

# Privacy Policy

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## DOCUMENT VERSION

Date	Comments
17 April 2019	Draft document shared with Board
26 April 2019	Policy approved by Femili PNG Board
3 May 2019	Policy amended to include further information client data collection and storage.
18 May 2019	Policy approved by Femili PNG Board

## POLICY AMENDMENTS

This is a working document and subject to amendment. This Policy will be available in English only.

Any suggestions about this Policy should be directed to the Femili PNG Operations Directors, Development Manager or Chief Executive Officer/Senior Social Worker (CEO/SSW) so changes can be considered. When suggestions are raised, the matter will be raised with the Executive Management Committee (EMC) for consideration. Any amendments or changes to the Policy will be submitted to the Board for endorsement.

The Operations Directors, Development Manager and CEO/SSW is responsible for maintaining this document; including updating confirmed changes, informing staff of the changes, and disseminating the latest version across the organisation.

Any changes or amendments involve the following steps:

- Updating the Document Version table at the top of this page;
- Updating the relevant provision in this manual;
- Replacing the updated version of the manual eg. shared drives, Intranet;
- Printing a hard copy of the updated manual for the office;
- Communicating the changes to all staff; and
- Archiving the old version of manual.

# Contents

<b>DOCUMENT VERSION</b> .....	<b>2</b>
<b>POLICY AMENDMENTS</b> .....	<b>2</b>
<b>1.0 INTRODUCTION</b> .....	<b>4</b>
1.1 Purpose .....	4
1.2 Definitions .....	4
1.3 References / other policies .....	4
<b>2.0 CLIENT INFORMATION</b> .....	<b>5</b>
<b>3.0 COLLECTION OF PERSONAL INFORMATION</b> .....	<b>5</b>
3.1 What other personal information do we collect? .....	5
3.2 How do we collect your personal information? .....	5
3.3 Anonymity .....	5
3.4 How do we use your information? .....	5
<b>4.0 SECURITY AND STORAGE OF PERSONAL INFORMATION</b> .....	<b>6</b>
4.1 How do we secure and store your information? .....	6
<b>5.0 WEBSITE AND SOCIAL MEDIA</b> .....	<b>6</b>
5.1 Opting Out .....	6
<b>6.0 DISCLOSING YOUR INFORMATION</b> .....	<b>6</b>
6.1 Sharing Information Publicly .....	6
6.2 Staff Obligations in Relation to Confidentiality .....	7
<b>7.0 ACCESSIBILITY OF INFORMATION</b> .....	<b>7</b>
<b>8.0 ENQUIRIES AND COMPLAINTS</b> .....	<b>7</b>
<b>9.0 CONTACT INFORMATION</b> .....	<b>7</b>

## 1.0 INTRODUCTION

This Policy covers both Femili PNG and Friends of Femili PNG. For simplicity, the document will only refer to Femili PNG. This policy applies to all board members, employees, volunteers, supporters, partners and clients in PNG and Australia.

Femili PNG is committed to using your information responsibly. We want to ensure that we're as transparent as possible in informing all our supporters how we capture data, store it, and most importantly, use it.

We are bound by the Australian *Privacy Act 1988* (Cth) (the "**Privacy Act**"), the Payment Card Industry Data Security Standard and the Australian Council for International Development (ACFID) Code of Conduct. The Right to Privacy is also protected under section 49 of the Independent State of Papua New Guinea Constitution.

### 1.1 Purpose

The purpose of this policy is as follows:

- a. To protect the confidentiality of all people who use Femili PNG services and to inform users of the service about the limits that apply to our confidentiality.
- b. To provide guidance to staff, visitors, volunteers, supporters, partners and donors about what they can expect from Femili PNG in handling their personal information.
- c. To provide avenues by which supporters and donors can control the information we hold on them and exercise their right to privacy.

### 1.2 Definitions

- **Personal information** - Information or an opinion about an identified individual, or an individual who is reasonably identifiable:
  - a. whether the information is true or not; and
  - b. whether the information or opinion is recorded in a material form or not.
- **Confidentiality** - The principle whereby personal information is kept secret and not disclosed to other parties without consent.
- **Privacy** - The right to control access to oneself, and information about oneself.

### 1.3 References / other policies

This policy must be read and understood in conjunction with the following other Femili PNG policies:

- Lukautim Pikinini Gut Long Birua - Femili PNG's Child Protection Policy and Code of Conduct - for confidentiality relating to children
- Femili PNG Case Management Policy and Procedure Manual – for client privacy and confidentiality policy and procedures
- Femili PNG HR Manual – for confidentiality relating to employment matters and staff.

The following principles and standards also guide Femili PNG's collection and use of your information:

- The Australian Privacy Principles: <https://www.oaic.gov.au/agencies-and-organisations/guides/app-quick-reference-tool>
- The Payment Card Industry Data Security Standard: [https://www.pcisecuritystandards.org/pci\\_security/maintaining\\_payment\\_security](https://www.pcisecuritystandards.org/pci_security/maintaining_payment_security)

## **2.0 CLIENT INFORMATION**

Femili PNG collects personal information from our clients and dependents in our case management centres and safe house.

For policy and procedures concerning the collection and use of information relating to Client Privacy and Confidentiality, refer to Section 3 of the Case Management Policy and Procedures Manual. This policy and procedures include the limits to confidentiality, and the client's right to know how their information is managed.

Confidentiality relating to children is also covered in Section 3 of the Case Management Policy and Procedures Manual, and in the Lukautim Pikinini Gut Long Birua Child Protection Policy.

## **3.0 COLLECTION OF PERSONAL INFORMATION**

### ***3.1 What other personal information do we collect?***

In addition to the information that we collection from clients, we may collect personal information from anyone else who engages with us. This includes, but is not limited to, supporters, staff, partners and volunteers. We may collect personal information such as name, contact details, payment information (for donations) and communication preferences.

We may also collect and hold sensitive information of our staff, Board members and volunteers or prospective staff and volunteers, including completed police checks and medical information.

### ***3.2 How do we collect your personal information?***

Femili PNG usually collects your personal information directly from you when you provide it over the phone, through our website, by email, in interviews with clients, through an online form or through a donation.

We may also collect personal information from public records, such as telephone directories, lists and third party surveys, for direct marketing and telemarketing, which you have agreed to be on. When it is necessary to collect your personal information, including from a third party, we will take such steps as are reasonable in the circumstances to ensure that you are notified in compliance with the Privacy Act.

We will not collect, hold, use or disclose sensitive information (including health information or criminal records) about you unless you give us your consent to do so, or where required by law.

### ***3.3 Anonymity***

If you wish, you can remain anonymous or use a pseudonym when you contact us and if you make a donation. We will respect your anonymity. If you choose not to provide us with your personal information, we may not, for example, be able to provide you with an official tax-deductible receipt or a letter of thanks or assist you fully with your query or complaint.

### ***3.4 How do we use your information?***

We use your information to help us fulfil our charitable, aid and related activities. Examples of how we may use your personal information are as follows:

- a. process any donations from individuals or organisations.
- b. release any information regarding Femili PNG including newsletters, updates and information on appeals.
- c. update you if we have information that may affect your support.
- d. keep you informed via mail, email, SMS or telephone.
- e. respond to your questions, comments, or feedback.

- f. release of questionnaires to improve our services.
- g. analyse donor activity in order to improve quality assurance.
- h. report on our activities via an Annual Report.

## **4.0 SECURITY AND STORAGE OF PERSONAL INFORMATION**

### ***4.1 How do we secure and store your information?***

The protection of your privacy and personal information is of the utmost importance to Femili PNG. We store your personal information in our secure files which can be accessed from Australia and other countries. Our files are examined regularly to ensure information is current and held securely. Client files are held under strict access protocols with only certain staff being able to access these files. These protocols are outlined in the Security Policy and Procedures Manual and M&E Plan.

We will destroy or de-identify your personal information when we no longer need it for the purpose for which it was collected, unless the law requires otherwise. If you send us your personal information when we don't ask for it we will determine whether or not the information is related to one or more of our activities. If the information is not relevant to what we do, we may destroy or de-identify the personal information if it is lawful and reasonable to do so.

## **5.0 WEBSITE AND SOCIAL MEDIA**

In order to understand how people arrive at the Femili PNG website and related social media platforms and how they use it, we rely on cookies provided by third parties. This enables us to assess the effectiveness of our online advertisements. We may also use your browsing history on the Femili PNG website to send related messages on our work and appeals. Cookies do not reveal personal information. You can adjust your browser to disable cookies, but this may restrict your ability to access certain areas of our website.

You can also engage with us through social media, including Facebook and Twitter. You can control how you receive content through the setting on each social media site.

### ***5.1 Opting Out***

If you wish to opt out of communications from Femili PNG, use any of the clear links that we provide in all our digital communication (like sms or email) or email [friends@femilipng.org](mailto:friends@femilipng.org).

## **6.0 DISCLOSING YOUR INFORMATION**

We will only use and disclose your personal information in accordance with the *Privacy Act* and the *Australian Privacy Principles*. This may include where use or disclosure is required by law, where we have your consent to the use or disclosure, or for the purpose for which it was collected or related purposes that you would reasonably expect Femili PNG to use or disclose that personal information. We will not sell your information onto other third parties.

We will not disclose information about you to any other individuals or organisations apart from sourced contractors and service providers that we may engage on a confidential basis to help fulfil our fundraising activities.

### ***6.1 Sharing Information Publicly***

When providing information about the service in public talks, workshops and meetings, Femili PNG staff should outline it's confidentially obligations and the limits to confidentiality.

Femili PNG may be required to report on its activities to implementing partners, government and funding agencies. Such reporting will be in aggregate form, ensuring that no client is identifiable/potentially identifiable in such reporting. Where case studies are used in reporting and promotion, the client will be de-identified.

No identifiable client information will be used in any way that is not directly related to the provision of services to that particular client.

## **6.2 Staff Obligations in Relation to Confidentiality**

Staff will not use any confidential information which they have acquired in relation to the activities of Femili PNG for their own interests or the interests or purposes of others not associated with Femili PNG. Staff will not make copies of any confidential information for any reason other than those essential to and directly related to their position and responsibilities with Femili PNG.

Staff, upon request, and in any event upon ending their engagement or employment with Femili PNG, will return materials containing confidential information which are in their possession and will not use any information after leaving Femili PNG.

Any breaches of confidentiality or privacy must be reported to the EMC and appropriate action taken.

For further information on privacy and confidentiality relating to employment matters, refer to the Human Resources Manual.

## **7.0 ACCESSIBILITY OF INFORMATION**

Information held about an individual is accessible (at no charge) to that individual on request and reasonable steps taken to ensure the information is accurate and up to date.

Access to information may be denied if Femili PNG has reason to believe:

- a. that the request is not for a genuine purpose; or
- b. that the release of such information may place individuals or Femili PNG or its staff at risk of any harm. In these circumstances Femili PNG duty of care obligations may override the individual's right to access the information.

If a request for information is considered risky or not for a genuine purpose, the CEO/SSW or Development Manager will raise the issue with the EMC for consideration of the request.

## **8.0 ENQUIRIES AND COMPLAINTS**

Enquiries or complaints regarding privacy matters can be made in writing or over the phone using the details provided below under the 'Contact Information. Femili PNG are dedicated to respond to all enquiries as quickly as possible.

If you would prefer to deal with us anonymously, you are not required to provide your personal information to us unless we are required by law to deal with individuals who have identified themselves or it is impractical for us to deal with individuals who have not identified themselves.

If you are not satisfied with how we have handled your matter, you may wish to contact the Office of the Australian Information Commissioner via the contact details listed on [www.oaic.gov.au/about-us/contact-us-page](http://www.oaic.gov.au/about-us/contact-us-page).

## **9.0 CONTACT INFORMATION**

In Australia - if you have a privacy concerns, contact our team on [friends@femilipng.org](mailto:friends@femilipng.org) or by calling (02) 6125 3446. You can also contact us by post at the address: Friends of Femili PNG, C/- Development Policy Centre, Australian National University, 7 Liversidge St, Acton ACT 2601.

In PNG – you can contact our team on [info@femilipng.org](mailto:info@femilipng.org). You can also contact us at: PO Box 616 Lae, Morobe Province, phone: +675 7091 4027 or +675 472 8904; or PO Box 724, Vision City, Port Moresby, phone: +675 7916 9063.

To assist us with ensuring our personal information is accurate, complete, up-to-date, relevant and not misleading, please contact us if you are aware of any changes required to your personal information.