

Privacy

Policy

The aim of this policy is to support Council of Single Mothers and their Children's need to collect information for the purpose of providing services, including emergency relief, while recognising the right of individuals to have their information handled in ways that they would reasonably expect and in ways that protect the privacy of their personal information.

CSMC is committed to protecting an individual's right to privacy and accordingly it is committed to full compliance with its obligations under the Information Privacy Act 2000 (Vic) and the Commonwealth Privacy Act 1988. In particular, CSMC will comply with the Information Privacy Principles (IPPs) outlined in both these Acts.

This policy outlines how CSMC will ensure compliance with the Information Privacy Act 2000 (Vic) the Health Records Act 2001 (Vic) and the Commonwealth Privacy Act 1988.

Who is covered by the policy

All employees, board members, volunteers and contractors working with CSMC are required to comply with this Information Collection Privacy Policy for information collected from CSMC service users, members, donors and anyone providing personal information.

Definitions

Personal Information: Personal information is defined as information or an opinion (including information or an opinion forming part of a database) that is recorded in any form and whether true or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

Financial Information: Financial information is any information of a financial nature, including income, income support, banking or financial institution details or any other financial data pertaining to the individual.

Health Information: Health Information means information or an opinion about the physical, mental, psychological health of an individual, disability of an individual or a health service provided or to be provided to an individual.

Sensitive Information: Sensitive Information includes, but is not limited to, personal information or an opinion about individual's racial or ethnic origin, political opinions, trade union membership, philosophical or religious belief, sexual preferences or criminal record.

Information Privacy Principles

Collection of Information

CSMC will only collect personal information that is necessary for its functions and activities. CSMC may at times be required to collect personal and financial information to assist in verifying a single mother's claim for assistance (financial or otherwise) through CSMC. In some instances, CSMC may be required by law to collect personal information. This information will only be collected by fair and reasonable ways and by lawful means.

If it is reasonable and practicable to do so, CSMC will collect personal information, financial or health information about individuals directly from those individuals. If CSMC collects personal information about any individual from someone else, it will only do so with written or verbal consent from the individual whose information is being sought.

Interactions and communication via social media can at times mean that more personal information is available than has been provided directly by the individual. CSMC will not hold on record personal information other than is required to deliver services to the individual.

Use and disclosure

Information is collected and used by CSMC for the following purposes:

- To assist in the provision of services, including provision of financial aid, to single mothers;
- To assist CSMC to verify the status of a single mother;
- To assist CSMC and its employees to fulfil its duty of care to single mothers and their children.

Data quality

CSMC will take reasonable steps to ensure any personal information it holds is accurate, complete and up to date.

Data security

CSMC will take reasonable steps to protect all personal information it holds from misuse, loss, unauthorised access, modification or disclosure.

Destruction of data

CSMC will take reasonable steps to lawfully and responsibly destroy or permanently de-identify personal information when it is no longer needed for any purpose, subject to compliance with any applicable Act or Regulation.

Sensitive information

CSMC will not collect sensitive information about an individual unless the individual concerned has consented to the collection or the collection is required or authorised by law.

Access

Should any persons wish to access information CSMC holds relevant to that person, they may contact the CEO. Access will be provided subject to the provisions of the Freedom of Information Act and any other applicable Act or Regulation.

Complaint procedures

If any persons feel aggrieved by CSMC's handling of personal information about themselves, they may make a complaint in writing to the CEO at ceo@csmc.org.au

Alternatively, any person may make a complaint directly to the Privacy Commissioner.

www.privacy.vic.gov.au/privacy/web2.nsf/pages/making-a-complaint

Data Breaches

A data breach is when personal information held by CSMC is subject to unauthorised access, disclosure or loss. It can be caused by malicious action (internal or external), human error, or failure of security or information handling systems. It can cause significant harm, including financial fraud or identity theft and can lead to financial loss, emotional, psychological or physical harm or intimidation. For single mothers escaping family violence or with a history of violence, disclosure of personal information like a current address can have a significant impact on the family, including requiring relocation. It also represents a reputational risk for CSMC.

Data Breach Response Plan

In case of a data breach or suspected breach, the following steps will be taken:

- Staff should immediately inform the CEO and the IT support contractor, Lant3k IT Solutions;
- The CEO together with Lant3k will then assess the alleged data breach and its potential impact (what personal information is affected, who may have had access to it, and what the impact may be);
- The CEO and Lant3k will then:
 - Determine what steps, if any, are needed to contain the breach or what remedial actions will be taken to reduce potential harm to affected individuals;
 - Determine if CSMC needs to notify affected individuals, how to contact them and who will do so;
 - Determine if external bodies need to be notified, eg. Police, the Office of the Victorian Information Commissioner, CSMC's bank, insurer, ACNC or other entities;
 - Determine if a data breach statement needs to be created and posted on our website;

- Record the data breach on the CSMC Breach Register;
- Assess the response and revise this plan if necessary.

Further information on when a data breach is notifiable can be found here:

www.oaic.gov.au/agencies-and-organisations/guides/data-breach-preparation-and-response#identifying-eligible-data-breaches

Date policy made active: October 2017

Last update: September 2023

Review schedule: Every 12 months, or sooner in the case of changes to relevant legislation