

## Privacy Policy

Spinal Cord Injuries Australia (SCIA) respects the privacy of its members, clients, volunteers, beneficiaries, donors, business partners and online users and is committed to safeguarding the personal information that is provided to us.

This policy applies to all SCIA members, clients, volunteers, beneficiaries, donors, business partners and online users.

### Our obligations under the Privacy Act

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

### Definitions

**Online users** refers to anyone that accesses the SCIA website: <http://scia.org.au>.

**Personal information** is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not, and whether recorded in a material form or not.

**Sensitive information** includes information or opinion (that is also personal information) about an individual's racial or ethnic origin, religious beliefs or affiliations, membership of a professional or trade association, criminal record or health information, that is also personal information.

### Overview of SCIA's Programs and Services

SCIA provides support, information and resources for people with a spinal cord injury at every stage of their life journey. SCIA's focus is to get people 'back on track' following a spinal cord injury - finding solutions to obstacles that may arise and providing information and resources to ensure people with a spinal cord injury remain actively involved in personal, social and vocational activities. SCIA's services encompass all of life, from hospital to home to workplace, and the organisation strives to develop programs to educate and support the SCI community. In carrying out this mission SCIA engages volunteers and employees and receives donations, funding and support from members of the community, corporations, groups and governments. In addition to the services which we provide from funds donated by the public and corporations, SCIA also holds contracts to deliver State and Commonwealth government programs. In providing such services, we comply with the relevant state or national privacy principles and any additional obligations under the contract.

### Confidentiality practices of SCIA

Any sensitive information obtained from an individual will be regarded as confidential and will not be used for any purpose other than that for which it has been given. Employees of SCIA understand

their obligations for privacy and confidentiality and have signed a Staff Code of Conduct which states the confidentiality obligations under their employment contract with SCIA.

### **Who does SCIA collect personal and sensitive information from?**

SCIA collects personal and sensitive information from members, clients, volunteers and beneficiaries and personal information only from donors, business partners and online users. The nature and extent of personal and sensitive information collected varies depending on the recipient and the particular interaction with SCIA.

### **What are the types of information SCIA collects and holds?**

SCIA will collect and hold information for the purposes of delivering our services in an efficient and timely manner. This information may include:

- Contact details (such as name, address, email, phone numbers)
- Date of birth, gender, income
- Family background, supports clients may have in the community
- Health information and/or medical history
- Areas of interest
- Information on personal issues and experiences
- Criminal information
- Religious beliefs or affiliations
- Membership of professional or trade associations
- Financial information which may include credit card numbers or bank account details
- Complaint details
- If business partner - the type of support (eg workplace giving, goods in kind, program support, volunteering), the contact's person name, name of the organisation which employs the person and contact details, Australian Business Number (ABN)
- If volunteer or prospective employee – emergency contact person/s details, country of birth, citizenship or residency details, details of current/previous employment, skills and experience, languages spoken and written, qualifications, references, police checks
- If online users – non-personal information (eg visitor navigation and statistics, server address, browser type, date and time of visit). This information is collected to analyse website usage and to make improvements to the website. SCIA does not match personal information collected with non-personal information.

- *Additional information: The SCIA website may contain links to other websites, SCIA stresses that when an online user accesses a website that is not the SCIA 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.*

If we have collected personal information that you have provided to us about a third party (for example third party contact details), we rely on you to inform those individuals that their personal information is being provided to us and to direct them to this Privacy Policy.

#### **Does SCIA use Government related identifiers?**

If an individual has an identification number assigned from a government agency, SCIA will ensure that this identification is not adopted as its own identifier of the individual in the collection of personal information unless the Privacy Act allows us to do so. An example of an identification number could be a Medicare number, Centrelink reference number or Passport number. This will ensure that an identification number will not be used to jeopardise privacy by enabling personal information from different sources to be matched and linked in ways that an individual may not agree with or expect. There are exceptions to this rule, namely if SCIA needs to establish the identity of an individual and to verify that an individual is who or what they claim to be, for example, to verify their name and age and it hasn't been possible to obtain this information through other disclosures of personal information.

#### **What does SCIA do with unsolicited personal or sensitive information?**

If SCIA obtains unsolicited information that has not come from the individual or that is not contained in a Commonwealth record, we will determine whether we could have collected this information if it was solicited and if not, SCIA will as soon as practicable if it is lawful and reasonable to do so destroy the information or ensure that the information has been de-identified.

#### **How does SCIA collect and hold personal and sensitive information?**

- In application forms
- Online
- In-person interviews
- By telephone
- Communications, email flyers

Where possible, we collect your personal and sensitive information directly from you. If you feel that the information that 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. In some situations we may obtain personal information about you from a third party source. If we collect information about you in this way, we will take 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 or social worker.

We typically hold the personal and sensitive information we collect on electronic databases and retain hard copy records.

### **How does SCIA gain your consent?**

The collection of sensitive information typically requires consent from you (although there are some exceptions in the Privacy Act). Consent can mean 'express consent' or 'implied consent'. There are four elements of consent to consider including:

1. It must be provided voluntarily. The individual must have a genuine opportunity to provide or withhold their consent;
2. The individual must be adequately informed of what they are consenting to – that is, the individual will be made aware of the implications of providing or withholding consent, for example whether the individual is able to access a service;
3. It must be current and specific. We will seek consent at the time that we collect, use or disclose sensitive information;
4. The individual must have the capacity to understand and communicate their consent. That is, the individual must be capable of understanding the issues relating to the decision to consent.

SCIA will not use or disclose sensitive information beyond the consent provided by you, unless your further consent is obtained or we are permitted to do so under the Privacy Act or in compliance with another law. If SCIA uses your health information for research or statistical purposes, it will be de-identified if practicable to do so.

### **How does SCIA hold, use and disclose personal and sensitive information collected?**

SCIA will only hold, use and disclose personal and sensitive information for the purposes for which it has been given to us, or for purposes which are related to one of our functions or activities.

Specifically, SCIA will use personal and sensitive information to:

- Provide SCIA services
- Provide clients or beneficiaries with the most appropriate services for their needs
- Meet any requirements for government funding for programs
- Monitor and evaluate existing services and plan for future services
- Comply with legal obligations

SCIA will only hold, use and disclose personal information for the purpose of:

- Processing donations and provide accurate receipts
- Facilitating on-going fundraising and marketing activities
- Providing transparency relating to donated funds

#### **Does SCIA disclose personal or sensitive information to a third party?**

We may disclose your personal or sensitive information to a third party including:

- Government departments/agencies who provide funding for SCIA services
- Doctors and health care professionals, who assist us to deliver our services
- Other regulatory bodies
- Our professional advisors, including our accountants, auditors and lawyers, and
- Referees and former employers of SCIA employees and volunteers, and candidates for SCIA employee and volunteer positions
- Organisations to whom we outsource services such as mailing houses

We may also disclose your personal information to overseas recipients.

#### **Can an individual be anonymous or use a pseudonym?**

Where practicable, users of SCIA's services do have the option if they wish, to not identify themselves or to use a pseudonym when using a service but clients should be aware that this may have an impact on the ability of SCIA to provide a service to the client.

#### **Will personal information be used for the purpose of direct marketing?**

Personal information held by SCIA will not be used for the purpose of direct marketing (undertaken by SCIA through mail or email for example) unless the individual has given consent or would reasonably expect that their personal information may be used for direct marketing. If personal information is used by SCIA for direct marketing, the individual will always be given the option to 'opt out' of receiving any correspondence.

#### **How does SCIA keep personal information secure?**

SCIA takes reasonable steps to protect the personal and sensitive information we hold against misuse, interference, loss, unauthorised access, modification and disclosure. These steps include password protection for accessing our electronic IT systems, securing paper files in locked cabinets and physical access restrictions. Only authorised personnel are permitted to access these details. When the personal information is no longer required, it will be destroyed in a secure manner, or deleted according to our Records Disposal Policy.

### **How does SCIA maintain accurate and quality personal and sensitive information?**

SCIA will endeavour to ensure that wherever possible the personal and sensitive information held on an individual is accurate, up to date, complete and relevant at the time it is to be used or disclosed.

### **How can individuals get access to and make corrections of their personal information?**

You can request access to the personal information we hold about you, or request that we change that personal information by contacting our Privacy Officer. For security reasons, you may be required to provide proof of your identity. This is to ensure that personal information is provided only to the correct individuals and that the privacy of others is not undermined. We will take all reasonable steps to provide the information requested within 14 days of your request. 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 to the information requested within 30 days.

Under the Privacy Act, we can refuse to give access in certain circumstances. If we deny access to information we will set our reasons for denying access.

### **What is the complaint process if a breach of privacy has occurred?**

If you have a complaint about SCIA's privacy practices or our handling of your personal and sensitive information please contact our Privacy Officer. This could include matters such as how your information is collected or stored, how your information is used or disclosed or how access is provided to your personal and sensitive information.

We will aim to achieve an effective resolution of your complaint within a reasonable timeframe, usually 30 days or as soon as is practicable.

Once the complaint has been made, we will try to resolve the matter in a number of ways such as:

- Asking for further information,
- Investigating the issues,
- Discussing of options for resolution,
- The complaint is substantiated: If your complaint is found to be substantiated, you will be informed and appropriate steps will be taken to resolve the complaint, address your concerns and prevent the problem from recurring,

At the conclusion of the complaint, if you are still not satisfied with the outcome you are free to take your complaint to the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).



Spinal Cord Injuries Australia

### **Changes to this Privacy Policy**

SCIA reserves the right to review, amend and/or update this policy from time to time.

### **How to Contact SCIA**

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

### **Privacy Officer**

[privacy@scia.org.au](mailto:privacy@scia.org.au)

ph: 1800 819 775 or (02) 9661 8855

Spinal Cord Injuries Australia

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