



# Privacy

## 1. Background and Purpose

The Brotherhood of St. Laurence (BSL) complies with the Australian Privacy Principles (APPs) and Health Privacy Principles.

We are committed to protecting the privacy of our clients, supporters, employees, volunteers, contractors and others who engage with us.

By providing us with your personal information, you are consenting to the collection, use, disclosure (if required), and storage of that information for the purpose it was collected, as explained in this policy.

## 2. Objectives

To inform you about your privacy rights.

To explain how BSL collects and uses personal information.

## 3. About Your Information

### Why we collect information

We collect information to help us engage with you. For example, to process your donation and provide a receipt, to provide you with a service, or to process an application.

- BSL only uses personal information for the purpose it was collected, related secondary purposes, or as authorised by law.
- BSL informs individuals about the purposes for data collection.

### What information we collect

Information collected varies based on the situation but may include personal contact details, identification documents or information about your requirements and circumstances which are relevant to the services we provide.

From time to time, we may also collect sensitive information (such as information regarding your gender, sexual orientation or ethnic origin) and/or health information (such as information regarding a person's disability or mental health condition) about you when we have your consent or when we are required or authorised by law to collect such information.

At all times, it is your choice how much information you would like to provide. However, if you do not provide any or all of the information requested, BSL may be unable to provide services to you or otherwise deal adequately with any requests you have.

## **In the provision of service delivery**

We may collect personal information directly from you or in some cases from third parties including your representatives and carers, other not-for-profit organisations, government agencies, information service providers or from public sources.

If we collect sensitive information about you, such as information about health, religion, ethnic origin or criminal record, we will do so only where you consent, provide the information to us voluntarily or where we are otherwise authorised by law. In our health services areas, such as aged services, the collection of sensitive information takes place so that our clients' needs are properly understood.

## **When a financial donation is made**

When a financial donation is made, we may collect credit card numbers and/or bank account details along with contact information (name, address, email address and telephone numbers). We collect this data to process donations and provide receipts. We also use the information to keep our supporters informed about our work.

## **Through recruitment**

If you apply for a role with us, with your consent we may also collect information about your name, address, contact telephone number, employment history, qualifications, experience, email address and screening check results (including health, references, background, directorships, financial probity, identity, eligibility to work, vocational suitability and such sensitive information as your criminal record).

## **On appointment to a role**

If you then accept a role with us, we may also collect information about your current or former employment or engagement including information about your training, disciplining, resignation, termination, terms and conditions, staff benefits, emergency contact details, performance, conduct, use of our IT and communications resources, payroll matters, union or professional/trade association membership, recreation, drug/alcohol tests, leave and taxation, banking or superannuation affairs.

We are required and/or authorised to collect your personal information under various laws including the Fair Work Act, Superannuation Guarantee (Administration) Act and Income Tax Assessment Act.

## **Referee**

If you are a referee of a candidate being considered for employment by BSL, BSL may collect and hold information including your name, contact details, current employment information and professional opinion of the candidate.

## **Sensitive Information**

BSL will only collect sensitive information where you consent to the collection of the information and the information is reasonably necessary for one or more of BSL's functions or activities. Sensitive information includes, but is not limited to, information or an opinion about racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs, membership of a trade union, sexual preferences, criminal record, or health information.

## **Marketing**

BSL may use personal information to provide promotional materials and marketing communications. You can opt out of these communications.

## **How we collect information:**

We may collect information about you in a number of circumstances, including when you:

- complete a form (either physical or online)
- apply to receive our assistance or services
- interact with us directly
- provide feedback or request information from us
- apply for and/or accept a job or volunteer role
- make a donation
- join a mailing or contact list

We may also collect information when we:

- process transactions and administer your accounts
- address your queries and resolve any complaints
- send information updates
- review our quality improvement processes
- comply with any contractual obligations owed to funding agencies

With your consent, we may record conversations and communications between you and our employees. We also record details of our interactions with you, including any contact we have with you in person, by email, online or on the telephone.

Our staff may record personal information collected from you in the course of preparing notes, recommendations and decisions.

We may also receive personal information about you through publicly available sources of information.

## **Job applicants and contractors**

We collect information about applicants for employment directly from them and also:

- through background checks and police checks; and
- from referees and employment agencies

BSL relies on the information collected from job applicants about referees and assumes that the applicant has the consent of the referee to disclose his/her details to BSL.

Please note that we may retain personal information collected from unsuccessful applicants for the purpose of considering the applicant for other roles in the future.

## **Our website**

BSL does not collect personal information when you visit our website unless you provide it voluntarily.

Cookies are used for tracking website usage for statistical purposes.

If we have links to other sites, they will be bound by their own privacy policies.

## **4. Keeping your information safe**

We store and manage your personal information in accordance with the Australian Privacy Principles. We take the security of your information seriously and take all reasonable steps to ensure we have safe systems, processes, and training in place to protect your information.

When using open access (unsecured) Artificial Intelligence tools we will ensure no personal information is included in data sets or otherwise put at risk of inadvertent disclosure.

### **How we use and disclose personal information**

Personal information may be used for purposes including client support, assessing applications, processing donations, research, staff management or legal compliance.

Information is not used for unrelated purposes without consent or statutory exceptions.

### **Third party disclosure**

We may disclose personal information we collect from individuals to third parties to fulfil the purposes for which the information was collected, and any secondary purpose related to the primary purpose of collection, or otherwise as required or authorised by law.

We take reasonable steps to ensure that any third party takes steps to protect any personal information that we disclose to them and to destroy or to de-identify the information when the information is no longer required.

We may provide your personal information to your representatives, our agents or contractors, related organisations and our third-party service providers who perform tasks on our behalf, for example data processing and storage services, payment processing, banking, marketing, professional services (including legal, accounting, auditing and business consulting), research, payroll, staff benefits, training, website or technology services, and mailing services that send our letters.

If you are a client, we may sometimes disclose personal information to government agencies for purposes such as informing decisions about funding or third parties involved in your care. This may, for example, include disclosure of information to your health practitioners or allied health service providers.

In doing so, we will take into account the provisions of relevant laws such as the Aged Care Act. We may also be required by law (under the [Child Information Sharing Scheme](#), or the [Family Violence Information Sharing Scheme](#)) to share confidential information to support child wellbeing or safety.

If you have applied for a position with us, we may share your personal information with your referees, police, Centrelink, recruitment consultants, academic institutions, screening check providers, health service providers, professional and trade associations, previous employers and law enforcement agencies.

**Note:** BSL does not store any NDIS participant information within the BSL system. We abide by all NDIA requirements as one of their partners.

## How long we keep your information

We will keep your personal information for as long as you continue to engage with us and/or for as long as it is needed for the purpose for which it was collected.

- Personal information that is no longer required for the primary purpose, or required to be retained by law, will be deleted.
- If you ask us to delete your personal information, we will do so wherever possible, subject to any legal or safeguarding requirements that mean we have to keep your information.

## 5. General Information

### Dealing with us anonymously or pseudonymously

You have the right to deal with BSL anonymously or using a pseudonym, but it may limit service provision.

- In some instances, BSL may need to verify your identity, such as if you seek access to any of your personal information.

### Accessing, correcting, updating and further information

You can request access to your personal information, seek corrections, or update your communication preferences.

- NDIS participants should contact the National Disability Insurance Authority directly as BSL does not store information on NDIS participants.

To gain access to this information you should contact us (see details below) and provide the following information:

- Name of person requesting information, and if you are a guardian, name of client for whom you are requesting information
- Proof of Identity (copy of licence or other proof) and proof of authority to access information (power of attorney or similar)
- Sufficient information about the documents sought so that we are able to identify and locate
- Date range of the documents
- Reason for access (if possible).

You can also update or seek the correction of the information we have collected about you and let us know of your preferences for how we communicate with you by contacting us.

Where we decide not to make a requested correction to your personal information and you disagree, you may ask us to make a note of your requested correction within the information.

If we deny any request for access or correction, we will provide you with our reasons.

Where we grant a request to access, we may charge you a fee for accessing the personal information, as permitted by law.

## 6. Queries and Complaints

If you have any questions, concerns or complaints about this Privacy Policy or our handling of your personal information, please:

- email us at [privacy@bsl.org.au](mailto:privacy@bsl.org.au);

or use our online feedback system: <https://www.bsl.org.au/contact/feedback-and-complaints/>

If you believe BSL has breached this policy or your privacy rights, you have the right to complain. BSL will address your concerns and keep records of the resolution.

### Escalating

If your concerns are not resolved to your satisfaction, you may wish to make a submission to the Office of the Australian Information Commissioner (OAIC) at <https://www.oaic.gov.au/> or phone 1300 363 992.