



Privacy Policy

Version 2

Date: 27 October 2021

Policy Contacts

Custodian	General Manager, Finance and Administration
Authorising Person	Leadership Team
Policy Section	Corporate

Related Documents

Document	Name
Procedure	Data Breach Response Procedures
Policies	Whistle Blower Policy, Complaints Handling Policy, Risk Management Policy, Lifeline Australia Limited Privacy Policy
Forms	

Related Legislation

Name	Details
Privacy & Personal Information Protection Act 1998	Click Here for the link
Privacy Act 1988	Click Here for the link
Australian Privacy Principles – OAIC quick reference	Click Here for the link
Privacy Regulation 2013	Click Here for the link
Notifiable Data Breaches Scheme	Click Here for the link
ACNC Governance Standards	Click Here for the link

Document Control

Version	Version Date	Date Approved	Next Review Date
1.0	June 2018	14 June 2018	14 June 2019
2.0	July 2021	27 October 2021	27 October 2024

1. PURPOSE

This Policy outlines how Lifeline Macarthur and Western Sydney (LLMWS) deals with personal information collected as part of carrying out its business.

2. SCOPE

This Policy applies to all workers, including the LLMWS Board, and other persons of LLMWS.

3. DEFINITION

Data Breach

Means unauthorised access to, or unauthorised disclosure of, personal information or a loss of personal information. Examples of a data breach are when a device containing personal information is lost or stolen, an entity's database containing personal information is hacked or an entity mistakenly provides personal information to the wrong person.

Notifiable data breach

Means a data breach that is likely to result in serious harm, which must be notified to affected individuals and the Office of the Australian Information Commissioner.

Other Persons

Means any other individual or entity who is not a worker of LLMWS but has engaged with LLMWS and their personal information is held by LLMWS. Examples include; visitors (including those engaging with LLMWS online), clients and recipients of LLMWS services.

Personal information

This has the same meaning as defined in the Privacy Act 1988 (the Act); Information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- a) whether the information or opinion is true or not; and
- b) whether the information or opinion is recorded in a material form or not.

Workers

Includes employees, contractors and sub-contractors and their employees, labour hire employees, outworkers, apprentices and trainees, work experience students and volunteers.

4. POLICY

LLMWS will only collect, store, use, disclose and destroy your personal information in accordance with the Privacy Act 1988.

4.1 Anonymity

LLMWS generally provides individuals with the option of not identifying themselves when contacting LLMWS,

participating in activities or obtaining services/ assistance unless the information is required by law or it is impracticable to deal with individuals who have not identified themselves. In some circumstances the services/ assistance provided by LLMWS may be limited if personal information has not been obtained.

Lifeline Australia Limited may collect personal information via their IT system when an individual contacts Lifeline's 13 11 14 phone line, Online Crisis Support Chat or Text Services and may disclose that information to protect an individual or others. Please refer to Lifeline Australia Limited Privacy Policy for further information - <https://www.lifeline.org.au/policies/#policies-privacy>.

4.2 Collection, Use and Disclosure of Personal Information

LLMWS will only collect, hold, use and disclose personal information if the information is deemed necessary for or directly related to the functions and activities of LLMWS. For example, personal information may be collected and used to:

- Provide individuals with crisis support or suicide prevention services.
- Accept a donation.
- Provide individuals with information or send publications and resources.
- Manage an individual's recruitment and employment with LLMWS.
- Assess and register an individual as a volunteer.
- Manage education and training services provided by LLMWS.
- Engage emergency services or refer an individual to other service providers.
- Conduct research and evaluation and assurance activities to ensure the delivery of quality services and achieve continuous improvement in service delivery.
- Conduct fundraising activities to raise funds to support LLMWS activities.
- Communicate with the public and the media, including through websites and social media, to raise public awareness of LLMWS.
- Conduct investigations and manage responses in relation to complaints concerning LLMWS.
- Process online purchases.

Wherever possible, LLMWS will collect personal information directly from an individual, rather than from other sources. Personal information will be used for the primary purpose for which it was collected and a secondary purpose to which the individual has consented.

4.2.1 Direct Marketing

LLMWS does not provide personal information to other organisations for the purposes of direct marketing. LLMWS may send business related information to individuals, as direct marketing communications. These communications may be sent in various forms including mail, fax, email and communication via social media, in accordance with applicable laws and the individual's preference for a method of communication (where applicable). Individuals may, at any time, opt out of receiving marketing communications.

Individuals whose personal information is collected using a collection notice that references this Privacy Policy are taken to consent to the use of their personal information for direct marketing purposes unless they have specifically opted out. Where an “unsubscribe” link is not provided, individuals who do not wish to receive direct marketing communications from LLMWS may contact our Marketing team on 02 4645 7200 or marketing@lifelinemacarthur.org.au. Requests to opt out of direct marketing communications will be treated, in the first instance, as a request to opt out of the particular campaign or event to which the communication related. However, individuals may specify to opt out of all direct marketing communications, across all programs, events and channels.

Individuals who register for events, make a donation or otherwise provide their personal information for marketing-related purposes after they have previously opted out of direct marketing communications will be taken to have ‘opted in’ once again and may receive direct marketing communications. Individuals may continue to opt out as described above.

4.2.2 How Personal Information is Collected

LLMWS may collect personal information directly from an individual unless it is unreasonable or impractical to do so. Ways personal information may be collected includes:

- Through an individual’s access and use of the LLMWS website and social media.
- During conversations, general enquiries and correspondence between an individual and LLMWS representatives (via phone, in person, in writing or online).
- When an individual completes an employment or volunteer application form.
- When an individual registers for LLMWS training or conferences.
- When an individual completes a survey or makes a donation.
- At times, LLMWS may collect personal information from a third party or a publicly available source, but only if the individual has consented to such collection or would reasonably expect LLMWS to collect their personal information in this way. For example, personal information may be collected:
 - From referees provided by an individual in support of an application for a position with LLMWS (either as a worker or as a contractor).
 - From third parties such as contractors (including fundraising service providers) and list vendors.
 - From academic and training organisations where required to verify a person's educational status.

4.2.3 Minors

LLMWS makes no active effort to collect personal information from children under the age of 18. Children who do wish to submit information to LLMWS should secure permission from their parent or legal guardian prior to doing so.

4.2.4 Fundraising

For the avoidance of doubt, fundraising refers to the activities undertaken by LLMWS to raise funds to

support its activities. This includes (but is not limited to), facilitating donations, sponsorships, workplace giving and fundraising campaigns.

When donations are made, LLMWS collects the donor's name, contact details, the credit card details and the amount donated.

Where possible, LLMWS will collect personal information directly from the individual. However, it is permissible to obtain personal information from third parties such as contractors, including fundraising service providers and list vendors. LLMWS will ensure that any contractual arrangements with a list owner or broker will meet requirements outlined in the Australian Privacy Principles. Until first use, the broker or, in the case of the data being supplied direct, list owner is responsible for the accuracy and the agreement of those people on the list for their details to be used by third parties.

If personal information about an individual is collected from a third party and it is unclear that the individual has consented to the disclosure of his or her personal information to LLMWS, reasonable steps will be taken to contact the individual and ensure that they are aware of the collection. In most cases, this can take place simultaneously with the first use of the information by LLMWS.

Donors also have the availability to 'opt in' to providing other information such as date of birth, employment information, including but not limited to job title, opinions via surveys and questionnaires and postal address. This information can be provided to LLMWS in an 'opt in' basis, and donors have the ability to opt out of this at any time.

4.2.5 Online Purchases

When individuals order resources or items online, LLMWS will collect the individual's name and contact details, items purchased and credit card details.

4.2.6 Workers

LLMWS collects personal information necessary to assess an individual's application to work at LLMWS. Depending on the role, this may include:

- Resumes, referee reports, employment and volunteer history and tasks undertaken during the recruitment process.
- Education (including copies of academic qualifications) and training/ development information.
- Criminal history.
- Working with Children background checks.
- Conflict of interests.
- Proof of Australian citizenship or residency.
- Employment contracts.
- Records relating to the workers salary, benefits and leave.

- Health related information supplied by a worker or their medical practitioner.
- Taxation details.
- Superannuation contributions.

4.2.7 LLMWS Training and Education Services

LLMWS collects personal information such as student contact details, enrolment forms and academic records which are required by law to be collected by LLMWS and supplied to Lifeline Australia Limited as the Registered Training Organisation (RTO).

4.2.8 Website, Online Services and Cookies

LLMWS has its own website (www.lifelinemacarthur.org.au) as well as a number of social medial sites. It is usual practice for LLMWS to collect information about the visitors accessing online services and resources using "cookies". Cookies are text files that a website can transfer to an individual's computer when they access information on that site. Cookies allow websites to recognise individuals when browsing their website.

LLMWS uses Google Analytics to gather statistics about how the LLMWS website is accessed. Google Analytics uses cookies to gather information for the purpose of providing statistical reporting.

The information generated by cookies about an individual's use of the website will be transmitted to and stored by Google on servers located outside of Australia. No personally identifying information is recorded or provided to Google. If an individual is logged on the LLMWS website, information about the individual's user account is not linked to data recorded by Google Analytics and is not provided to Google.

Information gathered using Google Analytics and other tools includes:

- The IP address (collected and stored in an anonymized format).
- The number of visitors to the LLMWS online services.
- How visitors arrive at the LLMWS website, for example, did they type the address in directly, follow a link from another webpage, or arrive via a search engine.
- Web chat.
- The number of times each page is viewed and for how long.
- Time and date of visit.
- Geographical location of the visitor.
- Information about what browser was used to view our website and the operating system of the computer.
- Information about whether the browser supports Java and Flash.
- The speed of the user's internet connection.

Individuals can opt out of the collection of information via Google Analytics by downloading the Google Analytics Opt-out browser add on. Individuals can also disable cookies on their internet browser. Doing so will

not affect most of the LLMWS website, however some functions may not work properly if cookies are disabled.

When networking via social media sites, such as Facebook, Instagram and LinkedIn, LLMWS may collect personal information to assist us with communicating with individuals and the public. Social media sites also have their own privacy policies on their websites.

4.2.9 How Personal Information is Stored

LLMWS takes steps to protect the personal information held against loss, unauthorised access, use modification or disclosure, and against other misuse. These steps include:

- Only allowing personnel with a 'need to know' to access our IT systems and records.
- Password protection for accessing electronic IT systems.
- Securing paper files in locked cabinets and physical access restrictions.

4.2.10 Dealing with Unsolicited Personal Information

LLMWS may receive unsolicited personal information about an individual from a third party. In these circumstances LLMWS must determine whether the information has been collected lawfully. If this cannot be determined, the information will either be destroyed or de-identified.

4.2.11 Disclosure

LLMWS does not disclose personal information to another person or organisation (including police, emergency services and other government agencies) unless one of the following applies:

- The individual has consented to the disclosure of their personal information.
- The individual would reasonably expect, or has been told, that information of that kind is usually passed to those individuals, bodies or agencies and the disclosure:
 - In the case of personal information (that is not sensitive information) relates to the primary purpose for which it was collected.
 - Relates to collection from a third party, that being a charitable or other likeminded organisation, including third party service providers who facilitate the sharing of information between such types of charitable or like-minded organisations.
 - Contractors and service providers who perform services on our behalf, such as, printers, information technology service providers and database contractors.
- The disclosure is otherwise required or authorised by law.
- LLMWS reasonably believe that the disclosure will prevent or lessen a serious and imminent threat to somebody's life, health or safety (including your own) or serious threat to public health, property or public safety.
- The individual has made threats to harm third parties.
- The individual has made threats against LLMWS personnel.
- The individual repeatedly makes nuisance contact including calls, chats or emails.

4.2.12 Service Providers

LLMWS uses a number of service providers to whom personal information is disclosed. These include providers that host the LLMWS website servers and CRM system.

To protect the personal information we disclose we:

- Enter into a contract which requires the service provider to only use or disclose the information for the purposes of the contract.
- Include special privacy requirements in the contract, where necessary.

4.2.13 Personal Information Overseas

LLMWS does not disclose personal information to overseas recipients.

Web traffic information is disclosed to Google Analytics when an individual visits the LLMWS website. Google stores information across multiple countries.

When individuals communicate with LLMWS through a social media site, such as Facebook, Instagram or LinkedIn, the social network provider and its partners may collect and hold your personal information overseas.

4.2.14 Adoption, Use and Disclosure of Government Related Identifiers

LLMWS does not use Commonwealth Government identifiers as its own identifier of individuals such as Medicare numbers or driver's license numbers. Such identifiers will only be used and disclosed in circumstances permitted by the Act.

4.2.15 Quality of Personal Information

LLMWS will take steps to ensure that the personal information collected is accurate, up to date and complete. These steps include maintaining and updating personal information when individuals advise that their information has changed, and at other times as necessary.

4.2.16 Access and Correction of Personal Information

Individuals may ask LLMWS for access to their personal information or to change it at any time. All requests must be in writing and sent to our contact details. Proof of identity will be required to enable access to personal information.

All requests will be considered carefully and if a request is declined, a written reason for any refusal will be provided.

4.2.17 Retention of Personal Information

LLMWS will retain personal information in accordance with applicable laws or requirements of any government or other funding body's record-keeping requirements.

4.3 Notifiable Data Breaches

If LLMWS determine that personal information has been accessed without permission, acquired, used or disclosed in a manner which compromises the security of the personal information, the risk to affected parties will be assessed. If determined that a breach causes serious harm to an individual, LLMWS will notify all affected parties (including the individuals to whom the data pertains and the Office of the Australian Information Commissioner). The notification will provide recommendations about the steps individuals should take in response to the breach.

4.4 Contacting Us

If individuals have any questions about this Policy or any concerns or complaints about the way LLMWS has handled their personal information, please refer to the contact details below:

The General Manager, Finance and Administration

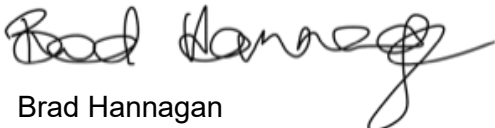
Email: financemanager@lifelinemacarthur.org.au

Phone: 02 4645 7200

5. REVIEW AND COMPLIANCE

This Policy should be reviewed every three (3) years unless legislation or workplace processes change which constitute an earlier review.

Adherence to this Policy is a condition of employment with LLMWS. If you are unsure about any aspect of this Policy or require further clarification you should speak to your Manager or the Human Resources Manager.



Brad Hannagan

Chief Executive Officer