



# PRIVACY POLICY

MEEDAC Incorporated

Last Updated May 2018

*The electronic version of this policy is the approved and current version. Any printed version is uncontrolled and may not be current.*

# Privacy Policy

## 1 Introduction

MEEDAC Incorporated (MEEDAC) is a not for profit organisation and provides services to individuals through the delivery of the Federal Government funded Community Development Programme (CDP).

MEEDAC is committed to protecting an individual's privacy and the privacy of the personal information they provide. MEEDAC takes its privacy obligations very seriously and wishes to ensure that an individual's personal information is dealt with in accordance with all relevant privacy laws and this privacy policy.

### 1.1 Privacy Obligations

MEEDAC is committed to upholding the Australian Privacy Principles contained in the Commonwealth Privacy Act 1988 incorporating the Privacy Amendment (Enhancing Privacy Protection) Act 2012. We are obligated to these requirements with the Federal Government.

## 2 Objectives

This privacy policy establishes how an individual's personal information will be collected, used and disclosed in order to comply with the Australian Privacy Principles.

MEEDAC may review and update this Privacy Policy and our Privacy Statement to take account change in law, business operations and to remain appropriate to Federal Government contracts.

## 3 What information we collect and hold

MEEDAC collects personal information about clients before and during the course of the individual's servicing arrangements to enable the delivery of its programs including but not limited to CDP.

Certain laws and contractual provisions relating to the operations of the abovementioned programme require information to be collected and to legally discharge our Government contractual duties.

In order to provide employment services and assistance under the Community Development Programme, MEEDAC is required to collect 'sensitive' information that is additional to personal information such as name, date of birth, place of birth. This 'sensitive' information may include details of:

- Schooling and other educational experiences;
- Cultural background, to ensure individuals are provided with the most appropriate service or a translator if required;
- Medical conditions, injuries or disabilities, for example to provide the individual with appropriate support services and/or to ensure suitability for certain employment opportunities and activities;
- Housing status and sustainability – this allows appropriate support services to be contacted if required;
- Membership of a professional trade or association to provide the individual with appropriate vocational training or accreditation.

If any of the above mentioned information is not provided by the individual when requested, MEEDAC may not be able to provide the employment services to the individual or otherwise fulfil the purpose for which MEEDAC collects the information.

#### **4 How we collect and keep safe personal information**

Where possible; personal information is collected with the consent of the individual at the time of the individual's interaction with MEEDAC. In some service programs, client personal information is received from third parties when the client is referred to MEEDAC for the services we provide.

The information MEEDAC collects includes:

- the information an individual provides in writing;
- any additional information the individual provides to staff;
- electronic communications or telephone calls with individuals;
- any information needed to collect about an individual from third parties on the individuals behalf.

MEEDAC undertakes all reasonable steps necessary to protect personal information it holds from misuse, interference and loss, as well as unauthorised access, modification or disclosure.

All personal and sensitive information is securely stored on electronic databases and computer systems which are protected from unauthorised access. Some of those databases are government controlled and held by a third party provider. Hard copy information is stored securely in locked filing cabinets at all times in secure access controlled offices.

All MEEDAC staff must comply with employee confidentiality agreements and the MEEDAC Privacy Policy.

#### **5 Purpose for which Personal Information is Collected**

We may collect, hold, use and disclose personal and sensitive information for purposes necessary to carry out our functions and provide our services. Generally, these purposes include:

- satisfying legal obligations and funding agreement requirements
- to enable proper governance processes such as internal audit and external audit purposes
- to seek feedback from clients and other individuals about the quality of the service provided by MEEDAC to contribute to continuous improvement
- to provide customer service functions, including handling customer enquiries and complaints
- where funding bodies require it as part of their funding agreement with MEEDAC
- in compliance with applicable laws
- other purposes which the individual has consented to

#### **6 Sharing of information and disclosure**

In order to provide individuals with MEEDAC services it may be necessary to disclose information to organisations and individuals that carry out functions on behalf of or in conjunction with MEEDAC.

MEEDAC will only share personal and sensitive information of an individual in accordance with their express consent and instructions, subject to the exclusions set out in the Australian Privacy Principles, or in accordance with the specific Privacy Notice provided to the individual at or near the time of collection of the personal and sensitive information.

MEEDAC will not disclose sensitive information unless the individual has consented; it is required by law; or in other special specified circumstances, for example, relating to health services provision and individual or public health or safety where a duty of care exists.

#### **7 Access and correction of personal and sensitive information**

Individuals have the right to access their personal and sensitive information, subject to some exceptions allowed by law. For security reasons these requests must be submitted in writing.

To enable MEEDAC to verify the request the following will need to be completed:

- Clients full name
- Address
- Contact phone number
- The relevant department or service that the request is related to.

This then needs to be sent to the details listed below for the organisations Privacy Officer.

If initial access is denied you may seek access through Freedom of Information (FOI) legislation. This request should be directed to the FOI of the Department of Prime Minister and Cabinet.

Where an individual informs MEEDAC that information held about them is inaccurate; out of date; incomplete; irrelevant or misleading; MEEDAC will correct it. These requests must also where applicable be submitted in writing.

## **8 Complaints about breaches**

MEEDAC is committed to protecting the privacy of individuals and upholding the Australian Privacy Principles. Should a client have a concern with the handling of their information they need to contact the Privacy Officer at the details below.

All complaints are taken seriously and MEEDAC will endeavour to respond to these concerns as soon as reasonably practicable.

Privacy Officer  
MEEDAC Incorporated  
PO Box 2996  
Geraldton WA 6532

Or email [privacyofficer@meedac.com](mailto:privacyofficer@meedac.com)

## **9 Overseas disclosure**

MEEDAC makes every effort to keep personal and sensitive information held in Australia only.

## **10 Compliance with notifiable data breaches scheme**

MEEDAC will notify clients in the event that personal information is involved in a data breach that is likely to result in serious harm. This notification will include recommendations about the steps that should be taken in response to the breach. Each suspected data breach reported to MEEDAC will be assessed to determine whether it is likely to result in serious harm, and as a result require notification.

## **11 Destruction and De-identification**

When personal information about an individual held by MEEDAC is no longer required to meet MEEDAC's vision and objectives, it is purged from information systems and destroyed or de-identified in line with the relevant government guidelines and retention schedules.