

Privacy Policy

Policy Overview

The Lighthouse Toowoomba (TLH) is committed to protecting the privacy of personal information which the organisation collects, holds, and administers. Personal information is information which directly or indirectly identifies a person.

Purpose

The purpose of this document is to provide a framework for TLH in dealing with privacy considerations.

Scope

This policy is applicable to all TLH employees, volunteers, and patrons, as well as Child Write Board Members.

Privacy Policy

TLH collects and administers a range of personal information for the purposes of volunteer recruitment, blue card registration (working with children), and marketing. The organisation is committed to protecting the privacy of personal information it collects, holds, and administers.

TLH recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – protected and made accessible to them on request. These privacy values are reflected in and supported by our core values and reflected in our Privacy Policy, which is compliant with the *Privacy Act 1988 (Cth)* and the *Privacy Act 2009 (Qld)*.

TLH is bound by laws which impose specific obligations when it comes to handling information. The organisation has adopted the following principles contained as minimum standards in relation to handling personal information.

TLH will

- Only collect information which the organisation requires for its primary function;
- Ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered;
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- Store personal information securely, protecting it from unauthorised access; and
- Provide stakeholders with access to their own information, and the right to seek its correction.

Privacy Procedures

Responsibilities

TLH is responsible for developing, adopting, and reviewing this policy.

TLH's COO is responsible for the implementation of this policy, for monitoring changes in Privacy legislation, and for advising on the need to review or revise this policy as and when the need arises.

Processes

Collection

TLH will:

- Only collect information that is necessary for the performance and primary function of TLH.
- Notify stakeholders about why we collect the information and how it is administered.
- Notify stakeholders that this information is accessible to them.
- Collect personal information from the person themselves wherever possible.
- If collecting personal information from a third party, be able to advise the person whom the information concerns, from whom their personal information has been collected.
- Collect Sensitive information only with the person's consent. (Sensitive information includes health information and information about religious beliefs, race, gender, and others).
- Determine, where unsolicited information is received, whether the personal information could have collected it in the usual way, and then if it could have, it will be treated normally. (If it could not have been, it must be destroyed, and the person whose personal information has been destroyed will be notified about the receipt and destruction of their personal information).

Use & Disclose

TLH will:

- Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose.
- For other uses, TLH will obtain consent from the affected person.
- In relation to a secondary purpose, use or disclose the personal information only where:
 - a secondary purpose is related to the primary purpose and the individual would reasonably have expected us to use it for purposes; or
 - the person has consented; or
 - certain other legal reasons exist, or disclosure is required to prevent serious and imminent threat to life, health, or safety.
- In relation to personal information which has been collected from a person, use the personal information for direct marketing, where that person would reasonably expect it to be used for this purpose, and TLH has provided an opt out and the opt out has not been taken up.

- In relation to personal information which has been collected other than from the person themselves, only use the personal information for direct marketing if the person whose personal information has been collected has consented (and they have not taken up the opt-out).
- Provide all individuals access to personal information except where it is a threat to life or health or it is authorized by law to refuse and, if a person is able to establish that the personal information is not accurate, then TLH must take steps to correct it. TLH may allow a person to attach a statement to their information if TLH disagrees it is inaccurate.
- Where for a legal or other reason we are not required to provide a person with access to the information, consider whether a mutually agreed intermediary would allow sufficient access to meet the needs of both parties.
- Make no charge for making a request for personal information, correcting the information, or associating a statement regarding accuracy with the personal information.

TLH's Storage

- Implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorised access, interference, unauthorised modification, or disclosure.
- Before TLH discloses any personal information to an overseas recipient including a provider of IT services such as servers or cloud services, establish that they are privacy compliant. TLH will have systems which provide sufficient security.
- Ensure that TLH's data is up to date, accurate and complete.

Destruction and De-Identification TLH

- Destroy personal information once is not required to be kept for the purpose for which it was collected, including from decommissioned laptops and mobile phones.
- Change information to a pseudonym or treat it anonymously if required by the person whose information [organisation] holds and will not use any government related identifiers unless they are reasonably necessary for our functions.

Data Quality

TLH will:

- Take reasonable steps to ensure the information it collects is accurate, complete, up to date, and relevant to the functions we perform.

Data Security and Retention

TLH will:

- Destroy/ deidentify personnel records after 5 years of inactivity.

Openness

TLH will:

- Ensure stakeholders are aware of TLH's Privacy Policy and its purposes.
- Make this information freely available in relevant publications and on the organisation's website.

Access and Correction

TLH will:

- Ensure individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading, or not up to date.

Anonymity

- Allow people from whom the personal information is being collected to not identify themselves or use a pseudonym unless it is impracticable to deal with them on this basis.

COVID-19 Vaccination Status

- Employees & Volunteers may decide to provide TLH with health information (particularly COVID-19 vaccination information). TLH will only collect information in relation to your COVID-19 vaccination status when and where you:
 - It is required by the Federal Government of Australia, or the Queensland State Government;
 - consent to provide responses to questions asked by the volunteer form as part of your online application; or
 - have provided your consent TLH to share such information or;
 - have voluntarily provided the information to TLH.



What kind of personal information does TLH collect and how does TLH collect it?

The type of information TLH collects and holds includes (but is not limited to) personal information, including sensitive information, about:

- Contact Details (Name, Phone Number, Address, Email)
- Reference Details
- Blue Card Status and registration (Working with Children Check)
- Emergency Contact Details
- COVID-19 Vaccination Status

This will be done predominately through the recruitment process.

Document Control

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