

SALTBUSH STANDARDS CONFIDENTIALITY AND PRIVACY



Saltbush is committed to providing quality services to our clients and this policy outlines our ongoing obligations in respect of how we manage Personal Information.

The purpose of this privacy policy is to:

- clearly communicate the personal information handling practices of Saltbush
- enhance the transparency of the organisation's operations, and
- give individuals a better and more complete understanding of the sort of personal information that the organisation holds, and the way we handle that information.

Saltbush has adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The NPPs govern the way in which we collect, use, disclose, store, secure and dispose of Personal Information.

A copy of the Australian Privacy Principles can be obtained from the website of The Office of the Australian Information Commissioner at www.aaic.gov.au

We developed our Personal Information Handling Practices and Record Management and Documentation procedures to demonstrate our commitment to fair information practices and the protection of privacy.

These procedures contain detailed information about the organisation's responsibilities, participant rights, and the information that may be collected by Saltbush and how it would be used.

Wherever possible Saltbush uses information in a de-identified form. Personal information is not be disclosed to third parties without a participant's permission, except where permitted or required under the Information Act or other Legislation.

We take steps to protect all personal, sensitive and health information and government related identifiers held by us against misuse, interference, loss, unauthorised access, modification and disclosure.

Participants can access the personal information that we hold, and can ask us to correct any errors identified in the personal information we hold.



Nicole Shackcloth
CEO, Saltbush Social Enterprises
10th February 2021

Personal Information Handling Practices

OP042 V2.0

Our obligations under the Privacy Act

This procedure sets out how we comply with our obligations under the Privacy Act. Saltbush is bound by the Australian Privacy Principles (APPs) in the Privacy Act which regulate how we collect, use and disclose personal information, and how individuals may access and correct personal information held about them.

Collection of personal and sensitive information

Saltbush collects personal and sensitive information primarily for the purpose of providing services to participants.

Type of information collected:

- Contact details (name, address, email, etc.)
- Personal details including: date of birth, gender, ethnicity
- Information on personal issues and experiences, relationships
- Family background, supports participants may have in the community
- Areas of interest
- Health information and/or medical history
- Financial information
- Technical information
- Marketing and communications information

How the information is collected:

- Initial and ongoing contact, query or request
- Through Interviews and assessments
- Enrolment forms
- When you complete an application
- Through account sign-ups, purchases or similar form
- From those who request our services on your behalf
- When you post information or otherwise interact with our platforms
- Survey participation
- From government regulators, law enforcement agencies and other government entities
- From business contacts, external service providers and suppliers
- From publicly available sources of information

Saltbush uses personal information to deliver our services to you, including but not limited to:

- Preparing and delivering documents
- To provide you with information about Services you requested
- To meet any requirements of government funding for programs
- To monitor and evaluate existing services and plan for future services
- To produce reports, and to comply with legal obligations
- To personalise and customise your experiences with us
- To help us meet our warranty obligations
- To help us assess an application submitted by you or on your behalf in relation to your employment with Saltbush Social Enterprises
- To communicate with you, including by email, mobile and in-application notifications
- To process donations

- To investigate any complaints about or made by you, or if we have reason to suspect you have breached any relevant terms
- To do anything else as required or permitted by any law

How we collect information

Where possible, we collect personal and sensitive information directly from you, although some information is provided by additional sources including family, carers, Territory Families, NT Police and others.

If you feel that the information we are requesting, either on our forms or in our discussions is not information you wish to provide, you should be encouraged to raise this with us. If we collect information about you from a third party source we will take reasonable steps to ensure that you are aware of this and the purpose for which we are collecting the information.

The organisation will not use information beyond the consent provided, unless consent is obtained or in accordance with one of the exceptions under the Privacy Act or in compliance with another law. If Saltbush uses health information for research or statistical purposes, it will be de-identified.

Use and disclosure of personal information

We only use personal information for the purposes for which it was given to us, or for purposes that are related to one of our functions or activities. For the purposes referred to in this procedure (discussed above under 'Collection of Personal and Sensitive Information'), we may also disclose your personal information to other external organisations including:

- Government departments/agencies who provide funding to Saltbush
- Contractors who manage some of the services we offer, such as training providers and people who provide therapeutic programs.
- Doctors and health care and legal professionals, who assist us to deliver our services

Except as set out above, the organisation will not disclose your personal information to a third party unless one of the following applies:

- You have consented
- You would reasonably expect us to use or give that information for another purpose related to the purpose for which it was collected (or in the case of sensitive information – directly related to the purpose for which it was collected)
- It is otherwise required or authorised by law
- It will prevent or lessen a serious threat to somebody's life, health or safety or to public health or safety
- It is reasonably necessary to assist in locating a missing person

This website uses Google Analytics to help analyse how people use our site. The tool uses "cookies" to collect standard internet log and visitor behaviour information in an anonymous form. The information generated by the cookie about your use of the website (including IP address) is transmitted to Google. This information is then used to compile statistical reports on website activity for Saltbush Social Enterprises.

We will never use the statistical analytics tool to track or to collect any Personally Identifiable Information (PII) of visitors to our site. Google will not associate your IP address with any other data held by Google. Neither we nor Google will link, or seek to link, an IP address with the identity of a computer user. We will not associate any data gathered from this site with any Personally Identifiable Information from any source, unless you explicitly submit that information via a fill-in form on our website.

We use Facebook and LinkedIn and may from time to time use other social media tools.

Direct marketing - We will offer you a choice as to whether you want to receive direct marketing communications about services. If you choose not to receive these communications, we will not use your personal information for this purpose.

We will otherwise only use or disclose your personal information for the purposes of direct marketing if:

- we collected the information from you;
- it is reasonable in the circumstances to expect that we would use or disclose the information for direct marketing purposes;
- we provide you with a simple means to 'opt-out' of direct marketing communications from us; and
- you have not elected to 'opt-out' from receiving such direct marketing communications from us.

You may opt out of receiving such communications by:

- checking the relevant box on the form used to collect your personal information;
- clicking a link on the email communication sent to you; or
- contacting us.

You can enquire about our services anonymously or by use of a pseudonym. We will be able to discuss services that might be suitable, including costs which might be charged for those services. However, we cannot provide services to someone without confirming their identity. Until we have sufficient information to provide detailed information or outline of suitable services we can only give general, non-binding information.

Security of Personal and Sensitive Information

Saltbush takes reasonable steps to protect the personal and sensitive information we hold against misuse, interference, loss, unauthorised access, modification and disclosure.

These steps include password protection for accessing our electronic IT system, securing paper files in locked cabinets and physical access restrictions. Only authorised personnel are permitted to access these details. When the personal information is no longer required, it is maintained in a secure archive or if required, destroyed in a secure manner, or deleted.

We will destroy or de-identify your personal information if the purpose for which we collected the personal information from you no longer exists or applies, or you request us to destroy your personal information, and we are not required by law to retain your personal information.

If we become aware that a Data Breach in respect of personal information held by us may have occurred, we are required to comply with the Notifiable Data Breaches scheme under Part III C of the Privacy Act,

We will follow our Data Breach Response Plan and will:

- investigate the circumstances surrounding the potential Data Breach to determine whether a Data Breach has occurred; and
- if a Data Breach has occurred, carry out a reasonable and expeditious assessment of whether there are reasonable grounds to believe that the relevant circumstances amount to an eligible data breach.

If we become aware that there has been an eligible data breach in respect of personal information held by us, and the personal information relates to you or you are at risk from the eligible data breach, we will ensure that either we, or a relevant APP entity that is the subject of the same eligible data breach:

- prepare a statement that complies with subsection 26WK(3) of the Privacy Act;
- provide a copy of the statement to the Office of the Australian Information Commissioner (OAIC); and
- if it is practicable, notify you of the contents of the statement, or otherwise publish a copy of the statement on our website and take reasonable steps to publicise the contents of the statement, as soon as practicable after the completion of the preparation of the statement.

Access to and correction of personal information

If an individual requests access to the personal information we hold about them, or requests that we change that personal information, we will allow access or make the changes unless we consider that there is a sound reason under the Information Act or other relevant law to withhold the information, or not make the changes.

Requests for access and/or correction should be made to the Chief Operating Officer via managers@saltbushnt.org.au. For security reasons, requests need to be in writing and identity will need to be confirmed.

We will take all reasonable steps to provide access or the information requested within 14 days of the request.

In situations where the request is complicated or requires access to a large volume of information, we will take all reasonable steps to provide access to the information requested within 30 days. If an individual is able to establish that personal information the organisation holds about them is not accurate, complete or up to date, the organisation will take reasonable steps to correct our records.

Access may be denied if:

- The request does not relate to the personal information of the person making the request
- Providing access would pose a serious threat to the life, health or safety of a person or to public health or public safety
- Providing access would create an unreasonable impact on the privacy of others
- The request is frivolous and vexatious
- The request relates to existing or anticipated legal proceedings
- Denial of access is authorised or required by law and/or would prejudice law enforcement activities or be unlawful

Saltbush will advise of our reasons for denying access. Where there is a dispute about right of access to information or forms of access, this will be dealt with in accordance with the complaints procedure set out below.

Privacy Complaints Procedure

A privacy complaint relates to any concern that participants may have regarding Saltbush's privacy practices or our handling of personal and sensitive information.

The goal of this procedure is to achieve an effective resolution of complaints 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. Once the complaint has been made, we will try to resolve the matter in a number of ways such as:

- We will gather as much information as possible, including details of any relevant dates and documentation. This will enable us to investigate the complaint and determine an appropriate solution. All details provided will be kept confidential.
- We will discuss options for resolution with the participant and identify how the matter might be resolved
- Where necessary, the complaint will be investigated. We will try to do so within a reasonable time frame.
- If the complaint involves the conduct of our employees we will raise the matter with the employee concerned and seek their comment and input in the resolution of the complaint.
- If the complaint is found to be substantiated, the participant will be informed of this finding. We will then take appropriate steps to resolve the complaint, address any concerns and prevent the problem from recurring.
- If the complaint is not substantiated, or cannot be resolved to participant satisfaction, but this Privacy Policy has been followed, the organisation may decide to refer the issue to an appropriate intermediary. This may mean an appropriately qualified lawyer or an agreed third party, to act as a mediator.
- If a satisfactory conclusion to the complaint is not achieved, participants are free to take complaints to the Office of the Ombudsman.