Privacy Policy

This *Privacy Policy* outlines the practices Relationships Australia NSW (RANSW) uses for handing the personal information it collects. We will update this *Privacy Policy* when our information handling practices change. Updates will be publicised on our website and advised to staff through email communications.

RANSW is required to collect personal information in order to effectively carry out internal business functions and duties, and provide programs and services to members of the public. Some of these functions include:

- managing enquiries and applications for services and programs
- complying with requirements of funding contracts
- responding to requests and complaints
- processing applications for employment
- complying with duties under state and federal legislation
- information sharing with other entities or individuals where it is lawful to do so.

Some of the personal information RANSW collects may be considered sensitive information. The Commonwealth *Privacy Act 1988* defines many types of sensitive personal information, but RANSW is likely to collect the following information about you where it is relevant to your service or employment, or our business:

- racial or ethnic origin
- religious beliefs or affiliations
- philosophical beliefs
- membership of a professional or trade association
- membership of a trade union
- sexual orientation or practices
- criminal record
- health information

Anonymity

Where practical, individuals can choose to interact with RANSW anonymously or by using a pseudonym, such as when making general enquiries about services. For most business functions though, RANSW will generally need enough personal information to allow the organisation to effectively manage the application, request, or complaint.

Collecting your personal information

RANSW aims to collect only the information required for our business functions and duties. Usually we will collect your personal information directly from you. For example, we collect your contact details when you apply to access our services, apply for a job with us, or participate in a survey. If you do become a client or employee, we will collect financial information if we need it such as credit card, bank account details, or tax file number.

Indirect collection

RANSW may also collect personal information about you, including sensitive information, from publicly available sources such as social media, or from third parties such as your authorised representative if you have one.

Collection of personal information via the internet

Our website

The RANSW website www.relationshipsnsw.org.au is hosted in Australia. RANSW collects personal information through this website when you provide your personal details to make an enquiry, provide feedback or make a complaint.

YouTube

RANSW host videos on YouTube which load from the domain <u>www.youtube.com</u>. We do not collect personal information from YouTube. The information YouTube collects about user activity is handled in accordance with the <u>YouTube privacy policy</u>.

Social networking sites

RANSW uses Facebook, Instagram, YouTube and LinkedIn to communicate with the public about our work. When a person interacts with our pages to 'like', 'share', or 'comment' about Relationships Australia NSW we are able to collect the personal information provided in that communication. Facebook and Instagram have the same <u>privacy policy</u>, while <u>YouTube</u>, and <u>LinkedIn</u> have their own privacy policies.

Personal information the organisation may collect

The term 'personal information' used throughout this policy has the meaning given to it in the Privacy Act and includes private and sensitive information. In general terms, it is any information that can be used to personally identify a person and includes opinions about the person.

Examples of personal information RANSW collects for relevant business purposes include a person's:

- name, age, date of birth
- contact and emergency contact details such as email, phone number, street address
- profession, occupation, or job title
- financial details such as bank details, credit or debit card number, tax file number
- information in driver licence, passport, birth certificate and other identity documents
- health information
- image in a photograph or video recording
- details used when assessing an application to access services or to become an employee. This
 may also include sensitive information such as it relates to disability, Aboriginal and Torres Strait
 Islander identity, nationality, gender, or criminal record
- Centrelink Customer Reference Number.

Unsolicited personal information

Personal information provided to RANSW that the organisation has not requested, and is not likely to request, will be destroyed or de-identified as soon as practicable.

Use of personal information

RANSW uses your personal information for the purpose it was collected, which includes:

- performing necessary business functions and duties
- processing job applications and student placement requests
- analysis, business improvement, and reporting.

Business functions and duties

Examples of the use of personal information for our business functions and duties include:

- assessing a person's needs as a customer and to provide services to the person
- financial recordkeeping purposes
- administrative, planning, service development, and quality control purposes
- communicating information about the organisation's work, objectives, programs, and activities
- updating the organisation's records and keeping the person's contact details up to date
- processing and responding to requests or complaints
- complying with any applicable law, rule, regulation, lawful and binding determination, decision, or direction of a regulator, or in co-operation with any relevant governmental authority.

Job applications and student placement

RANSW collects your personal information when you apply for a job or student placement with us. Typically this may include your name, address, and contact details, and application documentation. During this process we may also need to verify your identity, working visa, Working With Children Check status, criminal history, COVID-19 vaccination status. We will not retain copies of this information but will only note in our system that the checks have been completed.

Analysis and business improvement

RANSW analyses personal information in order to improve our services. However, when we de-identify the information used for analytics, the information in the reports is not considered personal information as we remove the information that could reasonably be used to identify you.

Marketing

RANSW may use your personal information for direct marketing with your consent. For example, we may send you information about our services and products via newsletters or email updates. Our marketing material will contain opt-out information, so if you choose to opt out your name will be removed from the relevant mailing list. To unsubscribe from any of our communications at any time please contact marketing@ransw.org.au or click "unsubscribe" or "stop" if the option is available.

Relationships Australia NSW does not provide personal information to other organisations for direct marketing purposes.

Use of sensitive personal information

There may be times where RANSW needs to use your sensitive personal information, but we will only use this with your consent. There are limited exceptions that allow us to use your sensitive information without your consent. These include where it is required by law, and where there is a permitted general situation, such as where we reasonably believe it is necessary to prevent or lessen a serious threat to the life, health, or safety of a person or the public.

Disclosure

RANSW may disclose your personal information for a purpose other than which the information was collected in certain limited circumstances, such as:

- where you have provided consent to disclosure for a secondary purpose
- where the secondary disclosure of your personal information is authorised or required by law
- where you would reasonably expect RANSW to use it for that secondary purpose, and the information is related to the primary purpose of collection
- where a permitted general situation exists in relation to the use or disclosure of the information

• to participate in or institute proceedings in courts.

Disclosure authorised or required by law

Relationships Australia NSW is required to provide data and reports to state and federal government funding bodies and other funders. Often the information we use to create these reports is no longer considered personal information as we remove the information that could reasonably be used to identify you. Where RANSW is required to provide your personal information to our funding bodies we will tell you and seek your consent to do so.

The NSW *Children and Young Persons (Care and Protection) Act 1998* allows for the flow of information between government agencies and non-government organisations for the purposes of the safety, welfare, or wellbeing of the client. This law gives priority to the care and protection of children over the protection of a person's privacy and RANSW will share or request personal information where necessary.

Disclosure of personal information overseas

RANSW does not usually disclose personal information overseas. When you communicate with us through a social network site such as Facebook or LinkedIn the social network provider and its affiliate companies may collect and hold your personal information overseas.

Disclosure of sensitive personal information

There may be times where RANSW needs to disclose your sensitive personal information, but we will only disclose this information with your consent. There are limited exceptions that allow us to disclose your sensitive information without your consent. These include where it is required or authorised by law, and where there is a permitted general situation, such as where we reasonably believe the disclosure is necessary to prevent or lessen a serious threat to the life, health, or safety of a person or the public.

Information Security

RANSW protects personal information by taking such security safeguards as are reasonable against loss, misuse, and unauthorised access, use, modification, or disclosure. We reinforce with our employees their responsibilities to maintain confidentiality and protect the privacy and security of information. Access to personal information is limited to the staff who need the information for operational business purposes or to provide business services.

Storage

Digital records in the RANSW client records management system and employee records management system are held on servers located in Australia and we retain effective control of the information. Hard copy client and employee records are held on site in locked cabinets and are sent to a document storage facility when archived. The documents are destroyed when we are no longer legally required to keep them. Digital client and employee records are de-identified or securely destroyed when no longer needed or legally required to be retained.

We use the services of organisations whose websites and servers are based outside of Australia for some business-related activities. RANSW uses <u>HubSpot</u>, with product infrastructure hosted via <u>Amazon Webservices</u> <u>AWS</u> in the United States for email marketing and website enquiries.

Online security

As the RANSW website is linked to the internet the organisation cannot provide any assurance concerning the security of information sent or received online. There is no guarantee that information sent or received via the internet will not be intercepted during transmission. Individuals who send personal information to the organisation via online or other electronic methods do so at their own risk.

The RANSW website may contain links to websites operated by other organisations or individuals. RANSW is not responsible for the privacy policy and practices of these organisations, and users are advised to read their privacy policies.

Breaches

If a privacy or data breach does occur RANSW will act immediately to meet its obligations under the notifiable data breach (NDB) scheme under the Privacy Act. Relationships Australia NSW staff are required to follow the organisation's Notifiable Date Breach Procedures and immediately report and respond to any suspected or actual breach of personal information.

Accessing and correcting your personal information

You have the right to ask to access the personal information Relationships Australia NSW holds on you, and request that it is corrected if you believe the information that we hold is incomplete, inaccurate, or not up to date. RANSW will need to verify your identify before we give you access to your personal information or make any amendments or corrections.

All requests to access or amend your personal information will be assessed before being actioned and we will respond to you within a reasonable period after the request is made, generally within 10 business days.

RANSW may refuse access to all or part of your record if it would interfere with the privacy of others, or if it would reveal confidential business information, or for any other applicable reasons described in the Privacy Act. You will be notified in writing of the reasons if a refusal is made on these grounds.

If we do not agree that your personal information needs to be corrected you can ask for a note to be attached to your personal information stating that you disagree with the content of the record, and the reasons why.

How to make a complaint

If you would like to make a complaint about the way the organisation handles your personal information you can email your concerns to Privacy@ransw.org.au. An authorised representative of the organisation will respond to the complaint within a reasonable period, generally within 10 business days and will let you know of the expected resolution date if it appears the complaint will take longer to resolve.

Contact Us

If you wish to make and enquiry, provide feedback, or make a complaint about how Relationships Australia (NSW) has managed your personal information please email Privacy@ransw.org.au. You can also write to:

Privacy at Relationships Australia (NSW) PO Box 371 North Ryde BC NSW, 1670

Document Control

Document Control Data

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Application	Internal and Public document		
This version	3.1 (v3.0 first published 20.03.2024)	Previous version	3.0
Supersedes	Privacy Policy – Corporate Policy		
Review cycle	3 years (first published 20.03.2024)	Next review due	March 2027

Associated Documents

Forms	
Related documents	Keeping You Safe
	Notifiable Data Breach Procedure
Legislation	Privacy Act 1988 (Cth)
	Health Records and Information Privacy Act 2002 (NSW)
	Children and Young Persons (Care and Protection) Act 1998 (NSW)

Relationships Australia NSW Diversity, Inclusion and Belonging Statement

Amendment History

Date	Sections	Amendments
27/3/2024	6	Amended to specify both client and employee records.

How can we improve this document?

If you identify opportunities for us to improve this document, please email your suggestions to $\underline{\text{Policy@ransw.org.au}}$