

CHALLENGE COMMUNITY SERVICES

Organisational Procedure: PRIVACY POLICY

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General Policy Statement:

Challenge Community Services (Challenge) is committed to preserving privacy.

This privacy policy discloses Challenge's information gathering and dissemination practices. Challenge is bound by the Privacy Act 1988 and Australian Privacy Principles. Challenge clearly understands the sensitive nature of the information we collect.

Worker files are not covered in the Privacy Act or any other legislation. Challenge treats information collected about staff with the same respect and diligence as all other private information.

1. Definitions

Personal Information: is any information that could reasonably identify an individual. Examples of personal information that we collect may include: names, addresses, email addresses and phone numbers.

Sensitive Information: Information about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices criminal record or health information.

2. What personal information we collect and why?

Challenge only collects certain information to deliver specific services;

Providing services to employees;

Challenge collects names and addresses and other contact details, date of birth, health information, training certificates, records of communication and digital images. This information allows Challenge to best support employees in the workplace to reach their full potential and achieve their work related goals.

Providing services to clients;

Challenge collects names and addresses and possibly family member's names, addresses and other contact details, date of birth, other information about our client's needs and circumstances (such as living or financial circumstances). Challenge may also obtain health information about the individual including correspondence with the individual's health provider. Digital images or videos of individuals may also be collected if required for service provision. Having the relevant individuals' information allows Challenge to support its clients to achieve their goals and engage in the community.

Providing services to children and young people;

Challenge collects names and addresses, date of birth, religious beliefs, health and educational, cultural and behavioral information as well as digital images. Challenge may contact other service providers on the child or young person's behalf. Challenge staff are committed to obtaining all required information to contribute to 'Life Story' work and to provide all children and young people with required supports.

Providing services to Foster Carers;

Challenge collects names and addresses and other contact details, date of birth, health information, training certificates, financial statements, Criminal Record Checks, Working with Children Checks and detailed background information as well as digital images. Foster carers play an essential role in caring for vulnerable children. By having all relevant information Challenge can ensure that the carers can be matched to individual children and are capable of providing a positive care environment.

Responsible Persons;

The following responsible persons may, depending on the circumstances of an individual, be treated as being able to act on an individual's behalf for the purposes of this privacy policy and the collection, use and disclosure of personal information:

- a guardian, parent, carer or other person responsible for the care of the individual;
- someone with a general Power of Attorney or a Power of Attorney which includes health-related power;
- a person recognised under a law as responsible for any aspect of the care or welfare of the individual which is relevant to something Challenge does or intends to do; and
- a person nominated in writing by the individual where the individual is capable of giving consent.

Carers, volunteers and staff;

Information may also be received about carers, volunteers, and staff relating to a Working with Children Check (NSW) or National Criminal Check. This may mean that, the Government agency supplying the information and Challenge, may examine criminal or juvenile justice offences from the past. Information on carers, volunteers and staff is required prior to commencing work with Challenge.

Website use;

Challenge's internet website uses cookies to track visitors to the site. Whilst we may use cookies on our Website, they are not used to collect personal information. We also use Google Analytics to track website activity but this does not collect any person information.

3. Use of Personal Information

Where an individual has provided consent we use and disclose personal information we collect to:

- provide and improve our services to individuals and their family members, including to:

- assess, provide and obtain services required by the individual including the care and treatment of the individual as well as providing information, advice and assistance to the individual; this includes supporting persons' responsible and others (including third party service providers) in their care and treatment of the individual;
 - assess what third party services (including medical services and allied health and therapeutic or support services) may be required or available for the individual;
 - apply for and administer support from third parties (including government and other sources), whether of a financial, administrative, social, medical or other nature;
 - allow exchange of information between service providers with whom Challenge deals or who provide care, services or support of any kind and;
 - assess the adequacy of our services.
- communicating with individuals and their family members, supporters, and volunteers (including responding to queries and complaints) and distributing our publications, conducting events and raising awareness about our services;
 - our general business activities, including interacting with contractors and service providers, billing and administration including measuring and assessing the level of support we receive and the effectiveness of our fundraising activities and assessing applicants for positions with us.

We will not share personal information with third parties without consent except:

- if we are required by law or we believe in good faith that such action is necessary in order to comply with law, cooperate with law enforcement or other government agencies, or comply with a legal process served on the company (including other service providers or insurers) or court order;
- the disclosure of the information will prevent or lessen a serious and imminent threat to somebody's life or health;
- to our contractors, service providers and volunteers only to the extent necessary for them to perform their duties to us.

We are obliged to report to government and other bodies on the services they fund us to provide. Reports cover demographic and service use information only – your personal information will not be passed on.

Website analytics

To improve your experience on our site, we may use 'cookies'. Cookies are an industry standard and most major websites use them. A cookie is a small text file that our site may place on your computer as a tool to remember your preferences. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website.

Our website may contain links to other websites. Please be aware that we are not responsible for the privacy practices of such other sites. When you go to other websites from here, we advise you to be aware and read their privacy policy.

Our website uses Google Analytics, a service which transmits website traffic data to Google servers in the United States. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand website traffic and webpage usage.

By using this website, you consent to the processing of data about you by Google in the manner described in Google's Privacy Policy and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or use the opt-out service provided by Google.

Our website may also utilise other third party analytics software to help us understand website traffic and webpage usage.

clientdomain.com.au also uses interfaces with social media sites such as Facebook, LinkedIn, Twitter and others. If you choose to "like" or "share" information from this website through these services, you should review the privacy policy of that service. If you are a member of a social media site, the interfaces may allow the social media site to connect your visits to this site with other Personal Information.

Capturing Information for Remarketing and Other Online Advertising

Challenge captures information about its website visitors for remarketing and capturing information about similar audiences to advertise online.

Third-party vendors, including Google and others, may show ads for Challenge on various sites across the Internet. Challenge uses third-party vendors, such as Google, to use cookies to serve ads based on past visits to challengecommunity.org.au.

Visitors to challengecommunity.org.au can opt out of Google's use of cookies by visiting Google's Ads Settings. Alternatively, visitors can opt out of a third-party vendor's use of cookies by visiting the Network Advertising Initiative opt out page.

Your challengecommunity.org.au website user data may also be used by Challenge for advertising campaigns on other platforms such as Facebook and Instagram from time to time. For additional up-to-date detailed information on Facebook's data policy, see here: <https://www.facebook.com/policy.php>

4. How secure is your personal information?

We regard the security of personal information as a priority and implement a number of physical and electronic measures to protect it. Challenge will ensure that:

- Personal information is protected from misuse, loss, unauthorised access, modification or inappropriate disclosure;
- Personal information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure;
- Electronic data is kept within secure network storage and ensure that staff may only access that data which is necessary to perform their role.
- When the personal information is no longer needed for the purpose for which it was obtained; Challenge will take reasonable steps to destroy or permanently de-identify that information.

We remind you, however, that the Internet is not a secure environment and, although all care is taken, we cannot guarantee the security of information you provide to us via electronic means.

5. Quality of Personal Information

Challenge will take reasonable steps to ensure that the personal information it collects uses or discloses is accurate, complete, up-to-date and relevant to its functions and activities.

6. Accuracy and Correction of Personal Information

Any worker who collects personal information from an individual is required to make sure that the information remains current, accurate and complete while ever that person is using Challenge services.

7. Government identifier

Although in certain circumstances we are required to collect government identifiers such as tax file numbers, Medicare numbers or Pension card numbers, we do not use or disclose this information other than when required or authorised by law or unless the individual has voluntarily consented to disclose this information to any third party.

8. Sensitive information

Without consent, we will not collect information about an individual that reveals their racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership of a professional or trade association, membership of a trade union, details of health, disability, sexual orientation, or criminal record. Sensitive information will only be collected if it is specifically required for operational purposes.

This is subject to some exceptions including:

- the collection is required by law

- when the information is necessary for the establishment, exercise or defense of a legal claim

9. Making a complaint

If you feel Challenge has breached this Privacy Policy or in some way breached the Privacy Act you have the right to complain. Complaints may be lodged with Challenge in the following ways:

- Challenge Website: via 'Your Feedback'
www.challengecommunity.org.au
- In person
- By telephone – 1300 058 113
- By letter

10. Retention of Records

All information relating to retention and destruction of records can be found in the *Organisational Procedure - Document Control, Records and Archiving*.

11. Changes to this Privacy Policy

Challenge reserves the right to make amendments to this Privacy Policy at any time. If you have objections to the Privacy Policy, you should not access or use the website.

12. References

- Privacy Act 1988
- Australian Privacy Principles

Internal References

- HR Procedure – Personnel Files
- Organisational Procedure – Document Control, Records and Archiving