

	Governance Policy	Issue Date:	May 2016
		Approved By/Date:	Board/March 2020
	<p style="text-align: center;"><b>Privacy Policy (v.2)</b></p>	Policy Owner:	CEO
		Review Date:	March 2021

**Purpose:**

Lifeline Tasmania respects the rights of individuals to privacy and is committed to ensuring personal information is managed in accordance with the *Privacy Act 1988* (Cth) – ‘the Act’ and the Australian Privacy Principles (APP) of the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*. This Policy sets out Lifeline Tasmania’s responsibilities and individuals’ rights under the APP (Commonwealth Act).

**Scope:**

This policy applies to all Lifeline Tasmania Directors, Managers, employees, volunteers, clients, service providers, students and members of the public.

**Definitions:**

**‘personal information’** means information or an opinion about an identified individual or an individual who is reasonably identifiable. It includes information or opinion:

- (a) whether the information or opinion is true or not; and
- (b) whether the information or opinion is recorded in a material form or not.

It includes information which we request. It also includes information which is given to us, which we have not requested.

Personal information includes **‘sensitive information’** such as racial or ethnic origin, political opinions, religious beliefs or affiliations, philosophical beliefs, sexual orientation, criminal record, health information, or genetic information.

**‘Unsolicited personal information’** means any information received by Lifeline Tasmania that is provided in addition to what Lifeline Tasmania has requested.

**‘individual’** means any person such as a Director, Manager, employee, volunteer, client, service provider, students or a member of the public.

**“You”, “your” and “yourself”** refer to an individual about whom we have collected personal information.

**“Us”, “we” and “our”** refers to Lifeline Tasmania (ABN 63 961 004 547)

## **Policy:**

Lifeline Tasmania is committed to the retention of personal information in line with legislative requirements.

### **1. Open and transparent management of personal information**

Lifeline Tasmania will:

- Clearly communicate the personal information handling practices of Lifeline Tasmania;
- Enhance the transparency of Lifeline Tasmania's operations; and
- Give individuals a better and more complete understanding of the sort of personal information Lifeline Tasmania collects, and the way that information is managed.

A copy of this Privacy Policy will be available at all Lifeline Tasmania sites and on its webpage.

### **2. Anonymity and pseudonymity**

Individuals have the option of remaining anonymous or using a pseudonym each time they access Lifeline Tasmania services, however, it may affect our ability to provide you with services or allow you to participate in our programs or events if you do not give us personal information. Exceptions apply where identification is required by Australian law.

If we do identify you in the course of interacting with you anonymously (such as through your telephone number), we may use or disclose that information to protect you or others. For example we may provide your phone number to emergency services if we think there is a risk of harm to you or another person.

The choice of how much information you provide to Lifeline Tasmania is yours and depends on the purposes for which you interact with Lifeline Tasmania. However, if, for example, you want to enrol in a program or service, you want to subscribe to our mailing list, apply to become a volunteer or apply for employment with us, Lifeline Tasmania will require certain information from you. Donations can be made anonymously if requested.

### **3. Collection of solicited personal information**

Wherever possible we will collect personal information directly from you rather than another person unless you have given consent. However in some circumstances we will collect information from a third party including, if it is necessary, for a specific purpose such as referral to emergency services where we believe, on reasonable grounds, that it is necessary to prevent or lessen a serious and imminent threat to your life or health.

Lifeline Tasmania will only solicit and collect personal information that is reasonably necessary to provide an appropriate service to you.

For example, we may collect personal information from you in order to:

- provide you with crisis support; suicide prevention and resilience building services; or
- enrol you in a Lifeline Tasmania Program or service; or
- receive a donation from you; or

- give you information or send you publications or resources; or
- assess and register you as a Member; or
- engage emergency services or refer you to other service providers.

'Sensitive information' will only be collected if you consent and the information is reasonably necessary to provide appropriate service to you or as required or authorized by law. Further collection of solicited information is outlined below:

**a. Information collected from you when you enrol in a Lifeline Tasmania Program or Service**

When enrolling in a Lifeline Tasmania program or service, Lifeline Tasmania will collect personal information relevant to the program or service. Information collected may vary dependent on State or Federal funding requirements and can include the following:

- application forms
- contact details
- enrolment forms and academic records which are required by law to be collected by Lifeline Tasmania as a Registered Training Organisation (RTO). As an RTO, Lifeline Tasmania is also required to collect information from trainers and assessors to verify they possess the requisite qualifications to deliver training and education.

**b. Information collected when you volunteer to deliver Lifeline Tasmania services**

Lifeline Tasmania collects personal information necessary to enable us to assess your application to register as a volunteer. Depending on the role this may include your employment and volunteer history and education. Lifeline Tasmania requires a National Police Check to be completed prior to commencing volunteering. A Working with Vulnerable Persons Check can be in progress upon commencing volunteering. Volunteers for Board member positions may also have to provide information relevant to assessing conflict of interest risks.

**c. Information collected when you seek employment with Lifeline Tasmania**

We collect personal information necessary to enable us to assess your application for employment with us such as:

- your résumé, statement addressing the criteria and referee reports;
- written tasks undertaken by you during the selection process;
- details of financial and other personal interests supplied by you for the purpose of managing potential conflicts of interest;
- proof of Australian citizenship or residency;
- copies of academic qualifications.

**d. Information collected in relation to Lifeline Tasmania employees**

We collect personal information necessary to manage our employees such as:

- the employee's employment contract;
- details of financial and other personal interests which may be relevant for the purpose of managing conflicts of interest;
- proof of Australian citizenship or residency;
- copies of academic qualifications;
- records relating to the employee's salary, benefits and leave;
- health related information supplied by an employee or their medical practitioner;

- taxation details;
- superannuation contributions; and
- information relating to the employee's training and development.

Lifeline Tasmania employees should also refer to the Lifeline Tasmania Employee Information and Management Policy and any such queries should be referred to the Operations Manager.

#### **4. Dealing with unsolicited personal information**

Lifeline Tasmania may receive unsolicited personal information about you from a third party. If Lifeline Tasmania does get personal information in these circumstances, Lifeline Tasmania must determine whether we could have lawfully collected the information. If it is determined that we could not, Lifeline Tasmania will destroy the information or de-identify it as soon as practicable if it is lawful and reasonable to do so. If the information forms part of a Commonwealth record under a Lifeline Tasmania contract, we can only destroy or alter it in accordance with s24 of the Archives Act.

#### **5. Notification of the collection of personal information**

When Lifeline Tasmania collects personal information about you, we will take reasonable steps either to notify you or ensure that you are aware of the following matters:

- Lifeline Tasmania's contact details;
- the fact and circumstances of the collection;
- whether the collection is required or authorized by law;
- the purposes of collection;
- the consequences if personal information is not collected;
- Lifeline Tasmania's usual disclosures of personal information of the kind collected by Lifeline Tasmania;
- information about Lifeline Tasmania's Privacy Policy;
- whether Lifeline Tasmania is likely to disclose personal information to overseas participants and, if practicable, the countries where they are located.

Lifeline Tasmania will take reasonable steps before or at the time it collects personal information. If this is not practicable, reasonable steps must be taken as soon as practicable after collection. There may be times when Lifeline Tasmania may not take any steps to notify you in cases, for example where legal obligations or threats to health and safety are present.

#### **6. Use or disclosure of personal information**

Lifeline Tasmania will only use or disclose personal information for the purpose for which it was collected, or for purpose which are directly related to one of our functions or activities (primary purpose).

Lifeline Tasmania will not use or disclose personal information to another person or organisation for any secondary purpose unless one the following applies:

- the individual has consented to the disclosure of their personal information;
- the individual would reasonably expect, or has been told, that information of that kind is usually passed to those individuals, bodies or agencies and the disclosure:
  - in the case of personal information (that is not sensitive information) relates to

- the primary purpose for which it was collected; or
- in the case of sensitive information is directly related to the primary purpose for which it was collected; or
- Contractors and service providers who perform services on our behalf, such as mailing houses, printers, information technology service providers, data matching and data washing service providers, database contractors and telemarketing agencies.
- the disclosure is otherwise required or authorised by law;
- Lifeline Tasmania reasonably believes that the disclosure will prevent or lessen a serious and imminent threat to somebody's life, health or safety (including your own) or serious threat to public health, property or public safety;
- the individual has made threats to harm third parties;
- the individual has made threats against Lifeline Tasmania employees or volunteers or the individual repeatedly makes nuisance contact including calls or emails; or
- the disclosure is to a Lifeline Tasmania service providers e.g. those that host our website servers and CRM system. To protect the personal information Lifeline Tasmania discloses we will:
  - enter into a contract which requires the service provider to only use or disclose the information for the purposes of the contract;
  - include special privacy requirements in the contract where necessary.

Information collected by Lifeline Tasmania may also be used for quality assurance, research for service improvement, community promotion of Lifeline Tasmania services. For example, Lifeline Tasmania may use positive feedback on our services to promote Lifeline Tasmania services online or via social media and/or fundraising purposes, however this information will be de-identified unless the individual consents to its use.

Lifeline Tasmania also uses contact details and information collected from Members or from individuals who subscribe to Lifeline Tasmania's mailing lists for marketing purposes or to communicate information about Lifeline Tasmania's activities and events.

## **7. Direct marketing**

Lifeline Tasmania may use or disclose information (other than sensitive information) about an individual for the purpose of direct marketing if:

- Lifeline Tasmania collected the personal information from the individual;
- the individual would reasonably expect Lifeline Tasmania to use or disclose the personal information for that purpose;
- Lifeline Tasmania provides a simple way for the individual to request not to receive direct marketing communications from Lifeline Tasmania (also known as 'opting out') and the individual has not made such a request to Lifeline Tasmania.

## **8. Cross border disclosure of personal information**

Web traffic information is disclosed to Google Analytics when you visit our websites. Google stores information across multiple countries.

When you communicate with Lifeline Tasmania through a social network service such as

Facebook, Lifeline Tasmania receives analytical information such as name and age. The social network provider and its partners may collect and hold your personal information overseas.

Lifeline Australia's Customer Relationship Management Database (which hosts donation related information) is hosted on secure off-shore servers in the USA, Japan, Germany and Australia and accessed through the 'cloud'. Lifeline Australia has taken reasonable steps to ensure that:

- the recipient of information which is being transferred is subject to a law, or binding scheme, that has the effect of protecting the information in a way that, overall, is at least substantially similar to the way in which the Australian Privacy Principles protect the information; and
- there are mechanisms that you can access to take action to enforce that protection of the law or binding scheme.

Exceptions may apply where disclosure is required or authorized by Australian law or court order or international agreement to which Australia is a party. If Lifeline Tasmania is required by law to provide information or if the individual consents to disclosure, Lifeline Tasmania will not be held responsible for ensuring the recipient does not breach the APP in regard to cross-border disclosure.

#### **9. Adoption, use or disclosure of government related identifiers**

Lifeline Tasmania will not adopt, use or disclose a government related identifier such as a number, letter or symbol used to identify an individual unless it is:

- required or authorized under an Australian law or a court/tribunal order;
- prescribed by regulations;
- necessary to verify the identity of the individual (eg driver's license or passport);
- reasonably necessary for Lifeline to fulfil its obligations to an agency, State or Federal Government contract;
- reasonably believed by Lifeline Tasmania that the disclosure is necessary to lessen or prevent a serious threat to life, health and safety of an individual or public;
- suspected that unlawful activity, or misconduct of a serious nature, that relates to Lifeline Tasmania's functions or activities has been, is being or may be engaged in, and Lifeline Tasmania reasonably believes that the use or disclosure is necessary in order for the organisation to take appropriate action in relation to the matter;
- reasonably believed by Lifeline Tasmania that the use or disclosure of the identifier is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

#### **10. Quality of personal information**

Lifeline Tasmania will take reasonable steps to ensure that the personal information it collects is up to date and complete.

Lifeline Tasmania will take reasonable steps to ensure that the personal information it uses or discloses is, (having regard to the purpose of the use or disclosure as outlined in 6. *Use or disclosure of personal information*), accurate, up to date, complete and relevant.

These steps include:

- ensuring updated or new personal information is promptly added to relevant existing records;
- implementing protocols that ensure personal information is collected and recorded in a consistent format;
- where necessary, confirm the accuracy of information we collect from a third party or a public source;
- contacting the individual to verify the quality of personal information when it is used or disclosed, particularly if there has been a lengthy period since collection.

## **11. Security of personal information**

We take steps to protect the personal information we hold against loss, unauthorised access, use, modification or disclosure, and against other misuse. These steps include:

- only allowing employees with an 'authority to know' to access our IT systems and records;
- (where relevant) undertaking background checks on personnel who require access to our IT systems and records;
- password protection for accessing our electronic IT systems; and
- securing paper files in locked cabinets and physical access restrictions.

## **Card payments**

Lifeline Tasmania will destroy or delete in a secure manner any personal payment card information no longer required in adherence with the Payment Card Industry Data Security Standards.

## **12. Access to Personal Information and 13. Correction of Personal Information**

Under the Privacy Act (Australian Privacy Principles 12 and 13) you have the right to ask for access to personal information that Lifeline Tasmania hold about you, and ask that we correct that personal information.

Lifeline Tasmania will not provide access to personal information unless we are sure that the person seeking access is the person to whom the information relates, or the law otherwise supports such access. In some cases access may have to be denied because ownership of a record cannot be proven.

Individuals will be required to provide the following information before access or correction is undertaken.

- A written request for access and/or correction of information addressed to the CEO and sent either via email to [ceo@lifelinetasmania.org.au](mailto:ceo@lifelinetasmania.org.au) or via post to CEO, Lifeline Tasmania, Level 4, 31 Cambridge Road, Bellerive, 7018.
- Proof of identity. This may be achieved through a number of means, including using the 100-point identification system and proof of contact number, certified through a legal practitioner, pharmacist, police officer or GP with an accompanying statutory declaration.

Lifeline Tasmania will endeavor to correct personal information once it is identified as inaccurate by Lifeline Tasmania or by the individual, and will ensure that any other organisation to whom the

individual's personal information was previously forwarded receives notification of any change, unless it is impracticable or unlawful to do so. Should Lifeline Tasmania refuse to give access to or correct personal information as requested by the individual, Lifeline Tasmania will provide written reasons for refusal to the individual.

### **How to make a complaint or contact us**

If you wish to contact Lifeline Tasmania about a privacy matter or are concerned about the way we have handled your personal information, you can lodge a Lifeline Tasmania Feedback Form at either of the addresses below. This Form is available at office and retail locations state-wide, through Lifeline Tasmania's website or by calling (03) 6282 1500.

**Postal Address:** Lifeline Tasmania Feedback, Level 4, 31 Cambridge Road, Bellerive, TAS 7018

**Email Address:** [feedback@lifelinetasmania.org.au](mailto:feedback@lifelinetasmania.org.au)

If you are dissatisfied with Lifeline Tasmania's investigation of your concerns, you can lodge a complaint to the Office of the Australian Information Commissioner (OAIC) who is independent of Lifeline Tasmania.

### **Related Documents:**

- Privacy Act 1988
- Australian Privacy Principles (APP) of the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*
- Personal Information Protection Act 2004 (Tas)
- Payment Card Industry Data Security Standards
- Lifeline Tasmania Confidentiality Policy
- Lifeline Tasmania Employee Information and Management Policy
- Lifeline Tasmania Feedback Policy
- Lifeline Tasmania Data Breach Response Procedure
- Lifeline Australia Privacy Policy

### **Version History**

<b>Version #</b>	<b>Brief description of amendments</b>	<b>Approved by/Date</b>
1.0	Approved by Board	Board/May, 2016
2.0	Reviewed and mapped against APP and LA Privacy Policy	Board/March 2021