

Julia Farr group



POLICY

Policy Number	D1.1
Policy Title	Privacy Policy
Policy Classification	Business Operations

1. PURPOSE

The purpose of this policy is to maintain the privacy of the people the Julia Farr group interacts with.

2. SCOPE

This policy requires all Julia Farr group staff to follow the policy at all times.

3. PRINCIPLES

- Julia Farr group meets statutory requirements and guidelines relating to privacy; and
- Julia Farr group is committed in ensuring that personal information about individuals is protected.

4. POLICY

The Julia Farr group privacy policy is governed by the *Privacy Act 1988* (the Act) and the Australian privacy principles which regulates the handling of personal information about individuals, including the collection, use, storage and disclosure of personal information, and access to, and correction of, that information.

The following principles apply:

Open and transparent management of personal information

The Julia Farr group endeavours to manage personal information in an open and transparent nature in accordance with this principle.

Anonymity and pseudonymity

Wherever it is lawful and practicable, the Julia Farr group will provide a person with the option of not identifying themselves when entering into transactions with the Julia Farr group.

Collection of solicited personal information

Personal information will only be collected when it is considered reasonably necessary for, or directly related to, one or more of the Julia Farr group's functions or activities. When information is sought, people will be advised of their right to refuse to provide personal information. The purpose of collecting personal information will be explained to people along with the intended use and outcomes of the information. People will be advised of how information will be stored, who will be able to access it and what measures will be taken to ensure privacy is maintained. The Julia Farr group will not collect sensitive information about a person without consent.

Dealing with unsolicited personal information

In the event Julia Farr group receives unsolicited personal information we will determine whether or not the Julia Farr group could have collected the information. If we determine the Julia Farr group could not have collected the information, we will act immediately to destroy and de-identify the information.

Notification of the collection of personal information

Whenever Julia Farr group collects personal information about people, we will take reasonable steps to notify the individual of the intent to collect information and the details pertaining to that collection.

Use or disclosure of personal information

Julia Farr group will not disclose personal information about people other than for the primary purpose of collection. Disclosure of information for the purpose of Julia Farr group activities will only occur if the:

- Person has consented or would reasonable expect the Julia Farr group to use or disclose information for a secondary purpose. Please refer to the 'Consent to Share Form' for further information.
- Information has been de-identified.

The exception to the above is in situations where Julia Farr group staff are required to meet mandatory reporting obligations, eg alleged abuse, neglect and exploitation. For further information, please refer to the Disclosure of Abuse or Neglect Policy.

This principle does not apply to the use or disclosure by Julia Farr group of personal information for the purpose of direct marketing.

Direct marketing

The Julia Farr group will not use or disclose personal information for the purpose of direct marketing, with the following exceptions:

- Where Julia Farr group collected information from the individual.
- The individual would reasonably expect the organisation to use or disclose the information for that purpose.
- Julia Farr group provides a simple means by which individuals may easily request not to receive direct marketing communications from our organisation.

Cross-border disclosure of personal information

Before the Julia Farr group discloses personal information about an individual to a person (the overseas recipient) who is not in Australia or an external Territory and who is not the entity of the individual, we will take such steps as reasonable in the circumstances to ensure the overseas recipient does not breach the APPs in relation to the information.

Adoption, use or disclosure of government related identifiers

When implementing our own identification system, the Julia Farr group will not adopt, use or disclose a government related identifier which has been assigned to a person by a government 'agency'. Exceptions include where such a disclosure is necessary to fulfil an obligation to a government agency.

Quality of personal information

The Julia Farr group will take reasonable steps to ensure any personal information it collects, uses or discloses is accurate, complete and up-to-date.

Security of personal information

The Julia Farr group will adopt the strictest measures to protect and secure the personal information of people from misuse, interference and loss, unauthorised access, modification or disclosure. The Julia Farr

group will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed by the Julia Farr group.

Access to personal information

Where the Julia Farr group holds personal information about a person, we will provide access to that information on request by the person. This will be subject to any exemptions provided under the *Privacy Act*.

Correction of personal information

The Julia Farr group will correct personal information when it is deemed inaccurate, out of date, incomplete, irrelevant or misleading, or in the event an individual requests the Julia Farr group to correct personal information. The Julia Farr group will take reasonable steps in the above circumstances to ensure that for the purpose for which it is held, information is accurate, up-to-date, complete, relevant and not misleading.

A Julia Farr group Privacy Policy is available online.

Further information and requests

The Julia Farr group will endeavour to support a person in their request for information in a fair, respectful and timely manner. If a person is unsatisfied in any way in which the Julia Farr group has handled a privacy matter, then we encourage the person to contact the Julia Farr group at:

Julia Farr group

PO Box 701, Unley Business Centre, Unley SA 5061

Phone: 1300 857 327 or (08) 8373 8333

Fax: (08) 8373 8373

Email: admin@purpleorange.org.au

Complaints

A person may make a complaint about a breach of the *Privacy Act* by us. Please refer to the Complaints Policy and Complaints Procedure for further information. A person may also make a complaint to the Office of the Australian Information Commission.

Office of the Australian Information Commissioner

Write: GPO Box 2999, Canberra ACT 2601

GPO Box 5218, Sydney NSW 2001

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Website: www.oaic.gov.au

5. ROLES AND RESPONSIBILITIES

Position	Role and Responsibility
Employees	All employees working for Julia Farr group have a responsibility to ensure compliance with this policy and to report breaches.
Managers	To take appropriate action to resolve breaches in a timely manner.

6. RELATED POLICIES, PROCEDURES AND WORK INSTRUCTIONS

[Confidentiality Policy](#)

[Complaints Policy](#)

[Disclosure of Abuse or Neglect Policy](#)

[Consent to Share Information](#)

Forms and external policies

[Privacy Policy \(external\)](#)

[How Can I Access Personal Information? \(external\)](#)



[Privacy Information Request Form](#)

7. LEGISLATION AND AWARDS

[Privacy Act 1998](#)

8. CHANGE HISTORY

Version	Effective Date	Significant Changes	Authoriser
Julia Farr Group APP Privacy Policy Draft	July 2015	Reformatted onto current template	S Peterson Information & Communications Officer
V1	22 July 2019	Reviewed and updated	Cat Morgan

	NAME	TITLE	SIGNATURE	DATE
Author	Geoff Barber	Chief Operating Officer		24/7/2019
Authoriser	Robbi Williams	Chief Executive Officer		26/7/2019