

# **Privacy Policy**

## 1. PURPOSE

Service Personnel Anglican Help Society (SPAHS) recognises the importance of privacy, security and confidentiality of information held about its members, staff, volunteers, and other stakeholders. This policy outlines a framework for SPAHS to manage the information provided to us by individuals.

#### 2. APPLICATION

This policy applies to all records, hard and electronic copies, which contain personal or sensitive information about members, staff and volunteers. Service Personnel Anglican Help Society (SPAHS) will ensure that:

- a. it meets its legal and ethical obligations as an organisation and employer and will protect the privacy of individuals through its systems, practices and procedures;
- b. individuals are provided with information about their rights regarding privacy, including their right to access and correct their information, lodge a privacy complaint and have that complaint dealt with fairly and promptly;
- c. individuals are provided with privacy when they are being interviewed or discussing matters of a personal or sensitive nature;
- d. all staff, board members, consultants, contractors and volunteers understand what is required in meeting privacy obligations.

## 3. AUSTRALIAN PRIVACY PRINCIPLES

in accordance with the Australian Privacy Principles from Schedule 1 of the Privacy Amendment (Enhancing Privacy Protection) Act 2012, Service Personnel Anglican Help Society (SPAHS) manages your personal information in the following manner:

- a. Your personal information is only collected if you give us consent to do so. Consent can be either in writing via the privacy consent form or verbally. If consent is given verbally, a note will be made on your file that you have given verbal consent. Service Personnel Anglican Help Society (SPAHS) will only collect information that is necessary to provide services to you. This information may include the following: your name, address, contact details, communication needs (e.g. interpreter or translator), emergency contact information, or other items required to deliver a service to you.
- b. Some of your information is collected via the Service Personnel Anglican Help Society (SPAHS) membership form that you will fill out when you apply to become a member. Some information may be collected over the phone, such as when you phone us for assistance. Your personal information is stored in our secure database or in hard copy in a secure location. Your information is never shared.
- c. Your personal information is collected solely for the purpose of providing support to you. Your information will not be disclosed to third parties unless you, or your legal representative, gives consent that specifies the information to be released and to whom. This policy excludes the collection and transmission of non-identifying statistical data to any funding agency or for purposes of research.

- d. Service Personnel Anglican Help Society (SPAHS) is obliged to disclose information about an individual, with or without the consent of the client and/or their responsible person, where directed or prescribed as a legal requirement.
- e. If you would like access to your personal information for any reason, you can contact our staff in writing by email or mail. E: reception@warwidowsqld.org.au or P.O. Box 13604, George Street Post Shop, Brisbane, QLD, 4003.
- f. Individuals may have supervised access to their own records following a written request to our office. Access may include viewing the information, receiving a summary of information held, or having information explained. Access to some records may be limited if providing access potentially breaches another individual's privacy. We will collate all electronic and paper files held on the individual making the request, review and make a recommendation for access to the Executive Officer. Upon approval, the staff member will liaise with the individual to arrange supervised access at a time and location suitable to both parties. Staff will obtain photographic proof of identity, including proof of current residential address prior to providing access to files. A copy of the documents sighted is forwarded to the Privacy Officer.
- g. You can make a complaint anytime if you believe Service Personnel Anglican Help Society (SPAHS) has breached the Australian Privacy Principles. You can make a complaint to us in writing by email or post: E: reception@warwidowsqld.org.au or P.O. Box 13604, George Street Post Shop, Brisbane, QLD, 4003.
- h. Complaints can be made through the Service Personnel Anglican Help Society (SPAHS) Feedback and Complaints policy and form outlines how we will respond to your complaint and the timelines within which we will provide a response.
- i. Service Personnel Anglican Help Society (SPAHS) does not disclose personal information to any overseas organisations.

#### 4. ANONYMITY & PSEUDONYMITY

You have the option of dealing with Service Personnel Anglican Help Society (SPAHS) anonymously; however, this only applies where it is practical for Service Personnel Anglican Help Society (SPAHS) to deal with you acting anonymously or under a pseudonym. Examples of when you may prefer to remain anonymous or use a pseudonym could include your preference to not be identified; to keep your whereabouts secret for safety purposes; to access services without being identified; and/or to express your views without being personally identified.

In some instances, it may be impractical for us to provide assistance if you are anonymous or utilising a pseudonym. For example, if you make a complaint under a pseudonym we may be unable to investigate your complaint.

## 5. PASSIVE INFORMATION COLLECTION

As you navigate through our website, certain information can be passively collected (that is, gathered without you actively providing the information) such as cookies, internet tags or web beacons, and navigational data collection (log files, server logs, and clickstream data). For example, we may collect information about matters including but not limited to the date, time and duration of visits and which pages of our website are most commonly accessed. This information is generally not linked to your identity, except where our website is accessed via links through personal online accounts.

## 6. REVIEW

This policy is to be reviewed every two years or as a result of a complaint or legislative change.