

PRIVACY POLICY

The Deaf Society respects the privacy of all people who have contact with the Deaf Society including members, employees, volunteers, our customers, students, stakeholders, donors, business partners and online users, and is committed to safeguarding the personal information that is provided to us.

Purpose

The purpose of this privacy policy is to explain clearly how we collect, use, store and disclose personal information.

Scope

This policy and procedure applies to all Deaf Society members, volunteers, employees, customers, stakeholders, donors, business partners and online users.

The Privacy Act and this Privacy Policy do not apply to acts or practices which directly relate to employee records of the Deaf Society's current and former employees.

Definitions

An **online user** is anyone who uses a Deaf Society website, a Deaf Society social media platform, or online service.

Personal information as defined by the *Privacy Act 1988* (as amended) is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not, and whether recorded in a material form or not.

Sensitive information as defined by the *Privacy Act 1988* (as amended) is information or opinion (that is also personal information) about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual

preferences or practices or criminal record or health, genetic, biometric information or biometric templates, that is also personal information.

Overview of Deaf Society Programs and Services

The Deaf Society exists to achieve its vision, Equity for Deaf People. Our mission is to work in partnership with the Deaf Community to enhance the quality of life of deaf people, strengthen the community and advocate for changes that will ensure fundamental rights and freedoms.

In carrying out this mission The Deaf Society engages volunteers and employees, and receives donations, funding and support from members of the community, corporations, groups and governments.

In addition to the services which we provide from funds donated by the public, the Deaf Society also holds contracts to deliver State and Commonwealth government programs. In providing such services, we comply with the relevant state or national privacy principles and any additional obligations under the contract. We also provide many services on a fee-for-service basis (e.g. interpreting, awareness training).

Outline of this policy

'Part A — Personal Information Handling Practices' explains our general information handling practices across the Deaf Society including information about how we collect, use, disclose and store your personal information.

'Part B — Files' offers further detail by explaining our personal information handling practices in relation to specific Deaf Society functions or activities such as our customer database and interpreter booking system. Here you can find out what sort of records we keep and why. You may find this section helpful if, for example, you use our casework services and want to know how we manage our case notes.

PART A — OUR PERSONAL INFORMATION HANDLING PRACTICES

Our obligations under the Privacy Act

This privacy policy sets out how we comply with our obligations under the *Privacy Act 1988* (Privacy Act). We are bound by the Australian Privacy Principles (APPs) in the Privacy Act which regulate how organisations may collect, use, disclose and store personal information, and how people can access and correct personal information about them.

Collection of Personal and Sensitive Information

If you would like to access any Deaf Society services anonymously (without giving us your name) or using a pseudonym (a false name), please tell us. If this is possible and lawful, we will take all reasonable steps so that you can access our services without giving us your name. However, we may not be able to provide some services if you do not provide the personal information we need.

The type of personal and sensitive information, and how much information we collect is different for different people. It depends on the situation.

The Deaf Society collects personal and sensitive information from customers/stakeholders, donors, business partners, Deaf Society people and online users.

Here is more information about the kind of information we collect from each of these groups and how we use it:

Deaf Society Customers and Stakeholders

Kind of information collected:

- contact details (name, address, email etc.)
- personal details including: date of birth, gender, income
- information on personal issues and experiences, relationships,
- family background, supports customers may have in the community
- areas of interest
- information about any disability (including whether you are deaf, deafblind or hard of hearing)
- other health information if necessary for your case
- credit card numbers or bank account details if we need to charge you for goods or services

- information about your interpreting requirements (e.g. interpreting booking details, preparation materials for interpreters) and your preferred interpreters

How the information may be collected:

- membership applications
- online registration
- telephone
- face to face with our staff who record it on:
 - Customer files and case notes
 - Walk In Service records
 - forms

Purpose for which The Deaf Society uses the information:

- to provide Deaf Society services
- to provide customers and stakeholders with the most appropriate services for their needs
- to meet any requirements of government funding for programs
- to monitor and evaluate existing services and plan for future services
- to produce annual reports and for research purposes which may involve contracted organisations
- to comply with legal obligations

Deaf Society Donors

Kind of information collected:

- contact details (name, address, telephone numbers, email etc.)
- personal details including gender
- areas of interest
- donation history
- credit card numbers or bank account details of all our donors
- expiration date of credit card

How the information is collected:

- communications, email, flyers
- online registration
- telephone, SMS or Skype contact with a staff member

Purpose for which the Deaf Society uses the information:

- to provide Deaf Society services
- to process donations and provide accurate receipts
- to facilitate on-going fundraising and marketing activities
- to comply with legal obligations

- to provide transparency relating to donated funds, particularly for appeals for public donations
- to acknowledge the generosity of supporters by publishing their names in our Annual Report. Please let us know if you would prefer to give anonymously.

Partner Organisations and Suppliers

Type of information collected:

- contact person's name,
- the name of the organisation which employs the person
- telephone numbers, fax number
- street and postal address, email address and position title
- areas of interest by category and industry
- bank details (if the Deaf Society is to receive payment or make payment for services received)
- Australian Business Number (ABN)
- type of support (eg. workplace giving, goods in kind, program support, volunteering)

How the information is collected:

- communications, email, flyers
- online registration
- forms
- telephone, SMS or Skype contact with our staff

Purpose for which the Deaf Society uses the information:

- to provide Deaf Society services
- to process payments and provide accurate receipts
- to pay for services
- to establish and manage partnerships
- to receive services from you or the organisation which employs you
- to manage the Deaf Society 's relationship with the business partner
- to provide information about the Deaf Society 's services
- to update the company on Deaf Society appeals for public donations, programs and services

Deaf Society People (volunteers, employees, delegates) and candidates for volunteer work and prospective employees

Type of information collected:

- contact details (name, address, telephone numbers, email etc.)
- personal details including personal details of emergency contact person(s)
- date of birth
- country of birth, citizenship, residency and/or visa details

- details of current/previous employment or volunteer involvement
- skills and experience
- languages spoken and written
- qualifications, drivers licence details
- information and opinions from referees for prospective employees and candidates for volunteer work
- a National Police Check is required for all roles in the Deaf Society, and a Working With Children Check is required for roles involving children and/or young people. Individuals will be required to provide certain information for these checks. See our Human Resources policies for further information.
- information about any disability which you chose to disclose.
- in some situations it is necessary for the Deaf Society to collect or receive information about an individual's health. In this circumstance, the Deaf Society will advise why the information is being collected and whether and to whom it will be released.

Purpose for which the Deaf Society uses the information:

- to provide Deaf Society services
- to process an application to become a member, volunteer or employee of our organisation
- to facilitate a placement in an appropriate service or position
- to assist with services whilst an individual is employed or engaged as a volunteer with the Deaf Society
- to provide feedback on performance as a volunteer or employee
- to meet legislative responsibilities to all volunteers and employees
- to obtain feedback from individuals about their experiences
- to assist the Deaf Society to review and improve its programs and services to keep individuals informed about Deaf Society developments and opportunities
- to provide information about Deaf Society services
- to facilitate further involvements with the Deaf Society (e.g. Disability supports, membership, donor)
- to provide an accessible workplace.

Deaf Society Members

Type of information collected:

- contact details (name, address, telephone numbers, email etc.)
- credit card details
- expiration date of credit card
- areas of interest

Purpose for which The Deaf Society uses the information:

- to provide Deaf Society services
- to provide communication updates and ensure transparency

- for communicating with you about donated funds, particularly Appeals for public donations, and Deaf Society operations
- to process donations and provide accurate receipts
- to facilitate ongoing fundraising and marketing activities
- to provide info about The Deaf Society
- to receive invitations to upcoming events and activities
- to recognise your support of The Deaf Society

Online Users

Where this Privacy Policy applies to online privacy issues, it is part of the terms and conditions of use for the Deaf Society websites and other online services.

Type of information that may be collected through our websites, including social media platforms:

- contact details (name, address, telephone numbers, email etc.)
- credit card number
- expiration date of credit card
- non-personal information eg. visitor navigation and statistics
- server address, browser type, date and time of visit
- personal information
- information about whether you are deaf, deafblind or hard of hearing (subscription list only)
- IP addresses and data on usage associated with these addresses

Purpose for which The Deaf Society uses the information:

- to process donations, purchase orders, online bookings, applications and purchases/ transactions (e.g. enrolling in courses)
- to analyse website usage and make improvements to the website
- to provide accessible information to you via our subscription list
- to respond to your enquiries.

The Deaf Society does not match the personal information collected with the non-personal information

Additional Information

The website may from time to time contain links to other websites. When an online user accesses a website that is not the Deaf Society website, it may have a different privacy policy. If you want to know how that website collects and uses information, you should check that particular website's policy.

How We Collect Information

Where possible, we collect your personal and sensitive information directly from you. We collect information through various means, including telephone and in-person interviews, appointments, forms and questionnaires. If you feel that the information we are requesting, either on our forms or in our discussions with you, is not information that you wish to provide, please feel free to raise this with us.

In some situations we may also obtain personal information about you from a third party source. If we collect information about you in this way, we will take reasonable steps to contact you and ensure that you are aware of the purposes for which we are collecting your personal information and the organisations to which we may disclose your information, subject to any exceptions under the Act. For example, we may collect information about you from a health care professional, such as your doctor.

Health Information

As part of administering Deaf Society services, the Deaf Society may collect health information. For example, the Deaf Society often collects information about whether a person is deaf, deafblind or hard of hearing.

In some cases, the Deaf Society may collect more detailed health information (such as medical history) from customers participating in Deaf Society programs where this is relevant to the service we are providing (e.g. case management relating to assistance with access to health services).

When collecting health information from you, the Deaf Society will ask you if it is ok for us to collect it. We will explain how the information will be used and disclosed.

If health information is collected from another person or organisation (such as your doctor), the Deaf Society will inform you that this information has been collected and will explain how this information will be used and disclosed.

The Deaf Society will not use health information beyond the consent provided by you, unless your further consent is obtained or in accordance with one of the exceptions under the Privacy

Act or in compliance with another law. If the Deaf Society uses your health information for research or statistical purposes, it will be de-identified.

Use and Disclosure of Personal Information

We only use personal information for the purposes for which it was given to us, or for purposes which are related to one of our functions or activities.

We may share your personal information within the organisation where this is appropriate. For example, our Community Services staff may give your details to our Interpreting department so that they can make an interpreter booking for you.

For the purposes referred to in this Privacy Policy (discussed above under '*Collection of Personal and Sensitive Information*'), we may also disclose your personal information to other external organisations including:

- Government departments/agencies who provide funding for Deaf Society services
- Contractors who manage some of the services we offer to you, such as distribution centres who may send information to you on behalf of the Deaf Society. Steps are taken to ensure they comply with the Australian Privacy Principles when they handle personal information and are authorised only to use personal information in order to provide the services or to perform the functions required by the Deaf Society;
- Doctors and health care professionals who assist us to deliver our services;
- Other regulatory bodies, such as WorkCover NSW;
- Referees and former and prospective employers of Deaf Society employees and volunteers, and candidates for Deaf Society employee and volunteer positions; and
- Our professional advisors, including our accountants, auditors and lawyers.

Except as set out above, the Deaf Society will not disclose your personal information to another person or organisation unless:

- you have consented
- you would reasonably expect us to use or give that information for another purpose related to the purpose for which it was collected (or in the case of sensitive information – directly related to the purpose for which it was collected),
- it is otherwise required or authorised by law,
- it will prevent or lessen a serious threat to somebody's life, health or safety or to public health or safety,
- it is reasonably necessary for us to take appropriate action in relation to suspected unlawful activity, or misconduct of a serious nature that relates to our functions or activities,
- it is reasonably necessary to assist in locating a missing person,

- it is reasonably necessary to establish, exercise or defend a claim at law,
- it is reasonably necessary for a confidential dispute resolution process,
- it is necessary to provide a health service,
- it is necessary for the management, funding or monitoring of a health service relevant to public health or public safety,
- it is necessary for research or the compilation or analysis of statistics relevant to public health or public safety, or
- it is reasonably necessary for the enforcement of a law conducted by an enforcement body.

We do store some personal information outside of Australia. When we have to send information overseas we will take steps to protect your personal information. We will protect your personal information either by ensuring that the country of destination has similar privacy protections or that we have a contract with the recipient of your personal information that safeguards your privacy.

Security of Personal and Sensitive Information

The Deaf Society takes reasonable steps to protect the personal and sensitive information we hold against misuse, interference, loss, unauthorised access, modification and disclosure.

These steps include password protection for accessing our electronic IT systems, securing paper files in locked cabinets and physical access restrictions. Only authorised staff are allowed to access these details.

When the personal information is no longer required, it is destroyed in a secure manner, or deleted according to our Records Management Policy.

We sometimes store personal information using cloud-based IT services such as Mailchimp, Dropbox, Survey Monkey and Survey Gizmo which may be located outside Australia. We always take steps to ensure that similar privacy protections apply in the countries where these services operate.

Access to and correction of personal information

If an individual requests access to the personal information we hold about them, or requests that we change that personal information, we will allow access or make the changes unless we

consider that there is a sound reason under the Privacy Act or other relevant law to withhold the information, or not make the changes.

Requests for access and/or correction should be made by [contacting us](#). For security reasons, you must put your request in writing and provide proof of your identity by showing photo ID (e.g. driver's licence). This is to make sure that personal information is only accessed by the correct individuals.

In the first instance, the Deaf Society will generally provide a summary of the information held about you. It will be assumed (unless told otherwise) that the request relates to current records. These current records will include personal information which is included in Deaf Society databases and in paper files, and which may be used on a day to day basis.

We will provide access by allowing you to inspect, take notes or print outs of personal information that we hold about you. If personal information (for example, your name and address details) is duplicated across different databases, the Deaf Society will generally provide one printout of this information, rather than multiple printouts.

We will take all reasonable steps to provide access or the information requested within 14 days of your request. If the request is complicated or needs access to a large volume of information, we will take all reasonable steps to provide access to the information requested within 30 days.

The Deaf Society may charge you reasonable fees to reimburse us for the cost of providing access to information, including in relation to photocopying and delivery cost of information stored off site. For current fees, please [contact us](#).

If you can prove that personal information we hold about you is not accurate, complete or up to date, we will take reasonable steps to correct our records.

Access will be denied if:

- the request does not relate to the personal information of the person making the request;
- providing access would pose a serious threat to the life, health or safety of a person or to public health or public safety;
- providing access would create an unreasonable impact on the privacy of others;
- the request is frivolous and vexatious;
- the request relates to existing or anticipated legal proceedings;

- providing access would prejudice negotiations with the individual making the request;
- access would be unlawful;
- denial of access is authorised or required by law;
- access would prejudice law enforcement activities;
- access would prejudice an action in relation to suspected unlawful activity, or misconduct of a serious nature relating to the functions or activities of the Deaf Society
- access discloses a 'commercially sensitive' decision making process or information; or
- any other reason that is provided for in the Australian Privacy Principles or in the Privacy Act.

If we deny access to information we will tell you our reasons for denying access. Where there is a dispute about your right of access to information or forms of access, this will be dealt with in accordance with our Complaints and Feedback Policy.

Complaints and Feedback

If you would like to make a complaint or give us feedback about privacy, please see our Feedback and Complaints brochure:

http://deafsocietynsw.org.au/documents/We_want_your_ideas!_Brochure.pdf

Changes to this Privacy Policy

The Deaf Society reserves the right to review, amend and/or update this policy from time to time.

We aim to comply with the APPs and other privacy requirements required to be observed under State or Commonwealth Government contracts.

If further privacy legislation and/or self-regulatory codes are introduced or our Privacy Policy is updated, we will summarise any substantial modifications or enhancements in this section of our Privacy Policy.

Actions taken to improve our Privacy compliance will be noted in the Quality Review Record on the Privacy tab: [..\..\Quality Review Record.xlsx](#)

How to contact us

You can get more information about this privacy policy, or provide any comments, by [contacting us](#).

PART B — FILES: HOW WE HANDLE SPECIFIC TYPES OF FILES THAT CONTAIN PERSONAL INFORMATION

Public Awareness and Education Files

Purpose

The purpose of public awareness and education files is to record details of public awareness and educational activities, such as contact with the media, speeches, event management, surveys and publication preparation.

The limited personal information in public awareness and education files relates to organisations, individuals, media representatives, event attendees, service providers and events calendar listings which appear on our website.

Collection

It is our usual practice to collect personal information in public awareness and education files directly from individuals.

Sometimes we may collect personal information from an individual's representative or from publicly available sources such as websites or telephone directories.

Use and disclosure

We only use the personal information in public awareness and education files for the purposes of undertaking public awareness and education initiatives and managing public relations.

The personal information on public awareness and education files is not disclosed to other organisations or anyone else without consent unless the individual would reasonably expect, or

has been told, that information of that kind is usually passed to those organisations or individuals, or the disclosure is otherwise required or authorised by law.

Data quality

We maintain and update personal information in our public awareness and education files as necessary, or when we are advised by individuals that their personal information has changed.

Data security

Public awareness and education files are stored in either password protected electronic media or in locked cabinets in paper form. When no longer required, personal information in public awareness and education files is destroyed in a secure manner or deleted in accordance with our Records Management Policy.

The following staff members have access to public awareness and education files on a need to know basis:

- Management staff
- Relevant administration and project staff

Access and correction

For information about how to access or correct personal information in public awareness and education files see 'Access and correction' in Part A of this document

Contacts Lists

Purpose

We maintain contacts lists which include contact information about individuals who may have an interest in disability services. We use these contacts lists to distribute information about our activities and publications. Contact lists include our Subscription List (Mailing List) and the contact lists of management and project staff relevant to their areas of work.

Collection

It is our usual practice to collect personal information in contacts lists directly from individuals, for example, where they have asked to be added to a contact list.

Sometimes we collect personal information from a third party or from a publicly available source such as a website or telephone directory. We usually only collect personal information in this way if the individual would reasonably expect us to, or has given their consent. For instance, we might collect this information if we thought that the individual (or the organisation they work for) would like to receive information about services we are carrying out, or that they might be likely to consider information about disability care useful in the work they do. We would only contact this individual in their work capacity.

Use and disclosure

We only use personal information in contacts lists for the purpose of managing stakeholder relations.

We do not give personal information about an individual to other organisations or anyone else without consent unless the individual would reasonably expect, or has been told, that information of that kind is usually passed to those organisations or individuals, or the disclosure is otherwise required or authorised by law.

Data quality

We maintain and update personal information in our contacts lists when we are advised by individuals that their personal information has changed. We also regularly audit contacts lists to check the currency of the contact information. We will remove contact information of individuals who advise us that they no longer wish to be contacted.

Data security

The personal information in the contacts lists is stored in either password protected electronic media or in locked cabinets in paper form. When no longer required, personal information in contacts lists is destroyed in a secure manner or deleted in accordance with our Records Management Policy.

Routine access to contacts lists is limited to the database operators who have responsibility for maintaining the contacts lists. Other staff members have access to the personal information in contacts lists on a need to know basis.

Access and correction

For information about how to access or correct personal information in our contacts lists see 'Access and correction' in Part A of this document.

Customer Databases

Purpose

We maintain customer databases which include personal information about people who use our services. We use database files to provide services to individuals, evaluate our services, claim payment for services, and plan for future service provision. We may also use this information to contact people about additional services which they may want.

Databases include the CRM used by our Community Services, the interpreter booking system used by our Interpreter Service, the Smoke Alarm Subsidy Scheme database, our online course enrolment system, and Job Ready Live, used by our Employment Service.

Collection

It is our usual practice to collect personal information in contacts lists directly from individuals, for example, where they have asked to be added to a contact list.

Sometimes we collect personal information from a third party or from a publicly available source such as a website or telephone directory. We usually only collect personal information in this way if the individual would reasonably expect us to, or has given their consent. For instance, we might collect this information from your employer if they make an interpreter booking on your behalf.

Use and disclosure

We only use personal information in databases for the purpose of providing the relevant services, including evaluating and planning our services.

We do not give personal information about an individual to other organisations or anyone else without consent unless the individual would reasonably expect, or has been told, that information of that kind is usually passed to those organisations or individuals, or the disclosure is otherwise required or authorised by law.

Data quality

We maintain and update personal information in our databases when individuals tell us that their personal information has changed. We also regularly audit databases to check the accuracy and currency of information.

Data security

The personal information in the contacts lists is stored in password protected electronic media. When no longer required, personal information in contacts lists is destroyed, deleted or de-identified in accordance with our Records Management Policy.

Routine access to contacts lists is limited to the staff who are providing, arranging, managing, evaluating or planning the relevant services. Staff members only have access to personal information in databases on a 'need-to-know' basis.

Access and correction

For information about how to access or correct personal information in our contacts lists see 'Access and correction' in Part A of this document.

Note: This policy is covered in the staff induction website. Cross-check changes.