



## **SCHEDULE EIGHT**

### **Allowable Player Payment Rule Management: Privacy and Confidentiality Protocols**

#### **PURPOSE:**

To identify the processes necessary for the management of the Allowable Player Payments Rule whilst ensuring privacy and confidentiality of club Player Payment documents.

To identify Privacy and Confidentiality Protocols for OEFN management in the administration process required for the management of the Allowable Player Payment Rule

To protect the integrity of OEFN management whilst managing the procedural requirements of the Allowable Player Payments Rule

#### **OEFN RESPONSIBILITIES:**

##### **OEFN Management shall:**

- Ensure that individual contract files remain confidential
- Ensure that the contents of individual contracts remain confidential
- Ensure that the clubs Player Budget documents and contents remain confidential
- Ensure the Integrity of OEFN and its management in the administration of the APP

##### **OEFN CEO shall:**

- Securely store club accesses to the online reporting portal and shall only provide access to any other persons:
  - With the written consent of the relevant club President and one other Committee member.
- At the discretion of the OEFN CEO with the exception of:
  - The AFL Victoria Country Manager who shall store all club's passwords securely as a back up to the Regions system
  - For the purpose of an Investigation under OEFN By Laws

##### **OEFN CEO shall:**

- Delegate specific OEFN management permission shall have no direct access but may view individual contract files and budgets
  - Delegated OEFN management who are authorised to view APP documents shall be full time employees of OEFN and shall be recorded in the organisations APP system files

**Individual's delegated authority to view files by the CEO shall:**

- always Ensure confidentiality of information consistent with OEFN Privacy and Confidentiality Protocols
- Ensure computers with authorised access to confidential information are 'locked' when unattended

**OEFN ACCESS TO CLUB FILES**

**OEFN Management shall only view clubs APP documents provided that:**

- Notice be sent to the relevant clubs nominated APP or club email address outlining the specific purposes for accessing the files; and
- That it be for compliance auditing and either one or more of the following purposes:
  1. Clarification of procedural correctness in lodgement process
  2. Clarification of club compliance with the APP requirements
  3. For monitoring and comparison of contracts and budgets
  4. For the purpose of substantiating or disproving evidence presented in an official investigation request made under OEFN regulations
  5. To identify APP management practices for education and improvement purposes
  6. To assist an integrity officer in the conduct of an official investigation to be conducted under OEFN By Laws

**PRINTING & RECORDING OF APP CLUB FILES**

No documentation, contracts or files accessed in the online reporting portal for the purpose of the APP shall be printed by OEFN unless for the purpose of:

- OEFN compliance auditing and provided that:
  - a minimum of 24 hours written notice that OEFN intends to print specific contract files or budgets relevant to the APP, identifying for what purpose and be sent to the relevant clubs nominated APP or club email address
  - On the completion of the compliance audit, all documents must be placed in a locked security shredding bin

Documentation, contracts or files accessed in online reporting portal may only be saved electronically by OEFN provided that:

- a minimum of 24 hours written notice that OEFN intends to save specific contract files or budgets relevant to the APP, identifying for what purpose and be sent to the relevant clubs nominated APP email address
- The files be securely stored and accessible only with the permission of the OEFN CEO and consistent with the OEFN Privacy and Confidentiality Protocols.

At the completion of the identified purpose and its process, all saved files must be deleted.