

## Privacy Policy

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### Purpose and Scope

The purpose of this policy is to establish standards of privacy and the roles and responsibilities of employees, contractors, volunteers and the board of Diversity and Disability Alliance (DDAlliance) in relation to privacy.

The policy has been framed around individuals' rights as they are specified in the *Privacy Act 1988* (Cth), Australian Privacy Principles, NSW Disability Services Standards and the *Freedom of Information Act 1982* (Cth),

This policy applies to all members of the DDAlliance Board from the time they are elected to office and all employees, contractors and volunteers. It applies to all of Diversity and Disability Alliance's programs and activities.

A copy of this policy will be given to all Board members upon their election and all employees, contractors and volunteers upon commencing their employment or voluntary work.

### Policy Statement

DDAlliance is committed to protecting and upholding the right to privacy of people, staff, volunteers, board members and representatives of agencies we deal with. In particular DDAlliance is committed to protecting and upholding the rights of our clients to privacy in the way we collect, store and use information about them, their needs and the services we provide to them.

DDAlliance is committed to collecting, keeping and disposing of client records in ways that protect privacy and ensure confidentiality is maintained.

### Procedures

#### Collection and holding of personal information

Generally, DDAlliance will collect personal information directly from the relevant individual. Sometimes, DDAlliance may need to collect information about a client from a third party, such as their representative, a parent, carer, guardian or other responsible person or a third party such as a health service provider, government or similar agency or the client's educational institution or workplace.

DDAlliance will do this if the client has consented for us to collect the information in this way, or where it is not reasonable or practical for us to collect this information directly from the client (such as in an emergency, because the client is not able to provide the information required or where collection in this way is a reasonable and efficient way to collect the information without inconvenience to the client).

Information may be collected directly by DDAlliance or by people or organisations

acting on behalf of Diversity and Disability Alliance. DDAlliance may also obtain personal information collected by other Commonwealth agencies, State or Territory government bodies, or other organisations.

DDAlliance only collects personal information that is reasonably necessary to conduct our functions and activities. DDAlliance will take reasonable steps when collecting personal information to notify the person why the information is collected, where it is stored, to whom it is usually disclosed and any law requiring the collection. DDAlliance generally provides this notification by having Privacy Notices on our paper-based forms and online portals.

DDAlliance collects personal information through a variety of different methods including:

- paper-based forms
- electronic forms (including online forms)
- face to face meetings
- telephone communications
- email communications
- Diversity and Disability websites and social media websites

DDAlliance holds personal information in a range of paper-based and electronic records. All reasonable steps are taken to keep secure any information that is held about individuals.

DDAlliance employees and volunteers are obliged to respect the confidentiality of any personal information held by us and are provided with information on the Australian Privacy Principles

#### Kinds of personal information collected and held

In performing its functions, DDAlliance collects and holds the following kinds of personal information (which will vary depending on the context of the collection):

- name, address and contact details (e.g. phone, email and fax)
- information about personal circumstances (e.g. marital status, age, gender, occupation, accommodation and relevant information about a partner or children)
- information about financial affairs (e.g. income details, household expenses, bank account details and information about business and financial interests)
- information about identity (e.g. date of birth, country of birth, passport details, visa details, drivers license, birth certificates)
- information about employment (e.g. work history, referee comments, remuneration)
- information about background (e.g. educational qualifications, the languages spoken and English proficiency)
- government identifiers (e.g. Centrelink Reference number, Medicare number or Tax File number)
- information about assistance provided under Diversity and Disability Alliance's funding arrangements

On occasions, a range of sensitive information may also be collected or held about people, including information about:

- racial or ethnic origin;
- health (including information about your medical history and any disability or injury you may have)
- any criminal record and/or traffic offence record
- photographs, video recordings and audio recordings

#### Purposes for which personal information is collected, held, used and disclosed

DDAlliance collects personal information for a variety of different purposes relating to its functions and activities including:

- providing services to clients
- performing its employment and personnel functions in relation to DDAlliance staff and volunteers<sup>[1]</sup><sub>[SEP]</sub>
- performing legislative and administrative functions
- policy development, research and evaluation<sup>[1]</sup><sub>[SEP]</sub>
- complaints handling
- program management
- contract management

DDAlliance only uses and discloses personal information for the primary purposes for which it is collected or for a closely related secondary purpose; e.g. where the client's needs have changed or become extended or the client has consented to the use or disclosure of the information for the secondary purpose. DDAlliance will only use personal information for secondary purposes in circumstances that are in accordance with the *Privacy Act 1988* (Cth).

If necessary to carry out functions and provide services and programs, DDAlliance may need to disclose personal and sensitive information to external service providers (such as legal service providers, other community service providers, etc.).

DDAlliance may also be required to disclose information by or under law or for various legal purposes.

#### Seeking access to and correcting personal information

All persons have a right under the *Privacy Act 1988* (Cth) to access personal information DDAlliance holds about them and request corrections to any personal information that DDAlliance holds if the information is inaccurate, out-of-date, incomplete, irrelevant or misleading. However, the *Privacy Act 1988* (Cth) sets out circumstances in which DDAlliance can decline access to or correction of personal information.

To access or seek correction of personal information we hold about you, please contact DDAlliance using the contact details set out at [www.ddalliance.org.au](http://www.ddalliance.org.au).

Where services have been provided under a contract with a government department or agency it will be possible to access and correct documents held by DDAlliance

under the *Freedom of Information Act 1982* (Cth).

#### Accidental or unauthorised disclosure of personal information

DDAlliance will prevent unauthorised persons gaining access to an individual's confidential records and permit individuals access to their own records when this is reasonable and appropriate.

DDAlliance will take seriously and deal promptly with any accidental or unauthorised disclosure of personal information.

#### Data Security

Access to personal information held by DDAlliance is restricted to authorised persons who are DDAlliance employees or volunteers. Electronic and paper records containing personal information are protected in accordance with the relevant DDAlliance policy and procedures.

#### Complaints

If you believe that your privacy has been breached, please contact DDAlliance using the contact information at [www.ddalliance.org.au](http://www.ddalliance.org.au) and above and provide details of the incident so it can be investigated. All complaints are taken very seriously and DDAlliance will endeavour to respond to privacy complaints and address concerns as soon as reasonably practicable.

You also have the option of contacting the OAIC (Office of the Australian Information Commissioner) if you wish to make a privacy complaint against DDAlliance. The OAIC website ([www.oaic.gov.au](http://www.oaic.gov.au)) contains information on how to make a privacy complaint. If you make a complaint directly to the OAIC rather than to DDAlliance, the OAIC may recommend you try to resolve the complaint directly with DDAlliance in the first instance.

### **Responsibilities**

It is the joint responsibility of the President and the Secretary to ensure:

- that any new Board Member(s), and employees are provided with orientation and relevant information about the Privacy policy;
- that Board members are aware of their roles/responsibilities; and
- that the storage of people's, employees, volunteers, contractors and other service agencies information is secure and as safe as possible from access by unauthorised person or destruction.

It is the responsibility of the Public Officer to ensure that employees, volunteers and contractors are aware of their roles/responsibilities.

### **Review**

This policy will be reviewed on a two yearly basis.

However, if at any time the legislative, policy or funding environment is so altered that the policy is no longer appropriate in its current form, the policy shall be reviewed immediately and amended accordingly.

**Effective Date:** 28 May 2016

**Reviewed Date:** 4 May 2019

**Next Review Date:** 4 May 2021