

Privacy Policy	
Policy Rationale	To explain how CatholicCare handles personal information.
Policy Statement	<p>CatholicCare Social Services collects, holds, uses and discloses personal information to carry out our functions or activities.</p> <p>CatholicCare respects the privacy of all, including clients, stakeholders, business partners, staff, volunteers and donors. We are therefore committed to safeguarding the personal information that is provided to us and ensuring that this information is managed appropriately and only used for its intended purpose.</p>
Policy Scope	<p>The following people have a responsibility in relation to this policy:</p> <ul style="list-style-type: none"> ○ Line Managers are responsible for implementation and for ensuring that staff are aware of this policy and related procedures. ○ All staff, Council Members and Volunteers are responsible for compliance with this policy and related procedures.
Consequences	Failure to comply with this policy and associated procedures shall result in disciplinary action which may include termination of employment.
Related Documentation	<p>Client Information Procedure</p> <p>Complaints Policy</p> <p>Notifiable Database Breach Procedure</p> <p>Privacy Statement</p> <p>Release of Client Information Procedure</p>
Legislative References	<p>Archive Act 1983</p> <p>Australian Privacy Principles</p> <p>Competition & Consumer Act</p> <p>Disability Services Act 2006</p> <p>Fair Work Act 2009 (Cth)</p> <p>Human Rights Act – QLD (2019)</p> <p>Privacy Act 1988 (Cth)</p> <p>Roman Catholic Church (Incorporation of Church Entities) Act 1994 (Qld)</p> <p>Social, Community, Home Care and Disability Services Industry Award 2010</p>

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Summary Privacy Policy

Scope

This summary sets out the key points about how CatholicCare handles personal information.

Collection of your personal information

We usually collect personal information (including sensitive information) from you or your authorised representative to deliver our services and programs.

We will also collect your personal information when you apply for a job or work with CatholicCare or are one of our stakeholders we work with.

Personal information may include personal information, contact details, information on personal issues and experiences, relationships, and family background.

Sensitive information may include information about your health, racial or ethnic origin, family background, religious beliefs, sexual orientation, criminal history, relationship information and opinions.

We also collect personal information through our websites and social networking services such as Facebook, Twitter and Instagram. We use this information to improve our website and receive feedback from the community.

CatholicCare information technology security practices

All personal information collected is held on cloud storage, on servers located in Australia. We retain effective control over any personal information held on our cloud, and the information is handled in accordance with the Australian Privacy Principles.

We use CSnet, SRS and Dynamics 365 to manage client information and to store stakeholder information. When you use our services, the information is encrypted and stored in a secure server. Depending on the service you use, this server is controlled by either CSnet or Youth Justice and certain government departments may be able to view your information as part of our Service Agreement.

Disclosure

To meet our funding guidelines, we disclose relevant and necessary information about you to the relevant third parties (government department).

We may also disclose personal information:

to service providers (like those that host our website servers, manage our IT and manage our human resources information)

the disclosure is required or authorised by or under an Australian law or a court/tribunal order.

We don't disclose sensitive information about you unless you agree, or would reasonably expect us to.

As well, web traffic information we collect using Google Analytics may be stored overseas.

Accessing and correcting your personal information

If you ask, in most cases we must give you access to the personal information that we hold about you, and take reasonable steps to correct it if we consider it is incorrect. We will try to make the process as simple as possible.

How to make a complaint

You can complain to us in writing about how we have handled your personal information. We will respond to the complaint within 30 days.

Enquiries, reports and complaints can be directed to hello@catholiccare.services OR
CatholicCare Attention: Privacy Officer, PO Box 1733, Toowoomba Qld 4350

Overview

This Privacy Policy sets out how we comply with our obligations under the *Privacy Act 1988* (Privacy Act). We are bound by the *Australian Privacy Principles (APPs)* in the Privacy Act which regulate how organisations may collect, use, disclose and store personal information, and how individuals may access and correct personal information held about them.

CatholicCare's mission is to empower individuals, families and communities to meet the challenges of life and relationships. We employ staff in the areas of community development, counselling, family dispute resolution, youth work and settlement support and related corporate and administration support services. Our staff and volunteers are carefully selected and supported to ensure CatholicCare's mission and values are upheld.

CatholicCare is a for purpose organisation, and we rely upon funding through governments, corporations, groups and the community, to deliver valuable services to the people in our community who need our support.

CatholicCare collects, uses, discloses and holds personal information to deliver its services and perform its functions. The majority of our services delivered at CatholicCare include state or commonwealth government programs, and we comply with the relevant state or national privacy principles that apply to these programs, as well as any other obligations contained in each contract.

Some of these services and functions include:

- delivering counselling, mediation, settlement support and youth work;
- consulting with stakeholders, for example, on service-related issues;
- maintaining systems, registers, databases;
- responding to access to information requests;
- communicating with the public, stakeholders and the media including through websites and social media; and
- information sharing with other entities or the public where it is lawful to do so.

CatholicCare also collects, uses and discloses and holds personal information to carry out certain business functions, such as assessing suitable candidates for career opportunities within the organisation.

Collection of sensitive information

CatholicCare also collects sensitive information.

The Privacy Act defines 'sensitive information' as:

- a) information or an opinion about an individual's:
 - racial or ethnic origin; or
 - political opinions; or
 - membership of a political association; or
 - religious beliefs or affiliations; or
 - philosophical beliefs; or
 - membership of a professional or trade association; or
 - membership of a trade union; or
 - sexual orientation or practices; or
 - criminal record;

that is also personal information; or

- b) health information about an individual; or
- c) genetic information about an individual that is not otherwise health information; or
- d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
- e) biometric templates.

Collection of your personal information

The nature and extent of personal and sensitive information collected by CatholicCare varies depending on the service you require.

CatholicCare aims to only collect the personal or sensitive information it requires to carry out its services, functions, and duties in any given instance.

The main way CatholicCare collects personal information about you is when you provide it.

For example, we collect personal information such as contact details, when you receive a service, work with us a stakeholder, respond to a survey response, or make a job vacancy application or lodge a report.

CatholicCare may also collect your contact details and other personal information, where relevant, if you are a stakeholder participating in a meeting or in consultation with the organisation.

Anonymity

Clients are encouraged to inform CatholicCare staff if they wish to access a service on an anonymous basis or using a pseudonym.

If this is possible and lawful, we will take all reasonable steps to comply with the request.

However, we may not be able to provide the services requested if we are not provided with the necessary personal information.

Use

CatholicCare usually uses your personal and sensitive information for the purpose for which it was collected.

This ordinarily includes:

CatholicCare Clients

Kind of information collected:

- contact details (name, address, email etc.)
- personal details including: date of birth, gender, income
- information on personal issues and experiences, relationships,
- family background, supports clients may have in the community and health information and/or medical history

Purpose for which CatholicCare uses the information:

- to provide a CatholicCare service
- to provide clients with the most appropriate services for their needs
- to meet any requirements of government funding for programs
- to monitor and evaluate existing services and plan for future services
- to comply with legal obligations

CatholicCare Business Partners and Stakeholders

Type of information collected:

- contact person's name, the name of the organisation phone numbers, address, email address, Australian Business Number (ABN) etc
- bank details (if CatholicCare is to receive payment or make payment for services received)

Purpose for which CatholicCare uses the information:

- to provide CatholicCare services
- to process donations and provide accurate receipts
- to pay for services
- to establish and manage partnerships
- to receive services from you or the business/organisation which employs you
- to manage CatholicCare's relationship with the business partner

- to provide information about CatholicCare's services
- to update the partner organisation regarding CatholicCare appeals for public donations, programs and services.

CatholicCare Donors

Type of information collected:

- contact details (name, address, telephone numbers, email etc.)
- donation history
- credit card numbers or bank account details of all our donors expiration date of credit card

Purpose for which CatholicCare uses the information:

- to provide CatholicCare services
- to process donations and provide accurate receipts
- to facilitate on-going fundraising and marketing activities
- to comply with legal obligations
- to provide transparency relating to donated funds, particularly in relation to appeals for public donations.

CatholicCare People (volunteers, staff members, delegates) and candidates for volunteer work and prospective staff members)

Type of information collected:

- contact details (name, address, telephone numbers, email etc.) and personal details including personal details of emergency contact person(s)
- date of birth, country of birth, citizenship, residency and/or visa details
- details of current/previous employment or volunteer involvement, skills and experience, languages spoken and written
- qualifications, drivers licence details
- information and opinions from referees for prospective staff members and candidates for volunteer work

How We Collect Information

- a) Where possible, we collect personal and sensitive information directly from individuals with their informed consent. We collect information through various means, including telephone, online and in-person interviews, appointments, forms and questionnaires.

If you feel that the information we are requesting (either on our forms or in our discussions with you) is not information that you wish to provide, please feel free to raise this with us.

- b) In some situations, we may also obtain personal information about you from a third party source. If we collect information about you in this way, we will take all reasonable steps to contact you and ensure that you are aware of the purposes for which we are collecting your personal information and the organisations to which we may disclose your information, subject to any exceptions under the Privacy Act (for example, we may collect information about you from a health care professional, such as your doctor).

Analytics, business improvement and reporting

CatholicCare collects your information using its various analytics tools and survey platforms, namely: Survey Monkey and Microsoft Forms.

Information collected will not ordinarily be your personal information, so it would not be identified or reasonably identifiable.

If the information collected includes personal information, it will be de-identified and used for analytics, business improvement and reporting purposes. This information needs to be collected in order to communicate with you regarding events, services or content you subscribe to, as well as to be able to improve our services and content for you.

CatholicCare also collects personal information through Mail Chimp for the purpose sending electronic newsletters, and you can unsubscribe at any time.

Cookies

CatholicCare collects information about your interactions with our website using cookies.

Information collected about your interactions with the website via cookies is used to improve your website user experience.

Disclosure

CatholicCare discloses personal information for purposes other than the purpose for which personal information was collected in certain circumstances. These include:

- Government departments/agencies who provide funding for CatholicCare services;
- Health care and other social service professionals, who assist us to deliver our services;
- Other regulatory bodies, such as WorkSafe;
- Referees and former employers of CatholicCare staff members and volunteers, and candidates for CatholicCare employee and volunteer positions; and
- Our professional advisors, including our accountants, auditors and lawyers.

Disclosure as required or authorised by law

CatholicCare will not disclose an individual's personal information to a third party unless one of the following applies:

- you have consented;
- you would reasonably expect us to use or give that information for another purpose related to the purpose for which it was collected;
- it will prevent or lessen a serious threat to somebody's life, health or safety or to public health or safety;
- it is reasonably necessary for us to take appropriate action in relation to suspected unlawful activity, or misconduct of a serious nature that relates to our functions or activities;
- it is reasonably necessary to assist in locating a missing person;
- it is reasonably necessary for a confidential dispute resolution process; or
- it is reasonably necessary for the enforcement of a law conducted by an enforcement body.

Storage and security of personal information

All personal information collected digitally by CatholicCare is held on servers located in Australia. We retain effective control over any personal information held on those servers.

Some personal information may be held on the data bases of government portals, as part of funding agreements, as part of CatholicCare performing its services and functions.

Reasonable steps to protect personal information

In addition to Information and Communications Technology (ICT) security and physical security measures, CatholicCare takes reasonable steps to protect the security of the personal information it holds from both internal and external threats through access security and monitoring controls, including:

- regularly assessing the risk of misuse, interference, loss, and unauthorised access, modification or disclosure of that information;
- taking measures to address those risks, for example, by keeping a record (audit trail) of when someone has added, changed or deleted personal information held in databases and regularly checking that staff only access those records they are permitted to and when they need to; and
- conducting regular audits to assess whether CatholicCare has adequately complied with or implemented these measures;
- by implementing and regularly updating our data breach response plan to ensure we meet our obligations under the notifiable data breach (NDB) scheme under the Privacy Act; and

- by undertaking privacy impact assessments when information handling practices change, or new practices are introduced.

Access to and correction of personal information

1. If you request access to the personal information we hold about you, or request that we change that personal information, we will allow access or make the changes unless we consider that there is a sound reason under the Privacy Act or other relevant law to withhold the information, or not make the changes.
2. Requests for access and/or correction should be made to the Privacy Officer (details set out below). For security reasons, such requests must be made in writing and proof of identity will be required. This is necessary to ensure that personal information is provided only to the correct person and that the privacy of others is not compromised.
3. CatholicCare will generally provide a summary of the information held and will provide access for you to view your personal information, including case notes and any additional information.
4. We will take all reasonable steps to provide access, or the information requested, within 14 days of a request being made. In situations where the request is complicated or requires access to a large volume of information, we will take all reasonable steps to provide access within 30 days.
5. If you are able to establish that personal information CatholicCare holds about you is not accurate, complete or up to date, we will take reasonable steps to correct our records.

Access will be denied if:

- the request does not relate to your personal information;
- providing access would pose a serious threat to the life, health or safety of a person or to public health or public safety;
- providing access would create an unreasonable impact on the privacy of others;
- the request is frivolous and vexatious;
- the request relates to existing or anticipated legal proceedings;
- access would be unlawful;
- we're required or authorised by law;
- access would prejudice law enforcement activities;
- access discloses a 'commercially sensitive' decision making process or information; or
- any other reason that is provided for in the APPs or in the Privacy Act

Destruction/deletion of personal information

CatholicCare destroys personal information in a secure manner or takes steps to de-identify personal information it holds when it is no longer needed and when it is lawfully authorised or required to do so.

The destruction of personal information held by CatholicCare follows the minimum period outlined in the table below:

Client	Retention Period
Adult over 18 years of age	7 years since the last contact with the client
Young person under 18 years of age	until the client is 25 years of age

As legislation is often changed, it is necessary that we remain current regarding client record retention requirements.

Virtual Meetings

Workplace Meetings and Information

Workplace meetings discuss 'information' and from time-to-time that may be information referred to as 'confidential information' - which may fit the definition of 'personal information' or 'sensitive information' as set out in the *Privacy Act 1988* (Cth).

CatholicCare will take all reasonable steps to protect personal information from disclosure during virtual meetings, including ensuring that those participating in the meetings are:

- in a 'physical' place that ensures that the information that is being discussed is secure; and
- aware who is also present in the meeting.

CatholicCare staff facilitating the meetings will take a quick 'security of information' check at the beginning of each Virtual Meeting and make a meeting minute taken to prove that reasonable steps were taken to protect disclosure of personal or sensitive information under the Act and 'confidential information'.

Notifiable Data Breaches (NDB)

What is a Notifiable Data Breach?

A Notifiable Data Breach occurs when Personal Information of an individual held by CatholicCare is accessed by, or is disclosed to, an unauthorised person, or is lost, and:

- a) a reasonable person would conclude that the unauthorised access or disclosure would likely result in serious harm to the relevant individual; or
- b) in the case of loss (i.e. having a laptop stolen), unauthorised access or disclosure of Personal Information is likely to occur, and a reasonable person would conclude that the unauthorised access or disclosure would likely result in serious harm to the relevant individual.

Assessment

If we suspect that a Notifiable Data Breach has occurred, we will follow the *Notifiable Data Breach Procedure*, and conduct a reasonable and expeditious assessment to determine if there are reasonable grounds to believe that a Notifiable Data Breach has occurred.

CatholicCare will take all reasonable steps to ensure that the assessment is completed within 30 days of becoming aware of the suspected Notifiable Data Breach.

Notification

Subject to any restriction under the Act, in the event a Notifiable Data Breach occurs, we will, as soon as practicable, prepare a statement outlining details of the breach, and:

- a) notify you (the individual) of the unauthorised access, disclosure or breach; and
- b) notify the Office of the Australian Information Commissioner of the unauthorised access, disclosure or breach.

Complaints Procedure

If CatholicCare holds personal and sensitive information about a person and CatholicCare denies the person access to this information, that person has a right to make a complaint and have it investigated and dealt with under our *Complaints Policy*.

How to contact us

Individuals can obtain further information in relation to this privacy policy, or provide any comments, by contacting The Privacy Officer on:

P: 1300 477 433

Mail : CatholicCare, PO Box 1733, TOOWOOMBA QLD 4350

Email: hello@CatholicCare.services

Additional Information

The website may from time to time contain links to other websites. CatholicCare emphasises that when an online user accesses a website that is not the CatholicCare website, it may have a different privacy policy. To verify how that website collects and uses information, the user should check that particular website's policy.

Glossary of terms

Data breach means when personal information held by an entity is lost or subjected to unauthorised access, use, interference, modification, disclosure, or other misuse.

Eligible data breach is a data breach that is likely to result in serious harm to any of the individuals to whom the information relates. Further information about eligible data breaches can be found in the OAIC's [Data Breach Preparation and Response](#).

Information security means all measures used to protect any information generated by an entity or individual that is not intended to be made publicly available from compromise, loss of integrity or unavailability.

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- 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.'

Personal information security means keeping personal information secure from misuse, interference and loss, as well as unauthorised access, modification or disclosure.

PIA means privacy impact assessment and is discussed in the OAIC's [Guide to Undertaking Privacy Impact Assessments](#).

Privacy Act means the *Privacy Act 1988* (Cth).

Privacy Officer - The Privacy Officer is authorised to:

- a. undertake a privacy review of existing systems to ascertain the way in which the organisation uses personal information
- b. direct and implement a privacy strategy
- c. establish systems to ensure compliance with the new legislation
- d. maintain the privacy compliance system.

Sensitive information has the meaning as set out in s 6(1) of the Privacy Act and includes information or an opinion about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, sexual orientation, criminal record, health information and some aspects of genetic and biometric information.