

Richmind WA Privacy Policy

Version 4.0

Policy Number	POL-99
Policy Name	Richmind WA Privacy Policy
Policy Area	Governance
Policy Owner	Chief Executive Officer

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1. About this Privacy Policy

- 1.1 Richmind WA Inc. (RW, we, us or our) has implemented this Privacy Policy to provide information about what kinds of Personal information we may collect or hold, how we collect, hold, use, and disclose that Personal Information, choices you have regarding our use of that Personal Information, and your ability to access or correct that Personal Information. If you wish to make any inquiries regarding this Privacy Policy, you should contact our Quality Team in any of the ways specified in paragraph 15.

2. Personal Information

- 2.1 "**Personal Information**" is 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. Personal Information includes "sensitive information", which are generally more sensitive categories of information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual orientation, criminal record/criminal history, and health information (including biometric information, e.g., fingerprints).

3. What Personal Information do we collect and hold?

- 3.1 The types of Personal Information we may collect about an individual will depend upon the nature of our interaction with them. Personal Information that we collect may include (but is not limited to) the following:
- name
 - age and/or date of birth
 - contact details including telephone numbers (landline and/or mobile)
 - current address (including postal address)
 - email address
 - gender
 - basic health information
 - name and contact details about your next of kin in case we need to contact them in the event of an emergency
 - payment details, such as your credit card or bank account details
 - if you apply for an employment position with us, or as a contractor, volunteer, or student placement role, we may collect Personal Information relating to the requirements of the work to be undertaken, payroll and HR requirements, including:



- occupation and employment details including qualifications, employment status and any previous work experience.
- bank account and taxation details
- relevant health information
- copies of correspondence with RW
- employment/placement agreements and contracts, and
- other information from or in connection with your resume or job application
- photographs and/or images of you from camera footage (e.g., CCTV footage), and
- publicly available information from social media accounts and profiles.

3.2 We collect and record personal information about individuals such as:

- our clients, potential clients and their representatives, and clients' family members and support persons
- external stakeholders including the public.
- our suppliers and potential suppliers and their representatives, directors, partners, proprietors, and shareholders
- consultants, contractors and subcontractors and potential consultants, contractors and subcontractors and their representatives in relation to providing goods and services to us.
- our volunteers and students on placement
- our employees past and present, including applicants, and
- any other person who comes into contact with RW including Website visitors (see paragraph 4).

3.3 We are authorised to collect tax file numbers (TFNs) by the Income Tax Assessment Act 1936 (Cth). It is not compulsory for you to provide your TFN for our products and services, but if you do not, taxation law may require additional deductions to be made from amounts payable to you.

4. How and when do we collect Personal Information

4.1 We collect your Personal Information to allow us to conduct our organisational functions, to provide, market and sell our products and services and for the specified purposes set out in paragraph 5. In some circumstances the collection of Personal Information may be required by law.

4.2 We may collect your Personal Information in the course of providing you with services, or:

- when you enquire about or use our services



- when you provide us, or you offer or apply to supply us, with goods or services.
 - when you donate
 - when you provide information to us in any way (including by completing a form, disclosing information over the phone or via email, or providing us a business card)
 - when you request information about us or our services
 - when you provide feedback to us
 - when you visit or fill in a form on our website (see paragraph 5)
 - when you visit premises from which we operate
 - when you (or your employer) provide that information to us in the course of conducting or administering our relationship with you, or when you are carrying out activities in connection with our operations
 - when you submit a job application to us, or submit an application to volunteer or for a student placement with us
 - when you otherwise contact us by telephone, fax, email, social media, post or in person, or
 - where we are otherwise required or authorised by law to do so.
- 4.3 Generally, when providing our products and services, dealing with our personnel, or obtaining goods and services from our service providers, suppliers, or contractors, we collect Personal Information directly from the relevant individual where reasonable and practicable.
- 4.4 We may also collect Personal Information about you from third parties and other sources such as:
- your nominated representatives (e.g., family members and support persons of our clients, accountants, people acting under power of attorney, brokers and other professional advisors), or
 - publicly available sources of information,
- but we will only collect your Personal Information in this way if it is unreasonable or impracticable to collect this information directly from you or if we are otherwise permitted to do so.
- 4.5 If the Personal Information we collect includes sensitive information, including health information, we will ask for your consent to collect sensitive information unless the law allows us to collect it without your consent.
- 4.6 Where we engage with you multiple times over a short period in relation to the same matter, we may not provide you with a separate notice about privacy each time we engage with you.
- 4.7 Wherever it is lawful and practicable, individuals will have the option of not identifying themselves or requesting that RW does not store any of their Personal Information. Individuals who would like to access any RW services anonymously or want to use a pseudonym should inform us of this.
- 4.8 We will take all reasonable steps to provide services in accordance with any request. However, if you choose not to provide your Personal Information to us for the purposes



set out in this Privacy Policy, or if we do not or are unable to collect the Personal Information we require, we may not be able to provide you with the services you request. If we do not have your Personal Information, we may also be unable to provide you with any requested information or other services, or to effectively conduct our relationship with you.

5. Information collected via our website

- 5.1 Personal Information may be collected by us and by our third-party service providers who assist us in operating our website at <http://rw.org.au> including its subdomains and any other website we operate from time to time (collectively the **Website**).
- 5.2 We may use various technological methods from time to time to track the visiting patterns of individuals accessing our website, including but not limited to the methods set out in this paragraph.

Analytics

- 5.3 We use Analytics to help analyse how you use our website. Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated is used to create reports about the use of our website.

Click Stream Data

- 5.4 When you read, browse, or download information from our website, we or our internet service provider may also collect information such as the date, time and duration of a visit, the pages accessed, the IP address of your computer, and any information downloaded. This information may be used for purposes including statistical, reporting and website administration, maintenance, and improvement purposes, and to provide content and information most relevant to the user's profile and requirements.

Cookies

- 5.5 Our website may use 'cookies' from time to time. Cookies are small files that are transferred to a user's computer hard drive by a website for the purpose of storing information about a user's identity, browser type or website visiting patterns. Cookies may be used on our website to monitor web traffic, for example the time of visit, pages visited and some system information about the type of computer being used. We use this information to enhance the content and services offered on our website.
- 5.6 Cookies are sometimes also used to collect information about what pages you visit and the type of software you are using. If you access our website or click-through to our



Website from a link in an email we send you, a cookie may be downloaded onto your computer's hard drive.

- 5.7 Cookies may be used for other purposes on our website.
- 5.8 If you do not wish to have cookies downloaded you can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences. RW takes no responsibility for this.
- 5.9 If you disable the use of cookies on your web browser or remove or reject specific cookies from our Website or linked sites then you may not be able to gain access to all of the content and facilities in those websites
- 5.10 Some of the content on our Website may include applications made available by third parties, such as social media buttons or links that allow you to share content or links to our Website through the relevant third party platforms. These third party applications themselves may facilitate collection of information by those third parties, through your interaction with the applications and sometimes even if you do not interact directly with them. We are not responsible for the technical operation of these applications or the collection and use practices of the relevant third parties. Please visit the relevant third party websites to understand their privacy practices and options they may make available to you in relation to their collection of your Personal Information.

6. How do we use your personal information

- 6.1 We use the Personal Information we collect about you for our organisational functions and activities, in order to operate our business efficiently, and to market our products and services for the benefit of our clients.
- 6.2 We may collect, hold and use your personal information:
 - to identify and communicate with you
 - to respond to enquiries about our programs
 - to facilitate referrals to programs
 - to provide treatment and support to our clients
 - to enable us to provide you with other requested information, products or services
 - to otherwise assist our clients by providing them with information and support
 - to collect and process payments including donations
 - to help us to manage and enhance products or services we provide to you
 - for sector development activities
 - for community development activities
 - to help us to manage and enhance goods and services we procure from our suppliers and subcontractors
 - to personalise and customise your experiences on our website
 - to promote and market our products and services to you, including via our newsletter



- to provide you with information that we believe may be of interest to you or that you may be interested in receiving regarding us and our partners
 - to conduct research for the purposes of improving existing products or services or creating new products or services
 - to help us research the needs of our clients to enable us to develop our products and services with a better understanding of your needs and the needs of clients generally
 - to provide for the safety and security of our workers and onsite visitors
 - to help us manage our operations, including managing engagements with consultants and contractors
 - for administration and business support purposes including human resources management, maintenance, backup and audit
 - in respect of our employees, contractors, volunteers and students on placement - to determine and manage the work to be undertaken and for payroll and HR requirements
 - to process any job application, volunteer application or student placement application submitted by you
 - to respond to any queries or complaints you may have
 - to investigate, review, mitigate risks associated with, and inform you of, a data or other security breach involving your personal information, or
 - to comply with our statutory and legal obligations.
- 6.3 We may aggregate personal information for reporting, statistical and analysis purposes, and for business, product and service improvement purposes. This allows us to better inform ourselves and anticipate our customers' preferences and requirements, and to monitor and improve the effectiveness of our business, products and services. We may also de-identify information for inclusion in such aggregated databases or reports.
- 6.4 We reserve the right at all times to monitor, review, retain, and/or disclose any information as necessary to satisfy any applicable law, but we have no obligation to monitor the use of the Website or to retain the content of any user session.
- 6.5 You consent to us using your Personal Information in the above ways and as set out in this Privacy Policy.
- 6.6 We may otherwise collect, use or disclose your Personal Information where the collection, use or disclosure is:
- in accordance with this Privacy Policy or any agreement you enter into with us, or
 - required or authorised by law, including without limitation the Australian Privacy Principles under the Privacy Act 1988 (Cth).



7. When do we disclose your Personal Information

- 7.1 RW may disclose, or provide access to, your Personal Information to third parties in connection with the purposes described in [paragraph 5](#). Depending on the circumstances and the nature of your engagement with us, we may disclose your Personal Information to our related entities (from time to time), to third parties that provide products and services to us or through us, or to other third parties (such as your referee(s) in connection with a job application you have submitted).
- 7.2 We may also disclose your Personal Information to:
- for clients, their family members or support persons in accordance with clients' requests, or where they are the relevant client's guardian or caregiver
 - any of RW's internal divisions, business units or departments
 - your nominated representatives
 - other organisations or individuals who assist us in providing services to you
 - professional service providers and advisors who perform functions on our behalf, such as lawyers or medical providers
 - representatives, agents or contractors who are appointed by us in the ordinary operation of our business to assist us in providing goods or services or administering our business (such as for data storage or processing, printing, mailing, marketing, planning and product or service development)
 - banks, lenders, valuers, insurers, brokers, auditors, business consultants and IT service providers if necessary in their provision of products or services to us, and
 - Government agencies, regulatory authorities and other organisations or individuals either with your consent or as otherwise required or authorised by law (such as where necessary to lessen or prevent a serious risk to health or safety).
- 7.3 We may also disclose your Personal Information to our Website host or software application providers in certain limited circumstances, for example when our website experiences a technical problem or to ensure that it operates in an effective and secure manner.
- 7.4 As we continue to develop, we may buy, merge or partner with other companies or organisations, and in so doing, acquire customer Personal Information. In such transactions, Personal Information may be among the transferred assets. Similarly, in the event that a portion or substantially all of our business or assets are sold or transferred to a third party, we may also disclose certain information including your Personal Information to a purchaser or potential purchaser in connection with the sale or potential sale of our organisation or any of our assets, including in insolvency.



8. Overseas disclosure

- 8.1 Generally, we do not send or disclose your Personal Information to overseas recipients. However, in future there may be certain circumstances in which some of your Personal Information may be disclosed, transferred, stored, processed or used overseas by us, or by third party service providers. This may happen if:
- our offices or related entities are overseas
 - we outsource certain activities overseas
 - transactions, information, services or products have an overseas connection, or
 - our banking and computer systems including IT servers provided by our third party service providers may be connected or located overseas.
- 8.2 You consent to the collection, use, storage, and processing of your Personal Information outside of Australia as set out in this Privacy Policy.
- 8.3 In particular your, Personal Information may be disclosed to third parties outside Australia in which those parties or their, or our, computer systems may be located from time to time, where it may be used for the purposes described in this Privacy Policy.

9. Other uses and disclosures

- 9.1 We may collect, use and disclose your Personal Information for other purposes not listed in this Privacy Policy. If we do so, we will make it known to you at the time we collect or use your Personal Information.

10. Marketing

- 10.1 We do not generally use your Personal Information for direct marketing purposes.
- 10.2 However, we operate an e-newsletter which you can sign up to via our Website. If you sign up to our e-newsletter, you consent to us using your Personal Information for sending you the newsletter which may contain information about us or our products and services, as well as the products and services of third parties, now and in the future.
- 10.3 If you do not want to receive our newsletters, you can unsubscribe in any of the following ways:
- 10.4 clicking on the 'Unsubscribe' or subscription preferences link in any newsletter emails that you have received from us, or
- 10.5 contacting us using the contact details specified in [paragraph 15](#)



11. Storage and security of Personal Information held by us.

- 11.1 We aim to keep your Personal Information secure. RW uses reasonable physical, technical and administrative security safeguards to protect Personal Information held in electronic and hard copy paper records.
- 11.2 If we find that we no longer require or have no further need for your Personal Information we may de-identify it or remove it from our systems and destroy all record of it.

12. You can access and update your Personal Information

- 12.1 You are generally entitled to access Personal Information that we hold about you. If you request access to your Personal Information, in ordinary circumstances we will give you full access to your Personal Information. Depending on the nature of the request, RW may charge for providing access to this information, however such charge will not be excessive. However, there may be some legal or administrative reasons to deny access and if there is a sound reason under the *Privacy Act 1988 (Cth)* or other relevant law we may refuse access. If we refuse your request to access your Personal Information, we will provide you with written reasons for the refusal where we are required by law to give those reasons.
- 12.2 A request for access can be made by completing the "Privacy Request" form available (including providing the requested certified identification). The form is available on the Richmond WA Website and Kaya. You can also contact our Quality Team in any of the ways specified in [paragraph 15](#). Any dispute about your right of access to Personal Information will be handled in accordance with our Feedback and Complaints Resolution Policy and Procedure (see [paragraph 13](#) below).
- 12.3 We take all reasonable steps to ensure that any Personal Information we collect and use is accurate, complete and up-to-date. To assist us in this, you need to provide true, accurate, current and complete information about yourself as requested, and properly update the information provided to us to keep it true, accurate, current and complete.
- 12.4 Please contact us in any of the ways specified in [paragraph 15](#). If you believe that the Personal Information is inaccurate, incomplete, or out of date, and we will use all reasonable efforts to correct the information.
- 12.5 It would assist us to ensure we properly understand your request, and allow us to respond more promptly, if requests are made in writing and include as much detail as possible.



13. How do we deal with complaints about privacy?

- 13.1 If you feel that we have not respected your privacy or that we have conducted ourselves inconsistently with this Privacy Policy and you would like to make a complaint, you can either:
- contact our Quality Team in any of the ways specified in paragraph 15 and advise us as soon as possible or
 - submit the feedback/complaint form (available at: <https://www.rw.org.au/feedback/>) in person or via email to feedbackandcomplaints@rw.org.au.
- 13.2 It would assist us to respond to your complaint promptly if it is made in writing. Please detail information relevant to your complaint.
- 13.3 We will endeavour to respond in writing within five business days to acknowledge receipt of the feedback or complaint. We will investigate your queries and privacy complaints within a reasonable period of time depending on the complexity of the complaint. If you raised the complaint by following our Feedback and Complaints Resolution Policy and Procedure, we will respond as further detailed in our Feedback and Complaints Resolution Policy.
- 13.4 We will notify you of the outcome of our investigation.

14. Updates to this privacy policy

We may, from time to time, review and update this Privacy Policy, including to take into account new laws, regulations, practices and technology. All Personal Information held by us will be governed by our most recent Privacy Policy, posted on our Website at: <https://www.rw.org.au/privacy-statement/>. Any changes to this Privacy Policy may be advised to you by updating this page on our Website. We will aim to provide reasonable advance notice of such changes though this may not always be possible depending on the circumstances. We encourage you to check this page from time to time for any changes.

15. Contact us (questions, problems, complaints, use of your Personal Information)

If you:

- have a query or concern about this Privacy Policy or our Personal Information handling processes



- wish to make a complaint in relation to a breach of your privacy
- would like to access your Personal Information held by us or any Richmind WA owned information
- would like to update or correct your Personal Information held by us, or
- would like to opt out of direct marketing, please contact our Quality Team in any of the following ways:

Attention: Quality Team

Email Address: privacy@rw.org.au

Mailing Address: PO Box 682, Bentley WA 6982, or

Phone: (08) 9350 8800

Related Documents

- POL-154 Employee Privacy Policy
- PRO-47 Consumer Information Access Procedure
- POL-101 Documentation of Consumer Information Procedure
- POL-100 Email and Internet Usage Policy
- POL-104 Social Media Policy
- Documentation of Consumer Information
- POL-97 Informed Consent Policy
- PRO-79 Informed Consent Procedure
- PRO-52 Data Breach Response Procedure

Supporting Information

- Australian Privacy Principles
- Commonwealth Freedom of Information Act 1982
- Privacy Act 1988 – amended in Privacy Amendment (Enhancing Privacy Protection) Act 2012
- WA Freedom of Information Act 1992
- National Standards for Mental Health Services 2010
- National Disability Insurance Scheme Act 2013 (Cth)
- National Disability Insurance Scheme (Code of Conduct) Rules 2018
- National Disability Insurance Scheme Practice Standards and Quality Indicators
- QIC Health and Community Services Standards



Review Timeframe and Responsibility

Date of effect:	September 2016
Review Period:	3 years
Next review date:	30 October 2026
Prepared by:	GM Quality Governance and Risk
Preparation date:	1 March 2023
Reviewed by:	Chief Executive Officer
Reviewed date:	July 2023
Legal review by:	K&L Gates
Legal review date:	30 August 2021
Reviewed by Consumer and Family Reference Group:	N/A
Approved by:	Richmind WA Board
Approval date:	30 October 2023

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