

# Privacy Policy

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| Approved by the Board   |                       |
| Approval date: Dec-2018 | Review date: Dec-2021 |

## Introduction

This Policy sets out how Community Information & Support Victoria (CISVic) manages your personal information and protects your privacy. Personal information (including sensitive information) is information that can be used (or is reasonably likely) to identify an individual.

This policy applies to all workers (including board members, paid staff, volunteers, students and contractors).

## Statement

CISVic is committed to upholding the principles contained within the Commonwealth and Victorian privacy legislation. We are committed to maintaining your privacy and we will only use your personal information for the purpose for which we have collected the information.

## Definitions

### Personal information

This is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in material form or not. It may include information such as names, addresses, bank account details and health conditions (Privacy Act 1988).

### Sensitive information

This is information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record or health, genetic or biometric templates, that is also personal information (Privacy Act 1988).

## Consents

Means voluntary agreement to some act, practice or purpose. Consent has two elements: knowledge of the matter agreed to and voluntary agreement.

## Confidentiality

Implies the relationship of confidence between the organisation and individuals. Confidentiality ensures that information is accessible only to those authorised to have access.

## Organisational information

Includes publicly available, and some confidential information about organisations. Organisational information is not covered by the Privacy Act (1988) but some organisational information may be deemed confidential.

## Policy

All workers are bound by the Commonwealth Privacy Act 1988. The Privacy Amendment Act 2000 governs the collection, use and storage of personal and/or sensitive information, including written and verbal information.

We are committed to ensuring that information is used in an ethical and responsible manner.

We recognise the need to be consistent, cautious and thorough in the way that information is recorded, stored and managed.

All CISVic stakeholders have legislated rights to privacy of personal information. In circumstances where the right to privacy may be overridden by other considerations (for example, child protection concerns), workers act in accordance with the relevant policy and/or legal framework.

The duty to preserve confidentiality is regulated by privacy legislation.

## The information we collect and hold

1. CISVic is the **peak body** for member agencies that provide advice, information and support to clients across Victoria. We collect and hold information from our members that is necessary for us to carry out our peak body functions.
2. **People who access CISVic member services:** Our peak body status means that any information we receive, relating to service recipients and clients of our members, will be in a de-identified format and used for research, reporting,

evaluation and statistical matters. In the event that we do receive your personal information (including sensitive information) from our members, it will not be retained or disclosed. Any breach will be investigated and addressed. We do not have direct access to your personal information.

3. **Service delivery:** CISVic branches collect personal and sensitive information for the purpose of delivering direct services, administering processes associated with service delivery e.g. case work, referrals, group work or evaluation. The nature and extent of the information collection varies depending on the individual's interaction with us. Such information may include:
  - a. Contact details (name, address, email etc)
  - b. Personal details (date of birth, gender, income, emergency contacts etc)
  - c. Information on personal issues and experiences, areas of interest, relationships
  - d. Family background or support that participants may have in the community.
  - e. Health information
  - f. Criminal history
  - g. Credit card or bank account details.
  
4. **CISVic Training:** CISVic collects and holds personal information (such as name, contact details, gender and date of birth) from persons who register for training provided by CISVic and/or its external training providers.
  
5. **Supporters/Donors/Individual Members:** CISVic collects and holds personal information (such as name, contact details and payment details) from its supporters, donors and individual members.
  
6. **CISVic Staff, Interns, Contractors and Volunteers:** CISVic collects and hold your personal and sensitive information (such as name, contact details, date of birth, banking details, police check report and employment history) as part of your employment or contract with us.
  
7. **CISVic website:** We collect information about your website browser activities.

Our website contains links to our members as well as other sites. CISVic is not responsible for the content and the privacy practices of these websites and we encourage you to examine each site's privacy policy and make your own decisions regarding the accuracy and reliability of the information found on these sites.

## How your information is collected and stored

How we collect and store your personal and sensitive information varies depending on the purpose for which it is collected, but most information will be collected in connection with your dealings with us.

However, we are also likely to receive your personal information from sources such as public records, mailing lists, contractors, staff, recruitment agencies and our members. In particular, we may collect your information as follows:

1. **Our members:** we may indirectly receive your personal information as a result of our members' use of our systems and services, especially where you access services provided by our members.
2. **Registrations/Memberships:** when you submit your details to register for our training sessions or become a member.
3. **Our direct service delivery:** information may be collected via face-to-face interview, over the telephone or electronic communications.

Should any clients accessing services wish to remain anonymous or use a pseudonym, we will take all reasonable steps to comply should contractual obligations allow it.

4. **Donations:** when you contact or donate to us.
5. **Human resources:** when you apply or we are looking to fill a position at CISVic.
6. **Internet:** when you access us through the internet, we may collect information using cookies or analytical services such as Google Analytics. You may be able to adjust your browser's setting to accept or reject such cookies.

Google Analytics is a web analysis service provided by Google. Google utilises the data collected to track and examine the use of our website to prepare reports on our website's activities. For more information on how Google uses your information when you access our website, go to

<https://www.google.com/policies/privacy/partners/>

7. **Contact:** When you contact us in any way including a request for assistance or to lodge a complaint about us, or one of our members.

There are many circumstances in which we may collect your information both electronically and physically. We will endeavour to ensure that you are always aware of when your personal information is being collected.

## How your information is kept safe

We may store your personal information in physical or electronic form, as is necessary to carry out our functions. All personal information is securely stored by us or by our

authorised external providers. Only authorised persons will have access to this information.

We will take all reasonable steps to protect all collected personal information from misuse, interference, loss and unauthorised access, modification or disclosure.

Reasonable physical safeguards include: lockable filing cabinets & secure off-site storage areas, positioning technological hardware so they cannot be seen or accessed by unauthorised people.

Reasonable technical safeguards include: passwords to restrict computer access, requiring regular changes to passwords, establishing different access levels for workers, ensuring information is transferred securely, and installing virus protections and firewalls. The Code of Conduct outlines the expectations of all workers to take all reasonable steps to protect organisational and personal information. All workers are required to sign this.

If we no longer require the personal information for any specified purpose and we are not required by Australian law or courts to retain the information, we will take reasonable steps to destroy or de-identify the information.

## Why we collect and hold information

We may collect, hold, use and disclose personal information for purposes necessary to carry out our functions and provide our services and programs. Generally, these purposes include:

1. to provide you with any services, information or advice that you have requested from us;
2. to comply with necessary business/accounting standards, and reporting obligations to the Australian Taxation Office and other government agencies; or
3. to manage your training/internship/employment records or volunteer arrangement with us.

## How we share your information

We will only share your personal information:

1. in accordance with your express consent;
2. as provided through the exclusions set out in the Commonwealth and Victorian privacy legislation (including the Australian Privacy Principles);
3. as required or permitted by any law; or
4. in accordance with the Privacy Notice provided to you at or near the time of collection of your personal information.

We do not disclose or sell your personal information to unrelated third parties under any circumstances.

We will not disclose your personal information to any entity outside of Australia that is in a jurisdiction that does not have a similar regime to the Australian Privacy Principles or an enforceable privacy policy similar to this Privacy Policy.

## How you can access and correct your personal information

You have the right to access your personal information, subject to some exceptions allowed by law. If you would like to access or correct your personal information, please contact the CISVic Executive Officer at the contact details listed below.

For security reasons you will be asked to put your request in writing. To enable us to verify your request, please include the following in your request to us:

1. Your full name
2. Address
3. Contact phone number
4. Identify the activity that your request relates to (if applicable).

There is no fee for making a request to access your personal information.

## Breaches

The notifiable data breaches scheme under the *Privacy Amendment (Notifiable Data Breaches) Act 2017* (NDB scheme), creates a requirement for organisations who discover a data breach that is likely to cause serious harm, to notify the Office of the Australian Information Commissioner and affected individuals. Any applicable breaches will be reported in accordance with legislation.

## How you can complain about a breach of the privacy principle

We are committed to protecting your privacy and upholding the Australian Privacy Principles. If you believe we have breached the Australian Privacy Principles, please contact the CISVic Executive Officer with your concerns at the contact details listed below.

We take all complaints seriously and we will endeavour to respond to your concerns as soon as reasonably practicable.

## Changes to this privacy policy

Changes may be made to this policy from time to time. We will give notice about these changes on our website.

## Related documents

*Australian Privacy Principles*

*Commonwealth Privacy Act 1988*

*Victorian Privacy & Data Protection Act 2014*

*Client Consent Form*