

St Giles Society Limited (known as the Organisation hereinafter) is committed to protecting the privacy and confidentiality of participants and their families, staff, volunteers, prospective employees, service providers, donors, sponsors, community partners and stakeholders in the way information is collected, stored and used.

This policy describes how your privacy is respected and protected in accordance with the Australian Privacy Principles and the Commonwealth [Privacy Act 1988](#). It applies to all information we collect about you through the use of our services. This includes personal information collected in person, in forms completed by you or on your behalf, by telephone, through our website, via other service providers and by other electronic communication channels (e.g., desktop, laptop, mobile phone or other consumer electronic devices) to access our services.

This policy aims to provide clarification on:

- what guides us when we collect personal information,
- what we must do before personal information is used or disclosed,
- the choices you have about giving us personal information,
- your rights to access and correct personal information,
- your rights to complain about our handling of your personal information, and
- employee's responsibility to maintain privacy and confidentiality, at all times.

When you use our website and/or utilise our services, you consent to the collection, use and disclosure of your personal information in line with this policy and any contract, agreement, or other arrangement between us.

### Collection of Personal Information

We collect information directly from you and are intentional in only collecting personal information that is necessary for effective and quality service delivery.

As part of employment with St Giles and in line with our [Code of Conduct](#), staff acknowledge and agree to maintain confidence and privacy of any confidential information that they become aware of and have access to. Staff agree not to use the confidential information for any other purpose other than for the benefit of our participants and St Giles, during or after their employment. All staff members, including board members, contractors, students and volunteers acknowledge that we may obtain injunctive relief against an individual for any breach of the Privacy and Confidentiality Policy and protocols.

Confidential information includes, but is not limited to;

- documentation or information received by staff in the performance of their duties;
- records, materials, trade secrets, financial information, and personal details; and
- information relating to our business activities that has not been made public.

Sometimes we may need to collect information about a participant from a third party, such as a parent, carer, guardian, health service provider, government or similar agency. We ensure that consent is sought and that we have authorisation to collect the information in this way, or where it is not reasonable or practical for us to collect this information directly from the participant and/or family.

We collect personal information only when it is reasonably necessary and directly related to the Organisation's functions and activities.

- Personal Information

The personal information that we collect will depend on your relationship with us and the service you have requested. It may include an individual's name and contact details, and information about the individual's age, gender, occupation, and relationship with St Giles.

We also collect information about an individual's disability, together with related information which is necessary to deliver the specific services which our participants and families' request.

- Sensitive Information

Sensitive information will be collected only when it is specifically required for operational reasons. The sensitive information that we collect may include health and medical information. We will limit the collection of sensitive information to the minimum amount required in the circumstances.

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- Government Identifier  
Sometimes we are required to collect government identifiers such as an NDIS Participant Number or Medicare Number. We do not use or disclose this information unless required by law or if you consent to disclose this information to any third party.

### Use and Disclosure of Personal Information

We use and disclose personal information for the purpose for which it was collected and will only use or disclose information for another purpose where this is permitted under the Privacy Act. We do not use or disclose personal information for another purpose unless one of the following applies:

- the individual has consented.
- the individual would reasonably expect St Giles to use or disclose the information for that other purpose and it is either related or, in the case of sensitive information, directly related to the purpose for which it was collected.
- it is required or authorised by or under an Australian law or a court order.
- it is necessary to lessen or prevent a serious threat to somebody's life, health, or safety, or to public safety.

### *Participants and Families*

If you are a participant and/or family, we may use your information to:

- Provide our services.
- Record communications with you.
- Communicate with you by phone, email, and other electronic means to distribute our publications, promotional material, host events, raise awareness about our services and respond to queries and complaints.
- Work with contractors and service providers.
- Report to government and other funding bodies on the services they fund us to provide. Reports generally cover demographic and service use information only – your personal information will not be passed on.

### *Donors*

If you are a donor to St Giles, we may use your information to:

- Process your donation and complete your tax receipt.
- Engage third party service providers to process online donations. We take reasonable steps to make sure that they protect the privacy of your personal information.
- Communicate with you by phone, email, and other electronic means to distribute our publications, promotional material, host events, raise awareness about our services and respond to queries and complaints.
- Measure how effective our fundraising activities are.

### *Employees*

If you are an employee of St Giles, we may use your information to:

- Communicate with you by phone, email and other electronic means to maintain day-to-day operational functions, including arranging and supporting all training and professional development requirements.
- Ensure compliance with all legislative requirements as part of maintaining on-going employment.
- Process payments and entitlements.

### *Potential Employees, Students and/or Volunteers*

If you are a job applicant, student, or volunteer, we may use your information to:

- Keep records of communication with you.
- Assess your suitability when you apply for a position with us.
- Communicate with you by phone, email and other electronic means to encourage, record and acknowledge your support as well as distribute our publications, promotional material and raise awareness about our services.

### *Marketing Communication / Profile and Engagement*

We may use your information to contact you with information about our products and services. You can opt out of marketing communications by contacting the Organisation on 1300-278-445. Should you

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elect not to opt out, we will work on the basis that we have your consent to receive similar information and communications in the future.

## Data Security

We endeavour to ensure that:

- personal information is reasonably protected from misuse, loss, unauthorised access, modification or inappropriate disclosure,
- electronic data is stored in a secure network and staff may only access that data which is needed to deliver quality services; and
- unless we are prevented by law, we take reasonable steps to destroy or permanently de-identify your information when no longer required.

St Giles employs a range of methods to safeguard your personal information from access, use, modification, or release that has not been authorised, and protection generally from any other form of misuse. We use firewalls and password protection on our IT systems with access by authorised staff only.

When no longer required, personal information is destroyed in a secure manner.

## Quality of Data/Personal Information

We take steps to ensure that the personal information we collect is accurate, up-to-date and complete. These steps include maintaining and updating personal information when individuals advise us that their personal information has changed.

## Access to Personal Information

You have the right to access the personal information that the Organisation has about you, and we will respond to requests for access to personal information in accordance with the Privacy Act. In general, we will provide you with access except in limited circumstances where we are required or permitted by law to refuse access.

If you would like a copy of personal information that we have about you, please send the request to us in writing so we can confirm your identity. You can do this by email; [feedback@stgiles.org.au](mailto:feedback@stgiles.org.au) or by mail. We may charge you a fee for the administrative cost of providing the information to you. This will be dependent on where the information is stored or the time it takes us to respond to your request. Access may be provided by hard copy or by allowing you to view the relevant records.

If for any reason we do not give you access to your personal information or do not give you access in the way that you requested, we will give you written reasons unless it would be unreasonable for us to do so.

## Correction of Personal Information

If you consider that your personal information held by the Organisation is inaccurate, incomplete, or out of date, you may contact us to request that we correct your information. We will verify and where applicable correct the information.

We request that you help us to keep your information up to date by letting us know promptly about any changes in your circumstances or personal information. Please contact us to ask for any corrections to be made to your information held by us.

## Complaints

You may contact us at any time if they have any questions or concerns about this policy or about the way in which their personal information has been handled.

We will aim respond to the complaint within one week. If the complaint requires more detailed consideration or investigation, we will acknowledge receipt of the complaint and endeavour to complete the investigation into the complaint promptly.

If an individual is not satisfied with our response, or the individual considers the Organisation may have breached the Australian Privacy Principles or the Privacy Act, a complaint may be made to the Office of the



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Australian Information Commissioner. The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992 or by using the contact details on the website [www.oaic.gov.au](http://www.oaic.gov.au).

For more information about the way we handle complaints, refer to our [Complaints Management and Resolution Policy](#).

### Contact Us

To request access to or correction of personal information, or to make a privacy complaint, please do not hesitate to contact us;

St Giles Society Limited  
Post Office 416, Launceston TAS 7250  
Phone: 1300 278 445  
Email: [feedback@stgiles.org.au](mailto:feedback@stgiles.org.au)

Version:	Purpose:	Amended By:	Authorised By:	Date issued:
Five	Policy reviewed. Content updated.	Risk & Compliance Manager	Chief Financial Officer	24-Nov-2021