

## Privacy Policy: External Stakeholders

### Your privacy is important

This statement outlines CAFFSA's policy on how CAFFSA uses and manages personal information provided to or collected by it.

CAFFSA is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act and is compliant with the Privacy Amendment (Enhancing Privacy Protection) Act 2012, and the Information Sharing Guidelines for Promoting Safety and Wellbeing.

CAFFSA may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to CAFFSA's operations and practices and to make sure it remains appropriate to the changing legal environment.

### What kind of personal information does CAFFSA collect and how does CAFFSA collect it?

The type of information CAFFSA collects and holds includes (but is not limited to) personal information, including sensitive information, about:

- Member organisations;
- Staff, contractors, and Board/sub-committee members;
- Clients accessing services provided by CAFFSA.

### Personal Information you provide:

CAFFSA will generally collect personal information held about an individual by way of phone calls, forms, meetings, and emails. You do have the right to seek to deal with us anonymously or using a pseudonym, but it will often not be practicable for us to deal

with you or provide any services to you except for the most general responses to general enquiries, unless you identify yourself.

**Personal Information provided by other people:**

In some circumstances CAFFSA may be provided with personal information about an individual from a third party, for example a government department, member organisations, or other peak body.

**In relation to employee records:**

Under the Privacy Act, the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to CAFFSA 's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between CAFFSA and employee/contractor.

**How will CAFFSA use the personal information you provide?**

CAFFSA will use personal information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which you have consented.

In relation to direct marketing, CAFFSA will use your personal information for direct marketing where you have provided that information, and you are likely to expect direct marketing; only then will you be sent direct marketing containing an opt out. If we use your personal information obtained from elsewhere, we will still send you direct marketing information where you have consented (which will also contain an opt out). We will always obtain your consent to use sensitive information as the basis for any of our direct marketing.

**Job applicants, staff members and contractors:**

In relation to personal information of job applicants, staff members and contractors, CAFFSA 's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

The purposes for which CAFFSA uses personal information of job applicants, staff members and contractors may additionally include:

- for insurance purposes; and
- to satisfy CAFFSA 's legal obligations.

Where CAFFSA receives unsolicited job applications, these will usually be dealt with in accordance with the unsolicited personal information requirements of the Privacy Act.

### **Marketing and fundraising:**

CAFFSA treats marketing and seeking donations for the future growth and development of CAFFSA as important. Personal information held by CAFFSA may be disclosed to an organisation that assists in CAFFSA 's fundraising.

### **Who might CAFFSA disclose personal information to?**

CAFFSA may disclose personal information, including sensitive information, held about an individual to:

- government departments;
- CAFFSA employees/contractors and Board/sub-committee members;
- people providing services to CAFFSA;
- anyone you authorise CAFFSA to disclose information to.

### **Information Sharing Guidelines for Promoting Safety and Wellbeing**

Under the Information Sharing Guidelines, your informed consent for the sharing of information will be sought and respected in all situations unless:

1. It is unreasonable or impractical to gain consent or consent has been refused  
and

2. Without information being shared, it is anticipated a child, vulnerable person, or member of their family will be at risk of serious harm, abuse or neglect, or pose a risk to their own or public safety.

### **Sending information overseas:**

CAFFSA will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

CAFFSA does not use overseas providers of IT services, including servers and cloud services.

### **How does CAFFSA treat sensitive information?**

In referring to 'sensitive information', CAFFSA means:

“information relating to a person’s racial ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences or criminal record, that is also personal information; and health information about an individual”.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

### **Management and security of personal information**

CAFFSA 's staff, contractors and Board/sub-committee members are required to respect the confidentiality of personal information and the privacy of individuals.

CAFFSA has in place steps to protect the personal information CAFFSA holds from misuse, loss, unauthorised access, modification, interference or disclosure by use of various methods including locked storage of paper records and passworded access rights to computerised records.

When you use our website, having your cookies enabled will allow us to maintain the continuity of your browsing session and remember your details when you return. We may also use web beacons, Flash local stored objects and JavaScript. If you adjust your browser settings to block, reject or delete these functions, the webpage may not function in an optimal manner.

### **Updating personal information**

CAFFSA endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update their personal information held by CAFFSA by contacting the CEO or delegate at any time.

The Australian Privacy Principles require CAFFSA not to store personal information longer than necessary.

Under the Commonwealth Privacy Act, an individual has the right to obtain access to any personal information which CAFFSA holds about them and to advise CAFFSA of any perceived inaccuracy. There are some exceptions to this right set out in the applicable legislation. To make a request to access any information CAFFSA holds about you, please contact the CEO in writing.

CAFFSA may require you to verify your identity and specify what information you require. Although no fee will be charged for accessing your personal information or making a correction, CAFFSA may charge a fee to retrieve and copy any material. If the information sought is extensive, CAFFSA will advise the likely cost in advance.

### **How long will CAFFSA keep my information?**

Under our destruction and de-identification policies, your personal information that is no longer required will be de-identified or destroyed. In many circumstances, however, it will be kept for marketing purposes, as you will have consented to that in writing with us.

### **Enquiries and privacy complaints**

If you would like further information about the way CAFFSA manages the personal information it holds, please contact the CEO. If you have any concerns, complaints or you think there has been a breach of privacy, then also please contact the CEO who will first deal with you usually over the phone. If we then have not dealt satisfactorily with your concerns, we will meet with you to discuss further.

## CAFFSA Client Consent Form

I, ..... (record name) hereby acknowledge that Child and Family Focus SA (CAFFSA) has advised me of the following:

- Child and Family Focus SA Privacy Policy: External Stakeholders (COPY PROVIDED)
- My right to access personal information; and
- My right to withdraw my consent at any time.

I am aware of, and understand that, CAFFSA may need to collect and disclose personal information to third parties (as required) in order to provide an improved level of service, or to meet Information Sharing Guidelines requirements.

I understand that CAFFSA must comply with relevant privacy laws and I will contact the organisation immediately if I feel that these laws have been breached.

Client Name (printed) \_\_\_\_\_ Signature \_\_\_\_\_

Date:

CAFFSA rep (printed) \_\_\_\_\_ Signature \_\_\_\_\_

Date:

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## Client Non-Consent Form

I do not give my consent for CAFFSA to collect and disclose my personal information to any third parties.

Client Name (printed) \_\_\_\_\_ Signature \_\_\_\_\_

Date:

CAFFSA rep (printed) \_\_\_\_\_ Signature \_\_\_\_\_

Date: