

Policy name:	Privacy
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Status:	Endorsed
Responsibility:	CEO
Last Reviewed:	January 2025
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1. **Privacy Act**

St Johns Youth Services Incorporated (**we, us or our**) is an organisation and "APP Entity" for the purposes of the Privacy Act 1988 (**Act**), and is subject to the Australian Privacy Principles contained in the Act.

This Privacy Policy is intended to provide a general overview of our policies in respect of the handling of your personal information. Your "personal information" is essentially information or an opinion about you as an identified or reasonably identifiable individual.

Other policies may override this Privacy Policy in certain circumstances. For example, when we collect personal information from you, we may advise a specific purpose for collecting that personal information, in which case we will handle your personal information in accordance with that purpose.

This Policy is intended to cover most personal information handled by us, but is not exhaustive. If you have any queries about our handling of your personal information, please contact us for further information.

2. **Exemptions**

No general exemptions under the Act apply to us, or to any of our acts or practices.

3. **How We Collect, Hold and Use Personal Information**

3.1 **Collection**

We will collect your personal information directly from you unless it is unreasonable or impracticable to do so, and will limit the personal information we collect to that which is reasonably necessary for our functions or activities.

We collect a range of personal information about clients and other individuals who deal with us, for example, name and contact telephone number. If you are a client, this personal information may include sensitive information and health information. In some cases, we also collect information about a client's family, friends, previous carers and children. We may also hold other personal information that you volunteer to us.

We may collect this information when:

- you use our services (eg, you stay at facilities that we operate);
- you send us an e-mail or otherwise contact us (eg, using a comment or feedback form or feature of our website);
- you post a message to our website (eg, any message board forum we may operate);

- you make a donation to us;
- you volunteer or apply for a position with us;
- you communicate with us through social media (such as Facebook or Twitter);
- through your attendance at any event run by us or for us.

We do not generally collect (or, if it is provided by you to us, retain) any sensitive information about you.

When collecting your personal information, we will take reasonable steps to make you aware of the purposes for which we are collecting it, the types of organisations to which we would usually disclose it, whether we are likely to disclose it to overseas recipients (and where practicable the countries in which they are located), whether there are laws or court/tribunal orders which require or authorise us to collect it, and the main consequences for you if you fail to provide it to us. This Privacy Policy provides these details as they typically apply in most cases, however different details may apply depending on our specific interaction with you. If we do not notify you of such other details, the information in this Privacy Policy applies.

If you fail to provide personal information requested by us, there may be a range of consequences, for example, we may not be able to respond with your enquiry or otherwise deal with you. There will not usually be Australian laws or court/tribunal orders which require or authorise us to collect your personal information.

We may, in some circumstances, collect personal information about you from third parties, in which case we will take reasonable steps to notify you of that information and the circumstances of its collection.

3.2 Use

We will generally only use your personal information for the purpose for which we collected it, and for related purposes we consider would be within your reasonable expectations.

We generally use your personal information to:

- provide the service requested, respond to your enquiries, send you information that you request, or otherwise achieve the purpose for which the information was submitted to us;
- contact you to invite you to events (such as a new program we are launching) or inform you about new services we provide;
- help us plan for the future by using some information for administrative purposes such as statistical information with such statistical information being de-identified;
- engage in other activities where required or permitted by law;
- contact you to invite you to support our work with young people through volunteering or donating.

Where we propose to use your personal information for another purpose other than as outlined above, we will seek your permission (unless we are required or permitted by law to do so without seeking consent).

3.3 Storage

We will take reasonable steps to protect your personal information from misuse, interference and loss as well as unauthorised access, modification or disclosure.

For example, information stored on our computer network is protected by the system design, security access policies and procedures. Also, if your personal information is stored in a personal file, it is kept in secure storage. This information can only be accessed by our employees.

We undertake regular monitoring of our practices and systems to ensure the effectiveness of our security policies and identify and implement improvements where appropriate.

We will endeavour to destroy or de-identify your personal information as soon as it is no longer required by us (where permitted by law).

4. Access to and Correction of Personal Information

You may contact us to request access to or correction of the personal information about you that we hold. We may refuse to allow access or to amend your personal information if we are legally required or entitled to do so. If we do so, we will provide you with written reasons for the refusal (unless it is unreasonable to do so) together with information about the options available to complain about the refusal.

We may require you to pay certain costs in order to access your personal information held by us. We will advise the amount payable (if any) once we have assessed your application for access. We will not however charge a fee for you to lodge a request for access to or correction of your personal information.

If you lodge a request for access to your personal information, we may fulfil that request in any of a range of ways (for example, by supplying you with a copy of that personal information or providing you with the opportunity to inspect our records). We may require you to comply with certain procedures before we allow access to or amendment of your personal information to ensure the integrity and security of information that we hold. Depending on the nature of your request, this may include verifying your identity to our satisfaction.

We will take reasonable steps to ensure that the personal information that we collect is accurate, up-to-date and complete and the personal information we use and disclose is accurate, up-to-date, complete and relevant. If we are satisfied that any personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, we will amend our records accordingly.

Please notify us if your personal details change so that we may keep our records current.

5. Disclosure of Personal Information to Other Organisations and Overseas

We will generally only disclose your personal information for the purpose for which we collected it, and for related purposes we consider would be within your reasonable expectations.

We may disclose your personal information to:

- certain contractors or subcontractors of ours that provide administrative or promotional services (for example, mail processing businesses, printers or other service providers). We generally ensure such organisations are contractually required to ensure that information we disclose is used only for the limited purposes for which we provide it.

We may disclose your personal information to overseas recipients if it is required to fulfil the purpose for which we collected it, in which case we must take reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles as required by Australian Privacy Principle 8. However, we are not generally likely to disclose personal information to overseas recipients.

6. Online Privacy

6.1 Automatic Server Logs

Our servers automatically collect various details when you use our website, including:

- your IP (Internet Protocol) address (generally being an identifier assigned to your computer or access device when it is connected to the Internet);
- the operating system and browser software you are currently using; and
- the data you access (such as web pages or other document files or software), and the time that you download it.

We do not attempt to identify individuals using this information, and only use it for statistical analysis, system administration, and similar related purposes. This information is not disclosed to any other party.

6.2 Cookies

We may use "cookies" to identify your computer to our servers when you visit our website. Our website may store cookies on your computer in order to improve and customise your future visits to the website. Cookies can be used to track information about your usage of the site and to provide customised content to you. If you do not want information collected through the use of cookies, you may be able to configure your Internet browser to disable cookies.

We do not attempt to specifically identify or track individuals using cookies.

6.3 Email and Message Forms

We may collect personal information from you (such as your name, address, telephone number and email address, and any other personal information you volunteer) if you send us email or if you submit information to us using a message or feedback form. We will use this personal information to contact you to respond to your message, to send you information that you request, and for other related purposes we consider are within your reasonable expectations. We will not use or disclose any such information for any other purpose without your consent.

6.4 Storage and Transmission of Personal Information Online

If you provide any personal information to us via our online services (including email) or if we provide such information to you by such means, the privacy, security and integrity of this information cannot be guaranteed during its transmission unless we have indicated beforehand that a particular transaction or transmission of information will be protected (for example, by encryption).

If we receive your personal information, we will take reasonable steps to store it such that unauthorised access, modification, disclosure, misuse and loss are prevented.

6.5 Other Online Services

If any of our online services (including any email messages we send to you) contain links to other online services that are not maintained by us, or if other services link to our online services, we are not responsible for the privacy practices of the organisations that operate those other services, and by providing such links we do not endorse or approve the other services. This Privacy Policy applies only in respect of our online services.

7. Changes

We reserve the right to amend this Privacy Policy at any time. We publish our current Privacy Policy on our website, and you may obtain a copy of our Privacy Policy from our website or by contacting us.

8. Complaints

If you believe that a breach of your privacy has occurred, we encourage you to contact us to discuss your concerns. Our contact details can be found in section 10 below.

Your complaint will be considered and dealt with by our Privacy Officer. The Privacy Officer may escalate the complaint internally within our organisation if the matter is serious or if necessary to resolve it.

Please allow us a reasonable time to respond to your complaint. If you are not satisfied with our resolution, you may make a complaint to the Office of the Australian Information Commissioner, whose contact details can be found at: <http://www.oaic.gov.au/>.

9. **Further Information**

You may contact us if you require further information about the ways we manage your personal information.

10. **Contact Information**

Privacy Officer
St Johns Youth Services Incorporated
Level 1, 379 Halifax Street
Adelaide SA 5000

Phone: 08 8359 2989, fax 08 8359 2809 or email privacy@sjys.org.au

Reviewed: January 2025

Nicole Chaplin
Chief Executive Officer
ST JOHN'S YOUTH SERVICES