

Policy

MICAH PROJECTS



Breaking Social Isolation
Building Community

Privacy Policy

Area: Governance, Leadership and Management

1. Purpose

The purpose of the Privacy Policy is to ensure that Micah Projects meets its obligations under privacy laws in Queensland and Australia and has in place appropriate procedures that ensure the right of every participant to privacy and confidentiality.

2. Scope

The policy applies to the collection, holding, use and disclosure of personal information related to the people we support or who we may support in future and their immediate family/supports, current and prospective volunteers (including students), contractors, consultants, donors and collaborators and prospective employees.

3. Policy

Information we collect

Micah Projects collects information about several groups of people, including:

- the people we support or who we may support in future and their immediate supports/families
- current and prospective volunteers (including students), contractors, consultants, agents, and prospective employees
- donors and collaborators.

As a participant now or in the future, or their immediate supports/families, the kinds of information collected and held includes:

- contact details, including name, address, and telephone number (the people we support are given the option to provide a pseudonym for identification)
- date of birth
- employment history
- educational history
- history of service use
- government related identifiers such as Medicare and Centrelink reference numbers
- information (including sensitive information) that is directly impacting on current needs, including:



- o Previous residential address history
 - o Current and previous health issues
 - o Racial or ethnic origin
 - o Criminal records
- any other personal information required to provide services
 - Micah Projects adheres to a systematic process for determining the LGBTQIA+ inclusive practice language and ensures that communication is delivered in a respectful and positive way, specifically regarding the disclosure of sexual orientation, gender identity, intersex status, and autonomy.
 - For current or prospective volunteers (including students), contractors, consultants or agents or prospective employees, the types of information collected and held includes:
 - Contact details, including name, address and telephone number
 - Date of birth
 - Employment history
 - Educational history
 - Driving history
 - Credit information
 - Government related identifiers such as tax file number and driver licence number
 - Banking details
 - Sensitive information, including:
 - Health information (including but not limited to drug and alcohol testing results)
 - Criminal history
 - Membership of professional or trade associations
 - Membership of trade unions
 - Records of interactions with the participant
 - Any other personal information required in engagement.

As a current or prospective donor or collaborator, the information collected and held includes:

- Contact details, including name, address, and telephone number
- Date of birth
- Records of interactions
- Any other personal information required to receive donations, collaboration, or provision of services.



On the website, information collected may include personal information, regarding access, use and interaction. This information may include:

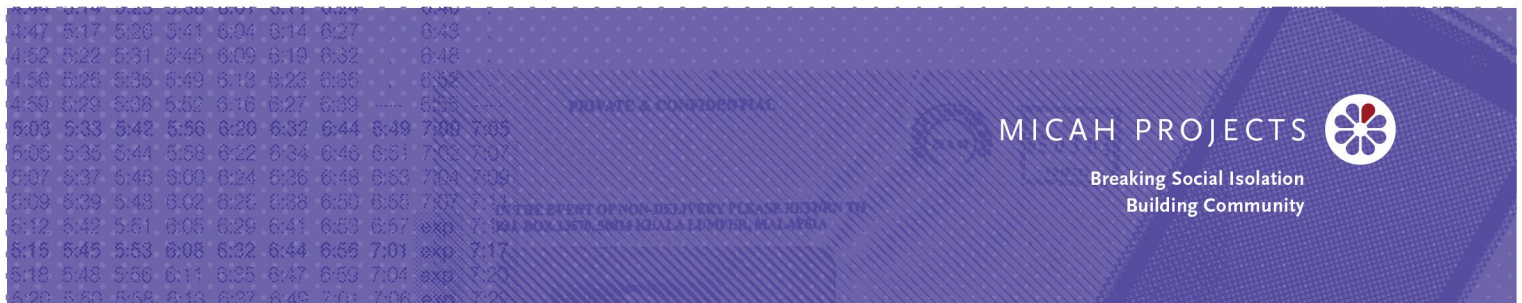
- location tracker/s, track previous sites visited
- technical data, which may include IP address, the types of devices being used to access the website, device attributes, browser type, language, and operating system
- Page clicks, time spent and other automatically collected meta-data.

Why we collect, hold, use and disclose information

We take reasonable steps to hold, use and disclose personal information for the primary purpose for which we collect it. The primary purpose for which we collect information varies depending on the individual that we are collecting the information from but is generally as follows:

- In the case of the people we support, or who we may support in future and their immediate supports/families - to provide:
 - o Goods and services include:
 - Preventing and solving homelessness for individuals and families
 - Assisting victims of domestic and family violence
 - Supporting people with a background of institutional abuse as children
 - Providing health care to disadvantaged individuals and families
 - Providing hospitality industry traineeships.
- In the case of a current volunteer (including students), contractor, consultant, or agent - to assist us in:
 - o Providing goods and services
 - o Conducting checks to ensure volunteers can perform the services to set standards
 - o Paying for goods and services provided.
- In the case of a prospective volunteer inclusive of students, contractors, consultants, agents, or employees – assessment of suitability for engagement or employment will be undertaken
- In the case of current or prospective donors and collaborators we will provide:
 - o Convenient means for making donations
 - o Details of events and other activities
 - o Newsletters and marketing material
 - o Offers or opportunities for collaboration.
- In the case of other persons that contact us (including users of the website) - to assist us to respond to enquiries or complaints.

Personal information may also be collected, held, used or disclosed by us for secondary purposes that are within reasonable expectations and that are related to the primary purpose of collection.



Disclosure of personal information only occurs if:

- We have the express consent of the information's owner to disclose the information, or consent may be reasonably inferred from the circumstances.
- Disclosure of personal information is required or authorised by law.
- We reasonably believe that the disclosure of the information is necessary for an enforcement related activity conducted by, or on behalf of, an enforcement body.

Disclosure of personal information outside Australia

In general, no personal information held by Micah Projects will be disclosed to any overseas recipients.

How we collect information

We generally only collect information directly from the person who owns the information. However, there are situations where we will receive referrals from other organisations with personal information about a person. In such cases we will ensure that consent is sought from the owner for this disclosure of information to occur.

The collection of information may occur verbally either on a phone call or in person, or in physical written documents such as emails, website contact forms or other correspondence. Micah Projects offers interpreter services, software assistance, sensory disability support services and audio/visual aids as required. The participant leads the communication by choosing how they would prefer this information collected.

In some circumstances we may also receive information from third parties, such as:

- A person's representatives and advisers
- A person's current or previous employer
- Banks and financial institutions
- Government bodies (such as relevant departments and regulatory authorities, etc.)
- employees, contractors, agents, volunteers (including students), collaborators and donors.

How we hold information

Personal information we receive is held in either of the following formats:

- Hard copy files
- Audio/visual files
- Information software systems on servers.

Electronic data is stored on cloud computing servers owned by Microsoft Azure. The physical hardware hosting the data is in Sydney, NSW. Security backup copies of all data are held in Melbourne, Victoria.

We implement and maintain processes and security measures to protect personal information we hold from misuse, interference, or loss, and from unauthorised access, modification or disclosure.



Some of these processes and systems include:

- using security cards, keys, or access codes to access areas that contain personal information
- using secure servers to store personal information
- using unique usernames, passwords and other protections on systems that can access personal information
- arranging for employees to complete training about information security
- holding certain sensitive documents securely and
- monitoring and reviewing policies.

Access to and correction of information

Identifying information will only be disclosed to third parties with the permission of the participant, except when preserving the privacy and confidentiality conflicts with the duty of care towards vulnerable individuals, such as children or people supported, where a person is believed to be endangered, or when reporting is mandated by law.

Any individual whose personal information we hold can ask to access that information or ask for it to be corrected. If required, copies of information will be provided to the owner of that information in a format that is suitable to the owner e.g., electronic format or hard copy format. The process for providing this information is contained in the Participant Record Management Procedure.

To request access to or correction of personal information, contact the CEO on 07 3029 7000 or email privacy@micahprojects.org.au.

Complaints

If an individual holds the opinion that Micah Projects has breached any of the Australian Privacy Principles or this policy and any of its procedures, they can register a complaint with the Privacy Officer. The complaint will be handled in accordance with the Feedback, Complaints and Appeals Policy and Procedure.

To make a complaint, contact the Privacy Officer on 07 3029 7000 or email privacy@micahprojects.org.au. If the privacy issue cannot be resolved, a complaint may be made to the Office of the Australian Information Commissioner.

Policy review

We may update, modify, or remove this policy at any time without prior notice.

4. Relevant legislation

Informing legislation:

- Privacy Act 1988 (Cth)
- Australian Privacy Principles (contained in schedule 1 of the Privacy Act 1988 (Cth))
- Freedom of Information Act 1988 (Cth)
- Information Privacy Act 2009 (Qld)



5. Relevant Standards

Supporting compliance with the following Accreditation and/or Certification Standards:

- HSQF: 1.7; 4.1
- ISO 9001:2015: 4.4; 5.2; 10.2
- DVFP: 1.1; 4.1
- NDIS: 1.1-1.5
- NSMHS: 6.1-6.8; 10.3

6. Documents that implement

This policy is implemented by the following procedures:

- Consent Procedure
- Feedback Complaints and Appeals Procedure
- Privacy and Confidentiality Procedure
- Participant Record Management Procedure
- Participant Information Requests from a Third-Party Procedure