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CNCISS POLICIES AND PROCEDURES

PRIVACY

1. PURPOSE

- 1.1. CNCISS is committed to protecting the privacy of your personal information. This Privacy Policy sets out how we collect, use, disclose and otherwise handle person information. It also tells you how you can ask to access and correct the personal information we hold about you and how to complain about a suspected privacy breach.
- 1.2. CNCISS complies with the Australian Privacy Principles (APPs) which are contained in the *Privacy Act 1988* (Cth) and any other applicable laws to protect your privacy.

2. SCOPE

- 2.1. This policy applies to all services provided at CNCISS both in our centre and in outreach services.
- 2.2. All CNCISS staff and volunteers to be aware of and work within these guidelines.

3. RESPONSIBILITIES

- 3.1. The EO and Program Manager are responsible for monitoring compliance and ensuring staff are aware of this policy.

4. BACKGROUND, DEFINITION, ABBREVIATIONS

4.1. Background

4.1.1. This policy provides information on the personal information collected by Casey North Community Information & Support Service (CNCISS), ABN 87 415 386 165

4.1.2. The policy covers:

- 4.1.2.1. Types of Information collected
- 4.1.2.2. How and why, we collect personal information
- 4.1.2.3. Accessing and correcting personal information
- 4.1.2.4. Security
- 4.1.2.5. Complaints
- 4.1.2.6. Privacy Officer Contact details

4.2. Definitions

4.2.1. Personal information

The type of personal information that we collect and hold about you depends on the type of dealings that you have with us.

If you are accessing CNCISS services or are a client of CNCISS, we may for identification purposes need to collect your name, gender, date of birth, driver's licence or other form of identification. To verify that you are eligible to receive certain services we may need your residential address and contact details.

If you are an employee, volunteer or student we will collect personal information including your name, gender, date of birth, residential address, contact details and next of kin details.

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If you apply for a job with CNCISS we will collect the information you include in your application.

4.2.2. Sensitive Information

Sensitive information is personal information such as health information and information about racial or ethnic origin and other information about your circumstances that is generally afforded a higher level of privacy protection. In order to comply with funding obligations, we may collect sensitive information on behalf of the Australian Government including your language background, citizenship status, status as an indigenous Australian and disability status. We only collect sensitive information where it is necessary for staff records, organisational programs and services and you have consented, or we are required to do so by law.

In order for us to collect and store your 'sensitive' information we are required to obtain your consent. Individuals have the option of not identifying themselves or using a pseudonym unless otherwise exempted by law.

5. How do we collect personal information?

5.1. We will collect personal information by lawful and fair means as required by the Privacy Act. We will collect personal information directly from you where this is reasonable and practicable.

5.2. We collect personal information in a number of ways, including:

5.2.1. Directly from you in person, over the phone, through written communications (either on paper or by email) or by you completing forms.

5.2.2. From third parties, including other support services, government agencies and your authorised representatives

5.2.3. Through our website if you choose to donate to CNCISS online through our secure payment gateway

6. Why do we collect, hold use and disclose your personal information?

6.1. The main purposes, for which we collect, hold, use and disclose personal information are:

6.1.1. Operational -Staff records are collected and held for the purposes of:

- Identification
- Communication
- Employment related purposes
- Emergency contact/health and safety reasons
- Compliance with various employment legislation
- Applications for employment, volunteering and student placements.

6.1.2. Programs and Services

- Identification
- To communicate with you about our services
- To provide efficient delivery of our services to you
- For purposes required or authorised by or under law.
- As part of the services provided to you by CNCISS, we need to collect some information about you to assist the Australian Government Department of Social Services to conduct performance reporting and research relating to the services that you receive from CNCISS. Your personal information is de- identified. The Department of Social Services will not use your personal information in an

identifiable form when conducting its research and evaluation, except where you have agreed or it is required by law.

- To help us improve our services
- For any other purposes that you have consented to.

7. How do we store your information?

7.1. Organisational-staff

7.1.1. Staff files, payroll system, electronic and hardcopies

7.2. Programs and Services

7.2.1. A centralised data base for all our organisation's programs holds client data

7.2.2. Individual program files and program administration

7.2.3. De-identified data can be collected for general administration purposes

8. To whom do we disclose your personal information?

8.1. We may disclose personal information which we collect for the purposes set out in section 4 above and these include:

8.1.1. Operational

8.1.1.1. Australian Government

8.1.1.2. Financial institutions

8.1.1.3. Other contacted providers for all employment/staff related purposes.

8.1.1.4. If you apply for a job or voluntary position with us, we may discuss your application with your nominated referees

8.1.2. Programs and Services

8.1.2.1. Financial Institutions (with your consent, for the purpose of advocacy)

8.1.2.2. Other Support services

8.1.2.3. Department of Social Services and other funding bodies (de-identified information only for research and performance reporting)

8.1.2.4. Education providers (with your consent)

8.1.2.5. Retailers (with your consent)

8.1.3. Other

Emergency services as needed

8.1.4. Overseas disclosure

We do not disclose personal information to any overseas entities

9. Data quality and security

9.1. We hold personal information in a number of ways including in electronic databases, email contact lists and in paper files held in secure storage on site. We take reasonable steps to:

9.1.1. Make sure that the personal information that we collect, use and disclose is accurate, up to date, complete and (in the case of use and disclosure) relevant

9.1.2. Protect the personal information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure

9.1.3. Destroy personal information that is no longer needed for any purpose that is permitted by APPs. Information that is to be destroyed is sent off site by way of an authorised contracted service

9.2. Security

9.2.1. The steps we take to secure the personal information we hold include ICT security (such as encryption, firewalls, anti-virus software and login and password protection), secure office access, personnel security and training and workplace policies.

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9.2.2. Payment security

We process payments using Centrepay facility and online technologies. All transactions processed by us meet industry security standards to ensure payment details are protected.

9.2.3. Website/Social Media

We do not post client pictures or information online. Staff, students and volunteer pictures will be posted for the purpose of promotion, education and information, unless otherwise advised by individual member of staff.

10. How can you access and correct your personal information?

10.1. We always take reasonable steps to make sure that the personal information we collect, use and disclose is accurate, complete and up-to-date.

10.2. You can request access to any personal information we hold about you and request corrections by contacting the Privacy Officer using the contact details set out below. In certain circumstances, we may not be required by law to allow access to or correction of personal information. If that is the case, we will provide our reasons for that decision.

11. Complaints

11.1. If you have a complaint about how we have handled your personal information please contact our Privacy Officer. You will be asked to complete a Privacy Complaint Form. In most cases, we expect that complaints will be investigated and a response provided within 30 days of receipt of the Privacy Complaint Form. If our investigation may take longer, we will let you know and in some cases requests may be referred to the Board of Management.

11.2. If you are unhappy with our response, you can refer your complaint to the Office of the Australian Information Commissioner.

12. Contact Details

All queries or complaints regarding this Privacy Policy or requests for access to, or correction of, personal information should be directed to the Privacy Officer.

Privacy Officer

Casey North Community Information and Support Service Inc

Suite 1, 90-92 Victor Crescent, Narre Warren Vic

Telephone: 03 97056699

Fax: 03 97056794

Email: cnciss@caseynorthciss.com.au

13. EVALUATION AND CONTINUOUS IMPROVEMENT

This Privacy Policy will be reviewed annually and updated as required. The current version will be posted on our website www.caseynorthciss.com.au and a copy may be obtained by request.