

Document name	Enterprise Privacy Policy
Applicability	Mission Australia Group
Authorisation	Executive Committee
Policy date	12 March 2014
Document version	Final
Policy owner	Chief Privacy Officer
Review date	As required

1 Introduction

Mission Australia is a not for profit organisation and provides services to individuals through funding by donors or by government agencies. Those services may be provided by one or more organisations within the Mission Australia group of entities.

This privacy policy applies to information collected by Mission Australia. Personal information and sensitive information is collected and held by Mission Australia about individuals to enable those services to be provided in an equitable, economic, efficient and effective manner.

1.1 Privacy Obligations

Mission Australia takes its privacy obligations very seriously and wishes to ensure that an individual's personal information is dealt with in accordance with all relevant privacy laws and this privacy policy.

Mission Australia is subject to the Privacy Act 1988 (Cth) (the "Privacy Act"), including the Australia Privacy Principles (APPs). Respecting and maintaining an individual's right to privacy in accordance with the APPs is a fundamental element of this.

"**Personal Information**" is defined as information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

"**Sensitive information**" is defined as information or opinion 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 preferences or practices, criminal record or health information or genetic information about an individual.

2 Objective

This privacy policy establishes how an individual's personal information will be collected, used and disclosed in order to comply with Australian Privacy Principles.

3 Scope

This privacy policy applies to all controlled organisations within the Mission Australia group of entities (hereafter referred to as Mission Australia).

This privacy policy applies to personal information for individuals that are external to the Mission Australia Group of entities such as donors, clients and suppliers. It does not apply to personal information for individuals within the Mission Australia Groups of entities such as staff members, Directors, volunteers or labour hire contractors.

4 Management of Private Information for Individuals

Mission Australia will:

- Take all reasonable steps to ensure that personal information about individuals is managed in an open and transparent way;
- Provide this policy free of charge and in an appropriate form for public access;
- Maintain adequate security of personal information about individuals to protect it from misuse, interference and loss from unauthorised access, modification or disclosure;
- Establish reporting channels to receive privacy inquiries from individuals and for reports of privacy breaches to be received and acted upon;
- Conduct privacy impact assessments for all new projects where personal information about individuals will be handled or where a change is proposed to information handling practices;
- Provide an option for individuals to use a pseudonym or otherwise be anonymous unless it is impractical or inhibits the adequacy or quality of service provided to the individual;
- Appoint a Chief Privacy Officer to oversight privacy governance processes, ensure compliance with Australian Privacy Principles and report on privacy issues to the Executive Committee and the Board Audit & Risk Committee;
- Provide relevant work training and privacy awareness on how the Australian Privacy Principles apply to Mission Australia and how they are reflected in privacy practices, procedures and systems; and
- Annually review the adequacy of this policy as well as the privacy practices, procedures and systems across the organisation.

5 Personal Information Collected and Held

5.1 Kinds of Personal Information

Mission Australia only collects information that is reasonably necessary for the functions or activities of Mission Australia. The kind of personal information about individuals that is collected and held by Mission Australia includes:

- Names, addresses, contact and bank details for clients, suppliers and donors;
- Images, video and sound recordings of individuals we interact with;
- Information associated with web browsing, email, text messaging, phone calls or other electronic interaction with individuals;
- Other information relevant to the purpose of providing services such as education qualifications, employment history, guardianship, complaint details etc.;

- Sensitive personal information about clients that may include gender, age, health, disability, mental health, racial or ethnic origin, criminal convictions, religious affiliation, tax file numbers, and other particulars required as part of Mission Australia's funding obligations and/or are essential for the proper provision of the services that Mission Australia provides.

5.2 How Personal Information is Collected and Held

Where possible; personal information is collected with the consent of the individual at the time of an individual's interaction with Mission Australia. In some service programs, client personal information is received from third parties when the client is transferred or referred to Mission Australia for the services that we provide.

Personal information may be collected in hard copy form or electronic. Hard copy records are required to be held securely. Electronic records are held in databases with security safeguards. Some of those databases are government controlled some are held by a third party provider.

Where consent is sought, it is sought voluntarily with the individual informed of what they are consenting to. Consent agreements are current and specific to the service to be provided.

Mission Australia will not collect sensitive information unless the individual has consented; it is required by law; or in other special specified circumstances, for example relating to health services provision and individual or public health or safety.

5.3 Purposes for which Personal Information is Collected, Held, Used and Disclosed

Personal information about individuals is collected, held and used only for the primary purposes for which it was collected or as set out below.

We use and collect your personal information for the primary purposes for which the information was collected including:

- to satisfy legal obligations and funding agreement requirements
- to enable proper governance processes such as internal audit and external audit purposes
- to seek feedback from clients and other individuals about the quality of services that Mission Australia provides so that the services Mission Australia provides can be continuously improved
- marketing and promotional activities, events and conferences organised and held by Mission Australia
- to provide customer service functions, including handling customer enquiries and complaints
- to provide the services that Mission Australia provides, including but not limited to housing support, employment services, counselling, volunteering, learning and development and fundraising. Use of that information may be shared between more than one legal entity within the Mission Australia Group in order to expand or improve the services to the individual
- where funding bodies require it as part of the funding agreement with Mission Australia

- in compliance with applicable laws
- other purposes which you have consented to

5.4 Disclosure to third parties

We will not disclose your personal information to organisations outside of Mission Australia unless we have your consent to do so and such disclosure is in relation to the goods or services we provide to you or for a purpose permitted by this privacy policy. Personal information is not provided to other parties for purposes beyond Mission Australia's vision, mission and objectives except as required by funding agreements; for transfer to another service provider in accordance with funding agreements; or at the request of an individual to do so.

Examples of organisations and/or parties that your personal information may be provided to where appropriate given the goods or services that we are providing to you, and where we have your consent to do so, include:

- to other service providers where a client is transferring to a service provider that is not part of Mission Australia
- to a government agency, which may be by portal directly into the agency's database system as required by our funding agreement
- to third parties for the electronic storage of information, some of which may be overseas

5.5 Opt-outs

If you receive communications from us that you no longer wish to receive, you should contact us by e-mail at integrity@missionaustralia.com.au and we will cease the relevant communication.

6 Access and Correction of Personal Information

6.1 Access

An individual is entitled to request access to the personal information held by Mission Australia about them. This is provided upon request by the individual. Requests are made to the same point of contact when the personal information was provided by the individual.

6.2 Correction

Where an individual informs Mission Australia that information held by Mission Australia about them is inaccurate; out-of-date; incomplete; irrelevant or misleading; Mission Australia will correct it. Notices to Mission Australia to incorrect information held about an individual are made to the same point of contact when the personal information was provided by the individual.

7 Complaints

The standard approach adopted by Mission Australia about possible breaches of management of personal information is an escalation process with an alternative reporting avenue as follows:

- a) Every complaint must firstly be directed to a worker at Mission Australia that is the individual's ordinary Mission Australia contact for resolution.
- b) Where a complaint lodged under a) above is not attended to and rectified within a reasonable timeframe, the individual is entitled to escalate the complaint to the workers' supervisor.
- c) Where a workers' supervisor does not adequately attend to the privacy matter raised within a reasonable timeframe, the individual is entitled to:
 - I. Take it to a more senior manager in the line of command, and/or
 - II. Contact the Mission Australia **Integrity Line 1800 021 673** for consideration of alternative action.
- d) Where none of the above approaches by an individual have resolved the issue, the complaint should be put into writing and forwarded for a more formal inquiry into the matter to the

Mission Australia Chief Privacy Officer
GPO Box 3515
SYDNEY 2000

Or email: integrity@missionaustralia.com.au

The individual may contact the **Privacy Commissioner** wherever they believe that their rights to privacy have been breached by Mission Australia.

8 Overseas Disclosure

Mission Australia may store personal information that it collects about individuals with third parties who store it overseas for Mission Australia's use. Mission Australia does not disclose personal information about individuals overseas.

To assist with providing Mission Australia's goods and services to you, Mission Australia may use data hosting facilities which may result in personal information provided to Mission Australia being transferred to, and stored at, a destination outside Australia, including but not limited to United Kingdom, New Zealand, Canada, China, Singapore, Hong Kong and United States of America.

You expressly agree and consent to the disclosure, transfer, storing or processing of your personal information outside of Australia in submitting your personal information to Mission Australia. In providing your consent, you understand and acknowledge that countries outside Australia do not always have the same privacy protection obligations as Australia in relation to personal information.

If you do not agree to the transfer of your personal information outside Australia, please contact us by e-mail at integrity@missionaustralia.com.au or call us on 02 9219 2000.

9 Destruction and De-identification

When personal information about an individual held by Mission Australia is no longer required to meet Mission Australia's vision, mission and objectives, it is purged from information systems and destroyed or de-identified.