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PRIVACY POLICY

Table of Contents

1.	Introduction	3
2.	Definitions	3
3.	Who should read this Privacy Policy?	4
4.	Collection of personal information	4
5.	Use of personal information	5
6.	Consent	6
7.	Disclosure of personal and sensitive information	6
8.	Security of personal information and archival of records	6
9.	Disposal	6
10.	Email and mail lists	6
11.	Breach of privacy	7
12.	Access and updating personal information	7
13.	Website	7
14.	How to make a complaint	7
15.	Anonymity	8
16.	Privacy Policy updates	8
17.	Availability of Privacy Policy	8
18.	How to contact VASS	8

Privacy Policy

1. Introduction

The Victorian Arabic Social Services (VASS) will keep information that it collects about its staff, volunteers, clients, students, members, donors and board members safe and secure and the individual's privacy will be protected.

VASS will only collect information that is required to fulfil its ethical and legal responsibilities and provide appropriate and timely services.

This privacy policy sets out how VASS complies with its obligations under the *Privacy and Data Protection Act 2014 (Vic)* and the *Privacy Act 1988 (Commonwealth)*. This Policy applies to all personal information collected by VASS.

The Privacy Act sets out 13 Australian Privacy Principles (APPs) which regulate the collection, use, disclosure and storage of personal information and how individuals can access and correct personal information held about them. VASS is legally bound by the APPs.

VASS provides a comprehensive range of services to clients across Victoria. VASS specialises in serving the needs of clients of Arabic-Speaking Background, in addition but not limited to clients who identify as Assyrian, Chaldean, Turkish, Persian, Kurdish or African. VASS is non-exclusive in the services it provides.

In performing its functions VASS may collect, hold, use or disclose personal information. VASS takes privacy seriously and will only collect, hold, use and disclose personal information in accordance with the Privacy Act.

2. Definitions

The Privacy Act contains the following definitions:

"personal information" means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not; and whether the information or opinion is recorded in a material form or not.

"sensitive information" means information or an opinion about an individual's racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of professional/trade associations, membership of a trade union, sexual orientation/practices, criminal record, health information or genetic information.

"health information" means information or an opinion about:

- the health or a disability (at any time) of an individual;
- an individual's expressed wishes about the future provision of health services to him or her;

- a health service provided, or to be provided, to an individual;
- personal information collected to provide, or in providing, a health service;
- an individual collected in connection with the donation, or intended donation, by the individual of his or her body parts, organs or body substances; or
- genetic information about an individual in a form that is, or could be, predictive of the health of the individual or a genetic relative of the individual.

3. Who should read this Privacy Policy?

You should read this privacy policy if you are:

- an individual whose personal information may be given to or held by VASS, including clients of social services;
- a contractor, consultant, supplier or vendor of goods or services to VASS;
- a donor to VASS;
- a person seeking employment with VASS;
- a person who is or was employed by VASS;
- a person seeking to be or who is a volunteer with VASS; or
- a student of the VASS College of Vocational Education, or another institution, doing work placement at VASS.

4. Collection of personal information

VASS only collects personal information that is reasonably necessary for, or directly related to the services that it delivers.

When VASS collects personal information, VASS is required under the Privacy Act to notify the person the information is related to of a number of matters. These include the purposes for which the information is collected, whether the collection is required or authorised by law and any person or body to whom the information will be disclosed.

The personal information collected and held by VASS for clients of our programs may include:

- information about the person's identity (e.g. name, date of birth, country of birth, passport details, visa details, drivers licence, birth certificates, ATM cards);
- contact details (eg. address, telephone number, email address);
- information about the person's background (e.g. educational qualifications, the languages spoken and English proficiency, employment history);
- information about racial or ethnic origin;
- bank details;
- health and medical information; and
- information about personal circumstances (e.g. marital status, age, gender, accommodation and relevant information about partner or children).

VASS generally uses forms and other electronic or paper correspondence to collect this information. Personal information will be obtained by employees of VASS during direct client interaction or through documentation.

Some government authorities/departments including the Department of Human Services and Department of Immigration and Border Protection may provide clients' personal information to VASS in its capacity as service provider.

Personal information about VASS staff, volunteers and students is collected when staff submit an application in response to an advertised position and when requested to provide updated information about qualifications and professional development. This information is stored in staff personnel files.

VASS holds personal information in a range of paper-based and electronic records.

VASS ensures that only those staff that need to access personal information have access to that information. Only limited information is provided to volunteers and students on placement. From time to time, VASS management may access files to ensure compliance with ethical and legislative obligations, and as part of quality improvement processes.

5. Use of personal information

The personal information provided will be used only for the purpose for which it was submitted unless VASS specifically discloses other uses and obtain the consent of the relevant person.

VASS collects certain personal information about people in order to:

- Assess what services may be required and whether VASS can provide those services;
- Verify the person's identity and eligibility;
- Evaluate ongoing services provided to the client;
- Assess a person's application to become a volunteer, student on placement, contractor or employee;
- Perform approved research and analysis;
- Complete funding applications and statistical reporting to comply with service agreements;
- Process donations;
- Comply with VASS Human Resources policies and procedures (for staff only);
- Communicate with clients, staff or volunteers;
- Comply with any legal or contractual obligations; and
- Improve VASS services.

VASS will only use your personal information for secondary purposes where it is able to do so in accordance with the Privacy Act.

6. Consent

By giving personal information to VASS a person is consenting to the use of that personal information in accordance with the principles outlined in this policy.

VASS will obtain consent before any personal information is collected from any individual. This will usually be written consent, however in some circumstances clients may provide verbal consent if they strongly prefer to do so.

If the client provides verbal consent, every effort should be made to document the circumstances in which the consent was given, and to verify the individuality of the consent given. This may include a handwritten account of the phrase used by the client to consent, or summary of the conversation. A second staff member may be asked to witness the consent, where possible.

Consent can be amended or withdrawn by the individual (including the carer/ legal guardian if they have given the original consent) at any time. The individual needs to contact the person who they provided consent to, or their replacement. The initial notification to withdraw or amend consent can be done in any manner (in writing, via email, verbally). Confirmation of this change needs to be in writing – in most cases an amendment or attachment to the original consent form.

7. Disclosure of personal and sensitive information

VASS will not disclose or pass on personal or sensitive information to a third party without prior consent (as described above), except where that disclosure is authorised or required by law, is reasonably necessary to enforce the law, or necessary to investigate a suspected unlawful activity. When obtaining consent to share information from a client to another source, the specific details of what information will be shared, to whom and why, needs to be explained to the client. A written or verbal signature of the client's (or their authorised representative's) understanding and agreement to this should be obtained.

VASS does not use or disclose personal information for the purpose of direct marketing. VASS does not disclose personal information to overseas recipients.

All VASS employees and volunteers must keep all personal, health and sensitive information about clients, staff, volunteers, members, donors, board members and information gained during the course of their employment with VASS private and confidential. All VASS employees and volunteers are given a copy of this privacy policy and must acknowledge that they will act in accordance with this policy.

VASS may only provide information about a student or client under the age of 18 to their guardian.

8. Security of personal information and archiving of records

VASS takes all reasonable steps to protect individual's personal information from misuse, loss and unauthorised access or disclosure to third parties.

All information for each will be kept in a file, either hard copy or electronic. Each file is kept in a lockable filing cabinet, with electronic files being kept securely on password protected servers, with servers separated by service area so that only the relevant staff can access it. Some electronic files are also kept on online systems, such as Shiftcare, which is also password protected and uses firewalls. Back-ups of electronic files are kept securely on a portable hard drive. Old files are archived in VASS Case File archiving system and stored for 7 years*. After 7 years files are destroyed.

*Or as otherwise described in relevant governmental legislation.

VASS ensures data is backed up by utilizing a Datto device to performs an incremental local backup every hour, and replicates this data to the cloud once the local data has been verified, this data can be restored almost immediately, and in the case of a total server failure, the Datto device can act as a temporary server while the hardware is replaced, ensuring minimal downtime for the business. Sophos Intercept X is used as an anti-virus on endpoints and server to protect against malicious data or attacks.

9. Disposal of documents

Files of clients who have exited the service will be kept securely for seven years, or as otherwise described in governmental legislation. After this time, physical files will be shredded, and all electronic files deleted.

10. Email and mail lists

VASS may collect email and mail address details if the person has provided them for event mailing lists. This information is only used for the purpose of sending updates and invitations to VASS events and activities.

Individuals may opt out of receiving any information about events and activities at any time. VASS does not provide email or mail lists to any third parties.

11. Breach of privacy

VASS will take seriously and deal promptly with any accidental or unauthorised disclosure of personal information.

If a staff member or volunteer has breached this privacy policy VASS will refer to the relevant staff member's contract and disciplinary action will be taken.

12. Accessing and updating personal information

VASS aims to ensure that all personal information that it holds is accurate. Individuals have a right under the *Privacy Act* to access personal information VASS holds about them, and can do so by request at any time.

Individuals also have a right under the *Privacy Act* to request corrections to any personal information that VASS holds about them if they think the information is inaccurate, out-of-date, incomplete, irrelevant or misleading. VASS will take reasonable steps to ensure that incorrect information is corrected.

However, the *Privacy Act* sets out circumstances in which VASS can decline access to or correction of personal information.

13. Website

VASS has a public website, www.vass.org.au. VASS does not collect any personal information from its website.

When a person visits VASS website to read or download information, a range of technical information which does not reveal a person's identity is recorded. This information is used for statistical and development purposes.

14. How to make a complaint

If an individual wishes to make a complaint about how VASS has handled their personal information, they should make a complaint, in writing, addressed to VASS Chief Executive Officer. If a person requires assistance to make a complaint they should contact VASS.

VASS will respond to complaints or requests promptly if the complainant provides his/her/their contact details. VASS is committed to quick and fair resolution of any complaints and will ensure all complaints are taken seriously. For more information on complaints see *VASS's Complaints and Grievances Policy and Procedures*.

If a person wishes to make a complaint to an external body about matters relating to privacy or freedom of information, they can contact the Office of the Victorian Information Commissioner
<<https://ovic.vic.gov.au/privacy/for-the-public/complaints/how-to-make-a-complaint/>>.

15. Anonymity

Where possible, an individual will be allowed to interact with VASS either anonymously or using a pseudonym.

16. Privacy Policy updates

This Privacy Policy will be reviewed annually and updated as required.

17. Availability of Privacy Policy

This Privacy Policy will be made available free of charge.

18. How to contact VASS

Tel: 93592861 or

Email: mail@vass.org.au

Visit: C1, 1 -13 The Gateway, Broadmeadows, Vic 3047

I have read, understood and will abide by VASS Privacy Policy.

Name: _____ Position: _____

Signature: _____ Date: _____

Witness Name: _____ Position: _____

Signature: _____ Date: _____

A handwritten signature in blue ink that reads "Seila Alkash". The signature is written in a cursive style and is placed on a light purple rectangular background.

Authorised by VASS CEO
Last Review: December 2023
Next review: December 2024