

What is the Purpose?

A person has the right to have their personal information and privacy kept secure. Northcott must have practices and systems in place to ensure this occurs within every area of Northcott's business.

Who needs to know about this Policy?

- Northcott Staff
- Northcott customers
- Contractors
- Donors
- Volunteers and Students
- Supporters

What is Northcott's Policy?

- ✓ We value your privacy and take reasonable steps to protect personal information received from customers, families, volunteers, prospective employees, service providers, sponsors and community partners.
- ✓ We are bound by the Privacy Act 1988 and Australian Privacy Principles as well as other related laws protecting privacy, including State and Territory health information legislation.
- ✓ When you give your personal information to us, you consent to our collection, use and disclosure of your personal information in line with this Privacy Policy and any contract agreement or other arrangement between us (if any).
- ✓ We take reasonable steps to make sure that the personal information we collect, use or disclose is accurate, complete, up-to-date and relevant to what we do.
- ✓ We only collect personal information from you that is necessary for us to do our jobs.
- ✓ Photographs/ audio/ video may be taken of you and we will seek your consent if these are to be used.
- ✓ We complete billing and administration activities including measuring and assessing the level of support you receive.
- ✓ You may choose to have your name and address removed from our database by [contacting us](#).
- ✓ We run events, promote and look for support for our events and other activities by sending marketing materials. You can ask us to stop sending you promotional and marketing material by [contacting us](#).

Subject Matter Expert: Information Privacy Officer		Version 0.3
Issue Date: 15 March 2019	Next Review Date: 15 March 2022	Page 1 of 9

- ✓ We collect your personal information for our general business operations if you are contracted to or are employed by our:
 - suppliers (including service and content providers)
 - contractors
 - agents

What Information do we Collect?

Your Personal Information

- The personal information that we collect will depend on your relationship with us and the service you have requested. It may include:
 - your name, addresses, email address, phone number, date of birth, gender, identification details
 - payment information in connection with a service or donation
 - needs and circumstances (such as living or financial circumstances)
 - Internet Provider (IP) address or domain when using our website
 - if you use social media to interact with us, any information that you allow the social media site to share with us
 - your donation history
 - your working history

Your Sensitive Information

- Sensitive information will only be collected if it is specifically required for operational reasons.
- The sensitive information that we collect may include:
 - racial or ethnic origin
 - political opinions
 - religious or philosophical beliefs or affiliations
 - details of health, disability or criminal record
 - membership of a professional or trade association
 - membership of a trade union
 - sexual orientation
- There are some exceptions which include:
 - we need to collect it by law
 - when the information is necessary for a legal claim

Subject Matter Expert: Information Privacy Officer		Version: 0.3
Issue Date: 15 March 2019	Next Review Date 15 March 2022	Page 2 of 9

Anonymity and Pseudonym

- Whenever it is lawful and possible, supporters and donors have the option of being anonymous or using a pseudonym when dealing with us.
- If you are receiving a service from us, you can not be anonymous or use a pseudonym because we need your personal information to provide you the service.

Government Identifier

- Sometimes we are required to collect government identifiers such as your tax file number, Medicare number or Pension card number.
- We do not use or disclose this information unless we need to by law or you have consented to disclose this information to any third party.

How do we collect your Personal Information?

- We generally collect information directly from you.
- Sometimes we may need to collect information about a customer from a third party, such as a parent, carer, guardian, other responsible person health service provider, government or similar agency or the customer's educational institution or workplace.
- We do this if the customer has consented for us to collect the information in this way or where it is not reasonable or practical for us to collect this information directly from the customer.

How do we Use and Disclose your Personal Information?

Customers

- Provide our services.
- Record communication 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.
- Provide and improve services to our customers and their family members by:
 - Assessing, providing and finding services, information, advice and assistance. This includes supporting responsible persons' and others including third party service providers in your care and treatment.

Subject Matter Expert: Information Privacy Officer		Version: 0.3
Issue Date: 15 March 2019	Next Review Date: 15 March 2022	Page 3 of 9

- Assessing what third party services including medical services, allied health, therapeutic or support services, may be needed or available to you.
- Applying for and managing support from third parties including government and other sources. This support can be financial, administrative, social, medical or most other supports you need.
- Sharing information with service providers we deal with or people in your life who provide care or support of any kind.
- Asking you if you are satisfied with our services.
- Work with contractors and service providers.
- We need to report to the government and other funding bodies on the services they fund us to provide. Reports cover demographic and service use information only – your personal information will not be passed on.

Donors

- 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.

People (Volunteers, students and delegates); Candidates for Volunteer Work and Prospective Employees

- Keep records of communication with you.
- 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, host events, raise awareness about our services and respond to queries and complaints.
- Measure how effective our fundraising activities are.
- When you apply for a position with us in order for us to assess your suitability for that or other positions.

Marketing Communication

- Contact you at a future date with information about our products and services.
- You can opt out of marketing communications by [contacting us](#).

Subject Matter Expert: Information Privacy Officer		Version: 0.3
Issue Date: 15 March 2019	Next Review Date: 15 March 2022	Page 4 of 9

Online Users

- We collect anonymous data and use it to look at trends, run the websites, fix problems on sites' servers, track user's movement and gather broad demographic information for aggregate use and to help improve the quality of the web pages.
- None of this data can reasonably be used to identify you.
- Our website uses cookies for site administration purposes. If you do not wish to take advantage of cookies, you can change your browser settings to not accept them. This may inactivate some of the features of our website.
- Our website may also identify and use your IP address or domain name for Internet traffic monitoring and capacity purposes or to run the website. No personal information is collected. The pattern of what you do on our website may be tracked so we can improve the service and content based on aggregate or statistical review of these patterns.

Disclosure of information to overseas recipients

- It is rare that we disclose personal information to a recipient outside of Australia. In the event that this does occur, it will only be done when we have got your consent and the recipient is subject to laws or binding schemes which are substantially similar to the Australian Privacy Principles.

How can your Personal Information be Used and Disclosed without your Consent?

- We do not use or share your personal information with anyone without your written permission, unless we have concerns for your safety or we are required to by law.

How Secure is your Personal Information?

- The security of your personal information is a priority and we have a number of physical and electronic measures which protect it. We make sure 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 do their job.
 - When the personal information is no longer needed for the reason that we obtained it for, we take reasonable steps to destroy or permanently de-identify your information.
- We remind you that the Internet is not a secure environment. Although all care is taken, we cannot guarantee the security of information you provide to us through electronic means.

Subject Matter Expert: Information Privacy Officer		Version: 0.3
Issue Date: 15 March 2019	Next Review Date: 15 March 2022	Page 5 of 9

How do you Access your Personal Information?

- Generally, you have the right to access the personal information we have about you.
- We handle requests for access to personal information in line with the Privacy Act.
- The Privacy Act will tell you the exceptions where we are not required to provide you with access to your information.
- 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, mail or fax. The details are in the [contacting us](#) section.
- We respond within 30 days after we receive your request.
- 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 you request.
- 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 the reasons why we cannot give you access in writing unless it would be unreasonable for us to do so.

How do you Correct your Personal Information?

- If you believe your personal information held by us is inaccurate, incomplete or out of date, you may contact us to request we correct your information.
- In most cases, we will amend any inaccurate, incomplete or out of date information.
- Sometimes we are not able to correct your personal information in the way you have requested. For example, if we need to keep a record of what we knew or understood to be correct about your personal information at a particular time. If this is the case, we:
 1. Let you know our reasons for refusing your request unless it would be unreasonable for us to do so.
 2. Let you know how you may make a complaint about our decision, if you wish to do so
 3. Take reasonable steps to note on our record of your personal information that you have said your information is inaccurate, incomplete or out of date.

How do you make a Complaint?

- If you have a complaint about how we have handled your personal information, you can make a complaint by [contacting us](#).
- Once we have received your complaint, we will investigate and respond to you within a reasonable period of time.

Subject Matter Expert: Information Privacy Officer		Version: 0.3
Issue Date: 15 March 2019	Next Review Date: 15 March 2022	Page 6 of 9

- We take any privacy complaint seriously and will deal with your complaint fairly and promptly.
- If you are not satisfied with our response or how we handled your complaint, you may complain to the Office of the Australian Information Commissioner through <http://www.privacy.gov.au> or <http://www.oaic.gov.au/>.

How do you Contact Us?

- You can contact us to:
 - access your personal information that we have about you
 - make a complaint about the way we have collected, used, held or disclosed your personal information
 - Ask us to remove your personal information from our database
 - Ask us to stop contacting you with promotional material or marketing material. For example our newsletter.
- Our contact details are:

Email: privacy@northcott.com.au

Phone: 1800 818 286

Fax: (02) 9683 2827

Mail: PO Box 4055, Parramatta NSW 2124

What other Northcott documents are related?

You may need to refer to these documents for more information:

[Northcott Rights Policy](#)

[National Disability Service Standards](#)

[Privacy Act 1988](#)

[Australian Privacy Principles](#)

Who is Responsible?	What are they Responsible for?
Chief Executive Officer	<ul style="list-style-type: none"> • Final review and approval of this policy.
Privacy Officer	<ul style="list-style-type: none"> • Maintain this policy, its related procedures and documents.
Level 3 and 4 Manager	<ul style="list-style-type: none"> • Ensure the policy is effectively implemented in their

Subject Matter Expert: Information Privacy Officer		Version: 0.3
Issue Date: 15 March 2019	Next Review Date: 15 March 2022	Page 7 of 9

	<p>services.</p> <ul style="list-style-type: none"> • Ensure staff follow the policy.
Supervisor	<ul style="list-style-type: none"> • Ensure staff have read and understand the policy, and have sufficient skills, knowledge and ability to meet the requirements.
All Employees	<ul style="list-style-type: none"> • Follow the requirements of the policy.

Definitions, Legislation & Standards Compliance

Definitions:

- **Personal Information:** Information or an opinion about an identified individual, or an individual who is reasonably identifiable. Examples of personal information that we collect may include: names, addresses, email addresses and phone numbers. This personal information is obtained in many ways including interviews, correspondence, by telephone and facsimile, by email, via our website and from third parties.
- **Sensitive Information:** Information or an opinion about an individual's: racial or ethnic origin; political opinions; membership of a political association; religious beliefs or affiliations; philosophical beliefs; membership of a professional or trade association; membership of a trade union; sexual orientation or practices; criminal record; or health information.
- **Responsible person:** For an individual is
 - a parent of the individual; or
 - a child or sibling of the individual if the child or sibling is at least 18 years old; or
 - a spouse or de facto partner of the individual; or
 - a relative of the individual if the relative is at least 18 years old; and a member of the individual's household; or
 - a guardian of the individual; or
 - a person exercising an enduring power of attorney granted by the individual that is exercisable in relation to decisions about the individual's health; or
 - a person who has an intimate personal relationship with the individual; or
 - a person nominated by the individual to be contacted in case of emergency
- **Pseudonym:** A false name or alias
- For other Definitions, please refer to Northcott Policy Dictionary.

Legislation:

- This policy and procedure was developed in accordance with the National Disability Insurance Scheme (Provider Registration and Practice Standards) Rules 2018.
- For other Legislation and Standards Compliance, refer to the Rights Policy.



Authorised by:

Kerry Stubbs, Chief Executive Officer

Subject Matter Expert: Information Privacy Officer		Version: 0.3
Issue Date: 15 March 2019	Next Review Date: 15 March 2022	Page 9 of 9