

PRIVACY AND DATA COLLECTION POLICY

Policy applies to	Volunteers and staff
Board approval date	October 2023
Date of next review	October 2025

PURPOSE:

To ensure that Lifeline Loddon Mallee explains how, what, when and why personal information is collected, held and disclosed, as well as how you can access and make corrections to the information Lifeline Loddon Mallee holds about you.

Lifeline Loddon Mallee respects the rights of individuals to privacy and is committed to ensuring personal information is managed in accordance with the Privacy Act 1988 (Cth) – ‘the Act’ and the Australian Privacy Principles (APP) of the Privacy Amendment (Enhancing Privacy Protection) Act 2012, and the Health Records Act (2001). This document sets out Lifeline Loddon Mallee’s responsibilities and individuals’ rights under the APP (Commonwealth Act).

SCOPE:

This policy applies to:

- staff
- crisis support volunteers
- retail volunteers
- clients
- service providers
- students
- contractors.

This policy applies when:

- Delivery training offsite.
- Delivery 13 11 1 4 onsite
- Working from home
- Representing LLM publicly

DEFINITIONS:

Personal information – any information that can personally identify you. This may include your name, address, telephone number, email address and profession.

POLICY:

‘Sensitive information’ will only be collected if the individual consents and the information is reasonably necessary to provide appropriate service to the individual. Examples include an individual’s race, ethnicity, political opinions, memberships, sexual preferences, religion, health (including vaccination status) and criminal records.

If the information that we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

What personal information do we collect about you?

We may collect the following types of personal information:

- Name
- Mailing, or street and residential address
- Email address
- Telephone number
- Age or birth date
- Indigenous status
- Gender and pronouns
- If you were a job applicant, volunteer or contractor, we may also collect information on your application, professional development history, life experiences and background, salary and payment information, including superannuation details and medical information (e.g., details of disabilities and/or allergies, medical certificates).

How do we collect personal information?

We collect your personal information (and including sensitive information) directly from you unless it is unreasonable or impracticable to do so.

We may collect your personal information in a variety of ways such as:

- provide you with crisis support, suicide prevention services, resilience building services or community education;
- in appointments, or interviews,
- when you complete a survey, or donate
- during conversations with one of our representatives.
- give you information or send you publications or resources;
- access and register you as a volunteer;
- access and register you as a Member; and
- engage emergency services or refer you to other service providers.
- employ you.
- you apply to become a volunteer.
- When you register and / or attend a community training program.
- When you access in person clinical services provided by Lifeline Loddon Mallee.

In some situations, personal information may be obtained from a third party (e.g. health care professional, carer, guardian or authorised representative, a referring body or government or non- government agency).

We will only collect information from third parties where:

- you have consented to such collection;
- it is legally permissible for us to do so.



Where we receive information about you from a third party, we will take reasonable steps before or at the time of collection (or as soon as practicable after collection) to let you know that we have collected your personal information and the circumstances of the collection.

We only collect information that is reasonably necessary to perform or carry out one of our functions or activities.

In some cases, we may receive unsolicited personal information about you from a third party. If we do get personal information in these circumstances, we must determine whether we could have lawfully collected the information. If we could not, we will destroy the information or de-identify it.

Use and disclosure of personal information

Lifeline Loddon Mallee will only use personal information for the purposes for which it was given to us, or for purposes which are directly related to one of our functions or activities. We will not use or disclose personal information for other purposes unless:

- the individual has consented.
- the individual would reasonably expect, or has been told, that information of that kind is usually passed to those individuals, bodies or agencies.
- it is otherwise required or authorized by law.
- on reasonable grounds it is believed that it will prevent or lessen a serious and imminent threat to somebody's life, health or safety or serious threat to public health or public safety.
- the individual has made threats to harm third parties; and
- the individual has made threats against Lifeline Loddon Mallee or, the individual repeatedly makes nuisance contact including calls or emails.

We will also disclose information to a law enforcement body (for example, the police) if we believe that it is reasonably necessary for an enforcement-related activity (for example, investigating a crime).

Information collected by Lifeline Loddon Mallee may also be used for quality assurance, research for service improvement, community promotion of Lifeline Loddon Mallee services (e.g. Lifeline Loddon Mallee may use positive feedback on our services to promote its services online or via social media) and /or fundraising purposes. However, information will always be de-identified prior to such uses.

Lifeline Loddon Mallee also uses contact details and information collected from Members or from individuals who subscribe to Lifeline Loddon Mallee mailing lists for marketing purposes or to communicate information about Lifeline Loddon Mallee's activities and events.

Integrity of personal information

Lifeline Loddon Mallee will take reasonable steps to ensure that personal information we collect is accurate, up-to-date and complete. These steps include maintaining and updating personal information when we are advised by individuals that their personal information has changed, and at other times as necessary.

Anonymity and Pseudonymity

Individuals have the option of not identifying themselves or of using a pseudonym when accessing Lifeline Loddon Mallee services. However, it may affect our ability to provide you with services or allow you to participate in our programs or events if you do not give us personal information. Exceptions apply where identification is required by Australian law.

Direct marketing

Lifeline Loddon Mallee will not use or disclose personal information for the purpose of direct marketing.

Cross-border disclosure of personal information

Lifeline Loddon Mallee will not disclose personal information about an individual to an overseas recipient. Exceptions may apply where disclosure is required or authorized by Australian law or court order or international agreement to which Australia is a party. If the organisation is required by law to provide information or if the individual consents to disclosure, Lifeline Loddon Mallee will not be held responsible for ensuring the recipient does not breach the Australian Privacy Principles (APP) regarding cross-border disclosure.

Adoption, use or disclosure of government related identifiers

We will not use Commonwealth government identifiers, such as Medicare number or your drivers' licence number, as its own identifier of individuals.

How can you access and correct your personal information?

You may request access to your personal information held by Lifeline Loddon Mallee by contacting us. The request must be in writing and addressed to the Executive Officer of Lifeline Loddon Mallee.

You may also authorise another person to access your information on your behalf if, for whatever reason, you are unable to access it yourself. This authority must be in writing and a copy must be provided to us. The authority must name the person whom you authorise to access your information. Once we have received your request and established appropriate personal identification, we will make available your information to you to inspect within a reasonable period of time (usually within 21 days).

Lifeline Loddon Mallee will ensure that any other organisation to whom the individual's personal information was previously forwarded receives notification of any change, unless it is impracticable or unlawful to do so. Should Lifeline Loddon Mallee refuse to correct personal information as requested by the individual, written reasons for refusal will be provided to the individual.

Open and transparent management of personal information

Personal information under this policy relates to all staff, volunteers, contractors, directors etc. This policy should be read in conjunction with the Lifeline Australia Privacy Policy in relation to services provided by Lifeline Australia.

Lifeline Loddon Mallee will regularly perform scheduled archiving/data cleansing processes to ensure that they are not holding any information that is not pertinent to performing business operations.

Lifeline Loddon Mallee in accordance with the law and Lifeline Australia guidelines will keep all information relating to training, assessment and accreditations for 30 years.

Personal information such as job applications, addresses etc. will only be stored for seven years.

Security of personal information

Lifeline Loddon Mallee takes steps to protect the personal information we hold against loss, unauthorized access, use, modification or disclosure, and against other misuse. These steps include:

- background checks
- password protection for using our electronic IT systems
- storing all personal data on a secure cloud platform which is password protected and only accessed by those who require access



- securing paper files in locked cabinets and destroying all hard copies when they are no longer required to be kept in a shredder
- physical access restrictions.
- use of multifactor authentication by all Lifeline staff when accessing IT systems.

Staff access to information is based on the 'need to know' principle.

RELATED DOCUMENTS:

Information Security Policy

Code of Conduct