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1. POLICY AIM

Gippsland Women's Health is committed to responsible and appropriate collection and management of personal and health information consistent with the:

- *Privacy and Data Protection Act 2014 (Vic)*
- *Health Records Act 2001 (Vic)*
- *Privacy Act 1988*
- *Child Safe Standards*

All Key Management Personnel (KMP) and employees of GWH, including any functions or staff employed under auspice arrangements are bound to treat personal and health information in accordance with this policy.

2. DEFINITIONS

Board means Gippsland Women's Health Board of Management

CEO means Chief Executive Officer

Employee means a person who is either a GWH Board member, paid employee (casual, part time or full time and including staff employed under auspice arrangements), volunteer or student.

GFVA means Gippsland Family Violence Alliance

GWH means Gippsland Women's Health

KMP means Key Management Personnel

MFA means Multi Factor Authentication

Personal information means information or an opinion about an identified individual or an individual who is reasonably identifiable. This includes:

- Name
- Age
- Address
- Employment status
- Employing organisation

Sensitive information means a subset of personal information and includes information or an opinion about:

- racial or ethnic origin
- political opinions
- religious beliefs or affiliations
- philosophical beliefs
- sexual orientation
- criminal record
- health information
- Genetic information¹
- Family violence experience
- Experiences with the health sector

3. SCOPE

Gippsland Women's Health Board members, employees (including auspice employees), volunteers, students, contractors and consultants are within scope for this policy.

4. WHY INFORMATION IS COLLECTED

GWH collect and use personal information so that GWH can perform the functions delegated to the organisation as set out in the legislation in Section 1 of this policy and to perform the functions of our services.

This may include:

- When an individual applies to work with GWH
- When an individual is employed by GWH
- If an individual is employed by an organisation GWH partner with
- When an individual has engaged with GWH through GWH website or social media
- When an individual has registered to attend an event or has attended an event hosted by GWH
- When an individual has subscribed to one of GWH publications
- When an individual engages GWH services to deliver training or similar service with or without a fee-for-service
- Participation in research and/or evaluation about GWH and/or women's health and prevention of violence
- Participation in other surveys as deemed necessary by funding bodies or for quality assurance purposes.

¹ Services Australia, Privacy Policy: <https://www.servicesaustralia.gov.au/privacy-policy?context=1>

5. TYPES OF INFORMATION COLLECTED

There is an acknowledgment that technology platforms can change quickly with advances, however the basic functions by which GWH performs tasks remains somewhat similar.

Platforms GWH use may change, however the functions of the platforms will remain similar.

GWH collect a range of information, through various platforms including:

- Websites - Appendix 1
- Social Media - Appendix 2
- Email lists - Appendix 3
- Events - Appendix 4
- Survey's - Appendix 5
- Application for Employment - Appendix 6
- Cloud Storage - Appendix 7
- Financial Accounts management - Appendix 8
- Partnering Organisations – Appendix 9
- Delivery of Services - Appendix 10
- Indirect collection of information - Appendix 11

6. HOW GWH USE INFORMATION

When personal information is submitted to GWH the individual provides consent for personal information to be used to:

- Administer a professional relationship with an individual in accordance with the activities that GWH participate in
- conduct surveys
- monitor activity on the organisations websites or social media;
- provide information to individuals about an event, activity, or publication conducted by GWH or other activities the organisation is affiliated with that may be of interest
- implement internal administrative purposes i.e. staff training, risk assessment
- improve the organisations website and other publications
- enforce legal rights including claim recovery activities and legal proceedings
- where possible, protect the rights, property, or personal safety of another person
- notify relevant authorities where
 - there is a serious threat to an individual's life or to public health or safety
 - there is reason to suspect unlawful activity has been engaged in
 - required or authorised by law or an enforcement body

GWH will generally only use or disclose personal information when it relates to the primary purpose for which it was collected. If an individual does not wish to receive communications from GWH preferences can be updated by contacting the organisation.

If personal information is provided to GWH via mobile phone number, email address, text message or instant message address or other methods of communication, the individual authorises GWH to send information using the same method of communication.

7. WHO PERSONAL INFORMATION CAN BE DISCLOSED TO

Personal information may be disclosed to persons within GWH in accordance with this Policy and associated legislation. Personal information may also be provided to:

- any third parties GWH engage to provide certain functions on our behalf i.e. storing and managing databases, compiling raw data for analysis and research purposes and providing professional services such as accounting or legal services and;
- Any third parties that an individual authorises us to give personal information to.

GWH will never permit third parties to use, sell, or transfer personal information for commercial purposes in any way.

Occasionally, GWH may disclose personal information to unrelated third parties i.e. legal or professional advisers and other government authorities or agencies. This will only occur where such disclosure is reasonably required to obtain advice, prepare legal proceedings, investigate suspected improper conduct or wrongdoing, and assist a lawful authority in the discharge of its duties and/or by law.

GWH impose strict requirements of security and confidentiality on all third parties that we deal with to ensure personal information is handled appropriately. However, GWH cannot be held responsible for any misuse or unauthorised disclosure of personal information by such third parties.

7.1 Disclosure to service provider

GWH uses a number of service providers to whom personal information is disclosed. These include providers that host website servers, manage Information Technology functions and other consultants.

To protect personal information disclosed, GWH will:

- enter into a contract which requires the service provider to only use or disclose the information for the purposes of the contract
- include special privacy requirements in the contract where necessary

7.2 Disclosure of sensitive information

GWH only discloses sensitive information for:

- The purpose for which it was intended by the individual
- Directly related purposes reasonably expected
- If the individual agrees to such disclosure

7.3 Disclosure of personal information overseas

Web traffic information is disclosed to Google Analytics when individuals visit the GWH and GFVA websites. Google stores information across multiple countries and further information can be found via the Google Data Centres and Google Locations.

When an individual communicates with GWH through a social network service such as Facebook or Twitter, the social network provider and its partners may collect and hold personal information overseas.

8. STORAGE OF INFORMATION

GWH is committed to keeping all data and information secure and all reasonable precautions will be implemented to protect personal information from loss, misuse, or alteration.

Personal information held by GWH is protected by a number of physical and electronic safeguards including restricted access to storage areas and computer databases. GWH will take all reasonable steps to keep personal information secure and confidential once it is no longer in use. GWH do this by:

- regularly assessing the risk of misuse, interference, loss, and unauthorised access, modification or disclosure that information; and
- Conducting regular internal and external audits to assess whether GWH have adequately complied with or implemented these measures.

GWH will also take reasonable steps to de-identify personal information before it is passed on to third parties i.e. in situations where an individual has agreed to the use of personal information to compile raw data for research purposes.

9. ACCESS TO PERSONAL INFORMATION BY AN INDIVIDUAL

In accordance with the Privacy Act (Australian Privacy Principles 12 and 13) an individual has the right to ask for access to personal information that GWH hold. An individual can ask for access or correction by contacting GWH and a response shall be provided within 30 days. GWH is required to take reasonable steps to correct personal information if GWH consider it is incorrect, unless there is a law that allows or requires GWH not to.

GWH will ask an individual to verify their identity before giving access to personal information or correct it, and GWH will endeavor to make the process as simple as possible. If GWH refuse to give an individual access to, or correct, personal information, GWH must notify the individual in writing setting out the reasons.

If GWH make a correction and have disclosed the incorrect information to others, an individual can request GWH to tell them about the correction. GWH must do so unless there is a valid reason not to.

If GWH refuse to correct personal information, an individual can request GWH to review this by providing a statement outlining why the individual believes the information is incorrect and why.

An individual also has the right under the Freedom of Information Act to request access to documents that GWH hold to be changed or annotated if it is incomplete, incorrect, out-of-date or misleading.

10. ANONYMITY

Where possible, GWH will allow individuals to interact with the organisation anonymously or using a pseudonym. For example, if an individual contacts GWH with a general question GWH will not ask for an individual's name unless it is needed to adequately respond including for GWH membership applications.

However, for most organisational functions and activities a name and contact information and enough information about the particular matter is required in order to enable GWH to fairly and efficiently handle inquiries, services, requests, complaints or a membership, Board or employment application.

11. COMPLAINTS

If an individual wishes to complain about how GWH have handled personal information a complaint can be made in writing. If an individual requires assistance in lodging a complaint, GWH can be contacted to assist. If GWH receive a complaint from an individual about how GWH has handled personal information GWH will determine what (if any) action should be taken to resolve the complaint.

If GWH decide that a complaint should be investigated further, the complaint will be handled by the GWH CEO (or delegate), along with the Management team or Board as appropriate, excluding any member whose actions the individual is complaining about. Where the actions pertain to the GWH CEO, an individual can refer to the GWH Whistle-blower's Policy and communicate with the GWH Board of Management.

GWH will assess and handle complaints about the conduct of the GWH and/or its members using the GWH Code of Conduct and the GWH Complaints policy. GWH will inform individuals that their complaint has been received within 7 business days and a response will be provided within 30 business days.

If an individual is not satisfied with GWH's response they may ask for a review by a more senior officer within GWH or a complaint can be lodged with the Office of the Information Commissioner: <https://www.oaic.gov.au/privacy/privacy-complaints>

12. RELATED POLICIES

- Gov-02 Board Code of Conduct
- Gov-07 Risk Management Policy
- Gov-17 Conflict of Interest and Related Parties Policy
- Gov-18 Whistleblower Policy
- Gov-23 Child Safety Standards
- Gov-24 Disclosure of harm to child or children policy
- HRM-02 Recruitment
- HRM-11 Grievance Procedure
- HRM-14 Disciplinary Procedure
- HRM-16 Code of Conduct

13. REFERENCES

- [*Privacy and Data Protection Act 2014 \(Vic\)*](#),
- [*Health Records Act 2001 \(Vic\)*](#),
- [*Privacy Act 1988*](#)
- [*Child Safe Standards*](#)

Appendix 1 - Websites

GWH manage and operate the following websites:

- Gippsland Women's Health
- Gippsland Family Violence Alliance
- Other event based websites as required

GWH use a range of tools provided by third parties, including Google, Bing and web hosting companies, to collect or view website traffic information. These sites have their own privacy policies. GWH also use cookies and session tools to improve user experience when accessing GWH websites. The information collected by these tools may include the IP address of the device individuals are using and information about sites that IP address has come from, the pages accessed on the GWH sites and the next site visited. GWH use the information to maintain, secure and improve GWH websites and to enhance user experience.

GWH can collect anonymous information using cookies on GWH websites. Cookies are pieces of information that a website transfers to an individual computer's hard disk. Cookies in and of themselves do not identify users personally but they do allow the tracking of an individual's use of a website. The use of cookies to track traffic patterns through websites is now commonplace. Most web-browsers are set to accept cookies however an individual can configure their web browser to reject cookies. If an individual rejects cookies, they may not be able to use all of the GWH online services.

GWH websites have a 'Quick Exit' button to ensure that those accessing assistance can view the websites privately. This will delete the website URL on the user's browser, so that there will not be a record of visiting the sites. This will only occur if you press 'Quick Exit'.

Appendix 2 – Social Media

GWH use social networking services such as Twitter, Facebook, Instagram, LinkedIn and YouTube to communicate with the public.

When an individual communicates with GWH using these services personal information may be collected - GWH only use this information to help communicate with individuals and the public.

Information collected through these sites occurs through Google Analytics and third party websites.

Social networking services will manage individual personal information for their own purposes.

These sites have their own privacy policies and links to these are:

- [Meta Privacy Policy](#)
- [Twitter Privacy Policy](#)
- [You tube Privacy Policy](#)
- [LinkedIn Privacy Policy](#)

Appendix 3 – Email lists

GWH use email for communication to our members, our partnerships and to the community.

Anyone can request to be unsubscribed from any email list at any time.

To unsubscribe from any communications, email admin@gwhealth.asn.au

GWH also use Hubspot to manage our subscription lists for bulk communications and Newsletters. Through this platform GWH collect email and other relevant information, such as name, interests and geographic location when and individual subscribes for these email lists.

GWH only use these email lists for their defined purposes, and cannot share email lists with third parties.

An individual has the right to unsubscribe from an email list at any time. Once unsubscribed to an email list, the email cannot be used for purposes other than the defined use.

Hubspot will handle personal information for their own purposes and their privacy policy can be found here [privacy policy](#).

Appendix 4 – Events

GWH use Eventbrite and Humantix to register attendance at GWH events, this includes attendance at GWH facilitated training.

GWH may use the data gathered through Eventbrite and Humantix for reporting purposes to GWH funding bodies and funding partners. This includes those who have registered for events and is inclusive of those who register but do not those attend those events.

GWH may also provide data of both registered and registered but not attended to employing agencies for their own reporting and monitoring purposes.

Participants have the options to opt out of both of the above at the time of registration. In that event, non-identifying information will be provided to funding partners and partner organisations.

The information gathered will be information pertaining to name, contact information, geographic and employment information.

Eventbrite and Humantix have their own Privacy Policies and they can be found at Humantix <https://www.humantix.com/au> and Eventbrite [Privacy Policy](#).

Appendix 5 – Surveys

Surveys are used to gather information to inform GWH planning, as a tool for evaluation, or for research purposes, and may also be used for any subsequent reporting to funding bodies and for the promotion and utilisation of reports and the organisation.

For example, GWH may quote an individual's responses in a report of promotional material, or to use the quantitative data collected for reporting for example: *'8 out of 10 respondents are more confident to work with those experiencing violence'*.

If GWH do this, we will not use an individual's name, address or any information that could identify that individual, unless explicit consent is sought and documented.

While GWH may collect personal information, at no stage will this information be published with an individual's survey answers.

When GWH do request personal information, this is done to ensure there are not multiple responses from individuals or in order to follow up with an individual if that has been requested in the survey response.

The only GWH personnel who have access to personal information is the survey coordinator, who's name will be provided at the start of each survey, and any team members working with the coordinator which will also be stated at the top of each survey.

When collecting information that is deemed sensitive, GWH will ensure that the survey's answers are stored in databases within Australia in accordance with the Privacy Act 1988 and [Australian Privacy Principles](#) (APPs).

However, for information that is personal, GWH will use Survey Monkey for the collection, aggregation and analysis of survey data. The information in these survey's is transmitted and stored securely in the United States and is accessed by GWH in accordance with this Privacy Policy and [Survey Monkey's Terms of Use](#).

An individual may decline to provide this information by not responding to these surveys.

If an individual does provide a survey answer, the individual therefore consents to storage of that survey answer offshore. This means that once the individual has chosen to participate in the survey, GWH will not have an obligation to take reasonable steps to ensure that Survey Monkey does not breach the Australian Privacy Principles.

Appendix 6 – Employment applications

When an individual applies for either a paid or voluntary role (including unpaid Board of Management roles) at GWH, personal information is collected to administer the application and assess suitability for the relevant position.

If the application is successful, the personal information GWH has collected will form part of the individual's employment or Board record and will be used to administer tenure of employment at GWH.

If the individual's application is not successful, GWH may keep personal information and related documents on file for a reasonable period and may use this information to communicate with the specific applicant about other employment opportunities that may be of interest.

Appendix 7 – Cloud based storage

In the context of this policy, GWH only utilises a Cloud based storage system for storage and management of data for the following information:

- GWH employment files and Board of Management files
- Research and evaluation pertaining to women's health and family violence
- Partner agency information, including names and contact information

GWH utilises i-drive Synology to perform a cloud based data backup system every 24 hours. In accordance with the data collection disclosure, information is not used or shared for any other purpose other than what is specified. The Data Collection Disclosure can be found here:

https://www.synology.com/en-global/company/legal/Services_Data_Collection_Disclosure

GWH utilise Multifactor authentication to ensure adequate security measures for accessing cloud based data.

Appendix 8 – *Xero* accounting system

GWH utilises the *Xero* financial management system to manage financial, accounting and payroll within the organisation.

Information that is stored within the *Xero* system includes GHW financial information and employee personal information related to payroll.

Xero is a cloud based system and their Privacy notice can be found here in order to understand issues related to sharing of information [Privacy Notice | Xero AU](#)

Xero has numerous security measures that help make it safe, secure and reliable including two-step authentication, data encryption, secure data centres in enterprise-grade hosting facilities and multi-layered network security.

Appendix 9 – Professional partnerships

GWH works closely with partner agencies across Gippsland and more broadly to build capability and capacity and to improve system's integration with family violence response services through the GFVA as an auspice function.

Under some circumstances the sharing of information for both research and projects between partners will be required.

This may include both personal and sensitive information.

In circumstances where sensitive information is shared a Memorandum of Understanding (MOU) or Partnership Agreement between the agencies will be required to ensure all information is only used for its intended purposes.

Participants in any research will be fully informed of the objectives and terms of the research and consent will be sought to have information shared in this manner.

Appendix 10 – Delivery of services

GWH may collect an individual's personal information when it is reasonably necessary for delivery of fee for service training or similar services, which may or may not require payment.

The information GWH may collect in these circumstances are:

- Confirmation of an individual's identity
- Information about the individuals organisation of employment
- Key contact phone number and/or email
- Bank account/payment information

In these circumstances, participants will be fully informed prior through an informed consent process to clarify the roles and responsibilities of all parties involved in the service.

Appendix 11 – Indirect collection of information

GWH will only collect personal information from third parties in limited circumstances.

In the course of handling and resolving a complaint, review or an investigation, GWH may collect personal information (including sensitive information) about an individual indirectly from publicly available sources or from third parties such as:

- The individuals authorised representative, if one is available
- Applicants, complainants or respondents to a complaint or a third parties' employees and witnesses.

GWH also collect personal information from publicly available sources to enable the organisation to contact partners who may be interested in GWH work or in participating in consultations.

GWH may also collect and individuals personal information from a third party where one of GWH partners or service providers notifies GWH that a relevant individual is a new practitioner in their organisation.

If GWH do collect personal information in this manner, GWH will ensure that the individual has been notified of:

- who GWH are
- why the individuals personal information has been collected
- GWH obligations under any applicable Australian privacy law
- How and individual can access this Privacy Policy.

When GWH deal with third parties, GWH will ask the third party to tell the individual that they have provided GWH with the individual's personal information and direct the individual to this Privacy Policy.