



Privacy Policy

Last updated: 28 July 2020

1 Introduction

1.1 Who should read this Privacy Policy?

You should read this policy if you are:

- (a) an individual who is giving Shoalhaven Neighbourhood Services (**SNS, we, us, our**) your personal information in connection with the supply of services by SNS to you;
- (b) an individual whose personal information we otherwise hold or may be given access to, including by the Australian Government Department of Social Services (**DSS**);
- (c) a contractor, consultant, supplier or vendor of goods or services to SNS;
- (d) a person seeking employment with SNS or a person who was employed by SNS;
- (e) a person who volunteers with SNS or a person who has volunteered with SNS in the past.

Personal information is information in any form that can reasonably identify a living person.

While not purporting to be a statement of compliance with the *Privacy Act 1988* (Cth) or *Privacy and Personal Information Protection Act 1998* (NSW) (together, **Privacy Acts**), this document sets out how we will manage your personal information.

More information about personal information and the Privacy Acts can be found on the websites of the Office of the Australian Information Commissioner (Commonwealth) (**OAIC**) and the Information and Privacy Commission (NSW).

1.2 Information covered under this Privacy Policy

This Policy applies to all personal information collected about you by SNS, including any information you provide to SNS and personal information collected through our websites and social media platforms.

As set out in clause 3.3, the client management systems we use include an IT system called the 'Data Exchange' which is hosted by the DSS (**DSS Data Exchange**). The DSS' privacy policy also applies in relation to any information collected by DSS from you, or which we provide to DSS in connection with the DSS Data Exchange. A copy of that policy is available on the DSS website (at <https://www.dss.gov.au/privacy-policy>).

2 SNS' personal information handling practices

2.1 Collection of personal information

Personal information about you may be collected by SNS from you, your representative or a third party. We generally use forms, online portals and other electronic or paper correspondence to collect this information.

Personal information will generally be collected directly from you. There may, however, be some instances where personal information about you will be collected indirectly (including through contracted service providers or session facilitators, and from DSS) because it is unreasonable or impractical to collect personal information directly from you. We will usually notify you about these instances in advance, or where that is not possible, as soon as reasonably practicable after the information has been collected.

From time to time personal information is provided to SNS by members of the public without being requested by SNS (and we will

handle that personal information in accordance with this Privacy Policy and the Privacy Acts).

SNS collects and holds a broad range of personal information in records, including records relating to:

- (a) employment and personnel matters for SNS staff and contractors;
- (b) individuals receiving SNS services or otherwise participating in programs and sessions;
- (c) the management of audits (both internal and external);
- (d) complaints (including privacy complaints) made and feedback provided to SNS;
- (e) the provision of legal and other advice by internal and external lawyers and professional advisers.

SNS will not ask you for any personal information which we do not need.

2.2 Kinds of personal information collected and held

In performing its functions, SNS collects and holds the following kinds of personal information (which will vary depending on the context of the collection):

- (a) name, address and contact details (e.g. phone, email, residential or business address);
- (b) photographs, video recordings and audio recordings of you;
- (c) information about your personal circumstances where relevant (e.g. marital status, age, gender, occupation, accommodation and relevant information about your partner or children); and
- (d) your health information including information about any disabilities, health conditions, your treating GP and your emergency contact.

If you are a client, employee or volunteer of SNS, we may collect your sensitive personal information including your nationality, languages spoken and information about your illnesses, disabilities, medical conditions or special care needs that we need to know about in order to assist you in an emergency situation (as relevant).

Additionally, if you are an SNS employee or volunteer, we collect the following types of sensitive and other personal information from you:

- (a) tax file number, bank account details and other tax and superannuation information; and
- (b) previous and current employment related information (including employment history and professional or trade union membership) and educational qualifications.

Except as otherwise set out above or permitted by law, we only collect sensitive information about you if you consent to the collection of the information and if the information is reasonably necessary for the performance of our functions, as set out below.

3 How SNS collects and holds personal information

SNS collects personal information through a variety of different methods, including:

- (a) paper-based forms;
- (b) electronic forms (including online forms);
- (c) face to face meetings;

- (d) telephone communications;
- (e) email communications;
- (f) communications by fax;
- (g) SNS websites;
- (h) SNS social media websites and accounts; and
- (i) the DSS Data Exchange.

3.2 Purposes for which personal information is collected, held, used and disclosed

SNS collects and holds personal information for a variety of different purposes relating to its functions and activities, including:

- (a) performing its employment and personnel functions in relation to SNS staff and contractors;
- (b) performing its personnel functions in relation to volunteers;
- (c) performing its primary functions, including providing services to its clients and for client management purposes;
- (d) policy development, research and evaluation;
- (e) complaints handling;
- (f) program management;
- (g) grant and contract management;
- (h) investigations and audits;
- (i) management of correspondence with the public; and
- (j) comply with its legal obligations.

SNS uses and discloses personal information for the primary purposes for which it is collected. You will be given information about the primary purpose of collection at the time the information is collected from you or as soon as possible afterwards.

SNS will only use your personal information for secondary purposes where it is able to do so in accordance with the Privacy Acts.

3.3 Data security and integrity

We hold and store your personal information in a range of paper-based and electronic records, including the DSS Data Exchange. The security of your personal information is important to us.

SNS takes reasonable steps, including through contractual measures, to protect the personal information we hold and against loss unauthorised access, use, modification, or disclosure, including electronic and physical security measures.

SNS takes reasonable steps to ensure that the personal information it holds is accurate, up-to-date, complete, relevant, and not misleading.

3.4 How to seek access to and correction of personal information

You generally have a right to access personal information we hold about you. We will respond to your request within a reasonable period. We may charge you a reasonable fee for processing your request (but not for making the request for access).

You also generally have a right to request corrections to any personal information that SNS holds about you if you think the information is inaccurate, out-of-date, incomplete, irrelevant or misleading.

To access or seek correction of personal information we hold about you, please contact SNS using the contact details set out at section 6.2 of this Policy.

We may decline a request for access to personal information, or a correction of personal information, in circumstances prescribed by the Privacy Acts. If we do, we will give you a written notice that

sets out the reasons for the refusal (unless it would be unreasonable to provide those reasons), including details of the mechanisms available to you to make a complaint.

3.5 Our website

Generally SNS only collects personal information from its website where a person chooses to provide that information.

If you visit our website to read or download information, SNS records a range of technical information which does not reveal your identity. This information includes your IP or server address, your general locality and the date and time of your visit to the website. This information is used for statistical and development purposes.

No attempt is made to identify you through your browsing other than in exceptional circumstances, such as an investigation into the improper use of the website.

Some functionality of the SNS website is not run by SNS and third parties may capture and store your personal information outside Australia. These third parties include (but are not limited to) Facebook, YouTube, MailChimp, SurveyMonkey, Twitter and Google, and they may not be subject to the Privacy Acts at all or in the same way as SNS. SNS is not responsible for the privacy practices of these third parties and encourages you to examine each website's privacy policies and make your own decisions regarding their reliability.

The SNS website contains links to other websites. SNS is not responsible for the content and privacy practices of other websites and encourages you to examine each website's privacy policies and make your own decisions regarding the reliability of material and information found.

3.6 Cookies

The SNS website may use cookies. Cookies are used to maintain contact with a user through a website session. A cookie is a small file supplied by SNS, and stored by your web browser software on your computer when you access the SNS website. Cookies allow SNS to recognise an individual web user, as they browse the SNS website. It does not store any personal information. You may disable cookies by adjusting the settings on your web browser, but if you do this you may not be able to use the full functionality of the SNS website.

3.7 Electronic communication

There are inherent risks associated with the transmission of information over the Internet, including via email. You should be aware of this when sending personal information to us via email or via a SNS website. If this is of concern to you then you may use other methods of communication with SNS, such as post or phone (although these also have risks associated with them).

3.8 Disclosure of personal information overseas

SNS may, on occasion, disclose personal information to overseas recipients. The situations in which SNS may transfer personal information overseas include:

- (a) the provision of personal information to overseas researchers or consultants (where consent has been given for this or SNS is otherwise legally able to provide this information);
- (b) the provision of personal information to recipients using a web-based email account where data is stored on an overseas server; and
- (c) the provision of personal information to foreign governments and law enforcement agencies (in limited circumstances and where authorised by law).

It is not practicable to list every country to which SNS may provide personal information as this will vary depending on the circumstances.

However, you may contact SNS (using the contact details set out at section 6.2 of this Policy) to find out which overseas recipients, if any, your information has been given to.

4 Remaining anonymous or using a pseudonym

SNS understands that anonymity is an important element of privacy and some members of the public may wish to be anonymous when interacting with SNS. SNS also understands some members of the public may wish to use a pseudonym.

Generally, members of the public will have the right to remain anonymous or adopt a pseudonym when dealing with SNS. However, it is not always possible to remain anonymous or adopt a pseudonym in order for us to interact with you effectively, and SNS will inform you when this is the case. Examples include where we need to provide you with an email containing a link so that you can participate in online sessions.

5 Complaints

5.1 How to make a complaint

If you think SNS may have breached your privacy rights you may contact us using the contact details set out at section 6.2 of this Policy.

5.2 SNS' process for handling complaints

We will respond to your complaint or request promptly if you provide your contact details. We are committed to quick and fair resolution of any complaints and will ensure your complaint is taken seriously.

5.3 How to complain to the OAIC

You also have the option of contacting the OAIC if you wish to make a privacy complaint against SNS and if you are not satisfied with how we have handled your complaint in the first instance.

The OAIC website contains information on how to make a privacy complaint.

If you make a complaint directly to the OAIC rather than to SNS, the OAIC may recommend you try to resolve the complaint directly with SNS in the first instance.

6 Privacy Policy updates and how to contact us

6.1 Updates

This Privacy Policy will be reviewed regularly and updated as required.

6.2 Contacting us

If you wish to contact us, including to:

- (a) query how your personal information is collected, held, used or disclosed;
- (b) ask questions about this Privacy Policy;
- (c) obtain access to or seek correction of your personal information;
- (d) make a complaint about a breach of your privacy; or
- (e) access this Policy in an alternative format (such as a hard copy),

please contact us using the following contact details:

email: info@sns.org.au

telephone: 4421 5077

post: 41 Worrigee St, Nowra NSW 2541.