Privacy Policy – Client Information

Purpose

The Australian Refugee Association Incorporated (ARA) is committed to managing clients' personal and sensitive 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 clients' personal and sensitive information. It aims to ensure that information is handled lawfully, securely and transparently while protecting clients' privacy rights.

Scope

This Policy applies to the collection, use, storage, disclosure and management of personal and sensitive information relating to ARA clients and their dependants.

It does not apply to information relating to donors, supporters, prospective supporters, job applicants, volunteers, contractors, service providers, event participants and other non-client individuals, which is managed under ARA's separate Privacy Policy – Donor and Stakeholder 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.
Client Information	For the purpose of this Policy, the personal and sensitive information of an individual who applies for, receives or has received services or support from ARA.
APPs	The Australian Privacy Principles contained in Schedule 1 of the Privacy Act.

Policy Statement

- ARA will only collect client information where necessary to provide services, manage its operations, or meet applicable legal obligations.

- ARA will only use and disclose client information for the purpose for which it was collected, a directly related purpose, or where otherwise authorised or required by law.

- ARA will take reasonable steps to protect client information from misuse, interference, loss, and unauthorised access, modification or disclosure.

- ARA will maintain a process to archive and securely dispose of client information when it is no longer required.

- ARA will provide clients with access to and correction of their personal information, and respond to privacy enquiries and complaints.

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?

- **Personal Information**
  When you apply to engage ARA:
  1. a record is made which includes your personal information; and
  2. enquiries are made by which we collect personal information about you.

  The type of personal information that we collect will vary depending on your circumstances and the kind of service that you request from us, but will typically include:
  1. your name, e-mail, postal address and other contact details;
  2. your employment details and work history;
  3. information about your dependants; and
  4. any additional personal information you provide to us, or authorise us to collect, as part of your interaction with ARA.

  Generally, we will collect this information directly from you either in person or electronically.

We may also collect personal information from third parties in ways which you would expect (for example, from government agencies, social workers, employers or other parties that you have nominated).
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**
  Some personal information is deemed to be 'sensitive information' under the Privacy Act. In order to provide our services, ARA may collect information which is considered sensitive information.

  The types of sensitive information that we collect will vary depending on the circumstances of collection and the kind of service that you request from us, but may include:
  1. health and medical details;
  2. visa status;
  3. details of any disability;
  4. details about your cultural background, including about religious affiliations;
  5. information about your criminal record; or
  6. details about family and domestic violence.

  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 do we collect personal and sensitive information?

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

The purposes for which ARA usually collects and uses personal information depends on the nature of your interaction with us, but may include:

1. responding to your requests for services;
2. providing services to you or your dependants;
3. managing, planning and administering programs;
4. researching, developing and expanding our facilities and services; 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 or in person.

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 takes all reasonable steps to protect your personal information from any unauthorised use.

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.

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, including after you have ceased being a client of ARA.

If you do not want to receive direct marketing communications, you can opt-out at any time by contacting us using the contact details shown at the end of this policy.

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 clients
ARA will use and disclose your personal information for the provision of services to you and your dependants or to refer you or your dependants to other services or agencies. For example, if you have engaged us to deliver a service, we may disclose information about you to service providers.

ARA may also disclose your personal information when required by government agencies or by the law.

Disclosure to supporters
From time to time, we may share your information with supporters of ARA for the purposes of reporting on ARA programs however we will not disclose any contact information or sensitive information in this way.

Can you deal with ARA anonymously?

Generally, it is not practicable for ARA to deal with clients anonymously or under a pseudonym on an ongoing basis. If we do not collect personal information about you, we may be unable to provide you with services or participate in programs or activities that 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. 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.

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 below:

By Post	PO Box 50, Salisbury SA 5108
By Email	feedback@ausref.net
By Phone	08 8354 2951

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 client, or where appropriate the carer, 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 - Donor and Stakeholder Information

Review and Revision

This policy will be reviewed at least every 2 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.

Document Type: Policy	**Initial Approval Date: December 2021**
Version No.: 1.0	**Last Review Date: 27 January 2026**
	Next Review Date: 27 January 2028