Privacy Policy – Donor and Stakeholder Information

Purpose

The Australian Refugee Association Incorporated (ARA) is committed to managing personal information in accordance with the Australian Privacy Principles (APPs) under the Privacy Act 1988 (the Privacy Act) and other applicable privacy legislation.

This Policy outlines ARA's approach to the collection and management of personal information. The Policy aims to ensure personal information is handled lawfully, securely and transparently while protecting the privacy rights of individuals.

Scope

This Policy applies to the collection, use, storage, disclosure and management of personal information relating to donors, supporters, prospective supporters, job applicants, volunteers, contractors, service providers, event participants and other individuals. It does not apply to client information, which is managed under ARA's separate Privacy Policy - Client Information.

Definitions

Personal Information	Information or an opinion about an identified individual.
Sensitive Information	Personal information that is afforded a higher level of protection under the Privacy Act, including information about an individual's health, racial or ethnic origin, religious beliefs, political opinions, sexual orientation or criminal record.
APPs	The Australian Privacy Principles contained in Schedule 1 of the Privacy Act.

Policy Statement

- ARA will only collect, use and disclose personal information for lawful and legitimate organisational purposes.
- ARA will only collect and handle sensitive information where authorised by law, with consent where required, and for the purpose for which it was collected.
- ARA will take reasonable steps to protect personal information from unauthorised access, disclosure, modification, misuse or loss.

Responsibilities

Privacy Officer	Oversees the implementation of this Policy, manages privacy enquiries and complaints, and addresses requests for correction of personal information. For the purpose of this Policy, the Finance and Corporate Services Manager performs the functions of the Privacy Officer.
ARA Employees	Comply with this Policy and handle personal and sensitive information in accordance with applicable privacy requirements.

Procedures

What information does ARA collect about you?

Donors, supporters and prospective supporters

- When you enquire about supporting ARA, a record is made which includes your personal information.

- The type of personal information that we collect will vary depending on the circumstances of collection and the kind of service that you request from us, but will typically include:
  (a) your name, e-mail, postal address and other contact details;
  (b) your professional details; and
  (c) any additional personal information you provide to us, or authorise us to collect, as part of your interaction with ARA.

Prospective employees or volunteers

- We collect personal information when recruiting personnel, such as your name, contact details, qualifications and work history. Generally, we will collect this information directly from you.

- We may also collect personal information from third parties in ways which you would expect (for example, from recruitment agencies or referees you have nominated). Before offering you a position, we may collect additional details such as your tax file number and superannuation information and other information necessary to conduct background checks to determine your suitability for certain positions (for example, positions which involve working with children).

Other individuals

- ARA may collect personal information about other individuals including members of the public who participate in events we are involved with, individual service providers and contractors to ARA and other individuals who interact with ARA on a commercial basis. The

kinds of personal information we collect will depend on the capacity in which you are dealing with ARA. Generally, it would include your name, contact details, and information regarding our interactions and transactions with you.

- If you are participating in an event we are managing or delivering, we may take images or audio-visual recordings which identify you.

- You can always decline to give ARA any personal information we request, but that may mean we cannot provide you with some or all of the services you have requested. If you have any concerns about personal information we have requested, please let us know.

Sensitive information

- In limited circumstances, ARA may collect information which is considered sensitive information. For example, if you are injured at an event promoted or delivered by ARA we may collect health information about you in an emergency or otherwise with your consent.

- Sensitive information will only be collected with your express consent, or in the case of a vulnerable person, the consent of a parent or guardian.

- Sensitive information will only be used and disclosed for the express purpose for which it was provided or a directly related secondary purpose unless otherwise agreed or permitted by law.

Why does ARA collect Personal Information?

- ARA collects personal information reasonably necessary to carry out our activities, to assess and manage our supporters' needs and to provide services. We may also collect information to fulfil administrative functions associated with these services, for example billing, entering into contracts with you or third parties and managing client relationships.

- The purposes for which ARA usually collects and uses personal information depend on the nature of your interaction with us, but may include:
    1. Responding to requests for information and other general inquiries;
    2. Managing, planning, advertising and administering programs and events; Researching, developing and expanding our facilities and services;
    3. Informing you of our activities, events, facilities and services;
    4. Recruitment processes (including for volunteers); and
    5. Responding to enquiries and complaints.

- ARA generally collects personal information directly from you. We may collect and update your personal information over the phone, by email, over the internet or social media, or in person. We may also collect personal information about you from other sources, for example:
    1. Affiliated and related charities; and
    2. Third-party suppliers and contractors who assist us to operate.

- ARA also collects and uses personal information for market research purposes and to innovate our delivery of support services.

How does ARA collect, store and use information?

ARA stores information in paper-based files or electronic record keeping methods in secure databases (including trusted third-party storage providers based in Australia and overseas). Personal information may be collected in paper-based documents and converted to electronic form for use or storage (with the original paper-based documents either archived or securely destroyed). We take reasonable steps to protect your personal information from misuse, interference and loss and from unauthorised access, modification or disclosure.

ARA maintains physical security over paper and electronic data stores, such as:

- Locks and security systems at our premises; and
- Maintaining information and network security as per the Department of Employment and Workplace Relations' Right Fit For Risk Cyber Security Accreditation requirements.

Our website does not necessarily use encryption or other technologies to ensure the secure transmission of information via the internet. Users of our websites are encouraged to exercise care in sending personal information via the internet.

How does ARA interact with you via the internet?

- You may visit our website at www.australianrefugee.org without identifying yourself. If you identify yourself (for example, by providing your contact details in an enquiry), any personal information you provide to ARA will be managed in accordance with this privacy policy.

- ARA's website uses cookies. A "cookie" is a small file stored on your computer's browser, which assists in managing customised settings of the website and delivering content. We collect certain information such as your device type, browser type, IP address, pages you have accessed on our websites and on third-party websites. You are not identifiable from such information.

- You can use the settings in your browser to control how your browser deals with cookies. However, in doing so, you may be unable to access certain pages or content on our website.

- From time to time the ARA website may contain links to third-party websites. ARA is not responsible for the content or privacy practices of websites that are linked to our website.

Does ARA use or disclose your personal information for direct marketing?

ARA may use or disclose your personal information for the purpose of informing you about our services, upcoming promotions and events, or other opportunities that may interest you. If you do not want to receive direct marketing communications, you can opt-out at any time by contacting us.

If you opt-out of receiving marketing material from us, ARA may still contact you in relation to any ongoing relationship with you.

How does ARA use and disclose personal information?

For donors and supporters:

The purposes for which we may use and disclose your personal information will depend on the reason for our interaction with you. For example, if you have engaged us to deliver a service, we may disclose information about you to service providers where this is relevant to our services.

For events:

If you are a participant in an event, we may disclose your personal information to venues where this is reasonably necessary for, and relevant to, the delivery of the event. We may use images or audio-visual recordings which identify you for promotional purposes where you would reasonably expect this to occur.

Disclosure to other charities:

From time to time we may share your information with other Australian charities. You can opt out of having your information shared with other charities by contacting ARA.

Third parties to whom we have disclosed your personal information may contact you directly to let you know they have collected your personal information and to give you information about their operations or about their privacy policies.

Can you deal with ARA anonymously?

ARA will provide individuals with the opportunity of remaining anonymous or using a pseudonym in their dealings with us where it is lawful and practicable (for example, when making a general enquiry). Generally, it is not practicable for ARA to deal with individuals anonymously or under a pseudonym on an ongoing basis. If we do not collect personal information about you, you may be unable to utilise our services or participate in our events, programs or activities we manage or deliver.

Use and disclosure for administration and management:

ARA will also use and disclose personal information for a range of administrative, management and operational purposes. This includes:

1. Administering billing and payments;
2. Planning, managing, monitoring and evaluating our operations;
3. Quality improvement activities;
4. Statistical analysis and reporting;
5. Training staff, contractors and other workers;

6. Risk management and management of legal liabilities and claims (for example, liaising with insurers and legal representatives);
7. Responding to enquiries and complaints regarding our services;
8. Obtaining advice from consultants and other professional advisers; and
9. Responding to subpoenas and other legal orders and obligations.

Other uses and disclosures:

We may use and disclose your personal information for other purposes explained at the time of collection or otherwise as set out in this privacy policy.

Does ARA disclose your personal information overseas?

Unless we have your consent, or an exception under the APPs applies, we will only disclose your personal information to overseas recipients where we have taken reasonable steps to ensure that the overseas recipient does not breach the APPs in relation to your personal information.

We use a third-party secure billing provider. Our billing provider collects donor information and processes online payments and may use data processing systems that are located outside Australia. Our current billing providers are known as “Give Easy”, “Stripe”, “Salesforce” and “Payments to Us”; each provides its services to ARA pursuant to its own privacy policy, which can be found on their respective websites.

How can you access or seek correction of your personal information?

You are entitled to access your personal information held by ARA on request. To request access to your personal information please contact our Privacy Officer using the contact details set out below.

You will not be charged for making a request to access your personal information, but you may be charged for the reasonable time and expense incurred in compiling information in response to your request.

We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date. You can help us to do this by letting us know if you notice errors or discrepancies in information we hold about you and letting us know if your personal details change.

If you consider any personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading you are entitled to request correction of the information. After receiving a request from you, we will take reasonable steps to correct your information.

We may decline your request to access or correct your personal information in certain circumstances in accordance with the APPs. If we do refuse your request, we will provide you with a reason for our decision and, in the case of a request for correction, we will include a statement with your personal information about the requested correction.

Archiving Obsolete Records

In accordance with the ARA Document Control Policy, obsolete records must be retained for a minimum period of five (5) years. After this minimum period, obsolete documents may be archived or destroyed with the permission of the Senior Management Team, unless there is a legal, regulatory, contractual or other requirement to retain the records for a longer period.

What should you do if you have a complaint about the handling of your personal information?

You may contact ARA at any time if you have any questions or concerns about this privacy policy or about the way in which your personal information has been handled.

You may make a complaint about privacy to the privacy officer at the contact details set out below.

ARA will manage privacy complaints in accordance with the CS009 Client Feedback and Complaints Policy. Complaint response timeframes are as follows:

- Complaints are to be acknowledged in writing by the Quality and Information Systems Coordinator within three (3) business days of being lodged.
- If an investigation is required, the CEO will appoint an appropriately qualified and independent investigator within two (2) business days.
- ARA will aim to complete the formal investigation and develop any required corrective actions within seven (7) business days of the complaint being lodged.
- A written outcome will be provided to the person making the complaint within seven (7) business days of the complaint process being completed.

If you are not satisfied with our response to your complaint, or you consider ARA may have breached the APPs or the Privacy Act, a complaint may be made to the Office of the Australian Information Commissioner (OAIC). The OAIC can be contacted by telephone on 1300 363 992 or by using the contact details on the OAIC website.

Compliance and Enforcement

Failure to comply with this policy may result in disciplinary action, including formal warnings, demotion or dismissal, where appropriate.

ARA will monitor compliance with this policy through regular reviews by the Service Governance Committee, including the examination of feedback and complaint records, investigation outcomes, and real-life case examples to identify opportunities for continuous improvement.

Related References

- Privacy Act 1988
- Australian Privacy Principles (APPs)

- ARA Document Control Policy
- ARA Client Feedback and Complaint Policy
- ARA Privacy Policy - Client Information

Review and Revision

This policy will be reviewed at least every two years, or earlier where changes to legislation require it, and any revisions will be made in accordance with the review findings.

Authorisation

This Policy is authorised for issue by ARA's CEO (or delegate) when published to the ARA Policy Hub.

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