

1.0 Policy Statement

Youth Off The Streets takes its privacy obligations seriously, we comply with the Privacy Act (Cth) 1988, including the Australian Privacy Principles (APPs). This policy outlines how:

- A. We collect, manage, use, store and secure your personal information
- B. You can access request correction of any record containing your personal information
- C. You can make a complaint about a breach of privacy

2.0 Scope

This policy applies to our Board, staff, volunteers, contractors and suppliers who handle **personal information** collected by Youth Off The Streets.

It applies to personal information for individuals that are external to us such as our clients, donors, volunteers and suppliers.

This policy does not cover employee records as these are not covered in the Privacy Act; however, we treat information collected about our employees with respect and confidentiality.

3.0 Definitions

Personal information: is defined in the Privacy Act as being information or an opinion about a person, **whose identity can then be reasonably established**. Personal information includes: names, addresses, email addresses, dates of birth, passport numbers. It also includes 'sensitive information' about a person, like their racial or ethnic origin, religious affiliation, sexual orientation, or health information.

4.0 How we manage your Personal Information

We will:

- Take all reasonable steps to ensure we are open and transparent about the way we manage your personal information
- Maintain adequate security of personal information to seek to protect it from misuse, interference and loss from unauthorised access, modification or disclosure

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- Establish reporting channels to receive privacy enquiries from you and for reports of privacy breaches to be received and acted upon
- Conduct risk assessments for all new and significant business projects which consider privacy impacts
- Provide an option for you to use a pseudonym or otherwise be anonymous unless it is impermissible or inhibits the adequacy or quality of service provided to you (for example, if you call us to make an enquiry about one of our services, we will not ask for your name unless we need it to adequately handle your question. But for most of our services, we usually need your name at least, in order to provide our services to you).
- Report any Privacy issues or breaches to our Board Audit & Risk Committee
- Provide this policy free of charge and in an appropriate form for public access
- Provide relevant training for our staff and volunteers on privacy obligations, how the APPs apply to us and how we implement them in our privacy practices, procedures and systems

4.1 Personal Information we collect and hold

4.1 Kinds of Personal Information

We will only collect information about you that is reasonably necessary for our functions or activities, which are listed under point 4.5. This may include:

- Your name, address, and contact details for clients, donors, volunteers, suppliers and Op Shop customers
- For clients, other information relevant to the purpose of providing services such as family and living circumstances, education qualifications, employment history, financial information including income, interests, feedback preferences, guardianship and service feedback and complaint details
- Sensitive information about you that may include your gender, age, date of birth, health, disability, mental health, racial or ethnic origin, criminal convictions, religious affiliation, and other particulars required as part of our funding obligations and/or that are relevant for the proper provision of the services that we provide
- Your image, video and sound recordings
- Information associated with emails, text messaging, phone calls, browsing our website or other electronic interaction with you including your phone number and user name

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- For donors, details relating to your donations, your bank and credit card details, and information relevant to the purpose of better identifying donor sources

4.2 How we collect and hold Personal Information

Where possible, personal information is collected directly from you with your consent at the time of your interaction with us. In some services, personal information is:

- Received from third parties where you are transferred or referred to us for the services that we provide;
- Received from third parties who obtain your personal information from publicly available sources; or
- Transferred between our own services provided it relates to the primary purpose for which it was collected.

Personal information may be collected in hard copy form or electronic form. Hard copy records are required to be held securely. We hold electronic records in databases with security safeguards. Some of those databases are controlled by a government department, while some are held by a third-party provider.

Where consent to collection is sought, it is sought voluntarily from you and we will inform you of what you are consenting to. Our consent agreements are current and specific to the services to be provided to you.

4.3 Collecting sensitive information

We will not collect sensitive information about you unless you have 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.

If you do not want to disclose information that we have requested, please raise this with us.

4.4 Collecting information through our website

We do not collect personally identifying information about you when you visit our website, unless you choose to provide such information to us.

Cookies

When you access our website, we may use software embedded in our website (such as Javascript) and we may place small data files (or cookies) on your computer or other device

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to collect information about which pages you view and how you reach them, what you do when you visit a page, the length of time you remain on the page, and how we perform in providing content to you. Our website may use Google Analytics features, which track your internet usage and discloses this to other members of the Google Ad network. A cookie does not identify individuals personally, but it does identify computers. You can set your browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it in each instance. We may gather your IP address as part of our business activities and to assist with any operational difficulties or support issues with our services. This information does not identify you personally. Except as might be required by law, we do not share any information we receive with any outside parties.

Website traffic

We use Google Analytics to track visits to our website. Google Analytics is software that helps website owners understand how visitors engage with their website. Google Analytics customers can view reports about how visitors interact with their website so they can improve it. Google Analytics collects information anonymously. It reports website trends without identifying individual visitors. All website owners using Google Analytics are required to have a privacy policy that fully discloses the use of Google Analytics. We use this information to track the effectiveness of our website. Types of data collected include visits, viewed pages and the technical capabilities of our visitors. These statistics will not identify you as an individual. You can also block Google Analytics from sending your data by downloading an add-on for Google Chrome, IE and Firefox browsers. Once installed, the tracking information gathered by Google Analytics JavaScript (ga.js) will not be sent to Google Analytics servers.

4.5 Purposes for which we collect, use and disclose Personal Information

We collect, hold and use personal information only for the primary purposes for which it is collected, or as set out below, including:

- To provide services which may include - case management, housing support, employment services, counselling, education, volunteering, learning and development and fundraising. Personal information may be shared between services within Youth Off The Streets to provide, expand or improve the services we provide to you or assist with more efficient service delivery

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- To comply with the requirements of funding bodies as part of a funding agreement with us
- To operate fundraising and charitable activity in support of our objectives
- To provide customer service functions, including handling customer enquiries, complaints and feedback
- To facilitate proper governance processes such as risk management, incident management, internal audit and external audits
- To gather feedback from you and other individuals about the quality of services that we provide so that the services we provide can be continuously improved
- To undertake marketing, fundraising and promotional activities, including activities to better identify donor sources, events and conferences organised and held by us
- To satisfy legal obligations, comply with applicable laws and meet the requirements of government bodies which regulate the services we provide
- To understand, through aggregated information, trends and patterns which we use for research and advocacy
- To fulfil other purposes which you have consented to.

4.6 Disclosure to third parties

We will not disclose your personal information to other external organisations except:

- Where the disclosure relates to the goods or services we provide to you and with your consent
- As required by law (for example, when we receive a subpoena for information)
- As permitted under the *Children and Young Persons (Care and Protection) Act*, where we may share information without consent, where we have concerns for the welfare of a young person
- For transfer to another service provider in accordance with funding agreements
- As required by funding agreements
- For a purpose permitted by this Policy; or
- If you request us to do so (for example, you may wish for a person that you know to access your personal information that we have, so that they can help you with your matter).

Examples of organisations and/or third parties that your personal information may be provided to include:

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- External service providers where you are transferring to a service provider that is not part of us
- A government agency, as required by our funding agreements (for example, by entering personal information of clients directly into the agency's database system)
- Third party service providers who assist us with the delivery of services or who provide services to or partner with us to enable us to deliver services, or in undertaking quality assurance of our services
- Third party service providers who assist us with fundraising activities or strategy, identifying donor sources or analysis of our fundraising activities, strategy or patterns (including data collectives)
- Third parties who assist us with co-ordination of volunteers, community activities and advocacy
- Government or non-government agencies where we have a reasonable concern regarding the safety or wellbeing of a young person. Chapter 16A of the *Children and Young Persons (Care and Protection) Act 1998* establishes a framework for interagency coordination and information exchange between YOTS and other prescribed bodies. We have a formal procedure that directs staff on how to share personal information under this provision, called *Chapter 16A Release of Information Procedure*.
- Third parties who collate and/or analyse information for the purposes of research and advocacy
- Third parties for the electronic storage of information, some of which may be overseas

While we seek to ensure through our contracts with external parties that they comply with the Privacy Act regarding the use of your personal information, we have limited control around how some external parties (for example, government agencies) use your personal information.

4.7 Opting out of direct marketing or information communications

When we use your personal information to send you marketing or promotional information, we will provide you with an opportunity to 'opt-out' of receiving such information. Where you do not elect to opt-out, we will assume that we have your implied consent to receive

similar information and communications in the future. We will always make our opt-out notices conspicuous and easy to take up.

If you do not wish to receive future electronic communications, you can click on the 'unsubscribe' link provided in our emails to you. For other ways that we may communicate with you (phone or mail), please ask us via:

- email: info@youthoffthestreets.com.au
- Telephone: + 61 2 9330 3500
- In writing: Opt Out, Youth Off The Streets, 28 Bowden St, Alexandria NSW 2015.

5. How you can access and correct your Personal Information

5.1 Access

You are entitled to request access to the personal information held by us about you. This is generally provided upon your request, subject to completion of our verification process and any access restrictions imposed or permitted by law. Please make your request for access to the same point of contact to whom you provided your personal information; alternatively, you can contact our Privacy Officer at privacy.officer@youthoffthestreets.com.au or Tel. 9330 5300.

If we refuse to give you access to your personal information, we will give you the reasons for that decision and the further steps available for you to complain about that decision.

5.2 Correction

Where you tell us that information held by us about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, we will correct it. If you want your information amended, please contact the same point of contact or person to whom you gave your personal information; alternatively, you can contact our Privacy Officer at privacy.officer@youthoffthestreets.com.au or Tel. 9330 5300.

If, having received and considered an application from you to amend your information, we do not consider that the information should be amended, we will not amend it but we will include a note with the information that you consider that it should be amended, and advise you accordingly.

6. Retention and disposal of personal information

We will retain and dispose of your personal information securely in accordance with applicable laws or requirements of any government or other funding body's record-keeping requirements.

When we no longer have any use for holding your personal information, we will destroy it securely. For personal information that relates to some of our government-regulated services, we may be required to send information to the applicable government department, whereupon that department becomes responsible for the secure storage of that information.

7.0 What to do if you have a privacy enquiry or complaint

If you have an enquiry or a complaint concerning the collection, use or management of your personal information, please direct your enquiry or complaint to the staff member who is your usual contact. We aim to respond and resolve your enquiry or complaint in a timely and appropriate manner. Alternatively, you may lodge your enquiry or complaint via:

- our Feedback and Complaints form on our website at <https://youthoffthestreets.com.au/about/feedback-and-complaints/>
- call us on (02) 9300 3500 and ask to speak to the Privacy Officer
- email us at privacyofficer@youthoffthestreets.com.au
- write to us: The Privacy Officer, Youth Off The Streets, 28 Bowden St, Alexandria NSW 2015

We will tell you promptly that we have received your complaint, and then give you a response to your complaint within 21 days.

If you are not satisfied with the outcome, you may request a review by a senior manager.

Where none of the above approaches by you has resolved the issue to your satisfaction, you can lodge a privacy complaint with the [Australian Information Commissioner](#). Go to their website and click on "**Make a privacy complaint**". Please be aware that the Australian Information Commissioner will not look at your complaint until we have had a chance to look at it first, to try to resolve it to your satisfaction.

8.0 Related Documents

Title	Scope
Chapter 16A Release of Information Procedure	Compliance Quality and Practice
Notifiable Date Breach Procedure and Response Plan	Corporate Services
Mandatory Reporting Procedure	HR
Reportable Conduct Procedure	HR

9.0 Revision Table

Version number	Reason/description	Date
2.0	<ul style="list-style-type: none"> ▪ Provide clarification for management of all types of personal information. ▪ Provide more information on how to lodge a Privacy complaint. 	13-12-2019
2.1	<p>Amendments as proposed by Audit and Risk Committee:</p> <ul style="list-style-type: none"> - Remove blanket consent from Scope, remove collection of client Usernames and Passwords in "Personal Information we collect", minor font and grammar adjustments - Approved by Audit & Risk Committee, 13/7/20 	30-06-2020