

Policy

MICAH PROJECTS



Breaking Social Isolation
Building Community

Micah Projects Privacy Policy

Area: Governance, Leadership and Management

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1. Purpose

The purpose of the Privacy Policy is to ensure that Micah Projects meets its obligations under privacy laws in Queensland and Australia.

2. Scope

The policy applies to the collection, holding, use and disclosure of personal information related to the people we support or who we may support in future and their immediate family/supports, our current and prospective volunteers (including students), contractors, consultants, donors and collaborators and our prospective employees.

3. Relevant legislation

Informing legislation includes:

- *Privacy Act 1988* (Cth)
- Information Privacy Act 2009 (Queensland)
- Australian Privacy Principles (contained in schedule 1 of the *Privacy Act 1988* (Cth))

4. Policy

4.1 Information we collect

Micah Projects collects information about several groups of people, including:

- The people we support or who we may support in future and their immediate supports/families
- Our current and prospective volunteers (including students), contractors, consultants, agents, and prospective employees
- Donors and collaborators.

If you are one of the people we support or who we may support in future, or their immediate supports/families, the kinds of information we may collect and hold about you includes:

- Contact details, including your name, address and telephone number (the people we support are given the option to provide a pseudonym for identification)

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- Date of birth
- Employment history
- Educational history
- Your history of use of our services
- Government related identifiers such as your Medicare and Centrelink reference numbers;
- Information (including sensitive information) that is directly impacting on your current needs, including:
 - Previous residential address history
 - Current and previous health issues
 - Racial or ethnic origin
 - Criminal records
- Any other personal information required to provide our goods and services to you.

If you are a current or prospective volunteer (including student), contractor, consultant or agent or a prospective employee, the kinds of information we may collect and hold about you includes:

- Contact details, including your name, address and telephone number
- Date of birth
- Employment history
- Educational history
- Driving history
- Credit information
- Government related identifiers such as your tax file number and driver licence number
- Banking details
- Sensitive information, including:
 - Health information (including but not limited to drug and alcohol testing results)
 - Criminal history
 - Membership of professional or trade associations
 - Membership of trade unions



- Records of interactions with you
- Any other personal information required to engage you.

If you are a current or prospective donor or collaborator, the kind of information we may collect and hold about you includes:

- Contact details, including your name, address and telephone number
- Date of birth
- Records of interactions with you
- Any other personal information required to receive donations from you, collaborate with you or provide our goods and services to you.

If you are a user of our website, we may also collect information (that may include personal information) about how you access, use and interact with our website. This information may include:

- The location from which you have come to the site and the pages you have visited
- Technical data, which may include IP address, the types of devices you are using to access the website, device attributes, browser type, language and operating system
- Page clicks, time spent and other automatically collected meta-data.

4.2 Why we collect, hold, use and disclose information

We take reasonable steps to hold, use and disclose personal information for the primary purpose for which we collect it. The primary purpose for which we collect information varies depending on the individual that we are collecting the information from but is generally as follows:

- In the case of the people we support or who we may support in future and their immediate supports/families - to provide you with:
 - Our goods and services, which include:
 - Preventing and solving homelessness for individuals and families
 - Assisting victims of domestic and family violence
 - Supporting people with a background of institutional abuse as children



- Providing health care to disadvantaged individuals and families
- Providing hospitality industry traineeships.
- In the case of a current volunteer (including students), contractor, consultant or agent - to assist us in:
 - Providing our goods and services
 - Conducting checks to ensure you can perform the services to our standards
 - Paying you for your goods and services.
- In the case of a prospective volunteer (including students), contractor, consultant, agent or employee - to assess your suitability for engagement or employment.
- In the case of current or prospective donors and collaborators - to provide you with:
 - Convenient means for making donations
 - Details of events and other activities
 - Newsletters and marketing material
 - Offers or opportunities for collaboration.
- In the case of other persons that contact us (including users of our website) - to assist us to respond to your enquiries or complaints.

Personal information may also be collected, held, used or disclosed by us for secondary purposes that are within your reasonable expectations and that are related to the primary purpose of collection.

Disclosure of personal information only occurs if:

- We have the express consent of the information's owner to disclose the information, or consent may be reasonably inferred from the circumstances
- Disclosure of personal information is required or authorised by law
- We reasonably believe that the disclosure of the information is necessary for an enforcement related activity conducted by, or on behalf of, an enforcement body.

4.2 Disclosure of personal information outside Australia

In general, no personal information held by Micah Projects will be disclosed to any overseas recipients.



4.3 How we collect information

We generally only collect information directly from the person who owns the information. However, there are situations where we will receive referrals from other organisations with personal information about a person. In such cases we will ensure that consent is sought from the owner for this disclosure of information to occur.

Our collection of information may occur verbally either on a phone call or in person, or in physical written documents such as emails, website contact forms or other correspondence.

In some circumstances we may also receive information from third parties, such as:

- A person's representatives and advisers
- A person's current or previous employer
- Banks and financial institutions
- Government bodies (such as relevant departments and regulatory authorities, etc.)
- Our employees, contractors, agents, volunteers (including students), collaborators and donors.

4.4 How we hold information

Personal information we receive is held in either of the following formats:

- Hard copy files
- Information software systems on our servers.

Electronic data is stored on cloud computing servers owned by Microsoft Azure. The physical hardware hosting the data is located in Sydney, NSW. Security backup copies of all our data are held in Melbourne, Victoria.

We implement and maintain processes and security measures to protect personal information we hold from misuse, interference or loss, and from unauthorised access, modification or disclosure.

Some of these processes and systems include:

- using security cards, keys or access codes to access areas that contain personal information;
- using secure servers to store personal information;
- using unique usernames, passwords and other protections on



systems that can access personal information;

- arranging for our employees to complete training about information security;
- holding certain sensitive documents securely; and
- monitoring and reviewing our policies.

4.5 Access to and correction of information

Any individual whose personal information we hold can ask to access that information or ask for it to be corrected. If required, copies of information will be provided to the owner of that information in a format that is suitable to the owner e.g. electronic format or hard copy format. Our process for providing this information is contained in the Access or Correction of Personal Information Procedure.

To request access to or correction of personal information, contact the Privacy Officer Justin Welfare on 07 3029 7000 or email privacy@micahprojects.org.au.

4.6 Complaints

If an individual holds the opinion that Micah Projects has breached any of the Australian Privacy Principles or this policy and any of its procedures, they can register a complaint with the Privacy Officer. The complaint will be handled in accordance with our Feedback, Complaints and Appeals Policy and Procedure.

To make a complaint, contact the Privacy Officer on 07 3029 7000 or email privacy@micahprojects.org.au. If the privacy issue cannot be resolved, you may take your complaint to the Office of the Australian Information Commissioner.

4.7 Policy review

We may update, modify, or remove this policy at any time without prior notice.

This Privacy Policy is effective 26/10/2021

5. Procedures that implement this policy

This policy is implemented by following these procedures:

- Access or Correction of Personal Information Procedure
- Consent Procedure

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- Information Sharing Procedure
- Privacy and Confidentiality Procedure
- Responding to Subpoenas Procedure.

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