

PRIVACY POLICY

Governance POS/QOS/PO-0012

MercyCare is committed to ensuring that individual's right to privacy, dignity and confidentiality is recognised and respected, and that the personal information MercyCare holds is managed in accordance with the *Privacy Act 1988* (Cth) and in particular, the Australian Privacy Principles.

PRIVACY DEFINITIONS

Personal information - is information that identifies or could reasonably identify an individual, such as a name, contact details and records of dealings with MercyCare;

Sensitive Information - is a type of personal information which includes, amongst other things, details about racial or ethnic origin, religious beliefs, criminal history, or health and medical information;

Australian Privacy Principles - outlines how most Australian and Norfolk Island Government agencies, all private sector and not-for-profit organisations with an annual turnover of more than \$3 million, all private health service providers and some small businesses (collectively called 'APP entities') must handle, use and manage personal information.

Why MercyCare handles personal information

We handle the personal information of many individuals, including those:

- to whom MercyCare provides a service such as community services, childcare services and aged care services;
- who assist MercyCare in its provision of services, including potential employees, volunteers and contractors; and
- who may provide support to MercyCare.

We collect, hold, use and disclose personal information for the following purposes:

- interact with and provide services to our service users;
- assess applications for employment, foster care programs and volunteer roles;
- conduct ongoing monitoring of foster carers and volunteers;
- conduct, and seek support for, fundraising activities;
- provide information and updates about MercyCare's services and activities;
- process transactions;
- maintain business records and otherwise manage our business;
- as required or permitted by law;
- as disclosed to and to which consent has been provided by an individual, and
- as would otherwise reasonably be expected.

MERCYCARE'S COMMITMENT

To facilitate this policy MercyCare will adhere to the following:

Collecting personal information

We collect personal information about individuals we deal with by lawful and fair means, and will only do so to the extent necessary for MercyCare to carry out its associated functions and activities. We only collect personal information for the purposes set out in this Privacy Policy, unless notified at the time of collection.

We will collect personal information through our interactions, for example:

- providing services to a service user;
- an individual interacts with one of our representatives;
- an individual provides services to MercyCare or volunteers for our programs;
- an individual offers support to MercyCare, and

- an individual subscribes to our newsletters and other communications.

In some circumstances, MercyCare may need to collect personal information from third parties, such as government departments, organisations that have provided a referral, other community service providers and other people and organisations that are involved with MercyCare.

Using and disclosing personal information

MercyCare will only use and disclose personal information for a purpose outlined in this Privacy Policy, except as otherwise communicated at the time the information is collected.

MercyCare may disclose personal information to others who assist us to provide our products and services, for example:

- service providers, including insurers, financial institutions, mailing houses, debt collection agencies, etc.;
- related companies and other business partners;
- professional advisers, including lawyers, accountants and auditors;
- government, regulatory and law enforcement authorities, and
- service user representatives, or any person who is responsible for a service user, such as a guardian or caregiver.

MercyCare does not disclose personal information outside Australia.

MercyCare may use personal information to provide individuals with information and updates about our services, including via email, SMS, post, or by telephone. If you no longer wish to receive these types of communications from MercyCare, please contact us on (08) 9442 3444 or email corporate@mercycare.com.au

Security

MercyCare holds personal information in both paper-based and electronic files. Electronic information is stored on secure servers that are located on MercyCare premises. MercyCare seeks to ensure all personal information it holds is protected from misuse, interference, loss, unauthorised access, modification or disclosure. MercyCare employees, volunteers and contractors who have access to MercyCare records, are obliged to treat all personal information confidentially.

Accessing and correcting personal information

Individuals who wish to request access to the current or historical personal information MercyCare holds about them please contact:

MercyCare's Quality and Organisational Services Team on (08) 9442 3444 or email recordinfo@mercycare.com.au

Where access cannot be given immediately, MercyCare aims to respond to requests for access within 30 days. If access is refused, a written notice stating the reasons for refusal will be provided. MercyCare may seek to recover reasonable costs incurred for providing access to personal information.

MercyCare endeavors to ensure the personal information collected, held, used and disclosed is accurate, complete, relevant, current and not misleading. If an individual believes the personal information MercyCare holds on them requires correction they can contact MercyCare, on the details provided above. MercyCare is not obliged to correct personal information if it does not agree that it requires correction and may refuse to do so. If a correction request is refused, a written notice stating the reasons for refusal will be provided.

MERCYCARE EVALUATION AND IMPROVEMENT

Updates to this Privacy Policy

MercyCare may change this Privacy Policy to ensure compliance with the Privacy Act 1988 (Cth). When changes are made, the updated Privacy Policy will be posted on our website at www.mercycare.com.au/privacy-policy

Questions and Complaints

If an individual has a question in relation to this Privacy Policy, or a complaint about the way in which MercyCare has handled their personal information, please contact:

MercyCare's Quality Improvement Specialist on (08) 9442 3444 or email feedback@mercycare.com.au

MercyCare responds to complaints within 5 working days.

MERCYCARE RESPONSIBILITIES

- Board, Executive Leadership Team and Finance, Risk & Audit Committee will monitor compliance with privacy legislation annually;
- Executive Director, People and Organisational Services will provide leadership to implement policies, procedures and systems to manage compliance to privacy legislation;
- Service Unit Managers will manage compliance with privacy legislation within the operation of their service areas; ensure compliance breaches are adequately investigated, actioned and reported to the Quality and Organisational Services team for trending and reporting;
- Manager, Quality and Organisational Services will report to the ELT Finance, Risk and Audit Committee and Board annually on compliance with privacy legislation;
- Risk and Special Projects Manager will maintain a compliance register to record privacy compliance obligations and adherence to them;
- Quality and Organisational Services team will maintain a complaint and incident register that includes privacy breaches and complaints;
- Employees who are nominated as designated investigators will investigate alleged privacy breaches and communicate outcomes to relevant stakeholders; and
- Employees, volunteers and contractors will understand and comply with this policy.

MERCYCARE INTERNAL REFERENCES

The following internal documents relate to this policy:

- Privacy Manual - Marketing and Fundraising, Direct Marketing Guideline;
- Privacy Manual – Services;
- Service User Feedback Policy; and
- Confidentiality Policy.

LEGISLATION AND STANDARDS

MercyCare's management of privacy will comply with the following:

- Privacy Act 1988;
- Do Not Call Register Act 2006;
- Spam Act 2003;
- EQulP6 Standards; and
- Service level accreditation standards and non-accreditation standards.

MercyCare Ltd. Board

Date Approved: 03/08/2017