



POLICY

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| SUBJECT: | MEMBERSHIP AND EMPLOYEES | | |
| TITLE: | PRIVACY POLICY | | |
| APPROVED BY: | Chair GOVERNANCE COMMITTEE/PRIVACY OFFICER | | |
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POLICY DOCUMENT CONTROL SHEET

Please contact the author for **Enquiries and Proposed Changes**

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Record of Issues

| Issue / Version No | Issue / Re-issue / Review Date | Nature of Amendment |
|--------------------|--------------------------------|--|
| 1 | 27 November 2015 | NEW POLICY (To reflect changes to Australian Privacy Principals, January 2014) |
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The versions maintained on the Intranet are the official controlled documents and any downloaded or printed hardcopy is uncontrolled. No changes are to be made to this document without the agreement of the authorising signatory and must be approved by the responsible manager before implementation.

A Document Change Request [DCR] must be completed for all changes.

1 STATEMENT OF PURPOSE

1.1 Privacy Policy

This document sets out the principles that the St Vincent de Paul Society Victoria Inc. (“**Society**”) has adopted in relation to the protection and handling of personal information.

As a major Victorian charity, the Society is committed to protecting your personal information and respecting the right of the individual to privacy and dignity.

1.2 Privacy Laws

The Society is bound by the Australian Privacy Principles in the *Privacy Act 1988* (Cth), and other laws which protect the privacy of individuals. We will sometimes handle personal information relying on exemptions under these laws including the exemptions in the Privacy Act applicable to not-for-profit organisations. Any permitted handling under such exemptions will take precedence over this Privacy Policy.

2 SCOPE

This policy applies to all the Society’s Directors, members, volunteers, employees and contract staff; the words “SVDP representatives” will be used in the Policy to reflect these categories.

3 POLICY STATEMENTS

3.1 Collection of personal information

3.1.1 Collection

In certain circumstances, we may collect personal information about you, for example when you contact us for assistance, apply for a job or volunteer position, make a donation or join our mailing list.

3.1.2 Privacy statement

All individuals seeking assistance from the Society will be asked to give their consent to the recording of personal information. All individuals will receive a copy of the Society’s Privacy Statement at the time of collecting information.

3.1.3 Private space used

The Society representatives will ensure that all reasonable measures are taken to ensure that unauthorised third parties do not overhear or otherwise gain access to personal information disclosed by individuals.

The Society’s representatives will ensure that all reasonable measures will be taken to use private spaces when collecting or discussing personal information. This approach must also be applied where the Society’s representatives are collecting or sharing personal information by landline telephone or mobile phone.

3.1.4 Type of information we collect

The type of information that we collect includes your name, contact details, identification information, title as well as any personal information provided in forms and documents you submit to us. We also record details of our interactions with you, including any contact we have with you in person, by email, online or on the telephone. If you are a donor, we may also collect credit card or other financial details.

The Society may monitor and record your communications with us (including by email and telephone) and we may also operate video and audio surveillance devices in our premises for security, dispute resolution and training purposes.

Where practical, the Society will collect personal information directly from you but we may also collect personal information from third parties including other not-for-profit organisations, government agencies, information service providers or public sources.

Where we collect sensitive information from you, such as health information or religious association, we will do so only with your written consent, where you provide such information voluntarily or where otherwise authorised by law.

3.2 Use and disclosure of personal information

3.2.1 Use and Disclosure

We collect, use and disclose personal information to provide, administer, improve and personalise our services and goods, process donations and payments, identify individuals, maintain and update our records, assess applications for support or assistance, provide support and assistance to those in need, assess employee or volunteer applications, conduct surveys and research, protect our lawful interests and respond to your queries or concerns.

We may also collect, use and disclose personal information in connection with lawful information requests from courts, government agencies and lawyers and in connection with suspected fraud, misconduct or unlawful activity.

If you are a donor, mailing list registrant, 'Vinnies' shopper or volunteer, we may use your personal information to provide you with ongoing promotional materials and marketing communications about our events, products, services and fundraising initiatives by telephone, email, online or by other means (unless you opt out or we are subject to legal restrictions).

We may not be able to do these things without your personal information. For example, we may not be able to communicate with you or respond to your enquiries.

We may send personal information overseas to other organisations within the Vincentian movement or to overseas servers and providers of IT services.

3.2.2 Third party access to information

Other individuals, third parties or external organisations will not have access to an individual's personal information without the written consent of the individual except where the Privacy Act or this privacy policy permits or requires us to disclose this personal information, or the use or disclosure is required by law.

3.2.3 Research, reports and evaluations

The Society will not release, publish or otherwise disclose identifiable information or images via research, reports or evaluations:

- without the informed consent of the individual;
- where consent is given however sensitive information (as defined by the Australian Privacy Principles) is involved; or
- where consent is given however the information is not relevant to the primary functions of the Society.

3.2.4 Requests for information from police

Police are often called to assist the Society because of threats to safety. In turn, Police may contact the Society in the course of other investigations. The Society acknowledges a dual responsibility to both assist police and also protect the privacy rights of individuals.

The Australian Privacy Principles do not oblige the Society to report unlawful activity or meet requests an individual's personal information, unless information disclosure is required by law, such as via a warrant. If the information is not being required by law, then the Society must exercise discretion.

All requests for an individual's personal information by police will be considered at a management level.

All requests for an individual's personal information will balance the importance of maintaining the individual's confidentiality with the public interest of the investigation and enforcement of the law.

The Society's representatives will not inhibit police investigations by providing untrue or deliberately misleading information to protect individuals.

3.3 Storage and security of personal information

3.3.1 Storage Measures

The Society handles personal information electronically and in hard copy form, both at our own premises and with the assistance of our service providers. In either case, a range of measures are implemented to protect the security of that personal information. We are also required to take reasonable steps to destroy or permanently de-identify personal information where it is no longer needed for a permitted purpose.

3.3.2 Hard copy security and storage

The Society's representatives will take all reasonable steps to ensure that all personal information is adequately secured at all times. Files and records will be stored in locked filing cabinets, cupboards or other suitable places when not in use. Identifiable or other personal information should not be left unattended where third parties may gain unauthorised access, misuse, modify or disclose the information.

3.3.3 Record disposal

Hard copy records will be securely kept by the Society for the period of time expected or mandated by the relevant government funding body. If a relevant government funding body does not specify the period of time that records must be kept, the Society will keep the record for seven years from the date the individual ceased contact with the Society.

The Society will take reasonable steps to ensure that all hard copy records are shredded or permanently de-identified when the relevant time period has elapsed.

3.3.4 Personal dignity

The Society and its representatives will respect and observe the personal dignity of individuals via:

- observation of an individual's choices regarding service types and the manner in which they are provided;
- approaching an individual with *unconditional positive regard* as the primary reference for all interaction. This approach includes suspending personal judgement on individual presentation and behaviour and adherence to individual preferences wherever possible and practical;

- actively pursuing opportunities to build self-esteem and confidence; and
- on going communication with the individual.

4. The St Vincent de Paul Society website and email

If you visit www.vinnies.org.au (“**Website**”) to read, browse or download information, our system may record information such as the date and time of your visit to the Website, the pages accessed and any information downloaded. This information is used for statistical, reporting and website administration and maintenance purposes.

Like many other websites, our Website may use ‘cookies’ from time to time. A cookie is a piece of information that allows our system to identify and interact more effectively with your device. The cookie helps us to maintain the continuity of your browsing session and remember your details and preferences when you return. You can configure your web browser software to reject cookies however some parts of our Website may not have full functionality in that case.

When we send you emails or other electronic messages, we may record where you open the message and click on particular links. This helps us to better understand what information is of interest to you.

If you are considering sending us any other personal information through our Website or other electronic means, please be aware that the information may be insecure in transit, particularly where no encryption is used (e.g. email, standard HTTP). We are subject to laws requiring us to protect the security of personal information once it comes into our possession.

The Website may contain links to other sites. We are not responsible for the privacy practices or policies of those sites.

5. Access and updating personal information

Please contact us using the details set out below if you have any queries or concerns about privacy or wish to access or correct any personal information we may hold about you. We may need to verify your identity.

If you are making an access or correction request, please provide details of the particular information you seek, to help us to locate it. If we deny any request for access or correction, we will provide our reasons. Where we decide not to make a requested correction to your personal information and you disagree, you may ask us to make a note of your requested correction with the information.

6. Dealing with privacy complaints

Your privacy is important to the Society and we will do our best to resolve any concerns. If you have a complaint regarding the treatment of your privacy or a possible breach of your privacy, please contact our Privacy Officer using the details set out below.

The Society takes your privacy concerns very seriously and treats all requests or complaints confidentially. We undertake to respond to any concerns raised within a timely manner, and to provide a response to written complaints within 30 days.

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| Privacy Officer: | Email: | privacyofficer@svdp-vic.org.au |
| | Phone: | 9895 5800 |
| | Address: | 43 Prospect Street, BOX HILL VIC 3128 |

For information about privacy generally, or if your concerns are not resolved to your satisfaction, you may contact the Office of the Australian Information Commissioner at www.oaic.gov.au and on 1300 363 992.

7. Publication of this Privacy Policy

The Society will publish and update this policy on its website (www.vinnies.org.au) and make hard copies available on request.