

PRISON FELLOWSHIP AUSTRALIA

POLICY ON PRIVACY AND PERSONAL INFORMATION

Adopted by the Board of Prison Fellowship Australia on 14 February 2019.

This policy is designed to inform Prison Fellowship Australia and its staff and volunteers about the importance of protecting the privacy and rights of individuals in relation to their personal information, and about the relevant procedures that Prison Fellowship Australia has adopted.

Prison Fellowship Australia will publish this policy on its website, for the information of its other stakeholders.

This policy will apply to all of the activities and operations of Prison Fellowship Australia, at all times.

Any breach of this policy is to be reported to the General Manager. Any significant breach of this policy is to be reported by the General Manager to the Chairman of the Board, within twelve hours of the General Manager becoming aware of that breach.

Any party that is engaged by Prison Fellowship Australia to undertake, on its behalf, activities that require access to personal information that is maintained by Prison Fellowship Australia (e.g. fundraising consultants, telemarketers, ministry partners or printers) will be required to comply with this policy as a condition of their engagement.

1. Introduction

Prison Fellowship Australia (“PFA”) is committed to the responsible and respectful use and protection of personal information, in compliance with the Australian Privacy Principles of the *Privacy Act 1988 (Cth)* (“the Act”) and with any relevant State and Territory legislation.

Information about a person, or that might reveal a person’s identity, is to be kept confidential. Any personal information that an individual or organisation chooses to provide to PFA is only to be used and protected in accordance with this policy.

PFA does not sell or rent personal data to third parties, under any circumstances.

PFA does not generally seek to obtain from third parties any information about a person that is not publicly available. However, it may do so from time to time, in the case of personal information about PFA’s clients that is held by a manager of custodial services and that is required to assist PFA to support that client. If it does so, then PFA will observe any protocols required by that manager. Any such information that is obtained will thereafter be used and protected in accordance with this policy.

2. Definition of personal information

PFA, and this policy, applies the definition of personal information that is used in the Act, i.e.

information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable.

PFA may collect and maintain records of personal information for its staff and volunteers, supporters and clients. The types of personal information that PFA maintains for each of these types of stakeholder is listed in Appendix A.

PFA takes all reasonable steps to ensure that personal information that is collected and maintained by PFA is accurate and is current.

3. Reasons for PFA's use of personal information

PFA collects and maintains personal information for different reasons for each type of stakeholder. The different types are

- (i) staff and volunteers;
- (ii) supporters; and
- (iii) clients.

Individual stakeholders may be recorded under more than one of these types, particularly in the case of staff and volunteers that are also supporters.

PFA takes all reasonable steps to ensure that personal information that is maintained by PFA is relevant to PFA's use of that information.

PFA also collects and maintains information that is not personal information, for each type of stakeholder.

3.1 Staff and volunteers

PFA uses personal information about its staff and volunteers to manage their PFA activities and to manage their relationship with PFA:

- (a) in the case of staff, as their employer; and
- (b) in the case of volunteers, as their supervisor.

3.2 Supporters

PFA uses personal information about its supporters for the following purposes:

- (a) to engage with them, in order to raise their awareness about PFA activities related to its vision and mission;
- (b) to seek financial and non-financial support from them;
- (c) to process donations, including the provision of receipts and annual tax statements;
- (d) to analyse the effectiveness of PFA's fundraising and other communications; and
- (e) to recruit staff and volunteers.

3.3 Clients

PFA's clients include inmates, former inmates and the families of inmates and former inmates, as well as victims of crime.

PFA uses personal information about its clients to manage the provision of PFA services to them.

4. Collection of personal information

PFA collects personal information directly from its individual stakeholders, through the following sources:

- (a) their access to, and use of, PFA's website;
- (b) the completion by them of application forms, registration forms and response forms provided by PFA; and
- (c) their conversations with PFA representatives.

In the case of its clients, PFA also collects limited personal information from the managers of custodial services.

5. Opt out provisions

Where personal information is used to communicate with an existing supporter or with an existing client, e.g. in person, by post, by email or by telephone, PFA will maintain reasonable awareness of any preference of that person to opt out of receiving such communications in future.

Any direct contact in any form with a prospective supporter, e.g. in person, by post, by email or by telephone, will include information on how to opt out of receiving such communications in future.

At reasonable intervals, information that is provided by PFA to existing supporters, e.g. by post or by email, will include an opportunity for that supporter to change the frequency or medium of communication to them by PFA.

If a person has not indicated a preference to opt out of receiving PFA communications, then PFA will assume their implied consent to receive further communications.

6. Disclosure of personal information

PFA does not disclose personal information about its staff and volunteers, or about its supporters, to other organisations or to other individuals.

PFA does not generally disclose personal information about its clients to other organisations or to other individuals. However, it may do so from time to time, in the case of personal information about a PFA client that is necessary for PFA to provide its services to other members of that client's family. If it does so, then PFA will observe any protocols required by the relevant manager of custodial services.

7. Access to personal information

PFA will provide any of its individual stakeholders with a copy of the personal information that is maintained by PFA about them, upon receiving a request to do so. Such a request needs to be either in writing or by email to the relevant contact address given in Section 10.

8. Data security assurance

PFA may collect and maintain personal information in hard copy or by electronic means. PFA takes reasonable steps to ensure that personal information is protected from misuse, from loss, from unauthorised access, from unauthorised modification and from unauthorised disclosure.

PFA's relevant internal systems are fully compliant with the security requirements of the Payment Card Industry Data Security Standard. Online donations to PFA are processed in real time using a secure and compliant payment gateway.

As part of PFA's commitment to openness about privacy practices, and in accordance with the Act, PFA maintains a data breach response plan. This plan sets out:

- (a) how PFA aims to prevent any serious data breaches;
- (b) how PFA will detect any serious data breaches;
- (c) how PFA will respond to any serious data breaches;
- (d) the requirement that, in the case of a serious data breach, PFA notify each affected person and that it notify the Australian Privacy Commissioner; and
- (e) the data breach response plan and this policy will each be reviewed to identify any changes that might be required.

Personal information that is maintained by PFA is destroyed when it is no longer needed.

PFA's email and website communications with its stakeholders are subject to the inherent insecurity of the internet. While PFA takes all reasonable steps to ensure the security of its internet communications to and from its stakeholders, it makes no assurance or warranty about the security during transmission of any such internet communication. Any personal information that is transmitted to PFA by an individual stakeholder using internet communications is transmitted at that stakeholder's own risk.

PFA's website may contain links to other websites, operated by third parties. PFA makes no assurance or warranty about the privacy practices of any such third party. PFA is not responsible for the privacy practices of any such third party. Each such third party is itself responsible to inform its stakeholders about its privacy practices.

9. Complaints

Any person with a complaint about the treatment of their personal information by PFA should notify their complaint to PFA in writing addressed to the Privacy Officer, either by mail or by email to the relevant contact address given in Section 10.

There is no charge for the lodgement of a complaint under this policy.

The Privacy Officer will investigate any complaint that is received about PFA's treatment of a person's personal information within a reasonable period (generally within 28 days) and will report the outcome of that investigation to the complainant and to PFA's General Manager.

If a complainant is not satisfied with PFA's response to the relevant complaint, then the complainant may refer the matter to the Australian Privacy Commissioner. In such a case, PFA will co-operate fully with any resulting process.

10. Contact addresses

Mail	Privacy Officer Prison Fellowship Australia PO Box 280 DONCASTER EAST VIC 3109
Email	privacy@prisonfellowship.org.au

APPENDIX A

Types of personal information maintained by PFA

1. Staff and volunteers

Name
Residential address
Mailing address
Email address
Phone number
Age / date of birth
Position title
PFA employment / volunteering history
Participation in PFA activities and events
Remuneration (staff only), including taxation and salary packaging
Bank account details (for payment of salary and reimbursements)
Registrations (e.g. for working with vulnerable people or for access to custodial facilities)
National Police Check
Formal qualifications, including training courses completed
Informal qualifications and other relevant skills (including languages other than English)
Ethnicity
Name and contact details for next of kin
Normal place of worship
Client referrals

2. Supporters

Name
Supporter number
Residential address
Mailing address
Email address
Phone number
Age / date of birth
Normal place of worship
Donation history
Communications history
Donor preferences (preferred ministries or locations)
Donor preferences (communications)

3. Clients

Name
Residential address
Mailing address
Email address
Phone number
Age / date of birth
Support relationships (assigned volunteer, family, guardian, local church)
Services requested / provided
Personal interests
Special needs (including dietary and medical information, where relevant)