



DUNLEA CENTRE
AUSTRALIA'S ORIGINAL BOYS' TOWN

PRIVACY POLICY

INTRODUCTION

Dunlea Centre Australia's Original Boys' Town is a unique family preservation service for families and young people in crisis. The service targets 'at risk' young people in years 7 - 10 by providing an educational program throughout the day as well as a residential living program in the evenings.

Our Agency combines both education and welfare programs including accommodation, counselling and behaviour intervention along with social and emotional support. The major focus of the program is to positively (re)engage young people with education and/or employment whilst simultaneously assisting families to reconnect with one another through enhanced interpersonal relationships.

The Dunlea Centre is a not-for-profit organisation and was established in 1939. While we do receive Government support, we also rely heavily on fundraising and donations from the community to help run our service.

INTENDED USE

This Statement is intended to be made available to the young people who participate in our programs or are enquiring about our programs, parents and carers, prospective parents and carers, staff, job applicants, volunteers, donors and others that come into contact with our Agency, including but not limited to past students, contractors and visitors

The purpose of the Policy is to detail how we protect your privacy and how we comply with the requirements of the *Privacy Act* and the Australian Privacy Principles, the *Health Records and Information Privacy Act 2002* and the *Spam Act 2003*.

PRIVACY POLICY

This Privacy Policy details how we protect your privacy and how we comply with the requirements of the *Privacy Act* and the 13 Australian Privacy Principles, the *Health Records and Information Privacy Act* and the *Spam Act*. This policy also describes:

- who we collect information from;
- the types of personal information collected and held by us;
- how this information is collected and held;
- the purposes for which your personal information is collected, held, used and disclosed;
- how you can gain access to your personal information and seek its correction;
- how you may complain or inquire about our collection, handling, use or disclosure of your personal information and how that complaint or inquiry will be handled; and
- whether we are likely to disclose your personal information to any overseas recipients.

WHO DO WE COLLECT PERSONAL INFORMATION FROM?

At Dunlea Centre, we collect personal information from young people participating in and/or enquiring about our programs, parents and carers, prospective parents and carers, staff, job applicants, volunteers, donors and others that come into contact with our Agency, including but not limited to past students, contractors and visitors.

It is noted that employee records are not covered by the Australian Privacy Principles or the Health Privacy Principles where they relate to current or former employment relationships between the Agency and the employee.

WHAT KINDS OF PERSONAL INFORMATION DO WE COLLECT?

The kinds of personal information we collect is largely dependent upon whose information we are collecting and why we are collecting it, however in general terms the Agency may collect:

- **Personal Information** including names, addresses and other contact details; dates of birth; next of kin details, financial information, photographic images and attendance records.
- **Sensitive Information** (particularly in relation to our young people and parent/carer records) including religious beliefs, government identifiers, nationality, country of birth, languages spoken at home, professional memberships, family court orders and criminal records.

- **Health Information** (particularly in relation to our young people and parent/carer records) including medical records, disabilities, immunisation details, individual health care plans, counselling reports, nutrition, medication and dietary requirements.

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

How we collect personal information will largely be dependent upon whose information we are collecting. If it is reasonable and practical to do so, we collect information directly from you.

Where possible the Agency has attempted to standardise the collection of personal information by using specifically designed forms (e.g. an Enrolment Form). However, given the nature of our operations, we often also receive personal information by email, letters, notes, over the telephone, in face to face meetings, through financial transactions, through fundraising events and through computer surveillance activities such as email and internet monitoring of our systems.

We may also collect personal information from other people (e.g. a personal reference) or independent sources (e.g. a telephone directory) or purchase commercial donor lists however we will only do so where it is not reasonable and practical to collect the information from you directly.

Sometimes we may be provided with your personal information without having sought it through our normal means of collection. We refer to this as “unsolicited information”. Where we collect unsolicited information we will only hold, use and/or disclose that information if we could otherwise do so had we collected it by normal means. If that unsolicited information could not have been collected by normal means then we will destroy, permanently delete or de-identify the information as appropriate.

HOW DO WE USE PERSONAL INFORMATION?

We only use personal information that is reasonably necessary for one or more of our functions or activities (the primary purpose) or for a related secondary purpose that would be reasonably expected by you, or to which you have consented.

Our primary uses of personal information include but are not limited to:

- providing education, pastoral care, counselling, extra-curricular and health services;
- satisfying our legal obligations including our duty of care and child protection obligations;
- keeping parents/carers informed as to agency community matters through correspondence, newsletters and magazines;
- marketing, promotional and fundraising activities;
- supporting the activities of Agency associations such as the “Boys Town old boys” including distribution of contact details on a contact list;

- supporting community based causes and activities, charities and other causes in connection with the Agency's functions or activities;
- helping us to improve our day to day operations including training our staff; systems development; developing new programs and services; undertaking planning, research and statistical analysis;
- Agency administration including for insurance purposes;
- the employment of staff;
- the engagement of volunteers.

We only collect sensitive information reasonably necessary for one or more of these functions or activities, if we have the consent of the individuals to whom the sensitive information relates, or if the collection is necessary to lessen or prevent a serious threat to life, health or safety, or another permitted general situation (such as locating a missing person) or permitted health situation (such as the collection of health information to provide a health service) exists.

If we do not have the relevant consent and a permitted health situation or permitted general situation does not exist, then we may still collect sensitive information provided it relates solely to individuals who have regular contact with the Agency in connection with our activities. These individuals may include young people, parents and carers, volunteers, former young people, former parents and carers and other individuals with whom the Agency has regular contact in relation to our activities.

We will only use or disclose sensitive information for a secondary purpose if you would reasonably expect us to use or disclose the information and the secondary purpose is directly related to the primary purpose.

STORAGE AND SECURITY OF PERSONAL INFORMATION

We store personal information in a variety of formats including on databases (including databases stored "in the cloud"), in hard copy files and on personal devices including laptop computers, mobile phones, cameras and other recording devices.

The security of your personal information is of importance to us and we take all reasonable steps to protect the personal information we hold about you from misuse, loss, unauthorised access, modification or disclosure.

These steps include:

- Restricting access to information on the Agency databases on a need to know basis with different levels of security being allocated to staff based on their roles and responsibilities and security profile.
- Ensuring all staff are aware that they are not to reveal or share personal passwords.
- Ensuring where sensitive and health information is stored in hard copy files that these files are stored in lockable filing cabinets in lockable rooms. Access to these records is restricted to staff on a need to know basis.

- Implementing physical security measures around the Agency buildings and grounds to prevent break-ins.
- Implementing ICT security systems, policies and procedures, designed to protect personal information storage on our computer networks.
- Implementing human resources policies and procedures, such as email and internet usage, confidentiality and document security policies, designed to ensure that staff follow correct protocols when handling personal information.
- Undertaking due diligence with respect to third party service providers who may have access to personal information, including cloud service providers, to ensure as far as practicable that they are compliant with the Australian Privacy Principles or a similar privacy regime.

Personal information we hold that is no longer needed is destroyed in a secure manner, deleted or de-identified as appropriate.

Our website may contain links to other websites. We do not share your personal information with those websites and we are not responsible for their privacy practices. Please check their privacy policies.

WHEN WE DISCLOSE PERSONAL INFORMATION

We only use personal information for the purposes for which it was given to us, or for purposes which are related (or directly related in the case of sensitive information) to one or more of our functions or activities. We may disclose your personal information to government agencies, other parents, other agencies, recipients of our agency publications, visiting teachers, counsellors and coaches, our service providers, agents, contractors, business partners and other recipients from time to time, only if one or more of the following apply:

- you have consented;
- you would reasonably expect us to use or disclose your personal information in this way;
- we are authorised or required to do so by law;
- disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety;
- where another permitted general situation or permitted health situation exception applies;
- disclosure is reasonably necessary for a law enforcement related activity.

PERSONAL INFORMATION OF YOUNG PEOPLE

The Privacy Act does not differentiate between adults and children and does not specify an age after which individuals can make their own decisions with respect to their personal information.

At Dunlea Centre we take a common sense approach to dealing with a young person's personal information and generally will refer any requests for personal information to a

young person's parents/carers. We will treat notices provided to parents/carers as notices provided to the young people and we will treat consents provided by parents/carers as consents provided by a young person.

We are however cognisant of the fact that young people do have rights under the Privacy Act, and that in certain circumstances (especially when dealing with older young people and especially when dealing with sensitive information), it will be appropriate to seek and obtain consents directly from the young people themselves. We also acknowledge that there may be occasions where a young person may give or withhold consent with respect to the use of their personal information independently from their parents/carers. There may also be occasions where parents/carers are denied access to information with respect to their young people, because to provide such information would have an unreasonable impact on the privacy of others, or result in a breach of the Agency's duty of care to the young person.

DISCLOSURE OF PERSONAL INFORMATION TO OVERSEAS RECIPIENTS

We may disclose personal information about an individual to overseas recipients in certain circumstances, such as when we are organising an overseas excursion or storing information with a "cloud computing service" which stores data outside of Australia. We will however take all reasonable steps not to disclose an individual's personal information to overseas recipients unless:

- We have the individual's consent (which may be implied); or
- We have satisfied ourselves that the overseas recipient is compliant with the Australian Privacy Principles, or a similar privacy regime; or
- We form the opinion that the disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety; or
- We are taking appropriate action in relation to suspected unlawful activity or serious misconduct.

HOW WE ENSURE THE QUALITY OF YOUR PERSONAL INFORMATION

We take all reasonable steps to ensure the personal information we hold, use and disclose is accurate, complete and up to date. These steps include ensuring that the personal information is accurate, complete and up to date at the time of collection and when using or disclosing the personal information. On an ongoing basis we maintain and update personal information when we are advised by individuals or when we become aware through other means that their personal information has changed.

Please contact us if any of the details you have provided change. You should also contact us if you believe that the information we have about you is not accurate, complete or up to date.

HOW TO GAIN ACCESS TO YOUR PERSONAL INFORMATION WE HOLD

You may request access to the personal information we hold about you, or request that we change the personal information, by contacting us.

If we do not agree to provide you with access, or to amend your personal information as requested, you will be notified accordingly. Where appropriate we will provide you with the reason/s for our decision. If the rejection relates to a request to change your personal information you may make a statement about the requested change and we will attach this to your record.

DONORS AND DONATIONS

The Dunlea Centre website may use cookies to track site visits, navigation within Dunlea sites and whilst using the donation facility. If you are concerned about the use of these cookies, your browser can be configured to notify you when you receive a cookie, and provide you with the opportunity to accept or reject it. You may refuse all cookies from the Dunlea Centre website however some functions may be unavailable.

Our online credit card processing may also use cookies for identification and anti-fraud purposes. Where you provide your email address to us we will only use it for the purpose provided unless you have consented to us using it for additional purposes. We will not pass it on to any other person or organisation unless we have disclosed this to you. We may also disclose your information where required by law to do so.

Forwarding credit card numbers or other sensitive information via email or facsimile is not safe. We suggest that you do not send information to us in either format. Certain sections of the Dunlea Centre's website are secured using SSL technology to encrypt data between your browser and the website. If you are entering any payment or credit card information on the internet, you should confirm that the page is secured (padlock symbol in your browser) before entering any information. We make every effort possible to make your donations and transactions within our site as secure and safe as possible for you.

You should be aware that there are inherent risks associated with the transmission of information via the Internet. If you are submitting personal details, credit card numbers or other information over the Internet, please be aware that, while all reasonable efforts are made to secure information transmitted to this website, there is a possibility that information you submit could be observed by a third party in transit.

By using our website you acknowledge that you do not hold the Dunlea Centre liable for any security breaches, viruses, or other malicious software that may infect your computer or any loss of data, revenue or otherwise that may occur.

From time to time the Dunlea Centre may need to contact donors directly to update or confirm their personal or credit card details. If the contact was to occur to update your personal details or to rectify problem with a credit card donation or payment, we will provide you with sufficient information from our existing database for you to be comfortable that the caller is our representative.

Any contact you receive requesting a full credit card number and CVV number, should be considered a hoax and you should disregard it and report the contact to either;

1. www.scamwatch.gov.au or
2. The Dunlea Centre Privacy Officer for further information.

THE SPAM ACT 2003

The Spam Act prohibits the sending of unsolicited emails, SMS and MMS messages for commercial purposes from or within Australia or to people in Australia, and bans the supply and use of software designed to harvest email addresses. While charities do have some exemptions from this Act, the Dunlea Centre will be guided by the best practice guidelines developed on responsible electronic messaging practices by the Australian Direct Marketing Association in conjunction with industry and consumer representatives and administered by the Australian Communications and Media Authority.

OPTING OUT OR MODIFYING YOUR INFORMATION

If you want to change any information that you have previously provided, or if you want to opt out of future communications please contact the Privacy Officer.

PRIVACY COMPLAINTS

If you wish to make a complaint about a breach by us of the Australian Privacy Principles or the Health Privacy Principles you may do so by providing your written complaint by email, letter, or by personal delivery to our Privacy Officer as noted below. You may also make a complaint verbally.

We will respond to your complaint within a reasonable time (usually no longer than 30 days) and we may seek further information from you in order to provide a full and complete response.

Your complaint may also be taken to the Office of the Australian Information Commissioner.

HOW TO CONTACT US

You can contact our Privacy Officer about this Policy or about your personal information by:

- Emailing karly@boystown.net.au
- Calling (02) 8508 3900
- Writing to our Privacy Officer at:
PO Box 99
ENGADINE NSW 2233

If practical, you can contact us anonymously (i.e. without identifying yourself) or by using a pseudonym. However, if you choose not to identify yourself, we may not be able to give you the information or provide the assistance you might otherwise receive if it is not practical to do so.

CHANGES TO OUR PRIVACY AND INFORMATION HANDLING PRACTICES

This Privacy Policy is subject to change at any time. Please check our Privacy Policy on our website www.boystown.net.au regularly for any changes.