

Indigo Junction is committed to protecting your privacy and personal information. Indigo Junction will have clear and transparent policies and practices related to your privacy, our records management and our information technology systems. Indigo Junction will comply with all relevant Australian Privacy Laws and Regulations

All Indigo Junction Policies are to be read in conjunction with the organisations overarching policy commitment statement and the Specialist Homelessness Services (SHS) service standards

The term "Personal Information" in this privacy policy means any information from which your identity is apparent or can be reasonably ascertained.

1.0 PURPOSE

This Privacy Policy outlines how Indigo Junction collects, stores, uses, discloses and otherwise handles personal information. It also seeks to explain how you can ask to access and correct the personal information we hold about you or complain about any suspected privacy breach.

This policy applies to all clients, staff, volunteers, contractors, donors and students of Indigo Junction.

2.0 THE PRIVACY ACT 1988 (PRIVACY ACT)

Indigo Junction is bound by and complies with the Privacy Act and the 13 Australian Privacy Principles (APP's) which regulate how we collect, store, use and disclose your personal information, and how you can access and correct personal information we hold about you.

For more information about the Privacy Act or your rights, please visit the website of the Office of the Australian Information Commissioner: <https://www.oaic.gov.au/>

3.0 WHY DO WE COLLECT YOUR PERSONAL INFORMATION

Indigo Junction only collects information that we need to support you and to make sure our services are safe and lawful.

We will always ask you for your consent before we collect or disclose your information.

We collect information from all our services to provide, maintain, protect, develop and improve them.

The type of information we collect will depend on the type of interaction or service that you have with us.

4.0 HOW AND WHAT INFORMATION DO WE COLLECT

Indigo Junction collects personal information through a variety of methods:

- Paper based forms;
- Face to Face meetings;
- Electronic Forms (including on-line forms);
- Telephone conversations;
- Emails;
- Faxes;
- Referral forms;
- CCTV footage; and
- Indigo Junction website and social media pages.

Depending on what service you access, if you are a staff, volunteer, contractor, donor, partner, funder, grant supplier or student we need to collect different types of information about you.

The types of information we may collect are:

- Names, addresses and contact details;
- Photographs, video recordings and audio recordings;
- Information about personal circumstances (e.g. marital status, age, gender, occupation, accommodation and relevant information about your partner, children, guardian);
- Information about financial affairs (e.g. payment details, bank account details and information about business and financial interests);
- Information about identity (e.g. date of birth, country of birth, nationality, passport details, visa details, drivers licence, birth certificates);
- Information about your employment (e.g. work history, referee comments, remuneration);
- Information about your background (e.g. education qualification, the language you speak);
- Government identifiers (e.g. Centrelink Reference Number, Tax File Number)
- Information about assistance provided to you under government funding arrangements;
- Your health (including information about your medical history and any disability or injury you may have); and
- Police checks and working with children checks for staff, volunteers and students.

5.0 KEEPING YOUR INFORMATION SECURE

Indigo Junction takes your privacy seriously. We have a records management policy and an information technology policy to ensure all paper and electronic copies of your information are stored securely and our staff are trained about the importance of privacy and confidentiality. Access to your personal information is restricted to staff who need it to provide services to you.

We will comply with the notification and other requirements of the Privacy Act where your personal information held by us has been inadvertently lost or disclosed or improperly accessed and that loss, disclosure or access may result in serious harm to you.

6.0 INFORMATION WE SHARE

We do not share your personal information with companies, organisations or individuals outside of Indigo Junction unless:

- We have your consent to do so;
- For legal reasons to meet any applicable law, regulation, legal process or enforceable governmental request;
- there is a serious and imminent threat to an individual's or other's life, health, or safety; or
- the disclosure relates to significant criminal behaviour, and is made to authorities with responsibility for dealing with such behaviour, and disclosure is not outweighed by other privacy principles.

When personal information is used or disclosed, in accordance with the above, a written note of the use or disclosure must be made in the individual's record. Any staff member involved in making this disclosure will not make the decision to do so alone, but will liaise with their line manager, on-call or other senior staff member.

7.0 ACCESS TO 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 it is incorrect. We will ensure that the request for personal information is made by the person concerned, or by another person authorised to make the request on your behalf (e.g. legal guardian).

Indigo Junction will respond within 30 calendar days of the request. If there is a delay we will contact you to explain the delay and provide an expected timeframe.

If Indigo Junction declines your request as per the Australian Privacy Principles you will be notified in writing, the reasons for the refusal and complaints mechanisms available to you.

8.0 WHAT TO DO IF YOU HAVE A PRIVACY ENQUIRY OR COMPLAINT

If you have an enquiry or a complaint concerning collection, use or management of your personal information, please direct your enquiry or complaint to the staff member who is your ordinary contact. Our staff will be provided with Indigo Junctions complaint process.

We will aim to respond to and resolve your enquiry or complaint in a timely and appropriate manner.

We will treat your enquiry or complaint confidentially. You may contact the **Australian Information Commissioner** wherever you believe that your rights to privacy have been breached by us.

9.0 HOW YOU CAN PROVIDE FEEDBACK OR COMMENTS ON THIS POLICY

If you have some questions or feedback about our Privacy and Confidentiality Policy or anything you have seen or read at Indigo Junction, please contact admin@indigojunction.org.au or phone (08) 9274 5382.

We will endeavour to respond to your feedback as soon as possible.

Associated Indigo Junction policies to this policy:


- Funding and Charitable Status (MA5002)
- Records Management (MA5003)
- Information Technology (MA5005)
- Media, Social Media and Publications (MA5006)
- Complaints, Grievances and Disputes (HR1003)
- Client Appeals (HR1004)
- Employees, Volunteers and Others Grievances (HR1001)
- Service Delivery (SD3000)
- Service Access (SD3001)

Policy Context: this policy relates to

Applicable Standards or other external obligations	SHS Standard 6 – Privacy and Confidentiality NRSCH 4c – Governance NCH 3.5 – Confidentiality and Privacy
Applicable legislation	Privacy Act 1988 13 Australian Privacy Principles (APP's) Notifiable data breach scheme
Applicable contractual obligations	



Policy Contact Person: CEO

Approval Signature	
Date of Approval	September 2019

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