

AnglicareSA Privacy Policy

1 AIM

AnglicareSA is required to comply with the *Privacy Act 1988* (Cth) (Privacy Act) including the Australian Privacy Principles (APP). This Policy explains how AnglicareSA collects, retains, uses and discloses personal information and your rights in respect to the personal information we hold about you.

2 OVERVIEW

2.1 This Policy applies to:

- any person who receives services and/or goods from AnglicareSA;
- members of the public who contact AnglicareSA but do not receive a direct AnglicareSA service; and
- information provided by a third party about a person who receives services and/or goods from AnglicareSA.

2.2 The following key terms are used in this Policy:

- **Personal Information** means any information or an opinion about an identified individual, or an individual who is reasonably identifiable regardless of whether:
 - the information or opinion is true or not; and
 - the information or opinion is recorded in a material form or not (for example: in written, photographic, video, DVD or audio format).
- **Sensitive information** is a subset of personal information which is 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 or trade union, sexual orientation or practices, criminal record or health information. Sensitive information is generally given a higher level of protection.
- **Health information** is a subset of sensitive information, which includes information or an opinion about:
 - the health or a disability (at any time) of an individual (e.g. including notes about symptoms, diagnosis and treatment, reports and test results); or
 - the individual's expressed wishes about the future provision of health services to him or her; or
 - a health service provided, or to be provided, to an individual, and other personal information collected to provide a health service.
- A **health service** means an activity undertaken to:
 - assess, record, maintain or improve the individual's health; or
 - diagnose the individual's illness or disability; or
 - treat the individual's illness or disability or suspected illness or disability

3 COLLECTING PERSONAL INFORMATION

WHAT TYPES OF PERSONAL INFORMATION DOES ANGLICARESA COLLECT?

3.1 AnglicareSA collects personal information in order to deliver a wide range of aged care, child care, housing support, foster care support, disability support and social and community services.

- 3.2** AnglicareSA is required to collect some types of personal information in order to comply with Australian laws and government service and funding agreements that govern how we deliver our services.
- 3.3** The types of personal information that AnglicareSA collects from an individual will depend on their relationships with AnglicareSA. Generally, such personal information will include:
- contact details (i.e. name, address, telephone number and/or email address);
 - date of birth;
 - information about the individual's dealings with us (including records of telephone, email, online and other interactions);
 - information about the services that the individual may be receiving, or interested in receiving; and
 - financial information (e.g. bank account details and credit card details), where an individual makes a donation to AnglicareSA or pays for AnglicareSA services or makes a payment for services.
- 3.4** AnglicareSA may also collect sensitive information about an individual, where that information is reasonably necessary to provide the individual with a particular service. We will only collect sensitive information with your consent or where we are required or authorised by law to do so.
- 3.5** If you do not provide all of the personal information we request, it may affect our ability to provide you with the services that you are seeking.

HOW DOES ANGLICARESA COLLECT PERSONAL INFORMATION?

- 3.6** In most cases, AnglicareSA will collect personal information directly from the individual, when the individual:
- Contacts us in person, or by telephone, email, fax or through our website;
 - Subscribes to our Facebook page or newsletters;
 - Donates or participates in fundraising or corporate sponsorship;
 - Attends events we host or facilitate; or
 - Responds to a survey.
- 3.7** AnglicareSA may also collect personal information about an individual from a third party, without the individual's knowledge or consent, such as where:
- One person's family, social or medical history is relevant to another person who is receiving a health service from AnglicareSA and we need such history in order to provide the health service;
 - A person is not physically or legally able to provide the information to AnglicareSA or provide consent, in which case, we may collect personal information from another person who is legally responsible for that person;;
 - An Australian law requires or authorises AnglicareSA to collect that information without consent, in the course of providing health services to that person; or
 - It is unreasonable or impracticable to obtain the person's consent, and the collection is necessary in order to prevent a serious threat to the life, health or safety of a person or the public.
- 3.8** If you provide AnglicareSA with personal information about a third party, you understand that by doing so you are authorising that the third party has consented to us collecting and using their personal information in accordance with this Policy.

4 USING AND DISCLOSING PERSONAL INFORMATION

- 4.1** AnglicareSA will use and disclose your personal information for the primary purpose for which it was collected, for related purposes that you would reasonably expect, and for other purposes required or authorised by law.
- 4.2** By providing AnglicareSA with your personal information, you consent to AnglicareSA using and disclosing your personal information for the following purposes:
- To provide you with services across the organisation and respond to your enquiries and/or requests for information;
 - To assess what services a person may require and whether we can provide those services;
 - To evaluate ongoing services provided to a person you;
 - To refer a person to another internal service or program;
 - To review and support ongoing improvement of employee performance;
 - To undertake internal reviews and analysis of how we deliver our services;
 - To undertake research and analysis and compile funding applications;
 - To undertake statistical reporting, including that needed to comply with service agreements;
 - To monitor and take action on any risks that may arise in delivering services to a person; and/ or
 - To respond to feedback or investigate and respond to complaints.
- 4.3** AnglicareSA does not sell, trade, or rent an individual's personal information for any purpose.
- 4.4** An individual's personal information is not disclosed outside AnglicareSA without their written consent or unless we are required or permitted to do so under Australian laws. For instance, we may disclose personal information to an individual's representatives, our professional advisers and government or regulatory authorities (where we are required or authorised by law to do so).
- 4.5** There are some circumstances where AnglicareSA may lawfully disclose an individual's personal information without their consent. This includes where:
- AnglicareSA believes there is suspected child abuse or neglect or elder abuse;
 - It is necessary to lessen or prevent a serious threat to the life, health or safety of any person;
 - It is necessary to lessen or prevent a serious threat to public health or safety;
 - It will assist the location of a missing person;
 - A court subpoenas a person's file (this means that the court requires us to provide it with the personal information contained in a file or the entire file itself); and/ or
 - A person is not physically or legally able to give or communicate their consent to us to disclose health information. If that person is receiving a health service from us, we may provide this information to another responsible person.

5 DISCLOSURE TO OVERSEAS RECIPIENTS

- 5.1** As at the date of this Policy, we do not disclose personal information to overseas recipients. If in future we do propose to disclose personal information overseas, we will do so in compliance with the requirements of the Privacy Act.
- 5.2** However, from time to time, we may engage service providers to develop or implement software systems or host our website servers for us, who use staff, consultants or other

agents that are based overseas. Please note that the use of such service providers will not always involve a disclosure of personal information. However, by providing us with your personal information, you consent to the storage of such information on overseas servers and acknowledge that Across Border Disclosure of Personal Information (APP 8.1) will not apply to such disclosure. For the avoidance of doubt, in the event that an overseas recipient breaches the APPs, that entity will not be bound by, and you will not be able seek redress under, the Privacy Act.

- 5.3** Please also be aware that when you visit AnglicareSA's website, web traffic information is disclosed to Google Analytics and Google stores information across multiple countries and when you communicate with AnglicareSA through any AnglicareSA social media, these platforms may collect and hold the individual's personal information overseas.

6 STORING PERSONAL INFORMATION

- 6.1** AnglicareSA holds your personal information as either physical records or electronic records on our servers, and in some cases, electronic records on third party servers.
- 6.2** AnglicareSA maintains systems and processes to protect the security of the personal information from the risk of misuse, interference. Loss and unauthorised access, modification or disclosure.
- 6.3** AnglicareSA destroys and/or de-identifies personal information in a secure manner when we no longer need it. Note that AnglicareSA is obliged under some Australian laws to maintain certain records of personal information for minimum timeframes.

7 ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

- 7.1** Individuals can request access to personal information that AnglicareSA holds about them, by contacting our Privacy Officer, using the details provided in paragraph 9.1 below. AnglicareSA will respond to requests for access to personal information as soon as practicable .
- 7.2** We will need to verify your identity before we allow you to access your personal information and may refuse your request for access if we are required or authorised by law to do so. We may charge a reasonable fee for assessing your request and providing access. We will advise the amount once we have assessed your request, and we may require payment prior to providing access. Access may be provided by hard copy or by allowing you to view our records.
- 7.3** If you believe the personal information we hold about you is inaccurate, incomplete or out of date, please contact our Privacy Officer using the details provided in paragraph 9.1 below. If you satisfy us that any personal information we hold about you is not accurate, complete or up-to-date, we will amend our records accordingly.
- 7.4** If AnglicareSA refuses to give you access to your personal information, or to correct your personal information, we will notify you in writing setting out the reasons. If we refuse to correct your information you can ask us to attach or link a statement to the record, which states that you believe the information to be incorrect and why.

8 COMPLAINTS

- 8.1** If you wish to complain to AnglicareSA about how it has handled your personal information, please contact our Privacy Officer. We request that any dispute or complaint be submitted to our Privacy Officer. We will confirm receipt of your complaint and investigate and respond within 28 days.

8.2 We will address complaints in accordance with the Privacy Act and relevant AnglicareSA policy and procedures. If you are not satisfied with our response, you may ask for a review by a more senior employee or manager within AnglicareSA (if that has not already happened) or you can complain to the Office of the Information Commissioner (see: <http://www.oaic.gov.au/privacy/making-a-privacy-complaint> for further information).

9 PRIVACY OFFICER

9.1 You can contact our Privacy Officer as per the details below:

Email: privacy@anglicaresa.com.au

Telephone: 08 8305 9200

Post: The Privacy Officer, AnglicareSA, 159 Port Road, Hindmarsh SA 5007

9.2 We reserve the right to amend this Policy at any time, without notice to you, to ensure that we maintain the highest standards. The date of this Policy will inform you as to whether there have been updates since your last visit.

HISTORY	
	Re
New	Privacy Policy for Customers