

# POLICY 1.20

## PRIVACY POLICY

### Policy statement

The Reach Foundation's primary purpose is to support young people to discover their power. In fulfilling this purpose, The Reach Foundation (Reach, we, us or our) collects, holds and uses personal information for a variety of purposes, including program participation, revenue generation, fundraising and events, partnerships, commercial interactions, marketing and relationship promotion. Reach is committed to protecting the privacy of personal information it collects, holds and uses, in accordance with the Australian Privacy Principles set out in the Privacy Act 1988 (Cth).

This policy is intended to help people get a better understanding of why we collect, hold and use personal and private information, and how we protect it. Reach understands the importance of protecting your personal information and does so in accordance with the Privacy Act 1988 (Cth). If you have any further questions about this Privacy Policy, please use the contact information provided in section 13.

DOCUMENT CONTROL			
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### Related documentation

Privacy Act 1988 (Cth)  
1.19 Privacy Policy – Internal  
1.15 Young Person Wellbeing Policy  
Reach [Collection Statement](#)

### Definitions

**Participant** – means any individual participating in a Reach program. This includes young people aged under 18 years old attending Reach programs, and Reach staff and volunteers attending Reach programs or activities.

**Reach person** – means a Reach employee or volunteer who has signed a confidentiality agreement with Reach, either via their employment agreement or as a stand-alone agreement, and received training including in Reach policies that are appropriate to their role within Reach.

**Personal information** - 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, and includes sensitive information. Examples of personal information collected in the course of Reach's business might include:

- Information about a person's private or family life (eg, name, signature, home address, email address, telephone number, date of birth, next of kin details);
- Information relating to a person's banking or financial details or financial transactions with Reach (eg, bank account details, credit card details, donation details, payment details);
- Information about a person's employment, and working habits (eg, work address and contact details, job title and work practices); Sensitive information (see below for a definition that fits the Reach context);
- Commentary or opinion about a person (see below for a definition that fits the Reach context).

**Sensitive information** - has the same meaning as in the Privacy Act 1988 (Cth). Sensitive information includes information or opinion about an individual's health, racial or ethnic origin, religious beliefs, sexual orientation or criminal record, provided the information or opinion otherwise meets the definition of personal information. The kind of sensitive information collected in the course of Reach's business might include a participant's:

- Aboriginal or Torres Strait Islander origin status
- Parental/guardian/referring agency details
- Medical details (eg, physical limitations, diagnosed medical conditions, prescribed medication; spiritual belief that may affect medical treatment)
- Wellbeing details (eg, previous mental health concerns, current professional wellbeing assistance being received, hospitalisations for mental health concerns, use of alcohol or recreational drugs).

**Commentary or opinion** – means commentary or opinion of a Reach professional in relation to a person. The kind of commentary or opinion that may be recorded in the course of Reach's business might include:

- Wellbeing case notes in relation to a participant
- Notes recorded in relation to a Reach crew member's skills and performance
- Contact notes.

**Secure storage** – means storage in a location with restricted access, requiring a key or password to access it, and which is given only to Reach people who are authorised to do so. Specifically this means:

- for information in hardcopy form – storage in a room, filing cabinet or cabinet which requires a key to access it; and
- for information in electronic form – storage in a system or file which requires a password to access it.

**Reach Medical and Consent form** – means the form that must be completed for any participant in a Reach program, including Reach staff and volunteers. The Medical and Consent form collects a range of personal information including contact details, emergency contacts, medical details and wellbeing details, as well as consent to photograph/film/record and opt-out of future communications/marketing.

## 1. Types of personal information

Reach collects, stores and uses personal information which falls into seven categories:

1. **Program-related personal and sensitive information.** This is typically gathered via the Medical and Consent form, via a program-specific enrolment form for each program the participant is booked in to, and/or via an evaluation form and is completed by the participant or a parent/carer/agency on the participant's behalf (where the participant is under 18 years old). Examples of personal information collected includes contact details such as phone number, email, address, date of birth. Programs may be run for

participants or for Reach crew, or for Reach staff and volunteers. Participant information is generally stored in a customer relationship management (CRM) database used for program management and/or learning and development purposes, and is managed by the Reach team responsible for the relevant program.

2. **Development-related and accreditation-related personal information.** This is typically gathered via processes run by the Learning and Development team and relates to Reach voluntary and accredited crew members. This information is generally stored in a customer relationship management (CRM) database used for program management and/or learning and development purposes, and is managed by the Reach team responsible for crew development, accreditation and employment.
3. **Wellbeing-related case notes relating to participants.** Given its highly sensitive nature, this information is entered into a highly restricted section of the relevant database, and is only accessible by Reach's Wellbeing professionals, either electronically or in hardcopy form.
4. **Images and recordings that are produced by Reach including photographs and video.** These images and recordings may be of Reach people or participants, and are generally produced for promotional purposes. These images and recordings are typically produced and managed by the Communications and Marketing team, and may be used and distributed by others in Reach for promotional purposes.
5. **Contact information, financial details and contact history.** This information pertains to people's engagement with Reach as benefactors, donors or supporters. The data is stored in a customer relationship management (CRM) database used for business development and fundraising purposes. This enables teams to understand the nature and details of a person's history of engagement with Reach over time. Reach may also gather and use data from marketing material, website access and cookies.
6. **Personal information relating to actual or potential job vacancies.** This information relates to people's contact details, educational and work history, referees and may also include other personal and potentially sensitive information requested or provided as part of the application.
7. **Personal information relating to potential volunteer opportunities at Reach.** This information is entered by individuals on the Reach website and relates to people's contact details, educational and work history, and may also include other personal and potentially sensitive information requested or provided as part of their expression of interest. The information is stored in a third-party system and emailed to Reach's Info mailbox each time someone completes the form.

In relation to personal and sensitive information Reach will:

- **Collect** information which we need for our primary purpose of delivering youth-led workshops for young people, however we will also collect and use information for ancillary purposes in support of our primary purpose, such as communication, relationship development, marketing and fundraising;
- **Inform** individuals as to why we collect the information and how we may use the information gathered for both primary and ancillary purposes;
- **Use** personal information only for our primary purpose, and for an ancillary purpose that supports our primary purpose with the person's consent;
- **Store** personal and sensitive information securely, protecting it from unauthorised access. This includes not storing such information on hard drives of devices used for work purposes, and password protecting any exported data that is in an electronic file;
- **Provide access** for individuals to their own information, and the right to review that information upon request and seek its correction if required; and
- **Ensure** that all Reach people (staff or volunteers) handling personal and sensitive information have had a current police check completed and verified that it is clear of any charges which would make their access to personal and sensitive information inappropriate.

## 2. Collection and use of personal information

With respect to personal information, Reach will:

1. Only collect information that is necessary for its primary or ancillary purposes in Reach.
2. Provide opt out options for personal information collected for the purposes of:
  - Email correspondence or Reach newsletters
  - Notifying job applicants of their application status
3. Notify individuals about why we collect the information and how it is used. This is typically done via a Privacy Collection Statement on forms completed by individuals.
4. Notify stakeholders that this information is accessible to them.
5. Collect personal information from the person themselves wherever possible.
6. 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.
7. Collect sensitive information only with the person's consent.
8. Determine, where unsolicited personal information is received, whether Reach could have collected the personal information in the usual way, which would typically be via the normal method of information gathering for the relevant area in Reach (eg, Medical and Consent form or registration and payment form for program participants, Donation Form for donors, ticket purchase for participants at Reach events).
  - o If it could have been collected in the usual way, Reach will treat the information normally, as though it had been gathered via the normal method for the relevant area in Reach.
  - o If it could not have been collected in the usual way, Reach will destroy the information, and advise the person whose personal information has been destroyed about the receipt and destruction of their information.

## 3. Disclosure of data

Reach is committed to the safety of personal information and therefore the disclosure of data is only permitted under certain circumstances, as listed below. Personal information will only be disclosed:

1. When the information is to be used for Reach's primary purpose or for ancillary purposes in support of our primary purpose, such as communication, relationship development, marketing and fundraising.
2. In relation to a secondary purpose: where:
  - The ancillary purpose is related to Reach's primary purpose and the individual would reasonably have expected Reach to use it for that purpose; 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. Reach people will take responsibility and exercise professional judgement in regard to protecting children and young people or others to whom we have a duty of care, as noted in Reach's Young Person Wellbeing policy, Identifying and Responding to Suspected Harm policy and Working with Children Check policy or any other relevant legislation or Reach policy as may be relevant based on the given situation.
3. In relation to personal information which has been collected from a person, only for direct marketing where that person would reasonably expect it to be used for this purpose, and Reach has provided an opt-out, and the opt-out has not been taken up.
4. In relation to personal information which has been collected other than from the person themselves, only for direct marketing if the person whose personal information has been collected has consented, and they have not taken up the opt-out.

Reach will:

1. State in any Privacy Collection Statements on forms whether the information may be sent overseas.

2. Require all Reach people (staff or volunteers) who handle personal and sensitive information to complete a criminal history check and verify that is clear of any charges which would make their access to personal and sensitive information inappropriate.

#### **4. Storage and retention of personal information**

Reach holds personal information in both hardcopy and electronic forms. Hardcopy personal information is kept in locked cabinets with restricted access, while electronic files are saved on restricted access folders and databases with password protection. Sensitive information like wellbeing notes have additional restrictions on access.

Reach Implements and maintains actions to ensure that personal information is protected from misuse and loss, unauthorised access, interference, unauthorised modification or unauthorised disclosure. Key practices by Reach are:

1. Before disclosing any personal information to any recipient, including providers of IT services such as servers or cloud services, Reach establishes that they are compliant with Australia's privacy requirements.
2. Reach takes reasonable measures to keep data up-to-date, accurate and, as far as is practicable, complete.
3. Where we have obligations to the Australian Charities and Not-for-profits Commission (ACNC) and Australian Securities and Investments Commission (ASIC), Reach retains relevant records for at least seven years. This requirement to store relevant records relates to Medical and Consent information, donation information and all other records involving financial transactions and employee records.
4. Where records are considered "health records" (wellbeing case notes), Reach retains records consistent with legislative requirements, which is for at least seven years for adults and where the record is for a young person under 18 years of age, until that person is 25 years old.

#### **5. Data quality**

Reach takes reasonable steps to ensure the information we collect is accurate, complete, up to date, and relevant to the functions we perform.

#### **6. Data security**

Reach:

- Only allows a Reach person's access to personal and sensitive information where access to this information is relevant to their role.
- Requires that all Reach people (staff or volunteers) handling personal and sensitive information have completed a police check and verifies that is clear of any charges which would make their access to personal and sensitive information inappropriate.
- Keeps electronic and hardcopy personal and sensitive information in secure storage, such that it can only be accessed by those whose role makes it relevant for them to do so.

#### **7. Data breach**

In the event of a data breach Reach will aim to respond quickly to understand the nature of the breach and the risks associated with the breach (its breadth and possible impact), and to develop and follow a response plan to assist in containing the breach and ensuring an appropriate response from Reach.

Reach will consider the situation on a case-by-case basis and decide actions according to the assessment of risks and responsibilities in their particular circumstances. If there is a real risk of serious harm as a result of a data breach, the affected individuals and the Office of the Australian Information Commissioner should be notified.

## **8. Destruction and de-identification of data**

Reach will:

1. Destroy personal information once it is not needed to be kept for the primary or ancillary purposes for which it was collected. Destruction of personal information will include removing it from decommissioned laptops and other electronic devices. Per this policy, personal and sensitive information is only kept in secure storage, which includes in folders on restricted access server folders. Personal and sensitive information is not stored on a device's hard drive. The Office & Technology Manager is responsible for checking any returned or decommissioned devices for personal information which may be stored on it and deleting any relevant information if required.
2. Change information to a pseudonym or treat it anonymously if required by the person whose information Reach holds and will not use any government-related identifiers unless they are reasonably necessary for our functions.

## **9. Openness**

Reach seeks to ensure individuals are aware of Reach's Privacy Policy and its purposes, and makes this information freely available in relevant publications and on Reach's website.

## **10. Access to and correction of data**

When releasing information to individuals Reach will:

- a. Provide all individuals with access to their own personal information except where it is a threat to life or health, or it is authorised by law to refuse;
- b. Verify the identity of the individual before releasing any of their personal information to ensure the information is being released to the correct person;
- c. Take steps to correct it, if a person is able to establish that the personal information is inaccurate, incomplete, misleading or not up-to-date;
- d. Verify the identity of the individual before changing any of their personal information, to ensure the information being corrected relates to the individual requesting the change;
- e. Allow a person to attach a statement to their information if Reach disagrees it is inaccurate, if the storage system being used to hold the information allows for a statement to be attached;
- f. 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;
- g. Make no charge for making a request for personal information, correcting the information or associating a statement regarding accuracy with the personal information.

## **11. Anonymity**

Reach allows individuals 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.

## 12. Making information available to other organisations

Reach may be required to disclose your personal information to third parties to enable us to function effectively as a business. Disclosure of data to third parties may occur:

1. To our third-party service providers who are appointed by us to support the ordinary operation, administration or promotion of our business. Such providers may include our website host, IT support providers and software application providers who ensure that our technology operates in an effective and secure manner and/or provide support when we experience a technical problem.
2. We may also provide personal information on a confidential basis to an individual's authorised representative, if requested to do so by that individual.
3. Generally, Reach will only disclose personal information to these parties:
  - a. for the purposes set out in this Privacy Policy or any agreement an individual enters into with us, and for otherwise promoting the interests of young people who we are working with;
  - b. if we are otherwise required or authorised by law, including the Australian Privacy Principles under the Privacy Act 1988 (Cth); or
  - c. if the disclosure is made with your consent.
4. Reach or our third-party service providers may disclose, process or store overseas some personal information solely for the purposes described in this Privacy Policy. This may happen if our service providers are located overseas, or if transactions, information, services or products have an overseas connection. Where such parties are located overseas, individuals may have rights to enforce such parties' compliance with applicable data protection laws, but may not have recourse against those parties under the Australian Privacy Act in relation to how those parties treat their personal information.
5. In collecting personal information, Reach asks individuals to agree to the disclosure and use of such personal information in accordance with this Privacy Policy, and to consent to its disclosure and use overseas by the third parties, in countries in which those parties or their computer systems may be located, without Reach being responsible for such use (or for any breach).

## 13. Contacting us about your own personal information

If you have any further questions about this privacy policy, wish to opt-out of our marketing, wish to access or update your personal information or wish to make a complaint about a possible privacy breach please contact us by the following media.

**Phone:** +61 3 9412 0900

**Email:** [info@reach.org.au](mailto:info@reach.org.au)

**Letter:** The Reach Foundation, 152-156 Wellington Street, Collingwood VIC 3066.