



COMPASS

## Privacy Policy

Version Date: 18 Jun 2018

# 1. Introduction

---

Compass Leaving Care Limited ACN 624 241 621 (“we”, “our” and “us”) is committed to responsible privacy practices and to complying with the Privacy Principles contained in the Privacy Act 1988 (Cth) (“Privacy Act”) to the extent they apply to us.

This Privacy Policy sets out our policies on the management of personal information including how we collect personal information, the purposes for which we use this information, and to whom this information is disclosed.

We may, at our discretion, change or update our Privacy Policy from time to time. At any time, the latest version of our Privacy Policy is available from our website at [www.compassleavingcare.org.au](http://www.compassleavingcare.org.au).

# 2. What is personal information?

---

In this Privacy Policy, “personal information” has the meaning set out in the Privacy Act. Essentially, personal information is information or an opinion about an individual who is reasonably identifiable.

# 3. What types of personal information do we collect?

---

The types of personal information we collect from you depend on the circumstances in which the information is collected.

The following are the main types of personal information collected by us and the main purposes they are used for:

<b>Relationship</b>	<b>Personal Information</b>	<b>What it is used for</b>
Persons who contact us with requests for information	Names and contact details	To respond to requests for information To assess the need for our services

Relationship	Personal Information	What it is used for
Clients <sup>1</sup>	<p>Names, contact details and personal histories</p> <p>Dates of birth</p> <p>Ethnicity</p> <p>Relevant cultural issues</p> <p>Occupation</p> <p>Dates of birth of family members</p> <p>Family history, including ethnicity and/or language spoken at home</p> <p>Referral information</p> <p>Medicare or Health Care card number</p> <p>Health information (such as allergies, results of general assessment, and any other medical or health test results)</p> <p>Assessments of the client's and client's family's needs</p> <p>Goals related to these needs</p> <p>Information about support which can help the client achieve these goals</p> <p>Intervention or service plans</p> <p>Information about the other agencies and services who may be working with us to assist the client</p> <p>Information and other case notes about home visits, telephone calls and consultations with the client and the client's family at our offices</p>	<p>To provide services to our clients</p> <p>For research purposes where permitted by law (for example, when consent is obtained)</p> <p>In aggregate form, to assess the need for our services and to assess wider policy implications for our clients</p>

---

<sup>1</sup> Where we collect personal information about third parties from clients, it will need to ensure that the required notifications are provided to the third party – this may be done at the first instance we communicate or deal directly with the third party, or by requiring the client to warrant that they have notified these third parties of the matters in our "Privacy Policy Statement".

Relationship	Personal Information	What it is used for
Staff or job applicants	<p>Names, contact details and personal histories</p> <p>Qualifications</p> <p>Work experience</p> <p>Criminal History Check</p> <p>Working With Children Check</p> <p>Whether disqualified as a carer under the <i>Children, Youth and Families Act 2005 (Vic)</i></p> <p>Notes from referee checks</p>	<p>To undertake the necessary or relevant procedures for assessing the applicant's suitability as an employee of us</p> <p>To conduct pre-employment screening</p> <p>Other employment related purposes</p> <p>To maintain accreditation</p> <p>To place children/young people with carers</p> <p>To fulfil our responsibilities as employer and contractor, as well as its responsibilities to volunteers</p> <p>To assist with our service planning and practices</p> <p>To ensure the safety and wellbeing of children in Out of Home care</p> <p>To provide services to our staff</p> <p>For research purposes where permitted by law (for example, when consent is obtained)</p>
Volunteer carers and volunteer carer applicants <sup>2</sup>	<p>Names and contact details</p> <p>Dates of birth</p> <p>Ethnicity</p> <p>Relevant cultural issues</p> <p>Occupation</p> <p>Family history, including the volunteer carer's/applicant's cultural history and life story (if applicable)</p> <p>Medical reports</p>	<p>To assess suitability as a volunteer with us</p> <p>To conduct pre-engagement screening</p> <p>To maintain accreditation</p> <p>To allocate the applicant to an appropriate role with us, and to place children/young people with carers</p> <p>To fulfil our responsibilities as employer and contractor, as well as its responsibilities to volunteers</p>

---

<sup>2</sup> We are only permitted to collect personal and sensitive information about an individual that is reasonably necessary for, or directly related to, one or more of our functions or activities. We should ensure that information about a volunteer's life story is necessary for its activities.

Relationship	Personal Information	What it is used for
	<p>Qualifications</p> <p>Criminal History Check</p> <p>Working With Children Check</p> <p>Whether disqualified as a carer under the <i>Children, Youth and Families Act 2005 (Vic)</i></p> <p>Notes from referee checks</p> <p>Step by Step Victoria Assessment Record</p> <p>Home and environment check</p> <p>Community Services Organisation check</p> <p>Evidence of competency</p> <p>History of involvement with Child Protection Services (if any)</p>	<p>To assist with our service planning and practices</p> <p>To ensure the safety and wellbeing of children in Out of Home care</p>
<p>Volunteers (other than a volunteer carer), or volunteer applicants</p>	<p>Names and contact details Dates of birth</p> <p>Ethnicity</p> <p>Relevant cultural issues</p> <p>Occupation</p> <p>Disability issues accommodated</p> <p>Work experience</p> <p>Criminal History Check</p> <p>Working With Children Check</p> <p>Notes from referee checks</p>	<p>To assess suitability as a volunteer with us</p> <p>To conduct pre-engagement screening</p> <p>To maintain accreditation</p> <p>To allocate the applicant to an appropriate role within us, and to place children/young people with carers</p> <p>To fulfil our responsibilities as employer and contractor, as well as its responsibilities to volunteers</p> <p>To assist with our service planning and practices</p> <p>To ensure the safety and wellbeing of children in Out of Home care</p>
<p>Donors, investors and supporters</p>	<p>Names and contact details</p> <p>Date of birth (if applicable)</p> <p>Date of death (if applicable)</p>	<p>For taxation and financial record-keeping, fundraising accountability</p> <p>To inform decisions about appropriate communications such as event invitations and appeal segmentation</p>

Relationship	Personal Information	What it is used for
	Payment details (such as credit card or bank account details)  Donation information (such as date of gift, amount of gift, appeal contributed to and name of spouse)	To process receipts  To keep donors and investors updated in relation to appeals and work being performed by us in the community  To undertake market research
Suppliers and potential suppliers to us	Names and business contact details	To administer our dealings and potential dealings with suppliers of products and services

Except as described in this section, we do not generally require you to disclose any sensitive information (e.g. details of race, religious belief, sexual orientation or membership of a trade union) to us. If you do provide us with sensitive information for any reason, you consent to us collecting that information and using and disclosing that information for the purpose for which you disclosed it to us and as permitted by the Privacy Act and other relevant laws.

In addition to the types of personal information identified above, we may collect personal information as otherwise permitted or required by law.

## 4. How do we collect your personal information?

We collect personal information in a number of ways. The most common ways we collect your personal information are:

- directly from you when you provide it to us or our agents or contractors;
- via our website or when you deal with us online (including through our social media pages);
- from publicly available sources;
- from our related companies; and
- from third parties (for example, from referees if you apply for a position as an employee or contractor with us).

## 5. For what purposes do we collect, use and disclose your personal information?

The purposes for which we use and disclose your personal information will depend on the circumstances in which we collect it. Whenever practical we endeavour to inform you why we are collecting your personal information, how we intend to use that information and to whom we intend to disclose it at the time we collect your personal information.

We may use or disclose your personal information:

- for the purposes for which we collected it (and related purposes which would be reasonably expected by you);
- for other purposes to which you have consented; and
- as otherwise authorised or required by law.

Some of the additional purposes for which we collect, use and disclose personal information are:

- to respond to you if you have requested information
- to address any issues or complaints that we or you have regarding our relationship; and
- to contact you regarding the above, including via electronic messaging such as SMS and email, by mail, by phone or in any other lawful manner.

## 6. Direct marketing

---

Direct marketing involves communicating directly with you for the purpose of promoting goods or services to you and to provide you with special offers. Direct marketing can be delivered by a range of methods including mail, telephone, email or SMS. You can unsubscribe from our direct marketing, or change your contact preferences, by contacting us (see section 15 of this Privacy Policy).

## 7. What happens if you don't provide personal information?

---

Generally, you have no obligation to provide to us any personal information requested by us. However, if you choose to withhold requested personal information, we may not be able to provide you with the products and services requested or allow you to participate in the marketing activities that depend on the collection of that information.

## 8. To whom do we disclose personal information?

---

We may disclose your personal information to third parties in connection with the purposes described in section 5 of this Privacy Policy.

This may include disclosing your personal information to the following types of third parties:

- our employees and related bodies corporate;

- our contractors and other third parties that provide goods and services to us (including website and data hosting providers, and other suppliers);
- our accountants, insurers, lawyers, auditors and other professional advisers and agents;
- payment system operators;
- if you are an individual contractor to us or a prospective employee, to our related companies and HR related service providers (e.g. for outsourced payroll processing);
- any third parties to whom you have directed or permitted us to disclose your personal information (e.g. referees);
- in the unlikely event that we or our assets may be acquired or considered for acquisition by a third party, that third party and its advisors;
- third parties that require the information for law enforcement or to prevent a serious threat to public safety; and
- otherwise as permitted or required by law.

Where we disclose your personal information to third parties we will use reasonable efforts to ensure that such third parties only use your personal information as reasonably required for the purpose we disclosed it to them and in a manner consistent with the Privacy Principles under the Privacy Act.

If you post information to public parts of our websites or to our social media pages, you acknowledge that such information (including your personal information) may be available to be viewed by the public. You should use discretion in deciding what information you upload to such sites.

## 9. Does personal information leave Australia?

We do not generally disclose your personal information outside of Australia. Except in some cases where we may rely on an exception under the Privacy Act, if we do disclose personal information to overseas recipients, we will take reasonable steps to ensure that such overseas recipients do not breach the Privacy Principles in the Privacy Act in relation to such information.

## 10. How do we protect personal information?

We will take reasonable steps to keep any personal information we hold about you secure. However, except to the extent liability cannot be excluded due to the operation of statute, we exclude all liability (including in negligence) for the consequences of any unauthorised access to, disclosure of, misuse of or loss or corruption of your personal information. Nothing in this Privacy Policy restricts, excludes or modifies or purports to restrict, exclude or modify any statutory consumer rights under any applicable law including the *Competition and Consumer Act 2010 (Cth)*.

Please notify us immediately if you become aware of any breach of security.

## 11. Accuracy of the personal information we hold

We try to maintain your personal information as accurately as reasonably possible. We rely on the accuracy of personal information as provided to us both directly (from you) and indirectly.

We encourage you to contact us if the personal information we hold about you is incorrect or to notify us of a change in your personal information. Our contact details are set out in section 15 of this Privacy Policy.

## 12. Links, cookies and use of our websites and applications

Our website may contain links to other sites. This Privacy Policy applies to our website and not any linked sites which are not operated or controlled by us. We encourage you to read the privacy policies of each website that collects your personal information.

We may use “cookies” and similar technology on our websites and in other technology applications. The use of such technologies is an industry standard, and helps to monitor the effectiveness of advertising and how visitors use our websites/applications. We may use such technologies to generate statistics, measure your activity, improve the usefulness of our websites/applications and to enhance the “customer” experience.

If you prefer not to receive cookies you can adjust your Internet browser to refuse cookies or to warn you when cookies are being used. However, our websites may not function properly or optimally if cookies have been turned off.

## 13. How can you access and correct personal information we hold about you?

You may seek access to personal information which we hold about you by contacting us as described in section 15 of this Privacy Policy. We will provide access to that information in accordance with the Privacy Act, subject to certain exemptions which may apply. We may require that the person requesting access provide suitable identification and where permitted by law we may charge an administration fee for granting access to your personal information.

If you become aware that any personal information we hold about you is incorrect or if you wish to update your information, please contact us (see section 15 of this Privacy Policy).

## 14. Queries, comments and complaints about our handling of personal information

---

If you have any questions, comments or complaints about our collection, use or disclosure of personal information, or if you believe that we have not complied with this Privacy Policy or the Privacy Act, please contact us (see section 15 of this Privacy Policy).

When contacting us please provide as much detail as possible in relation to your question, comment or complaint.

We will take any privacy complaint seriously and any complaint will be assessed with the aim of resolving any issue in a timely and efficient manner. We request that you cooperate with us during this process and provide us with any relevant information that we may need.

If you are not satisfied with the outcome of our assessment of your complaint, you may wish to contact the Office of the Australian Information Commissioner.

## 15. How can you contact us?

---

Please address all privacy complaints to:

Attention: Company Secretary  
Compass Leaving Care Limited  
103 Hoddle Street, Collingwood, Victoria, 3066, Australia

Or

[info@compassleavingcare.org.au](mailto:info@compassleavingcare.org.au)

If you wish to seek access to or correct or update any personal information we hold about you, or to unsubscribe from our direct marketing you can also contact us using the contact details listed above.