

PRIVACY POLICY		
1.	PURPOSE	St Vincent de Paul Society Canberra/Goulburn (the Society) is committed to the protection and appropriate handling of personal information consistent with its obligations under the <i>Privacy Act 1988</i> (Privacy Act) and the Australian Privacy Principles (APPs); and supports and upholds the rights of its companions, participants (and their carers) to privacy and confidentiality.
2.	SCOPE	This policy applies to all persons who are engaged in the collection or handling of private information on behalf of the Society.
3.	DEFINITIONS	<p>Private Information (or Personal Information): Information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not.</p> <p>Sensitive Information: (a) Personal information about an individual's: racial or ethnic origin; political opinions or membership of a political association; religious beliefs or affiliations; philosophical beliefs; membership of a professional association, trade association or trade union; sexual orientation or practices; or criminal record; or (b) an individual's health information.</p> <p>Australian Privacy Principles (APPs): A set of inalienable principles entrenched in the Privacy Act (1988) and ratified by the Privacy Amendment (Enhancing Privacy Protection) Act 2012 which address individual privacy consideration and outline legal requirements.</p> <p>Companion: In a broad sense, any person who receives assistance through any program of the Society.</p> <p>Participant: A person who receives assistance through any of the Society's Special Works programs in particular.</p> <p>Carer: A person whose life is affected by virtue of close relationship with a Companion/Participant, or who has a chosen caring role with a Companion/Participant.</p> <p>Eligible Data Breach: Unauthorised access to or disclosure of, or loss of personal information held by an organisation where this is likely to result in serious harm to any of the individuals to whom the information relates.</p>
4.	POLICY	<p>Open and transparent management of personal information (APP 1)</p> <p>The Society is committed to taking all such steps as are reasonably practical to implement and maintain practices, procedures and</p>

		<p>systems that ensure compliance with the Australian Privacy Principles, and enable it to deal with all related inquiries and complaints. The Chief Executive Officer is responsible for ensuring this policy is kept up-to-date, that all Society people are aware of it, that it is covered in Society inductions, that it is included in the Code of Conduct, and that adequate privacy training (including familiarisation with this policy and any related procedures) is given to all persons who handle or who may incidentally come into contact with private information.</p> <p>Anonymity and pseudonymity (APP 2) The Society upholds the right of persons to engage with the Society anonymously or pseudonymously, so long as this remains practicable or identification is not required by law.</p> <p>Collection of solicited personal information (APP 3) The Society will not collect personal information unless it is necessary for one or more of its functions or activities, and this, only by fair and lawful means. Sensitive information will not be collected without an individual's consent. Information pertaining to an individual will only be collected from the individual themselves, unless it is unreasonable or impractical to do so.</p> <p><i>Kinds of information the Society collects and holds include:</i></p> <ul style="list-style-type: none"> • Information about those we assist through conferences and Special Works (e.g. names, addresses, income information, ethnicity, languages, case history, details of help provided, limited medical history) • Information about donors including contact information, frequency and amount of donations • Information about attendees of various Society events • Employee, member and volunteer information • Website visitor information • Information collected about individuals with whom the Society enters into a business relationship • Sensitive information which is necessary for the performance of the Society's functions or activities, or where the information relates to the activities of the Society <i>and also relates solely</i> to Society members or individuals who have regular contact with the Society (in connection with its activities) <p><i>Means by which the Society collects personal information include:</i></p> <ul style="list-style-type: none"> • Direct collection from individuals who make contact in person, by telephone, by email, or via Society websites and online forms • Third parties or a publicly available sources (but only if the individual has consented to such collection or would reasonably expect their personal information to be collected in this way, or if it is necessary for a specific purpose such as to arrange a particular event) • Individuals who contact the Society and supply personal information about others in the documents they provide to us <p><i>Purposes for collecting personal information include:</i></p> <ul style="list-style-type: none"> • To better deliver services to those we assist • To satisfy statistical reporting requirements where the Society is being funded under a government contract
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5.	REFERENCES	<p>Privacy Act 1988 Privacy Amendment (Enhancing Privacy Protection) Act 2012 National Standards for Mental Health Services 2010 ACT Information Privacy Act 2014 Australian Capital Territory Privacy Principles- Privacy Fact Sheet 42</p>
6.	APPENDICES	Appendix One: APP 12.3 (Circumstances under which an entity is not required to give a person access to their personal information)
7.	RELATED DOCUMENTS	CG-007 Records Management Policy CG-006 Complaints Management Policy
8.	APPROVED	Chief Executive Officer
9.	APPROVED DATES	<p>This policy was approved on: 08 June 2018 This version 2.1 takes effect from: 08 June 2018 This policy will be reviewed by: 30 June 2020</p>
10.	POLICY OWNER	Director, Governance and Compliance

Appendix One

Privacy Act (1988) Schedule 1 Part 5 Sect. 12.3 (APP 12.3)

Exception to access - organisation

12.3 If the APP entity is an organisation then, despite subclause 12.1, the entity is not required to give the individual access to the personal information to the extent that:

- (a) the entity reasonably believes that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety; or
- (b) giving access would have an unreasonable impact on the privacy of other individuals; or
- (c) the request for access is frivolous or vexatious; or
- (d) the information relates to existing or anticipated legal proceedings between the entity and the individual, and would not be accessible by the process of discovery in those proceedings; or
- (e) giving access would reveal the intentions of the entity in relation to negotiations with the individual in such a way as to prejudice those negotiations; or
- (f) giving access would be unlawful; or
- (g) denying access is required or authorised by or under an Australian law or a court/tribunal order; or
- (h) both of the following apply:
 - i. the entity has reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to the entity's functions or activities has been, is being or may be engaged in;
 - ii. giving access would be likely to prejudice the taking of appropriate action in relation to the matter; or
- (i) giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- (j) giving access would reveal evaluative information generated within the entity in connection with a commercially sensitive decision-making process.