Family Services Australia

Privacy Policy			
Policy Name:	FSA CPI 3 Privacy Policy	Version:	2.0
Authorised By:	Managing Director	Date Reviewed:	11/2025
Authorisation Date:	07/2018	Next Review:	11/2027
Commercial in Confidence **Uncontrolled when printed**			

PURPOSE

The Board of Family Services Australia is committed to protecting the privacy of personal information which the organisation collects, hold, use and discloses.

Family Services Australia is required by law to comply with the *Privacy Act 1988* (Cth), including the Australian Privacy Principles (APP's).

Personal information is information which directly or indirectly identifies a person.

The purpose of this document is to provide a framework for how Family Services Australia handles personal information.

POLICY

Family Services Australia collects and manages a range of personal information for the purposes of providing integrated multi-disciplined community services programs. Family Services Australia is committed to protecting the privacy of personal information it collects, holds and administers.

Family Services Australia recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – protected on one hand and made accessible to them on the other. These privacy values are reflected in and supported by our core values and philosophies and also reflected in our Privacy Policy, which is compliant with the *Privacy Act 1988* (Cth), Australian Privacy Principles and Health Privacy Principles (HPPs).

Family Services Australia is bound by laws which impose specific obligations when it comes to handling information. The organisation has adopted the following principles contained as minimum standards in relation to handling personal information.

Family Services Australia will;

- Collect only information which Family Services Australia requires for its primary function;
- Ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered;
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- Store personal information securely, protecting it from unauthorised access, misuse, interference or loss from unauthorized access, modification or disclosure; and
- Provide stakeholders with access to their own information, and the right to seek its correction.

RESPONSIBILITIES

Family Services Australia's Board is responsible for developing, adopting and reviewing this policy.

Family Services Australia's Managing Director is responsible for the implementation of this policy, for monitoring changes in Privacy legislation, and for advising on the need to review or revise this policy as and when the need arises.

All Family Services Australia staff and contractors are responsible for adhering to this policy/

PROCESSES

Collection

Family Services Australia will:

- Only collect information that is reasonably necessary for Family Services Australia's functions and activities.
- Notify stakeholders about why we collect the information and how it is administered.
- Notify stakeholders that this information is accessible to them.
- Collect personal information from the person themselves wherever possible.
- If collecting personal information from a third party, be able to advise the person whom the information concerns, from whom their personal information has been collected.
- Collect Sensitive information only with the person's consent. (Sensitive information includes health information and information about religious beliefs, race, gender and others).
- Determine, where unsolicited information is received, whether the personal information could have collected it in the usual way, and then if it could have, it will be treated normally. (If it could not have been, it must be destroyed, and the person whose personal information has been destroyed will be notified about the receipt and destruction of their personal information).

Use and Disclosure

Family Services Australia will:

- Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose.
- For other uses, Family Services Australia will obtain consent from the affected person.

In relation to a secondary purpose, use or disclose the personal information only where:

- a secondary purpose is related to the primary purpose and the individual would reasonably have expected us to use it for purposes; or
- the person has consented; or
- certain other legal reasons exist, or disclosure is required to prevent serious and imminent threat to life, health or safety.

In relation to personal information which has been collected from a person, use the personal information for direct marketing, where that person would reasonably expect it to be used for this purpose, and the person has provided an opt out and the opt out has not been taken up.

In relation to personal information which has been collected other than from the person themselves, only use the personal information for direct marketing if the person whose personal information has been collected has consented (and they have not taken up the opt-out).

Provide all individuals access to personal information except where it is a threat to life or health or it is authorised by law to refuse. If a person is able to establish that the personal information is not accurate, then Family Services Australia will take steps to correct it. Family Services Australia may allow a person to attach a statement to their information if the individual disagrees it is inaccurate.

Where for a legal or other reason we are not required to provide a person with access to the information, consider whether a mutually agreed intermediary would allow sufficient access to meet the needs of both parties.

Make no charge for making a request for personal information, correcting the information or associating a statement regarding accuracy with the personal information.

Storage of Personal Information

Implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorized access, interference, unauthorized modification or disclosure.

Before Family Services Australia discloses any personal information to an overseas recipient including a provider of IT services such as servers or cloud services, establish that they are privacy compliant. Family Services will have systems which provide sufficient security.

Ensure that individuals data is up to date, accurate and complete.

Destruction and de-identification Family Services Australia

Destroy personal information once is not required to be kept for the purpose for which it was collected, including from decommissioned laptops and mobile phones.

Change information to a pseudonym or treat it anonymously if required by the person whose information Family Services Australia holds and will not use any government related identifiers unless they are reasonably necessary for our functions.

Data Quality

Family Services Australia will:

Take reasonable steps to ensure the information Family Services Australia collects is accurate, complete, up to date, and relevant to the functions we perform.

Data Security and Retention

Family Services Australia will:

Only destroy records in accordance with the Family Services Australia Records Management Policy and in alignment with Family Services Australia contractual requirements.

Openness

Family Services Australia will:

Take reasonable steps to ensure that we are open and transparent about the way personal information is managed

Ensure stakeholders are aware of Family Services Australia's Privacy Policy and its purposes.

Make this information freely available in relevant publications and on the organisation's website.

Access and Correction

Family Services Australia will:

Ensure individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading or not up to date.

Anonymity

Allow people from whom the personal information is being collected to not identify themselves or use a pseudonym unless it is impracticable to deal with them on this basis.

Making information available to other organisations

Family Services Australia can:

Release information to third parties where it is requested by the person concerned.

PRIVACY POLICY – FOR EXTERNAL USE

Privacy Policy

Your privacy is important

This statement outlines Family Services Australia's (FSA) policy on how FSA uses and manages personal information provided to or collected by it.

FSA is required by law to comply with the *Privacy Act 1988* (Cth), including the Australian Privacy Principles (APP's) and is compliant with the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

FSA may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to FSA's operations and practices and to make sure it remains appropriate to the changing legal environment.

What kind of personal information does Family Services Australia collect and how is it collected?

The type of information FSA collects and holds includes (but is not limited to) personal information, including sensitive information, about:

- Your name, address and contact details
- Information relevant to the purpose of providing services such as family and living circumstances, education qualifications, employment history, financial information, interests, feedback preferences, user names and passwords, guardianship and service feedback and complaint details
- Sensitive information about you that may include your gender, age, date of birth, health, disability, mental health, racial or ethnic origin, criminal convictions, religious affiliation, tax file numbers, and other particulars required as part of our funding obligations and/or that are relevant for the proper provision of the services that we provide
- Survey and questionnaire responses

Personal Information you provide:

- Family Services Australia will generally collect personal information held about an individual, with consent, during servicing. This includes case management meetings, phone call notations etc.
- You do have the right to seek to deal with us anonymously or using a pseudonym, but in almost every circumstance it will not be practicable for us to deal with you or provide any services to you except for the most general responses to general enquiries, unless you identify yourself.

Personal Information provided by other people:

- In some circumstances Family Services Australia may be provided with personal information about an individual from a third party, for example Government Agencies or other Community Not for Profit Agencies.

In relation to employee records:

- Under the Privacy Act the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to FSA's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between FSA and employee. However, FSA will provide access and ensure compliance with the Health Records and Information Privacy Act 2002

How will Family Services Australia use the personal information you provide?

FSA will use personal information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which you have consented.

In relation to direct marketing, FSA will use your personal information for direct marketing where you have provided that information, and you are likely to expect direct marketing: only then you will be sent direct marketing containing an opt out. If we use your personal information obtained from elsewhere we will still send you direct marketing information where you have consented, and which will also contain an opt out. We will always obtain your consent to use sensitive information as the basis for any of our direct marketing.

We may use video surveillance for security purposes and the footage will be used only by FSA and by the providers of our security services for security purposes. Surveillance videos are not used by FSA for other purposes and the footage is not publicly available. Surveillance cameras are not located in any bathrooms or change room facilities.

Job applicants, staff members and contractors:

- In relation to personal information of job applicants, staff members and contractors, FSA's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.
- The purposes for which FSA uses personal information of job applicants, staff members and contractors include:
- for insurance purposes;
- Employee Records
- For future employment opportunities
- to satisfy FSA's legal obligations,
- Where FSA receives unsolicited job applications these will usually be dealt with in accordance with the unsolicited personal information requirements of the Privacy Act.

Volunteers:

- FSA also obtains personal information about volunteers who assist FSA in its functions or conduct associated activities, such as to enable FSA and the volunteers to work together.

Marketing and fundraising:

FSA treats marketing and seeking donations for the future growth and development of FSA as important. Personal information held by FSA may be disclosed to an organisation that assists in FSA's fundraising.

Who might FSA disclose personal information to?

FSA may disclose personal information, including sensitive information, held about an individual to:

government departments;

- people providing services to FSA,
- Upon receiving a Subpoena and
- anyone you authorise FSA to disclose information to.

Sending information overseas:

- FSA will not send personal information about an individual outside Australia without:
- obtaining the consent of the individual (in some cases this consent will be implied); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.
- **We do not use overseas providers of IT services including servers and cloud services.**

How does Family Services Australia treat sensitive information?

In referring to 'sensitive information', FSA means:

"information relating to a person's racial ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences or criminal record, that is also personal information; and health information about an individual".

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

Management and security of personal information

FSA's staff are required to respect the confidentiality of personal information and the privacy of individuals.

FSA has in place steps to protect the personal information FSA holds from misuse, loss, unauthorised access, modification, interference or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.

Updating personal information

FSA endeavours to ensure that the personal information it holds is accurate, complete and up to date. A person may seek to update their personal information held by FSA by making contact at any time.

The Australian Privacy Principles and the Health Privacy Principles require FSA not to store personal information longer than necessary. In particular, the Health Privacy Principles impose certain obligations about the length of time health records must be stored.

You have the right to check what personal information FSA holds about you.

Under the Commonwealth Privacy Act and the Health Records Act, an individual has the right to obtain access to any personal information which FSA holds about them and to advise FSA of any perceived inaccuracy. There are some exceptions to this right set out in the applicable legislation. To make a request to access any information FSA holds about you, please contact the head office in writing.

FSA may require you to verify your identity and specify what information you require. Although no fee will be charged for accessing your personal information or making a correction, FSA may charge a fee to retrieve and copy any material. If the information sought is extensive, FSA will advise the likely cost in advance.

How long will Family Services Australia keep my information?

Under our destruction and de-identification policies, your personal information that is no longer required will be de-identified or destroyed. In many circumstances, however it will be kept for marketing purposes, as you will have consented to that in writing with us.

Enquiries and privacy complaints

If you have an enquiry or complaint about the way FSA manages your personal information please, in the first instance contact the staff member who is your ordinary contact.

If we don’t resolve your enquiry or complaint, contact a more senior manager and/or contact the Family Services Australia Privacy Officer – privacy@familyservices.org.au or write to:

Family Services House

PO Box 291

Shellharbour City Centre, NSW 2529

We will aim to respond and resolve your enquiry or complaint in a timely and appropriate manner. If you are not satisfied with our response to your complaint you may contact the

Office of the Australian Information Commissioner via:

enquiries@oaic.gov.au

1300 363 992