



Privacy Statement

Thank you for visiting libertyservices.org.au. We respect and protect the privacy of our users. This privacy policy tells you how we collect and use information.

Record of policy development		
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Who we are

Liberty Domestic and Family Violence Specialist Services provides specialist support and housing services to women and families affected by domestic and family violence and homelessness in the Port Macquarie Hastings region.

Definitions

Personal information: defined by Section 4 of the Privacy and Personal Information Protection Act 1998 as “information or an opinion (including information or an opinion forming part of a database and whether or not recorded in a material form) about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion”.

Sensitive information: a subset of personal information. It includes information or an opinion about your:

- racial or ethnic origin
- political opinions
- religious beliefs or affiliations
- philosophical beliefs
- sexual orientation
- criminal record
- health information
- genetic information

Health information: personal information that is information or an opinion about:

- the physical or mental health or a disability (at any time) of an individual
- an individual’s express wishes about the future provision of health services to him or her



- a health service provided, or to be provided, to an individual

Consent: voluntary agreement to some act, practice or purpose. Consent has five elements: it must be voluntary, client's must be informed of all facts, it must be for a specific purpose, it must be current, and the person must have the capacity to provide consent.

Notifiable data breach: occurs when personal information an organisation holds is lost or subjected to unauthorised access or disclosure. For example, when:

- a device with a customer's personal information is lost or stolen
- a database with personal information is hacked
- personal information is mistakenly given to the wrong person

Scope

Liberty Domestic and Family Violence Specialist Services ('Liberty') is subject to the Privacy Act 1998, the Privacy and Personal Information Protection Act 1998, and the Health Records and Information Privacy Act 2002, and will ensure that:

- it meets its legal and ethical obligations as a service provider in relation to protecting the privacy and confidentiality of clients
- it only collects and stores personal information that is necessary for the functioning of the organisation and its activities
- personal information is collected in fair and lawful ways and with consent
- people know what sort of personal information is held, what purposes it is held it for and how it is collected, used, stored, and disclosed, and who will have access to it
- personal information collected or disclosed is accurate, complete and up to date
- clients have the right to apply for access to their personal information and request a correction be made to any incorrect information held
- reasonable steps are taken to protect all personal information from misuse and loss and from unauthorised access, modification or disclosure
- clients are provided with information about their rights regarding privacy
- clients are provided with privacy when they are being interviewed or discussing matters of a personal or sensitive nature

This document outlines the personal information handling practices in accordance with this legislation.



Use of personal information

Liberty must only use individuals' personal information for the primary purpose for which it was collected, a secondary purpose to which the individual has consented, or for a purpose related to the primary purpose of collection and the individual would reasonably expect the personal information to be used for such purpose.

Liberty collects, holds, uses, stores and discloses personal information for the purpose of carrying out its objectives. Broadly these purposes include:

- enquiries about Liberty's services and programs
- assessment and referrals to services and programs
- providing client centred responses, including case coordination and case management
- administrative activities including human resources
- sector development activities
- data collection and evaluation of Liberty's services and programs
- community development activities
- complaint handling

Liberty is contractually obliged to provide de-identified data to our funding bodies including the Department of Communities and Justice and Women NSW. Information from the Client Information Management System (CIMS) is de-identified and monitored by the Australian Institute of Health and Welfare to identify needs within the domestic and family violence and homelessness service system and to ensure funding remains adequate.

Anonymity

Where it is lawful and practicable, individuals will have the option of not identifying themselves or requesting that Liberty does not store any of their personal information. However, this may impact on Liberty's capacity to deliver requested information, services or programs.

We do not collect personal information about you when you visit this online service and you can use this service without telling us who you are or revealing other personal information. Additionally, if you send us a contact or feedback form, you do not need to identify yourself or use your real name.



However, if we do identify you while interacting with you anonymously (such as through your telephone number), we may use or disclose that information to protect you or others. For example, we may provide your phone number to emergency services if we think there is a risk of harm to you or another person.

What we collect

We collect personal information that you provide to us to enable us to respond to your enquiry or request for support. For example, we collect your name, contact details and the nature of your enquiry if you contact us to:

- provide a donation
- receive information about our services
- book an appointment
- make a complaint about the way Liberty's service has been delivered to you
- ask for access to information that Liberty holds about you
- notify Liberty of a data breach
- apply for a job vacancy at Liberty

Additionally, as part of our intake and assessment process and ongoing case management, we collect sensitive and/or health information to enable us to provide services and support to improve the safety and wellbeing of women and children.

Perpetrator information

In the course of providing domestic and family violence support, Liberty may:

- collect, use, disclose and store personal information on perpetrators or people it reasonably believes to be the cause of a domestic violence threat
- share this information where it is relevant to the health, safety and wellbeing of children and young people, in a manner authorised under the relevant legislation and regulations or in other circumstances where Liberty believes there to be a serious and imminent threat to the life, health and safety of any person, or that a criminal offence may be committed

The safety of Liberty clients, staff and others is of paramount importance, therefore Liberty will not inform perpetrators, or their representatives, of any information held or shared by the organisation for the purposes cited above, unless required by law.



Collecting through our website

Liberty has its own public website — www.libertyservices.org.au. There are a number of ways in which we collect information through our website.

Analytics

Our website uses Google Analytics, a service which transmits website traffic data to Google servers in the United States. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand website traffic and webpage usage.

By using this website, you consent to the processing of data about you by Google in the manner described in Google's Privacy policy and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or use the opt-out option provided by Google.

Cookies

To improve your experience on our site, we may use 'cookies'. Cookies are an industry standard and most major web sites use them. A cookie is a small text file that our site may place on your computer as a tool to remember your preferences. You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not be able to use the full functionality of this website.

Social media

When you communicate with us using social networking sites, we may collect your personal information, but we only use it to help us communicate with you and the public. The social networking sites will also handle your personal information for its own purposes. These services have their own privacy policies accessible on their websites.

Who we collect information from

The main way we collect personal information about you is when you give it to us, such as when you have contact with us over the telephone, when you have contact with us in person, when you interact with us online including via our website and Facebook, and when you communicate with us in writing.



Sometimes we collect personal information from a third party but only if the individual has consented to such collection or would reasonably expect us to collect their personal information in this way. For example, we collect personal information:

- from other service providers
- from referees provided by you in support of an application for a position with us (either as an employee or as a contractor)

Disclosure of personal information

We do not disclose personal information to another person or organisation (including police, emergency services and other government agencies) unless one of the following applies:

- the individual has consented to the disclosure of their personal information
- the individual would reasonably expect, or has been told, that information of that kind is usually passed to those individuals, bodies or agencies and the disclosure
- the disclosure is otherwise required or authorised by law
- to reduce the risk of harm to children or young people
- where in relation to domestic and family violence, Liberty believes on reasonable grounds that disclosure is necessary to prevent or lessen a serious threat to a person's life, health or safety and it is 'unreasonable and impractical' to gain consent
- where there is serious threat to public health, property or public safety
- where the individual has made threats to harm third parties or Liberty staff
- where Liberty staff become aware of intent to commit a criminal offence

Quality of personal information

To ensure that the personal information we collect is accurate, up to date and complete, we apply the following data quality procedures:

- we record information in a consistent format and provide an IT system and software that supports consistent recording
- where necessary, we confirm the accuracy of information we collect from a third party or a public source
- we promptly add updated or new personal information to existing records

We also review the quality of personal information before we use or disclose it.



How we deal with requests

Under the Privacy Act (Australian Privacy Principles 12 and 13) you have the right to ask for access to your personal information and/or ask that Liberty corrects that personal information. You can ask for access or corrections in writing to PO Box 431 Port Macquarie NSW 2444 or email at info@libertyservices.org.au. Liberty will respond within 30 days.

If you ask, we must give you access to your personal information and take reasonable steps to correct it if we consider it is incorrect, unless there is a law that allows or requires us not to.

Amendments may be made to personal information to ensure it is accurate, relevant, up to date, complete and not misleading, considering the purpose for which the information is collected and used. If the request to amend information does not meet these criteria, Liberty may refuse the request.

How we protect personal information

Liberty takes steps to protect personal information held against loss, unauthorised access, use, modification or disclosure, and against other misuse. We maintain physical, technical and administrative safeguards to help protect the privacy of data and personal information we collect and hold. These steps include:

- password protection for accessing our electronic IT systems including prompts to periodically reset passwords
- updating and testing of security technology on an ongoing basis
- installing anti-virus protections to help guard against malware that steals credentials
- training our employees about the importance of confidentiality and maintaining the privacy and security of personal information
- access to a client's personal information is restricted to employees who need it to provide benefits or services to that client
- ensuring contracts in place with IT service providers make clear that information visible within the course of their work for Liberty is bound by our Privacy and Confidentiality policy and relevant legislation
- securing paper files in locked cabinets

Responding to data breaches

An eligible data breach under the Notifiable Data Breach scheme occurs when:

- there is unauthorised access to or unauthorised disclosure of personal information, or a loss of personal information, held by Liberty



- this is likely to result in serious harm to one or more individuals, and
- Liberty has not been able to prevent the likely risk of serious harm with remedial action

If you are affected by a data breach, Liberty must notify you and include the following information:

- Liberty's contact details
- a description of the data breach
- the kinds of information involved
- recommendations about the steps both the organisation and you should take in response to the data breach

Liberty staff must also notify the Office of the Australian Information Commissioner (OAIC) of the breach at www.oaic.gov.au/privacy.

Making a complaint

If you wish to contact us about a privacy matter or are concerned about the way we have handled your personal information, you can lodge a complaint via the following avenues:

- in writing to PO Box 431 Port Macquarie NSW 2444 or email at info@libertyservices.org.au
- calling on (02) 6583 2155
- 'Making a Complaint' downloadable PDF on the website or in hard copy at our office