

# PRIVACY POLICY

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## Policy Declaration

Prahran Place will protect and uphold the right to privacy of Prahran Place users, staff, CoM members, and representatives of agencies we deal with. Prahran Place is committed to protecting and upholding the rights of our users and staff to privacy in the way we collect, store, and use information about them, their needs, and the services we provide to them.

## Policy Description

### **Application:**

This policy requires staff and CoM members to be consistent and careful in the way they manage what is written and said about individuals and how they decide who can see or hear this information.

This policy applies to:

- all records – whether hard copy or electronic – containing personal information about individuals, and to interviews or discussions of a sensitive personal nature.
- the whole Prahran Place website and services provided, and documentation completed via the website. By accessing the Prahran Place website, you are agreeing your usage is subject to this Policy.

### **Background:**

Prahran Place will follow the guidelines of the Australian Privacy Principles (APP) as set out in the Privacy Act 1988 (Cth) (amended by the Privacy Amendment (Enhancing Privacy Protection) Act 2012).

To comply with our obligations under the APP, we have a Privacy Policy which sets out how we manage privacy in our organisation. For more information please contact the PEO for more information about the policy.

## **Objectives:**

Prahran Place will ensure:

- It meets its legal and ethical obligations as an employer and service provider in relation to protecting the privacy of Prahran Place users and organisational personnel.
- Users are provided with information about their rights regarding privacy.
- Users and organisational personnel are provided with privacy when they are being interviewed or discussing matters of a personal or sensitive nature.
- All staff, CoM members and volunteers understand what is required in meeting these obligations.

This policy conforms to the federal *Privacy Act (1988)* and the National Privacy Principles governing the collection, use and storage of personal information.

(Note: The Federal Privacy Act does not apply to organisations with an annual turnover under \$3m, but many funding contracts require funded organisations comply with the Privacy Principles).

## **Related Policies and Procedures:**

- Code of Ethics and Conduct Policy
- Child Safe Code of Conduct Policy
- Handling Child Complaints Policy
- Whistleblower Policy
- Social Media Policy
- Recruitment and Appointment of Staff Policy
- Grievance Resolution Policy
- Disciplinary and Performance Management Policy
- Performance Review Policy
- Incident Reporting and Response Policy
- First Aid Policy
- Workplace Behaviour Policy
- Child Safety and Wellbeing Policy
- Activities and Programs Policy
- Fraud Policy
- Marketing and Communications Policy

- CoM Resignation or Removal Policy
- Staff and Volunteer Exit Policy
- CoM In Camera Policy
- Worker Screening Policy
- Volunteer Policy
- Vocational Placement Policy
- Epidemic/Pandemic Policy
- Strategy, Business and Risk Management Policy

#### **Related Documents:**

- Incident Report Form
- Australian Privacy Principles Guidelines (accessed at <https://www.oaic.gov.au/privacy/australian-privacy-principles/australian-privacy-principles-guidelines>)

### **3.14.1 Privacy Procedures**

#### **Dealing with Personal Information**

In dealing with personal information, Prahran Place staff will:

- ensure privacy for Prahran Place users, staff, volunteers, and CoM members when they are being interviewed or discussing matters of a personal or sensitive nature.
- only collect and store personal information necessary for the functioning of the organisation and its activities.
- use fair and lawful ways to collect personal information.
- collect personal information only by consent from an individual.
- ensure people know what sort of personal information is held, for what purposes it is held, and how it was collected, used, disclosed, and who will have access to it.
- ensure personal information collected or disclosed is accurate, complete, and up-to-date, and will provide access to any individual to review information or correct wrong information about themselves.

- take reasonable steps to protect all personal information from misuse and loss and from unauthorised access, modification, or disclosure.
- destroy or permanently de-identify personal information no longer needed and/or after legal requirements for retaining documents have expired.

### **Responsibilities for Managing Privacy**

All staff are responsible for the management of personal information they have access to, and in the conduct of research, consultation, or advocacy work.

The PEO is responsible for content in Prahran Place publications, communications and website, and must ensure the following:

- Appropriate consent is obtained for the inclusion of any personal information about any individual including PRAHRAN PLACE personnel.
- Information being provided by other agencies or external individuals conforms to privacy principles.
- The website contains a privacy statement making it clear the conditions of any collection of personal information from the public through their visit to the website.

The PEO is responsible for safeguarding personal information relating to Prahran Place staff, CoM members, volunteers, contractors, and Prahran Place members.

### **Privacy Information for Prahran Place Users**

Prior to the initial interview, Prahran Place users will be told by staff what information is being collected, how their privacy will be protected, and their rights in relation to this information.

### **Privacy for Interviews and Personal Discussions**

To ensure privacy for Prahran Place users or staff when discussing sensitive or personal matters, the organisation will:

- conduct all Prahran Place user interviews in the specified interview rooms.
- make phone calls relating to Prahran Place users in the privacy of an office or private room.
- provide private rooms for all outreach Prahran Place user interviews.
- respect Prahran Place users' privacy when attending outreach locations.

## **Participants in Research Projects**

People being invited to participate in a research project must be:

- given a choice about the extent to which they will participate.
- given the right to withdraw at any time.
- informed about the purpose of the research project, the information to be collected, and how information they provide will be used.
- given copies of any subsequent publications.

The collection of personal information will be limited to what is required for the conduct of the project. Individual participants will not be identified.

Organisational participants in research projects will generally be identified in Prahran Place research, unless the nature of a particular project requires anonymity, or an organisation specifically requests it.

## **PRAHRAN PLACE ONLINE**

Prahran Place has a website and Prahran Place -identified spaces on blogs and social networking sites such as Instagram, Twitter, Facebook and YouTube. The Prahran Place website refers to this privacy policy and conditions-of-use statement, both of which are linked from the footer of every page on the website. Prahran Place also uses third party software (Social Planet, Mailchimp, etc) to manage some activities and endeavours at all times to ensure your personal information is secure.

The website provides online services requiring users to provide personal information. Personal details are maintained on secure servers. Sometimes Prahran Place also invites people to submit comments, photos, or stories via forms on the website. Although users are encouraged not to identify people, the stories may include some personal information. Whenever Prahran Place collects such content, individuals are informed about the purposes for which their content will be used (for example, publication on the website).

## **Cookies**

The Prahran Place website uses 'cookies'. A cookie is a small data structure sent from a web server to the internet browser and saved on your hard drive as a text file. The information is made up of a string of letters and numbers which uniquely identifies your computer and any username or password you may have already registered on the Prahran Place website. The information collected is used to

authenticate or identify whether you are registered on the Prahran Place website, without requiring you to re-enter details each time you log on to the website.

Most web browsers are set to accept cookies. If you do not wish to receive cookies, you can disable this function or delete existing cookies in your web browser, although doing so may restrict access to or use of some of the pages on the Prahran Place website.

Cookies are not used to collect and store your personal information. Cookies store information such as your server address, your top level domain name, the date and the time of your visit to a website, the pages you accessed and downloaded, the address of the last website you visited and the type of browser you are using. If you choose to personalise the Prahran Place website, the cookies will also enable the Prahran Place website to remember your preferred settings for your subsequent visits.

Prahran Place uses this information for monitoring website use to facilitate website management, development and planning.

### **Online Forms**

If you provide personal details during your visit to the Prahran Place website, then Prahran Place only use and disclose your personal information for the purpose for which it was collected. Any other type of use and disclosure will require your consent or be in accordance with prescribed exemptions under privacy laws.

For example, if you complete an online form requesting services, unless you give consent to your personal details being used for other purposes, then those details will only be used for the purpose of requesting that service, for a secondary related purpose, or for another that falls within one of the exemptions of use and disclosure in the privacy legislation.

### **Security of Transactions on the PLCL Website**

There are risks associated with transmitting information across the Internet and has implemented procedures to maximise security where transactions are undertaken on the website. In these areas, information such as your credit details are not stored on our Internet server.

### **Google Analytics**

Our website uses Google Analytics, a service which transmits website traffic data to Google servers in the United States. Google Analytics does not identify individual

users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand website traffic and webpage usage.

By using the Prahran Place website, you consent to the processing of data about you by Google in the manner described in [Google's Privacy Policy](#) and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or [use the opt-out service provided by Google](#).

### **Linking to Other Sites**

This Privacy Policy does not extend beyond the Prahran Place website. When linking to other sites you should familiarise yourself with their website privacy statements.

## **THE PRIVACY CONTACT OFFICER**

The Privacy Contact Officer is the PEO. The PEO will:

- ensure all staff are familiar with the Privacy Policy and administrative procedures for handling personal information.
- ensure Prahran Place users and other relevant individuals are provided with information about their rights regarding privacy.
- handle any queries or complaint about a privacy issue.

### **How to gain access to your personal information**

Prahran Place will provide you with access to personal information acquired or presented about you on the Prahran Place website for the purpose of verification and correction.

If you wish to enquire about the use of your personal information, contact us at:

[enquiries@prahranplace.org.au](mailto:enquiries@prahranplace.org.au)

Or

Principal Executive Officer  
Prahran Place  
40 Grattan Street, PRAHRAN 3181  
(03) 9510 7052