

## PRIVACY POLICY

This Policy sets out how Relationships Australia NSW (RANSW) complies with our obligations under Australian privacy law. RANSW is bound by the [Australian Privacy Principles](#) (APPs) and other laws which regulate how organisations collect, use, disclose, store or otherwise treat personal information as well as how individuals, including our clients, access or correct personal information held about them.

### 1 INTRODUCTION

#### 1.1 Our commitment to your privacy

Please read this Privacy Policy carefully and contact [privacy@ransw.org.au](mailto:privacy@ransw.org.au) if you have any questions. Supplying us with your personal information indicates that you have had sufficient opportunity to access and understand this Policy. You may choose not to provide personal information to us, to remain anonymous or to use a pseudonym, however this may impact the type, scope and nature of services we would be able to provide.

#### 1.2 Why we collect personal information

RANSW collects personal information on a need-to-know basis and if such information relates to fulfilling a legitimate purpose. The main reasons for us to collect personal information include:

- Allowing us to provide our services and support to you or your family. This includes counselling, mediation, specialist services, family support, training, health and mental health services, or other relevant services offered by us;
- Facilitating billing processes and financial transactions;
- The assessment, investigation and resolution of complaints or incidents;
- Responding to questions or enquiries;
- To help us in the distribution of information about our services to those who may be interested in them;
- Regular human resources and payroll functions e.g. onboarding or payment of staff;
- Engagement with volunteers, stakeholders and the wider community.

### 2. OUR INFORMATION HANDLING PRACTICES

#### 2.1 Types of personal information we collect

The various types of personal information we collect include:

- Dates of birth;
- Contact details;
- Family details including information about partners, children and family contacts;

- Bank account and financial details;
- Images or photographs, still or moving media;
- Government identifiers, e.g. Centrelink Reference Number or Medicare information;
- Driver's license numbers;
- Tax file numbers;
- Work histories and professional information e.g. qualifications and records thereof.

RANSW offers a diverse range of services tailored to different communities and client needs, and subsequently we collect sensitive information. This is covered in greater detail in Section 2.6 of this Policy: *RANSW and Sensitive Information*.

## **2.2 Who we collect information from**

Generally, RANSW will collect personal information from whom the information relates and will notify relevant parties when appropriate. Information can be collected from various sources including clients, patients, families, carers, guardians; RANSW staff or volunteers; Directors or associates; commercial partners or stakeholders and stakeholders in Government.

If unreasonable or impractical to collect information from an individual, we may source information from third parties or a publically-accessible information source. If this takes place RANSW will take reasonable steps to inform individuals of this avenue of collection.

## **2.3 Use and Disclosure**

We use personal information for the intended purposes of which it was collected e.g. to provide mediation services to families; to provide counselling or complex life-skills programs to refugees or asylum seekers; or to employ and pay staff. We would also use or disclose personal information for a related purpose where there is a reasonable expectation of use or disclosure, where there is consent, or where permitted under the Australian Privacy Principles (APPs).

We will not provide personal information to government agencies, other organisations or any other party unless a legitimate exception applies. This includes where:

- Consent has been provided by an individual or their guardian;
- There is a legal requirement or authorisation e.g. in the form of a Court order;
- Disclosure is reasonably necessary to prevent harm or damage to people or property;
- Disclosure is reasonably necessary to safeguard public health or safety;
- Disclosure is to a related service provider and is necessary in providing services to clients;
- Any other exception as prescribed by the APPs.

## **2.4 Sending personal information overseas**

We are committed to storing personal information in Australia. In the unlikely event that personal information is sent overseas we endeavour to ensure that the host country has privacy laws consistent with the APPs.

## 2.5 Receiving unsolicited personal information

When we receive personal information that we did not request, we will decide within a reasonable time whether we could have received such information legitimately. If not, RANSW will destroy or deidentify the information unless it contains a Commonwealth record or destroying the information would be unlawful.

## 2.6 RANSW and sensitive information

“Sensitive information” is a subset of personal information afforded higher levels of protection under the APPs. The nature of many of the services that RANSW provides means that we collect sensitive information from time to time. We only collect sensitive information with adequate consent and for a legitimate purpose. The types of sensitive information we collect includes:

- Health information e.g. allergies, medication and medical information, clinical session notes, including records or opinions on a person’s physical or mental health;
- Information about a person’s origin, race, ethnicity or religion;
- Information about a person’s sexual orientation;
- Criminal Records Check information;
- Working With Children Check information;
- Information that clearly implies one of these matters, e.g. a history of domestic violence, an Apprehended Violence Order/Apprehended Domestic Violence Order or information about a person’s dealings with Family & Community Services may have clear implications relating to sensitive information about their criminal record or their Working With Children Check status;
- Government identifiers e.g. Centrelink Reference Number or Medicare Number. NB: We will not adopt a government identifier as any form of internal identification;
- Other personal or sensitive information as needed to provide services to clients.

## 2.7 Quality and Security

We will take reasonable steps to ensure that any personal information collected, disclosed or used is relevant, accurate, appropriately current and complete. This includes the maintenance and updating of personal information when people or relevant organisations and government agencies advise of changes.

RANSW will take reasonable steps to protect personal information held by us from being lost, misused, or subject to unauthorised access, manipulation or disclosure. These steps include setting-up password protection for files, securing paper files in locked cabinets and having security systems in RANSW premises.

## 2.8 Direct Marketing

We may send out direct marketing materials about RANSW that we believe may be of interest to you. In doing so we are subject to laws that include the *Privacy Act 1988* (Cth) and the *Spam Act 2003* (Cth), and carry out our direct marketing activities with either the consent or the reasonable expectation of individuals.

To unsubscribe from any of our communications at any time please contact:

[marketing@ransw.org.au](mailto:marketing@ransw.org.au) or click “unsubscribe” if the option is available.

## **2.9 RANSW and Online Communications**

Information transmitted over the Internet as well as links to external websites cannot be guaranteed as secure, and although we take measures to secure information transmitted on our website and through other forms there can be no complete guarantee of security in any information you transmit or receive from us.

RANSW is part of a federation of multiple state and territory organisations. Our website, or the sites of our affiliates may use cookies. Cookies identify website traffic and enable the collection of some information when a site is visited. Cookies do not identify individual users.

## **2.10 Notifiable Data Breaches**

We are committed to reporting and acting on notifiable data breach incidents. Upon such an incident occurring, we will fulfil our legal obligations in identifying the breach to the best of our ability, communicating the breach to the appropriate authority or individual, as well as any other relevant details or recommendations in the appropriate format.

## **3. CONTACTING US**

### **3.1 Feedback & Complaints**

If you believe that we have breached any APP and wish to make a complaint, or wish to provide feedback of any other nature, please contact us (preferably via e-mail) with the details of the issue. We will promptly investigate any reasonable complaint and respond to you in writing setting out the outcome of our investigation and any proposed remedies.

### **3.2 Access and Correction**

You may request details of personal information we hold about you in certain circumstances set out in the *Privacy Act 1988* (Cth). We may refuse to provide such information if unreasonable or if a legal exception applies. RANSW reserves the right to charge an administration fee for providing this information.

If you believe any information held by us about you is inaccurate, not current, incomplete or irrelevant please contact us with the details of the information to be corrected. We will endeavour to respond to any questions and effect updates within a reasonable timeframe.

### **3.3 Contact us**

If you would like more information on how we handle personal information, would like to make a complaint, request access to information, or have concerns about a data breach, please contact our Privacy Officer on [privacy@ransw.org.au](mailto:privacy@ransw.org.au) or on 1300 364 277.

## **4. AMENDMENTS TO POLICY**

This Policy may be amended from time to time at our discretion. Your continued use of our services and website following any amendments indicates that you accept those amendments to this Policy.

## **5. RELEVANT LEGISLATION & EXTERNAL DOCUMENTS**

*Privacy Act 1988 (Cth)*

*Privacy Regulation 2013 (Cth)*

*Spam Act 2003 (Cth)*

*Health Records and Information Privacy Act 2002 (NSW)*

OAIC Factsheet 17 – Australian Privacy Principles

OAIC Factsheet 50 – Accessing and Correcting Your Health Information

## **6. RELEVANT RANSW DOCUMENTS**

Brand Marketing and Communications Policy

Customer Service Policy

Document and Record Management Procedure

Incident Management Procedure

Quality Management Framework and Procedure

Release of Client Information Procedure

Privacy and Confidentiality Forms

Release of Client Information Template Letters