

Privacy Policy

POLICY STATEMENT

The Bridge is a community based, not-for-profit organisation providing a variety of support services for people of adult age who have various disabilities, including intellectual, physical, sensory and psychiatric disabilities. Services include supported employment, open employment, community development, day supports, recreation, respite, in-home, community based individualised and shared supports.

In providing these services, we collect, use and disclose personal information. Personal information is information that identifies or could identify a participant, employee, the organisation or other party the organisation has relationships with. Some examples of personal information include a person's name or address. Personal information can also include medical records, bank account details, photos, videos, and even information about a person's likes, opinions and place of work - basically, any information that reasonably identifies someone.

We are committed to protecting the privacy of your personal information. This Privacy Policy explains how we collect, use, disclose and otherwise handle personal information. It also tells you how you can ask to access and correct the personal information we hold about you or complain about a suspected privacy breach.

We are required to comply with the Australian Privacy Principles (APPs) in the Privacy Act 1988 (Cth) (Privacy Act). The APPs regulate the manner in which personal information is handled. We are also required to comply with the Health Records Act 2001 (Vic).

1. WHAT TYPE OF INFORMATION DO WE COLLECT?

1.1 Personal Information

The type of personal information that we collect and hold about you depends on the type of dealings that you have with us. If we need to identify you or verify your identity, we may collect your name, gender, date of birth, driver's license and/or passport details. If we need to communicate with you, we may collect you and/or your primary carer's email, residential and postal addresses and telephone numbers.

1.1.1 Prospective Employees and Volunteers: If you are a prospective employee or volunteer, we may also collect information relating to your criminal history record, academic record and other

personal information contained in the documentation supporting your job application. If you apply for a job with us, we will only collect the information you include in your application.

1.1.2 Prospective Participants: If you are a prospective participant, we may also collect information about your medical history, support requirements, work experience, interests, education and other personal information provided by you.

To help us improve our services, we may collect your responses to surveys and details about how, when and why you access our services.

1.2 Sensitive information

Sensitive information is personal information such as health information, criminal history and information about racial or ethnic origin that is generally afforded a higher level of privacy protection.

In order to comply with government funding requirements and our obligations under Australian law, we may collect sensitive information about you, including your criminal history, language background, citizenship status, status as an indigenous Australian, disability status and health information.

We only collect sensitive information where it is reasonably necessary for our business functions and you have consented, or we are required to do so by law.

1.3 Methods of collection

We will collect personal information by lawful and fair means as required by the Privacy Act. We will also collect personal information directly from you where this is reasonable and practicable.

We collect personal information in a number of ways, including:

- Directly from you in person, over the phone, through written communications (either on paper or electronic) or by you completing forms or answering questions on our websites;
- From third parties, including recruitment agencies, education providers, government agencies, previous service providers and your authorised representatives;
- Through our websites, online recruiting systems and social networking services such as Facebook, when you engage with us via those platforms.
- From our own records of your use of our services.

1.4 Privacy Notices

Where we collect personal information directly from you, we will take reasonable steps to notify you of certain matters through a Privacy Notice. We will do this at or before the time of collection, or as soon as practicable afterwards.

Privacy Notices provide more specific information than this Privacy Policy in relation to particular collections of personal information. The terms of this Privacy Policy are subject to any specific provisions contained in Privacy Notices. We encourage you to read those provisions carefully.

In some instances, The Bridge may obtain information about an individual from a third party source. (i.e. Recruitment Agency, Case Manager, other service provider). If information is collected in this way, The Bridge will take reasonable steps to ensure that the external party has provided you with their Privacy Notice or a Consent form.

2. Why do we collect, hold, use and disclose your personal information?

2.1 General

The main purposes, for which we collect, hold, use and disclose personal information are:

For Prospective Employees or Volunteers applying for a position at The Bridge

- to assess your qualifications, knowledge, skills and experience against The Bridge's career / volunteer opportunities;
- to verify your information and conduct reference checks;
- to verify you are eligible to work in Australia (prospective employee's only);
- to conduct background checks if you are offered a position at The Bridge;
- to communicate with you (or your authorised recruitment agency representative) regarding employment opportunities;
- to create and submit reports as required by law or regulation;
- to improve The Bridge recruitment process;
- for any other purposes that you have consented to.

If you do not provide sufficient information, we may not be able to employ/appoint you.

If you send The Bridge unsolicited material such as a resume that you have provided in the absence of an advertised job vacancy, it may be retained by the Human Resources team for future consideration when a vacancy arises. Unsolicited material that is not deemed suitable for consideration will be destroyed.

For prospective Participants

- To identify you and verify your identity;
- To communicate with you about our services;
- To assess your suitability for our services;
- To determine your suitability to access services, as well as the supports appropriate to your skills, needs and aspirations.
- To obtain payment for our services;
- To help us improve our services;
- For any other purposes that you have consented to.

The Bridge will only use personal information for the purpose for which it was given or for purposes that are related to one of our functions or activities.

Direct marketing

Where we have your express or implied consent, or where we are otherwise permitted by law, we may use your personal information to send you information about the services we offer, as well as other information. We may send this information by mail, email, and telephone.

Opting out

You can opt out of receiving these communications at any time, by contacting us and telling us (see section 8).

2.2. To whom do we disclose your personal information?

We may disclose your personal information to any of the organisations that we deal with in the ordinary administration of our business for the purposes set out in section 2.1 above, including:

- The Australian Government;
- Financial institutions;
- Government departments/agencies that provide funding for The Bridge services (including through shared databases);
- Other regulatory bodies such as WorkSafe;
- Health care professionals and community based services that assist us to deliver services;
- Professional advisors including recruitment advisors, accountants, auditors and lawyers;
- Educational Institutions;
- Other Disability Service Providers where a service user transfers from one service to another;
- Information technology service providers (including cloud services providers);

In each case, we may disclose personal information to the service provider and the service provider may in turn provide us with personal information collected from you.

We may de-identify and aggregate the personal information of you and others for our own statistical purposes. Provided that it remains permanently de-identified, we may disclose that aggregated information to third parties or publish it for marketing or research purposes.

If you apply for a job with us, we may discuss your application with your nominated referees.

We may also share personal information with our operational business units including Administration and Finance and other support services within The Bridge.

We will not use or disclose identifiers issued by Commonwealth agencies (e.g. Medicare numbers, tax file numbers, Social Security numbers) unless the use or disclosure is authorised by the Australian Privacy Principles.

Note: an individual's name or ABN (as defined in A New Tax System Australian Business Number Act 1999) is not an identifier.

Except as set out above, the Bridge will not use or disclose personal or sensitive information for a purpose other than the primary purpose of its collection, unless:

- a. You have consented to its use or disclosure for a secondary purpose.
- b. The Bridge is permitted to use or disclose the personal information for a secondary purpose in accordance with the Australian Privacy Principles (e.g. use of personal information for research, statistics, data collection or direct marketing).
- c. It is otherwise required or authorized by law
- d. It will prevent or lessen a serious threat to somebody's life, health or safety or to public health

2.3. Cross border disclosure of personal information

We will not disclose personal information to third parties located overseas without your consent and in accordance with the requirements of the APP.

3. Data quality and security

3.1 General

We hold personal information in a number of ways, including in electronic databases, email contact lists, and in paper files held in secure premises. Paper files may also be archived offsite in secure facilities. We take reasonable steps to:

- Make sure that the personal information that we collect, use and disclose is accurate, up to date and complete and (in the case of use and disclosure) relevant;
- Protect the personal information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure;
- Destroy or permanently de-identify personal information that is no longer needed for any purpose that is permitted by the APPs.

3.2 Security of information

The Bridge takes steps to secure the personal information we hold. These include ICT security (such as encryption, firewalls, anti-virus software and login and password protection), secure office access and training regarding workplace policies.

The Bridge also takes all reasonable steps to ensure security of personal and sensitive information when such information is transported within the community.

3.3 Notifiable Data Breaches Scheme

The Bridge is required to provide notice of any serious privacy data breach to affected individuals and the Privacy Commissioner. This is to occur where there has been unauthorised access to, unauthorised disclosure of, or loss of, personal information held by The Bridge that would likely result in serious harm being caused to any of the individuals to whom the information relates. In the context of a data breach, serious harm to an individual may include serious physical, psychological, emotional, financial, or reputational harm. The Bridge will assess the risk of serious harm holistically, having regard to the

likelihood of the harm eventuating for individuals whose personal information was part of the data breach and the consequences of the harm.

In instances where The Bridge suspects that a serious privacy breach may have occurred, the organisation will carry out an assessment within 30 days. If such a breach is found to have occurred a statement will be prepared for the Privacy Commissioner, and all reasonable steps will be taken to notify each of the individuals whose information has been breached.

4. How can you access and correct your personal information?

You can request access to the personal information that we hold about you and request corrections by contacting either:

- **Participants** - the relevant Service Coordinator or Manager
- **Volunteers and Employees** – the Human Resources Manager

If you are not known to the person you have contacted you will be asked to verify your identity.

You are only able to view your own information. The privacy of others will not be compromised to facilitate this.

5. Anonymity

You may remain anonymous during certain interactions with The Bridge (e.g. enquiries regarding The Bridges services) provided that this is lawful and practicable. However, we will not be able to provide you with supports or services if we are not provided with the personal information requested.

6. Complaints

If you have a complaint about how we have handled your personal information, please contact either:

- **Participants** - the relevant Service Coordinator or Manager
- **Volunteers and Employees** – the Human Resources Manager

If you are not a current participant you can contact us using the contact details listed in Section 7.

The relevant Coordinator or Manager will attempt to deal with your complaint in the first instance and take any steps necessary to resolve the matter within a week.

If your complaint can't be resolved at first instance, we will ask you document your complaint in writing and provide it to either the next level line Manager or email thebridge@thebridgeinc.org.au.

Complaints process

Once a formal complaint has been received, The Bridge will endeavour to acknowledge receipt of the Complaint within 5 business days of receiving it and to complete our investigation into your complaint in a timely manner.

We are required to refer complaints about breaches of privacy to Senior Management.

In most cases, we expect that complaints will be investigated and a response provided within 30 days of receipt of the Complaint. If our investigation may take longer, we will let you know.

If you are unhappy with our response, you can refer your complaint to the Office of the Australian Information Commissioner.

7. Changes to this Policy (APP1)

We may amend this Privacy Policy from time to time.

A summary version and a link to the current version will be posted on our website. A copy may be obtained from our head office.

8. Further information

Please contact us if you have any queries about the personal information that we hold about you or the way we handle that personal information. Our contact details for privacy queries are set out below. Once you contact our office, we will direct your query to the appropriate person for a response.

Contact details for The Bridge

Email: info@thebridgeinc.org.au

Tel: 03) 8710 8555

Address: The Bridge Inc. Suite 3, Level 4 Plaza Business Centre

26 McCrae Street Dandenong VIC 3175

Postal Address: PO Box 7030

Dandenong VIC 3175