



Policy Document

Safety, Wellbeing and Rights

Doc No. SWR-06

Issue: 1

Released: 16th Jul 2014

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Applicable legislation and standards

Privacy Act 1988
Privacy Amendment (Enhancing Privacy Protection) Act 2012
ISO9001:2008 Quality Management Systems – Requirements
Human Services Quality Standards – Department of Communities Child Safety and Disabilities Services

Links to other related documents

Doc No.	Title	Doc No.	Title
FCA-07	Feedback, Complaints and Appeals		

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Privacy Statement

Personal information collected by Healthy Options Australia (the organisation) is protected by the Privacy Act 1988 (Cth) (the 'Privacy Act'). Personal information is any information that can be used to identify you and includes sensitive health information.

The organisation follows the Australian Privacy Principles contained in the Privacy Act in handling personal information from clients/beneficiaries, business partners, donors, members of the public and Healthy Options Australia people (including members, volunteers, employees, delegates, candidates for volunteer work and prospective employees).

The organisation has developed a Privacy Policy to protect your privacy. The Policy is available in hard copy on request, or may be downloaded using the link below, and contains detailed information about the organisation's responsibilities, your rights, and the information that may be collected by the organisation and how it would be used.

The primary purpose for collecting personal information from you is to provide treatment, training, information, and education services to people in need, including planning, funding, monitoring and evaluating our services. The kind of personal information we collect will depend on your relationship with us (e.g. as a client, donor, business partner, employee, volunteer or member, on line user of Healthy Options Australia website).

We usually collect personal information directly from you. However, we sometimes collect personal information from a third party such as your carer, trustee or authorised representative or from a publicly available source, but only if:

- You have consented to such collection or would reasonably expect us to collect your personal information in this way, or
- If it is necessary for a specific purpose.

We only collect personal information for purposes that are reasonably necessary for one or more of our functions or activities.

Your personal information may be used to:

- Provide you with a service
- Provide you with educational information on alcohol and other drugs, mental health, human services industry development and training
- Report to government or other funding bodies how the funding is used
- Process your donation or purchase and provide receipts
- Communicate with you about how your donation is used or about our services, causes, events which we believe may be of interest to you
- Respond to your feedback or complaint
- Answer your queries.

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It may also be used for:

- Any other purpose for which it was requested and which was advised by you
- Directly related purposes.

Please be assured that wherever possible Healthy Options Australia uses information in a de-identified form. Personal information will not be disclosed to third parties without your permission, except where permitted or required under the Privacy Act.

We take steps to protect all personal, sensitive and health information and government related identifiers held by us against misuse, interference, loss, unauthorised access, modification and disclosure.

You can access the personal information that we hold about you, and you can ask us to correct the personal information we hold about you. For more information, see our **Privacy Policy – ‘Access to and Correction of Personal Information’**.

If you are listed on one or more of our network email lists you can opt out at any time. You can unsubscribe by using the ‘unsubscribe options noted in our emails.

Link to full Privacy Policy

How to contact us

For further information contact us at hoa@healthyoptions.org.au or alternatively you can write to us at:

Healthy Options Australia
GPO Box 590,
Brisbane Queensland 4001.

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Privacy Policy

Healthy Options Australia (the organisation) respects the privacy of all Healthy Options Australia people including members, employees, volunteers, our clients/beneficiaries, 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:

- Clearly communicate the personal information handling practices of Healthy Options Australia
- Enhance the transparency of the organisation's operations, and
- Give individuals a better and more complete understanding of the sort of personal information that the organisation holds, and the way we handle that information.

Scope

This policy applies to all Healthy Options Australia members, volunteers, employees, clients/beneficiaries, 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 organisation's current and former employees.

Definitions

Online users refers to anyone that accesses any of the Healthy Options Australia websites.

www.healthyoptions.org.au

www.drugarm.com.au

www.mentalhealth.org.au

www.accs.edu.au

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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.

The website means any of the Healthy Options Australia websites.

www.healthyoptions.org.au

www.drugarm.com.au

www.mentalhealth.org.au

www.accs.edu.au

Overview of Healthy Options Australia programs and services

Healthy Options Australia (the organisation) is a not-for-profit organisation founded upon Christian values and principles. The organisation has three subsidiaries that implement its vision and mission across the drug and alcohol, mental health and education sectors. These subsidiaries are Drug ARM Australasia (DAA), the Mental Health Association Queensland (MHAQ) and the Australian College of Community Services (ACCS).

The organisation is dedicated to reducing harms associated with alcohol and other drug use, reducing the symptoms and severity of mental illness and promoting positive, healthy lifestyles. They provide community-based support through education, awareness, prevention, treatment and support programs that assist individuals, families and communities throughout Queensland, New South Wales, Victoria and South Australia.

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

In addition to the services that we provide from funds donated by the public, the organisation also holds contracts to deliver State and Commonwealth government

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programs. In providing such services, we comply with the relevant state or national privacy principles and any additional obligations under the contract.

Outline of this policy

‘Part A – Personal Information Handling Practices’ explains our general information handling practices across Healthy Options Australia (the organisation) 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 organisation functions or activities such as client files, and student and volunteer records. Here you can find out what sort of records we keep and why.

Part A – 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 individuals may access and correct personal information held about them.

Collection of personal and sensitive information

If you would like to access any of the organisations services on an anonymous basis or using a pseudonym, please tell us. If this is possible and lawful, we will take all reasonable steps to comply with your request. However, we may not be able to provide the services in question if we are not provided with the personal information requested.

The nature and extent of personal and sensitive information collected by the organisation varies depending on your particular interaction with the organisation.

The organisation collects personal and sensitive information from clients/beneficiaries, donors, business partners, Healthy Options Australia people and online users. Further information about the kind of information collected from each of these groups and the usage of such information is detailed below.

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Healthy Options Australia **Clients and Beneficiaries**

Type 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 clients may have in the community
- Areas of interest
- Health information and/or medical history
- Credit card numbers or bank account details

How the information is collected:

- Initial contact including eligibility screen
- Initial assessment
- Online registration
- Sessions
- Application/enrolment forms
- Telephone

Purpose for which the organisation uses the information:

- To provide Healthy Options Australia services
- To provide clients/beneficiaries 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 that may involve contracted organisations
- To comply with legal obligations

Healthy Options Australia **Donors**

Type of information collected:

- Contact details (name, address, email, etc.)
- Personal details including: date of birth, gender, income
- Areas of interest
- Donation history
- Credit card numbers or bank account details of all our donors
- Expiration date of credit card

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How the information is collected:

- Communications, email, flyers
- Online registration
- Telephone

Purpose for which the organisation uses the information:

- To provide Healthy Options Australia 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

Healthy Options Australia **Business Partners**

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 Healthy Options Australia is to receive payment or make payment for services received)
- Australian Business Number (ABN)
- Type of support (e.g. Workplace giving, goods in kind, program support, volunteering)

How the information is collected:

- Communications, email, flyers
- Online registration
- Telephone

Purpose for which the organisation uses the information:

- To provide Healthy Options Australia services
- To process donations and provide accurate receipts
- To pay for services
- To establish and manage partnerships
- To receive services from you or the organisation that employs you
- To manage the organisation's relationship with the business partner
- To provide information about the organisation's services

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- To update the company on the organisation's appeals for public donations, programs and services

Healthy Options Australia **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 police check may be required for some roles in the organisation (particularly those involving children, young people and other vulnerable individuals). Individuals will be required to provide certain information for a Police Check. There are different arrangements for Police Checks in each state and territory of Australia. In some cases the Police Check will be received directly by the organisation and then stored securely or destroyed.
- In some situations it is necessary for the organisation to collect or receive information about an individual's health. In this circumstance, the organisation will advise why the information is being collected and whether and to whom it will be released.

Purpose for which the organisation uses the information:

- To provide Healthy Options Australia 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 organisation
- 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

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- To assist the organisation to review and improve its programs and services to keep individuals informed about the organisation's developments and opportunities
- To provide information about the organisation's services
- To facilitate further involvements with the organisation (e.g. membership, donor)

Healthy Options Australia **Members**

Type of information collected:

- Contact details (name, address, telephone numbers, email, etc.)
- Date of birth
- Credit card details
- Expiration date of credit card
- Areas of interest

Purpose for which the organisation uses the information:

- To provide the organisation's services
- To provide communication updates and ensure transparency relating to donated funds, particularly Appeals for public donations, and organisation operations
- To process donations and provide accurate receipts
- To facilitate ongoing fundraising and marketing activities
- To provide information about the organisation
- To receive invitations to upcoming events and activities
- To recognise your support of the organisation

Online Users

To the extent that this Privacy Policy applies to online privacy issues, it is to be read as forming part of the terms and conditions of use for the Healthy Options Australia website.

Type of information collected:

- Contact details (name, address, telephone numbers, email, etc.)
- Credit card number
- Expiration date of credit card
- Non-personal information e.g. Visitor navigation and statistics
- Server address, browser type, date and time of visit

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- Personal information

Purpose for which the organisation uses the information:

- To process donations, purchase orders, online bookings, purchases/transactions (e.g. Booking First Aid Health & Safety courses)
- To analyse website usage and make improvements to the website
- The organisation 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. Healthy Options Australia stresses that when an online user accesses a website that is not the organisations website, it may have a different privacy policy. To verify how that website collects and uses information, the user 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 that 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 the organisation's services, Healthy Options Australia may collect health information. For example, the organisation collects health information (such as medical history) from some clients/beneficiaries participating in organisation programs. When collecting health information from you, the organisation will obtain your consent to such collection and explain how the information will be used and disclosed.

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If health information is collected from a third party (such as your doctor), the organisation will inform you that this information has been collected and will explain how this information will be used and disclosed.

The organisation 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 Healthy Options Australia uses your health information for research or statistical purposes, it will be de-identified if practicable to do so.

Use and disclosure of Personal Information

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

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 Healthy Options Australia services
- Contractors who manage some of the services we offer to you, such as distribution centres that may send information to you on behalf of the organisation. Steps are taken to ensure they comply with the APPs 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 organisation
- Doctors and health care professionals, who assist us to deliver our services
- Other regulatory bodies, such as WorkSafe
- Referees and former employers of Healthy Options Australia employees and volunteers, and candidates for the organisation employee and volunteer positions, and
- Our professional advisors, including our accountants, auditors and lawyers.

Except as set out above, the organisation will not disclose an individual's personal information to a third party unless one of the following applies:

- The individual has consented
- The individual 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

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- 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
- It is reasonably necessary for the enforcement of a law conducted by an enforcement body.

We do not usually send personal information out of Australia. If we are otherwise required to send information overseas we will take measures to protect your personal information. We will protect your personal information either by ensuring that the country of destination has similar protections in relation to privacy or that we enter into contractual arrangements with the recipient of your personal information that safeguards your privacy.

Security of Personal and Sensitive Information

Healthy Options Australia 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 system, securing paper files in locked cabinets and physical access restrictions. Only authorised personnel are permitted to access these details.

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

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.

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Requests for access and/or correction should be made to the Privacy Officer (details of which are set out below). For security reasons, you will be required to put your request in writing and provide proof of your identity. This is necessary to ensure that personal information is provided only to the correct individuals and that the privacy of others is not undermined.

In the first instance, the organisation will generally provide a summary of the information held about the individual. 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 the organisation's 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 organisation 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. In situations where the request is complicated or requires access to a large volume of information, we will take all reasonable steps to provide access to the information requested within 30 days.

Healthy Options Australia may charge you reasonable fees to reimburse us for the cost we incur relating to your request for access to information, including in relation to photocopying and delivery cost of information stored off site. For current fees, please contact the Privacy Officer.

If an individual is able to establish that personal information the organisation holds about them is not accurate, complete or up to date, the organisation 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

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- 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 organisation
- Access discloses a 'commercially sensitive' decision making process or information, or
- Any other reason that is provided for in the APPs or in the Privacy Act.

If we deny access to information we will set 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 the complaints procedure set out below.

Complaints Procedure

If you have provided us with personal and sensitive information, or we have collected and hold your personal and sensitive information, you have a right to make a complaint and have it investigated and dealt with under this complaints procedure.

If you have a complaint about the organisation's privacy practices or our handling of your personal and sensitive information please contact our Privacy Officer (details of which are set out below).

All complaints will be logged on our database.

A privacy complaint relates to any concern that you may have regarding the organisation's privacy practices or our handling of your personal and sensitive information. This could include matters such as how your information is collected or stored, how your information is used or disclosed or how access is provided to your personal and sensitive information.

The goal of this policy is to achieve an effective resolution of your complaint within a reasonable timeframe, usually 30 days or as soon as practicable.

However in some cases, particularly if the matter is complex, the resolution may take longer.

Once the complaint has been made, we will try to resolve the matter in a number of ways such as:

- Request for further information: We may request further information from you. You should be prepared to provide us with as much information as possible, including details of any relevant dates and documentation. This will enable us to investigate the complaint and determine an appropriate solution. All details provided will be kept confidential.

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- Discuss options: We will discuss options for resolution with you and if you have suggestions about how the matter might be resolved you should raise these with our Privacy Officer.
- Investigation: Where necessary, the complaint will be investigated. We will try to do so within a reasonable time frame. It may be necessary to contact others in order to proceed with the investigation. This may be necessary in order to progress your complaint.
- Conduct of our employees: If your complaint involves the conduct of our employees we will raise the matter with the employee concerned and seek their comment and input in the resolution of the complaint.
- The complaint is substantiated: If your complaint is found to be substantiated, you will be informed of this finding. We will then take appropriate agreed steps to resolve the complaint, address your concerns and prevent the problem from recurring.
- If the complaint is not substantiated, or cannot be resolved to your satisfaction, but this Privacy Policy has been followed, the organisation may decide to refer the issue to an appropriate intermediary. For example, this may mean an appropriately qualified lawyer or an agreed third party, to act as a mediator.
- At the conclusion of the complaint, if you are still not satisfied with the outcome you are free to take your complaint to the Office of the Australian Information Commissioner at www.oaic.gov.au.

We will keep a record of your complaint and the outcome.

We are unable to deal with anonymous complaints. That is because we are unable to investigate and follow-up such complaints. However, in the event that an anonymous complaint is received we will note the issues raised and, where appropriate, try and investigate and resolve them appropriately.

Changes to this Privacy Policy

Healthy Options Australia 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 and substantial modifications or enhancements in this section of our Privacy Policy.

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How to Contact Us

Individuals can obtain further information in relation to this privacy policy, or provide any comments, by contacting us:

Telephone

1300 656 800

Post

GPO Box 590

Brisbane Queensland 4001

Email

hoa@healthyoptions.org.au

Note: These calls can be made for a local call cost from fixed residential landlines anywhere in Australia, but calls from mobile and pay phones may incur higher charges. Check with the service provider for costings from mobile and pay phones.

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 that 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.

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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 File, Records & Archiving Management Policy.

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

- Directors
- Policy staff
- Corporate Affairs 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.

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Contacts Lists

Purpose

We maintain contacts lists which include contact information about individuals who may have an interest in disability services. We use these contact lists to distribute information about our activities and publications.

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 that they work for) would like to receive information about services we are carrying out, or that they might be likely to consider information about our services 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.

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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 File, Records & Archiving 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 public awareness and education files, see '**Access and Correction**' in **Part A** of this document.

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