

PRIVACY POLICY

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POLICY

Montrose respects the privacy of all stakeholders including members, employees, volunteers, clients, and donors and is committed to safeguarding the personal information that is provided to us.

PURPOSE

The purpose of this privacy policy is to:

- Clearly communicate the personal information handling practices of Montrose
- Enhance transparency of Montrose operations, and
- Explain the type of personal information that Montrose holds, and the way we handle that information.

SCOPE

This policy and procedure applies to all Montrose stakeholders.

The Information Privacy Act and the Privacy Policy does not apply to acts or practices which directly relate to employee records of Montrose' current and former employees.

REFERENCE

Information Privacy Act 2009

PROGRAMS AND SERVICES

Montrose provides therapy and respite services to children and young adults. In carrying out these services Montrose 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, Montrose also hold 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 obligation under those contracts.

OUR OBLIGATIONS UNDER THE PRIVACY ACT

This privacy policy sets out how we comply with our obligation under the *Information Privacy Act 2009*. We are bound by the Australian Privacy Principles (APP's) in the 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 services on an anonymous basis or using a pseudonym, please tell us. If this is possible and lawful, we will take all reasonable steps to comply with your request. However, we may not be able to provide the services in question if we are not provided with the personal information requested.

The nature and extend of personal and sensitive information collected by Montrose varies depending on your particular interaction with us.

Personal and sensitive information is collected from clients, donors, business partners, members and online users. Information collected from each of these groups, how and the purpose it is used for is outlined below.

Clients – examples of information collected

- Contact details (name, address, email etc.)
- Personal details including date of birth and gender
- Information on personal issues and experiences
- Family background, supports clients may have in the community
- Health information and medical history
- Credit card details or bank account details.

Clients – how the information is collected

- Application forms
- Client care plans
- Case notes

Clients – how the information is used

- To provide Montrose services
- To provide client 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 produces annual reports and for research purposes
- To comply with legal obligations

Donors – examples of information collected

- Contact details (name, address, email etc.)
- Personal details including date of birth, gender
- Areas of interest
- Donation history
- Credit card details or bank account details

Donors – how the information is collected

- Telephone
- Online registrations
- emails

Donors – how the information is used

- to provide Montrose 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 for Appeals for public donation

Business Partners – examples of information collected

- organisations name, telephone number, address
- contact person's name and contact details
- areas of interest by category and industry
- bank account details
- Australian Business Number

Business Partners – how the information is collected

- Email
- Telephone
- Correspondence

Business Partners – how the information is used

- to provide Montrose services
- to pay for services
- to receive services from you or the organisation which employs you
- to manage Montrose' relationship with the business partner
- to provide information about Montrose' services
- to update the company on Montrose appeals for public donations, programs and services

Employees and volunteers – examples of information collected

- contact details
- personal details including emergency contact details
- 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
- details of police checks/background checks
- health or injury issues which relate to tasks/activities being undertaken

Employees and volunteers – how the information is collected

- Application for employment forms
- Volunteer application forms
- Application for employment and resume
- Interview and referee checks

Employees and volunteers – how the information is used

- To process an application to become a volunteer or employee of our organisation
- To provide feedback on performance as a volunteer or employee
- To obtain feedback from individuals about their experiences
- To assist Montrose to review and improve its programs and services
- To meet legislative responsibilities to all volunteers and employees

Members – examples of information collected

- Contact details (name, address, telephone numbers, email etc.)
- Date of birth
- Areas of interest

Members – how the information is collected

- Application for membership
- Telephone

Member – how the information is used

- To provide communication updates and ensure transparency
- To process donations and provide accurate receipts
- To facilitate ongoing fundraising and marketing activities
- To provide information about Montrose
- To receive information about upcoming events and activities

Online Users – how the information is collected

- Contact details (name, address telephone numbers, email etc.)
- Credit card number
- Expiration date of credit card
- Server address, browser type, date and time of visit
- Personal information

Online Users – how the information is used

- To process donations, purchase orders, online bookings and transactions
- To analyse website usage and make improvements to the website

HOW WE COLLECT INFORMATION

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

In some situation 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 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 Act. For example, we may collect information about you from a health care professional, such as your doctor.

HEALTH INFORMATION

As part of administering Montrose' services, Montrose may collect health information. For example, Montrose collects health information (such as medical history) from some stakeholders participating in Montrose' programs. When collecting health information from you, Montrose 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, Montrose will inform you that this information has been collected and will explain how this information will be used and disclosed.

Montrose will not use health information beyond the consent provide 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.

USE AND DISCLOSURE OF PERSONAL INFORMATION

We only use personal information for the purposes for which it was given to us, or for purposes which are related to one of our functions or activities.

For the purposes referred to in this Privacy Policy we may also disclose your personal information to other external organisations including:

- Government departments/agencies who provide funding for Montrose;
- Contractors who manage some of the services we offer to you. These contractors are authorized only to use personal information in order to provide the services or to perform the functions required by Montrose;
- Doctors and health professionals, who assist us to deliver our services;
- Other regulatory bodies, such as WorkSafe;
- Referees and former employers of NFP Organisation employees and volunteers, and candidates for NFP Organisation employee and volunteer positions; and
- Our professional advisors, including our accountants, auditors and lawyers.

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

- the individual has consented;
- the individual would reasonably expect us to use or give that information for another purpose;
- it is otherwise required or authorised by law;
- 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 to establish, exercise or defend a claim at law;
- it is reasonably necessary for a confidential dispute resolution process
- it is necessary to provide a health service;
- it is necessary for the management, funding or monitoring of a health service relevant to public health or public safety;
- it is necessary for research or the compilation or analysis of statistics relevant to public health or public safety; or
- it is reasonably necessary for the enforcement of a law conducted by an enforcement body.

We do not usually send personal information out of Australia. If we are otherwise required to send information overseas we will take measures to protect your personal information. We will protect your personal information either by ensuring that the country of destination has similar protections in relation to privacy or that we enter into contractual arrangements with the recipient of your personal information that safeguards your privacy.]

SECURITY OF PERSONAL AND SENSITIVE INFORMATION

Montrose 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 system, securing paper files in locked cabinets and physical access restrictions. Only authorized personnel are permitted to access these details.

When the personal information is no longer required, it is destroyed in a secure manner, or deleted according to our organisational policies.

ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

If an individual requests access to the personal information we hold about them, or requests 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.

Requests for access and/or correction should be made to the Privacy Officer (details of which are set out below). For security reasons, you will be required to put your request in writing and provide proof of your 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, Montrose 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 which is included in Montrose databases and in paper files, and which may be used on a day to day basis.

Montrose may charge you reasonable fees to reimburse us for the cost we incur relating to your request for access to information, including in relation to photocopying and delivery cost of information stored off site. For current fees, please contact the Privacy Officer.

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

Access will be denied if:

- the request does not relate to the personal information of the person making the request;
- 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;
- 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 Montrose;
- access discloses a 'commercially sensitive' decision making process or information; or
- any other reason that is provided for in the APP's or in the Privacy Act.

If we deny access to information we will set our 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.

COMPLAINTS

If you have provided us with personal and sensitive information, or we have collected and hold your personal and sensitive information, you have a right to make a complaint and have it investigated and dealt with under this complaints procedure.

If you have a complaint about Montrose privacy practices or our handling of your personal and sensitive information please contact our Privacy Officer.

A privacy complaint relates to any concern that you may have regarding Montrose' privacy practices or our handling of your personal and sensitive information. 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.

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

- Request for further information: We may request further information from you. You should be prepared to provide us with as much information as possible, including details of any relevant dates and documentation. This will enable us to investigate the complaint and determine an appropriate solution. All details provided will be kept confidential.
- Discuss options: We will discuss options for resolution with you and if you have suggestions about how the matter might be resolved you should raise these with our Privacy Officer.
- Investigation: Where necessary, the complaint will be investigated. We will try to do so within a reasonable time frame. It may be necessary to contact others in order to proceed with the investigation. This may be necessary in order to progress your complaint.



- If your complaint involves the conduct of our employees we will raise the matter with the employee concerned and seek their comment and input in the resolution of the complaint.
- If your complaint is found to be substantiated, you will be informed of this finding. We will then take appropriate agreed steps to resolve the complaint, address your concerns and prevent the problem from recurring.
- If the complaint is not substantiated, or cannot be resolved to your satisfaction, but this Privacy Policy has been followed, Montrose may decide to refer the issue to an appropriate intermediary. For example, this may mean an appropriately qualified lawyer or an agreed third party, to act as a mediator.
- 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.

We are unable to deal with anonymous complaints. This is because we are unable to investigate and follow-up such complaints. However, in the event that an anonymous complaint is received we will note the issues raised and, where appropriate, try and investigate and resolve them appropriately.

HOW TO CONTACT US

Individuals can obtain further information in relation to this privacy policy, or provide any comments, by contacting us:

Tel: 3379 9200

Post: PO Box 3075
Darra Qld 4076

Email: hello@montrose.org.au