

1.0 OVERVIEW

- 1.1 Mambourin is committed to protecting the privacy of all personal and sensitive information of all its people including participants, members, employees, volunteers, donors, business partners and online users.
- 1.2 The purpose of this policy is to:
 - Clearly communicate the personal information handling practices of Mambourin
 - Enhance the transparency of Mambourin operations
 - Give individuals a better and more complete understanding of the sort of personal information that Mambourin holds, and the way we handle that information.

REFERENCE DOCUMENTS

Procedure – Records Control

DEFINITIONS

Personal Information – as defined in the Privacy Act 1988 (as amended) is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not, and whether recorded in a material form or not.

Sensitive Information – as defined by the Privacy Act 1988 (as amended) is information or opinion (that is also personal information) 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 preferences or practices or criminal record or health, genetic, biometric information or biometric templates, that is also personal information.

- 1.3 This privacy policy sets out how we comply with our obligations under the Privacy Act 1988 (privacy Act). We are bound by the Australian Privacy Principles (APPs) which regulate how organisations may collect, use, disclose and store personal information, and how individuals may access and correct personal information held about them.
- 1.4 The Privacy Act and this Privacy Policy do not apply to acts or practices which directly relate to employee records of Mambourin's current and former employees.
- 1.5 This Privacy Policy focuses on five essential elements:
 - Notice and disclosure – ensuring the participant is aware of what information is collected and how this information is/will be managed
 - Participant choice and consent – always obtaining the appropriate level of agreement from each participant in relation to their personal information
 - Access and correction – the participant's right to view, modify or delete information
 - Security – ensuring the integrity and protection of all participant information and data
 - Redress – ensuring a simple and easily understood pathway for requests, complaints and dispute resolution

2.0 Collection of personal information

2.1 Mambourin is required to collect personal information about each participant. This information may also include sensitive matters. All information is collected in order to :

- accurately assess the individuals needs for the provision of suitable services
- accurately tailor services to meet the specific needs of participants

3.0 Types of information collected

3.1 Mambourin will not collect any personal information unless it is necessary for service provision and/or participant support.

3.2 Information which may be collected by Mambourin may include, but is not limited to:

- individual's name, date of birth and address
- individual's disability and any supports/funding required
- any health issues/medication
- any other issues which may affect/impact on the individual's ability to participate in services provided

4.0 How personal and sensitive information is collected

4.1 Mambourin will collect personal and sensitive information only by lawful and fair means and not in any unreasonably intrusive manner.

4.2 When Mambourin collects information regarding an individual, all reasonable steps will be taken to ensure that the individual is aware of the following:

- the purposes for which the information is collected
- any organisations/individuals to whom Mambourin would usually disclose information of that kind to
- the fact that the individual has the right to access any information which is held by the organisation at any time

4.3 All Mambourin participants will be made aware of what information is required and the reasons for which it is required:

- verbally
- in writing providing information on how the privacy of the individual is protected, the nature of information required and how it will be used
- that the participant's (or that of their legal guardian) consent must be gained whenever possible
- advice will be provided regarding how the participant can access the information

5.0 Other parties/organisations with whom Mambourin may collect/discard information

5.1 Mambourin will collect personal and sensitive information directly from individuals (or those acting on their behalf) wherever possible and practicable to do so.

- 5.2 Where information pertaining to the participant is obtained from a 'third party,' reasonable steps will be taken to ensure that participants are made aware of the details.

6.0 Use and disclosure of personal and sensitive information

- 6.1 The primary purpose for the use of information shall always be to provide appropriate supports and services to the individual.
- 6.2 If Mambourin collects or discloses information for a purpose other than the main reason for which it is intended, Mambourin will ensure that:
- the use or disclosure of information is related to the primary purpose for collection, and the participant could reasonably expect that Mambourin would use or disclose the information in that way
 - the individual has provided consent to use/disclose their personal information for the secondary purpose
 - the use or disclosure is otherwise permitted under the Privacy Act

7.0 Data quality and security

- 7.1 To the extent required under the Act, Mambourin will take reasonable steps to:
- ensure that the information collected and disclosed is accurate, current and complete
 - protect personal information held from misuse, loss, unauthorised access, modification or disclosure
 - destroy or permanently de-identify information that is no longer needed for any purpose permitted under the Privacy Act

8.0 Anonymity

- 8.1 When it is lawful and practicable to do so, Mambourin will provide participants with the option of not identifying themselves in the disclosure of information.

9.0 Access to and correction of personal information

- 9.1 All individuals will be made aware of how to contact Mambourin if they wish to access, correct or amend their personal information.
- 9.2 Mambourin will provide individuals with access to their information if it is practicable to do so and will take all reasonable steps to amend any information which is incorrect.

10.0 Complaints

- 10.1 A privacy complaint relates to any concern regarding Mambourin's privacy practices or our handling of an individual's personal and sensitive information. This could include matters how such as how information is collected or stored, how information is used or disclosed, or how access to information is provided.
- 10.2 The goal of this policy is to achieve an effective complaint resolution within a reasonable timeframe, usually 30 days or as soon as practicable. However, in some cases, particularly if the matter is complex, the resolution may take longer.
- 10.3 All complaints about Mambourin's privacy practices can be reported to the General Manager – Operations.

10.4 All complaints will be lodged on Mambourin's data base, MERP.

11.0 Changes to this Privacy Policy

11.1 Mambourin reserves the right to review, amend and/or update this policy.