

# Privacy Policy

## Scope

This policy applies to the management and use of information relating to all Community Solutions Group (CSG) employees, directors, volunteers, clients, stakeholders, donors, business partners and online users. The *Privacy Act 1988* and this policy do not apply to acts or practices which directly relate to the employee records of CSG.

## Responsibilities

All CSG employees, directors, volunteers, clients, stakeholders, donors, business partners and online users

## Policy Statement

CSG respects the privacy of all CSG people, including employees, directors, volunteers, clients, stakeholders, donors, business partners and online users, and is committed to safeguarding personal information that is collected, stored and administered.

The purpose of this policy is to:

- a) clearly communicate how CSG collects, uses, discloses and stores personal information and how individuals may access and correct personal information held about them
- b) enhance the transparency of CSG operations, and
- c) give individuals a better and more complete understanding of the personal information that CSG holds, and the way information is managed.

## Definitions

**Authorised personnel** refers to anyone who occupies a CSG position with an inherent requirement to access personal information. This usually includes people in financial and human resource positions.

**Business partners** refers to a business that provides support to CSG via the provision of funds, time or services, including suppliers.

**Clients** refers to an organisation or individual that receives support or services from CSG either regularly, or for a short term.

**Community Solutions Group** includes all controlled organisations of Community Solutions Group Ltd.

**CSG people** refers to employees, directors and volunteers.

**CSG services** refers to the services described in the *Overview of CSG programs and services* section of this policy.

**Director** is a person, appointed by the members of the organisation/s, who takes up a position on the Board of the respective entity in accordance with its constitution.

**Donors** refers to a person/business that makes a one-off or occasional financial and/or in kind contribution to CSG.

## Privacy Policy cont.

**Online users** refers to anyone that accesses the CSG website at: [www.communitysolutions.org.au](http://www.communitysolutions.org.au) and all related sites and micro-sites.

**Personal information** as defined by the *Privacy Act 1988* 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** as defined by the *Privacy Act 1988* is information or opinion about an individual's racial or ethnic origin; political opinions; membership of a political association; religious beliefs or affiliations; philosophical beliefs; membership of a professional or trade association; membership of a trade union; sexual preferences or practices; criminal record or health information about an individual; that is also personal information.

**Stakeholder** is a person or group that has an investment, share or interest in CSG.

**The website** refers to the CSG website at: [www.communitysolutions.org.au](http://www.communitysolutions.org.au) and all related sites and micro-sites.

### Overview of CSG programs and services

CSG is a unique, not-for-profit community service organisation that brings together the resources of communities, business, government and individuals to target issues of concern and opportunity in regional communities.

The Community Solutions Group specialises in the provision of innovative services and essential community assets to individuals and regional communities which are disadvantaged and require benevolent relief.

In doing so, CSG engages employees and volunteers and receives donations, funding and support from members of the community, corporations, groups and governments.

CSG holds contracts to deliver State and Commonwealth government programs. In providing such services, CSG complies with the Australian Privacy Principles (APPs) and any additional obligations under the contract.

CSG delivers programs and services in Queensland. These programs include:

- Disability and Care Services
- Employment Services
- Youth Services
- Health and Wellbeing Services
- Social Enterprise Projects

## Privacy Policy cont.

### CSG's obligations under the Privacy Act

This privacy policy sets out how CSG complies with its obligations under the *Privacy Act 1988*. CSG 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.

### Collection of personal and sensitive information

If you would like to access any CSG service on an anonymous basis or using a pseudonym, please tell us. If this is possible and lawful, CSG will take all responsible steps to comply with your request. However, CSG may not be able to provide the services in question if they are not provided with the personal information requested.

The nature and extent of personal and sensitive information collected by CSG varies, depending on your particular interactions with CSG.

CSG collects personal and sensitive information from employees, directors, volunteers, clients, stakeholders, donors, business partners and online users. Further details about the kind of information collected from these groups and usage of such information is detailed below.

### CSG clients

Types of client information collected may include:

- 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 areas of interest
- health information and/or medical history
- credit card numbers or bank account details

Purpose for which CSG uses the information:

- to provide CSG services
- to provide clients with the most appropriate services to meet their needs
- to meet any requirements of government funding programs
- to monitor and evaluate existing services and plan for future services
- to provide Annual Reports and for research purposes that may involve contracted organisations
- to comply with legal obligations

## ***Privacy Policy cont.***

### **CSG donors**

Types of information collected may include:

- contact details (name, address, email contacts etc.)

Purpose for which CSG uses the information:

- to process donations and provide accurate receipts
- to comply with legal obligations
- to provide transparency about the management and administration of donated funds

### **CSG business partners**

Types of information collected may include:

- contact person's name, the name of the organisation which employs the person, telephone numbers, fax number, street and postal address, email address and position title
- areas of interest by category and industry
- bank details (if CSG is to receive payment or make payment for services received)
- Australian Business Number (ABN)
- type of support (i.e. program support, volunteering)

Purpose for which CSG uses the information:

- to provide CSG services
- to process donations and provide accurate receipts
- to pay for services
- to establish and manage partnerships
- to receive services from you or the organisation that employs you
- to provide information about CSG services
- to manage CSG's relationships with the business partner

### **CSG people, candidates for volunteer work and prospective employees**

Types of information collected may include:

- contact details (name, address, telephone numbers, email etc)
- personal details including personal details of emergency contact person(s)

## Privacy Policy cont.

- 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 employees and candidates for volunteer work
- Criminal History Check (in some instances – particularly for roles involving children, young people and other vulnerable groups). Individuals will be required to provide certain information for a Criminal History Check. There are different arrangements for Criminal History Checks in each state and territory of Australia. In some cases the Criminal History Check will be received directly by CSG and then stored securely or destroyed.
- health details such as WorkCover history (in some instances). In this circumstance, CSG will advise why the information is being collected and whether and to whom it will be released.

### Purpose for which CSG uses the information:

- to provide CSG services
- to process an application to become an employee or volunteer to the organisation
- to facilitate a placement in an appropriate service or position
- to assist with services whilst an individual is employed or engaged as a volunteer with CSG
- to provide feedback on performance as an employee or volunteer
- to meet legislative responsibilities to all employees and volunteers
- to obtain feedback from individuals about their experiences
- to assist CSG to review and improve its programs and services
- to keep the individual informed about CSG news, developments and opportunities
- to provide information about CSG services
- to facilitate further involvements with CSG

### Additional Information

- Information relating to unsuccessful applications for employment or volunteer work will be stored securely for reference as required to provide feedback to the applicant or, with the applicant's consent, for consideration of other opportunities with CSG. Otherwise this information will be destroyed.

## ***Privacy Policy cont.***

### **Online users**

To the extent that this Privacy Policy applies to online privacy issues, it is to be read as forming part of the terms and conditions of use for the CSG website and related sites.

Kind of information collected:

- contact details (name, address, telephone numbers, email etc)
- non-personal information (i.e. visitor navigation and statistics)
- server address, browser type, date and time of visit
- personal information

Purpose for which CSG uses the information:

- to respond to an enquiry or complaint and, if applicable, provide further information about CSG programs, services and initiatives
- to analyse website usage and make improvements to the website

CSG does not match the personal information collected with the non-personal information.

Additional Information

- The website may contain links to the websites of other organisations (i.e. external websites). CSG stresses that when an online user accesses an external website that is not the CSG website, it may have a different privacy policy. To verify how external websites collect and use information, the user should check that particular website's policy.

### **How CSG collects information**

Where possible, CSG collect your personal and sensitive information directly from you. CSG collect information through various means, including telephone and in-person interviews, appointments, forms and questionnaires. If you feel that the information that CSG is requesting, either on their forms or in their discussions with you, is not information that you wish to provide, please feel free to raise this.

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

## Privacy Policy cont.

### Health information

- As part of providing CSG services, CSG may collect health information (such as a medical history) from some clients participating in CSG programs. When collecting health information from you, CSG will obtain your consent to such collection and explain how the information will be used and disclosed.
- If health information is collected from a third party (such as your doctor), CSG will inform you that this information has been collected and will explain how this information will be used and disclosed.
- CSG will not use health information beyond the consent provided by you, unless your further consent is obtained or in accordance with one of the exceptions under the Privacy Act or in compliance with another law. If CSG uses your health information for research or statistical purposes, it will be de-identified.

### Use and disclosure of personal information

- CSG will use personal information for the purposes for which it was collected, or for purposes which are related to one of its functions or activities.
- For the purposes referred to in this Privacy Policy, CSG may also disclose your personal information to other external organisations including:
  - government departments/agencies who provide funding for CSG services
  - contractors who manage some of the services CSG offers to you. Steps are taken to ensure they comply with the Australian Privacy Principles (APPs) when they handle personal information and that they are authorised only to use personal information in order to provide the services or to perform the functions required by CSG
  - doctors and health care professionals, who assist to deliver CSG services
  - other regulatory bodies, such as WorkSafe or WorkCover
  - referees and former employers of CSG employees and volunteers, and candidates for CSG employee and volunteer positions
  - CSG professional advisors, including our accountants, auditors and lawyers

Except as set out above, CSG will not disclose an individual's personal information to a third party unless one of the following applies:

- the individual has consented to the release
- the release is required or authorised by law
- the individual would reasonably expect us to use or give that information for a purpose related to that for which it was collected (or in the case of sensitive information – directly related to the purpose for which it was collected)

## ***Privacy Policy cont.***

- it will prevent or lessen a serious threat to an individual's life, health or safety, or the public's 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 related to our functions or activities
- it is reasonably necessary for law enforcement purposes

CSG will not sell personal information to any third party.

CSG does not usually send or store personal information out of Australia without consent. If it does, or if a client requires information to be sent to another country, it will be done with the consent of the individual. If CSG is otherwise required to send information overseas, measures will be taken to protect personal information, either by ensuring that the country of destination has similar protections in relation to privacy, or that contractual arrangements are entered into with the recipient of the personal information, to safeguard privacy.

### **Security of personal and sensitive information**

CSG takes reasonable steps to protect the personal and sensitive information it holds against misuse, inference, loss, unauthorised access, modifications and disclosure. These steps include:

- password protection for accessing our electronic ICT systems
- securing paper files in locked cabinets
- only permitting authorised personnel to access your personal and sensitive information
- ensuring personal and sensitive information is destroyed in a secure manner in accordance with the *Client Records* section of the *CSG Clients and Services Principle Policy*

### **Access to and correction of personal information**

If an individual requests access to the personal information that CSG hold about them, or requests that CSG change that personal information, CSG will allow access or make the changes unless CSG consider that there is sound reason under the Privacy Act or other relevant law to withhold the information, or not make the changes.

Requests for access and/or correction should be made to the Privacy Officer (contact details for the Privacy Officer are set out below). For security reasons, the individual will be required to put the request in writing and provide proof of identity. This is necessary to ensure that personal information is provided only to the correct individuals and that the privacy of others is not undermined.

In the first instance, CSG will generally provide a summary of the information held about the individual. It will be assumed (unless told otherwise) that the request relates to *current* records. These current records will include personal information in CSG databases and paper files, and which may be used on a day to day basis.



## *Privacy Policy cont.*

CSG will provide access by allowing individuals to inspect, take notes or print outs of personal information that they hold about them. If personal information (for example, your name and address details) is duplicated across different databases, CSG will generally provide one printout of this information, rather than multiple printouts.

CSG will take all reasonable steps to provide access or the information requested within seven days of the request. In situations where the request is complicated or requires access to a large volume of information, CSG will take all reasonable steps to provide access or the information requested as soon as practicable.

CSG may charge the individual reasonable fees to reimburse the cost they incur relating to the request for access to information, including in relation to photocopying and delivery cost of information stored off site.

If an individual is able to establish that personal information CSG holds about her/him is not accurate, complete or up to date, CSG will take reasonable steps to correct its records.

Access will be denied if:

- the request does not relate to the personal information of the person making the request, except where that person is the legal guardian, or substitute decision maker of the person whose information is being requested
- providing access would pose a serious threat to the life, health or safety of a person or to the 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 related to existing or anticipated legal proceedings
- providing access would prejudice negotiations with the individual making the request
- access would be unlawful
- denial of access is authorised or required by law
- access would prejudice law enforcement activities
- access would prejudice an action in relation to suspected unlawful activity, or misconduct of a serious nature relating to the functions or activities of CSG
- access would disclose a 'commercially sensitive' decision making process or information
- there was any other reason provided for in the APP's or in the Privacy Act

If CSG denies access to information, they will set out their reasons for denying access. Where there is a dispute about your right of access to information or forms of access, this will be dealt with in accordance with the complaints procedure set out below.

## Privacy Policy cont.

### Complaints procedure

If personal or sensitive information is held by CSG, the individual has a right to make a complaint and have it investigated and dealt with under the *Client Feedback & Complaints - Dispute Resolution* procedure. A copy of this procedure can be obtained by contacting the Privacy Officer via the contact details listed below.

*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).

- CSG will keep an electronic record of the complaint and the outcome.
- In the case of anonymous complaints or those made under a pseudonym, CSG will handle the complaint as usual, but may not be able to provide feedback or other information about the outcome of the complaint.

### Changes to this Privacy Policy

CSG reserves the right to review, amend and/or update this policy.

CSG aims to comply with the APPs and other privacy requirements required to be observed under State or Commonwealth Government contracts.

If further privacy legislation and/or self-regulatory codes are introduced, or the CSG Privacy Policy is updated, CSG will summarise any substantial modifications or enhancements in this section of the Privacy Policy.

### Further information

Further information about National Privacy Law is available from the Office of the Australian Information Commissioner [www.oaic.gov.au](http://www.oaic.gov.au).

Further information about this policy can be obtained from the CSG Privacy Officer, Pat Burke at [governance@communitysolutions.org.au](mailto:governance@communitysolutions.org.au) or 07 5413 1555.