



# Privacy and Confidentiality Policy

Date: 29 April 2024

Author: Daniel Teoh

## Introduction

*Friends for Good Inc. collects and administers a range of personal information. The organisation including volunteers, employees and members of the Board of Management recognise the importance of maintaining confidentiality and are committed to protecting the privacy of any personal information which is collected, held or administered.*

## 1.1 Definitions

**Personal information** in general terms, means any information that can be used to personally identify an individual. This may include a person's name, address, telephone number, email address and profession or occupation. If the information collected personally identifies an individual, or an individual is reasonably identifiable from it, the information will be considered personal information.

**Primary purpose** (unless otherwise defined) means the provision of support and relief services or programs for people who suffer distress from loneliness.

## 1.2 Principles

Friends for Good is bound by legislation including Victorian privacy laws, which impose specific obligations when it comes to handling information.

### Privacy principles:

Friends for Good has adopted the following principles in relation to handling personal information.

We will:

- collect only information which the organisation requires for its primary function;
- ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered;
- use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- store personal information securely, protecting it from unauthorised access; and
- provide stakeholders with access to their own information, and the right to seek its correction.
- train volunteers working with vulnerable people in the community to understand the Friends for Good principles of privacy and the processes to uphold this

### Confidentiality principles:

Friends for Good has adopted the following principles in relation to handling confidential information.

- The Board of Management, staff members and volunteers shall not communicate, publish, release or disclose to any person information provided to them and/or the organisation in the course of their work that is likely to lead directly or indirectly to the identification of individuals.
- All those involved with Friends for Good will be required to sign a Confidentiality Agreement to this effect before they begin working or volunteering.
- In the event of the Board of Management deciding that a matter is confidential the members of the Board and staff shall respect the confidentiality of this information.
- Only an authorised person shall be permitted to inspect or have access to any confidential documents or other information.
- The obligation to protect such confidential matters from disclosure continues even after Board of Management or staff members have resigned from the organisation.

## **CONFIDENTIALITY & PRIVACY PROCEDURES**

### **COLLECTION**

Friends for Good will:

- only collect information that is necessary for the performance and primary function of the organisation.
- notify stakeholders about why we collect the information and how it is administered.
- notify stakeholders that this information is accessible to them.
- collect personal information from the person themselves wherever possible.
- if collecting personal information from a third party, be able to advise the person whom the information concerns, from whom their personal information has been collected.
- collect sensitive information only with the person's consent. (Sensitive information includes health information and information about religious beliefs, race, gender and others).
- determine, where unsolicited information is received, whether the personal information could have been collected in the usual way, and then if it could have,

it will be treated normally. (If it could not have been, it must be destroyed, and the person whose personal information has been destroyed will be notified about the receipt and destruction of their personal information).

## **USE AND DISCLOSURE**

Friends for Good will:

- only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose.
- for other uses, we will obtain consent from the affected person.
- in relation to a secondary purpose, use or disclose the personal information only where:
  - a secondary purpose is related to the primary purpose and the individual would reasonably have expected us to use it for those purposes; or
  - the person has consented; or
  - certain other legal reasons exist, or disclosure is required to prevent serious and imminent threat to life, health or safety.
- Only disclose personal information if required to by Law or with the express permission of the Chief Executive Officer.
- Disclosing information to supervisors or staff in the course of carrying out duties of a role at Friends for Good, for example, debriefing about calls taken on Friend Line, is not considered a breach of this policy.
- in relation to personal information which has been collected from a person, use the personal information for direct marketing, where that person would reasonably expect it to be used for this purpose, and we have provided an opt out and the opt out has not been taken up.
- in relation to personal information which has been collected other than from the person themselves, only use the personal information for direct marketing if the person whose personal information has been collected has consented (and they have not taken up the opt-out).
- state in our privacy policy whether the information is sent overseas and further will ensure that any overseas providers of services are as compliant with privacy as we are required to be.
- provide all individuals access to personal information except where it is a threat to life or health or it is authorised by law to refuse and, if a person is able to establish that the personal information is not accurate, then we must take steps to correct it. Friends for Good may allow a person to attach a statement to their information if we disagree it is inaccurate.
- where for a legal or other reason we are not required to provide a person with access to the information, consider whether a mutually agreed intermediary would allow sufficient access to meet the needs of both parties.
- make no charge for making a request for personal information, correcting the information or associating a statement regarding accuracy with the personal information.

## **STORAGE**

Friends for Good will:

- implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorised access, interference, unauthorised modification or disclosure.
- before we disclose any personal information to an overseas recipient including a provider of IT services such as servers or cloud services, establish that they are privacy compliant. Friends for Good will have systems which provide sufficient security.
- ensure that our data is up to date, accurate and complete.

## **DESTRUCTION AND DE-IDENTIFICATION**

Friends for Good will:

- destroy personal information once it is no longer required to be kept for the purpose for which it was collected, including from decommissioned laptops and mobile phones.
- change information to a pseudonym or treat it anonymously if required by the person whose information we hold and will not use any government related identifiers unless they are reasonably necessary for our functions.

## **DATA QUALITY**

Friends for Good will take reasonable steps to ensure the information we collect is accurate, complete, up to date, and relevant to the functions we perform.

## **OPENNESS**

Friends for Good will:

- ensure stakeholders are aware of our Privacy and Confidentiality Policy and its purposes.
- Make this information freely available in relevant publications and on the organisation's website.

## **ACCESS AND CORRECTION**

Friends for Good will ensure individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading or not up to date.

## **ANONYMITY**

Friends for Good will allow people from whom the personal information is being collected to not identify themselves or use a pseudonym unless it is impracticable to deal with them on this basis.

The Friend Line phone service and other related services providing support to vulnerable people in the community will remain anonymous unless otherwise advised. All data collected will be de-identified and no personally identifiable data will be recorded.

### **MAKING INFORMATION AVAILABLE TO OTHER ORGANISATIONS**

Friends for Good may release information to third parties where it is requested by the person concerned.

## **PRIVACY POLICY – FOR EXTERNAL USE**

Friends for Good recognises the importance of protecting the privacy and the rights of individuals in relation to their personal information. This Privacy Policy explains how we collect and handle your personal information. This policy may change periodically so please check back on a regular basis.

### **What personal information do we collect and hold?**

We may collect the following types of personal information:

- name;
- mailing or street address;
- email address;
- telephone number;
- age or birth date;
- profession, occupation or job title;
- details of the services you have accessed from us or which you have enquired about, together with any additional information necessary to deliver those services and to respond to your enquiries;
- any additional information relating to you that you provide to us directly through our websites or indirectly through use of our websites or online presence, through our representatives or otherwise; and
- information you provide to us through our services, research surveys or visits by our representatives from time to time.

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users use our website.

### **Personal Information you provide:**

Friends for Good will collect personal information held about an individual through our website, phone calls, meetings or other methods. You have the right to seek to

deal with us anonymously or using a pseudonym, unless it is impracticable for us to deal with you on this basis.

### **In relation to employee records:**

This Privacy Policy does not apply to Friend for Good's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the organisation and employee.

### **How will Friends for Good use the personal information you provide?**

Friends for Good will use personal information we collect from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which you have consented.

In relation to direct marketing, we will use your personal information for direct marketing where you have provided that information, and you are likely to expect direct marketing: only then you will be sent direct marketing containing an opt out. If we use your personal information obtained from elsewhere we will still send you direct marketing information where you have consented and which will also contain an opt out. We will always obtain your consent to use sensitive information as the basis for any of our direct marketing.

We may use video surveillance for security purposes and the footage will be used only by Friends for Good and by the providers of our security services for security purposes. Surveillance videos are not used by us for other purposes and the footage is not publicly available. Surveillance cameras are not located in any bathrooms or change room facilities.

### **Job applicants, staff members and contractors**

In relation to personal information of job applicants, staff members and contractors, Friends for Good's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

The purposes for which Friends for Good uses personal information of job applicants, staff members and contractors include:

- for insurance purposes;
- to satisfy the organisation's legal obligations,.

### **Volunteers**

Friends for Good also obtains personal information about volunteers who assist us in our functions or to conduct associated activities, such as to enable Friends for Good and the volunteers to work together.

### **Marketing and fundraising**

Friends for Good treats marketing and seeking donations for the future growth and development of the organisation as important.

Personal information held by Friends for Good may be disclosed to an organisation that assists in our fundraising.

### **Who might Friends for Good disclose personal information to?**

Friends for Good may disclose personal information, including sensitive information, held about an individual to:

- government departments;
- people providing services to the organisation; and
- anyone you authorise us disclose information to.

### **Sending information overseas**

Friends for Good will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

### **How does Friends for Good treat sensitive information?**

‘Sensitive information’, means “information relating to a person’s racial ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences or criminal record, that is also personal information; and health information about an individual”.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

### **Management and security of personal information**

Friends for Good staff and volunteers are required to respect the confidentiality of personal information and the privacy of individuals.

We have in place steps to protect the personal information we hold from misuse, loss, unauthorised access, modification, interference or disclosure by use of various methods including locked storage of paper records and passworded access rights to computerised records.

When you use our website, having your cookies enabled will allow us to maintain the continuity of your browsing session and remember your details when you return. We may also use web beacons, Flash local stored objects and JavaScript. If you adjust your browser settings to block, reject or delete these functions, the webpage may not



function in an optimal manner. We may also collect information about your IP address, although this may not identify you.

### **Updating personal information**

Friends for Good endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. You may seek to update your personal information held by contacting Friends for Good at any time.

### **Access to personal information**

You have the right to check what personal information we hold about you. We may require you to verify your identity and specify what information you require.

### **How long will Friends for Good keep my information?**

Friends for Good will not keep or store personal information longer than is necessary. Personal information that is no longer required will be de-identified or destroyed. In many circumstances, however it will be kept for marketing purposes, as you will have consented to that in writing with us.

### **Enquiries and privacy complaints**

If you would like further information about the way Friends for Good manages the personal information it holds, please contact us.

If you have any concerns, complaints or you think there has been a breach of privacy, then also please contact us. I

If you are not satisfied with our response to your complaint after a reasonable time, then you can refer your complaint to the Office of the Australian Information Commissioner via:

- email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)
- tel: 1300 363 992
- fax: +61 2 9284 9666.