

## PRIVACY POLICY - MANAGEMENT OF PERSONAL INFORMATION

At CHIPS, we recognise the importance of your privacy and understand your concerns about the security of the personal information you provide to us. We comply with the Australian Privacy Principles (APPs) as contained in the *Privacy Act 1988* (Cth), the Information Privacy Principles (IPPs) as contained in the *Privacy and Data Protection Act 2014* (Vic); and the Health Privacy Principles (HPPs) as contained in the *Health Records Act 2001* (Vic).

The APPs, IPPs and HPPs detail how personal, sensitive and health information may be collected, used, disclosed, stored and destroyed, and how an individual may gain access to or make complaints about the information held about them.

**Personal information** is information or an opinion about an identified individual, or about an individual who is reasonably identifiable.

Sensitive Information, a sub-set of personal information, is information or an opinion about an individual's racial or ethnic origin, political opinions, political association membership, religious beliefs or affiliations, philosophical beliefs, professional or trade association membership, trade union membership, sexual orientation or practices, or criminal record, and includes health information and genetic information.

**Health Information** is information or an opinion about an individual's health or disability, the health services provided or to be provided to them, their expressed wishes for the provision of future health services, personal information collected to provide a health service, personal information collected in connection with organ and body-part donation, and predictive genetic information.

This policy details how CHIPS manages personal, sensitive and health information about you, whether you are:

- A participant in CHIPS' programs, or a recipient of CHIPS' services;
- A contractor, allied agency or business partner of CHIPS;
- A volunteer for CHIPS; or
- A donor to CHIPS.

The collection of personal, sensitive and health information for and during CHIPS' programs is often necessary or unavoidable, but we collect only such information as is required to provide our programs.

## WHAT PERSONAL INFORMATION WE COLLECT AND HOLD

We collect personal, sensitive and health information about:

- Children – before, during and after the child's participation and/or their siblings' participation in CHIPS' programs;
- Parents and/or guardians (parents) – before, during and after their child's and/or their own participation in CHIPS' programs;
- Members of school communities – before, during and after their pupil's and/or their own participation in CHIPS' programs;
- Volunteers – before, during and after their volunteer activities with CHIPS;
- Job applicants, staff members, contractors to CHIPS and workers in referral agencies; and
- Donors who provide funding and other support to CHIPS.

## CHILDREN AND PARENTS

The kinds of personal, sensitive and health information that we commonly collect and hold from or about children and parents include: name, address, phone, fax and mobile numbers, email address, date of birth, age, gender, nationality and cultural background, religious beliefs or affiliations, family composition details, parent occupation, emergency contact and next-of-kin details, photographs and video footage, conduct and behaviour reports and assessments, medical and health history information, health fund details, Medicare number, allergy treatment plans, dietary requirements, requirements for special needs, physical disabilities and learning disabilities, psychological and psychometric assessments, applicable welfare and agency referrals, applicable marital, custody and parenting orders, and bank account and credit card details.

## SCHOOL COMMUNITIES

The kinds of personal, sensitive and health information that we commonly collect and hold from or about the members of school communities include: name, address, phone, fax and mobile numbers, email address, occupation, nationality and cultural background, religious beliefs or affiliations, photographs and video footage, dietary requirements and applicable welfare and agency referrals.

## VOLUNTEERS, JOB APPLICANTS AND STAFF MEMBERS

The kinds of personal, sensitive and health information that we commonly collect and hold from or about prospective and current volunteers, job applicants and staff members include: name, address, phone, fax and mobile numbers, email address, occupation, religious beliefs or affiliations, professional association membership, photographs and video footage, emergency contact and next-of-kin details, allergy treatment plans, dietary requirements, medical and health history information, health fund details, Medicare number, criminal history check, working with children check, and bank account and credit card details.

## CONTRACTORS

The kinds of personal, sensitive and health information that we commonly collect and hold from or about prospective and current contractors to CHIPS include: name, address, phone, fax and mobile numbers, email address, occupation, professional association membership, emergency contact and next-of-kin details, medical and health history information, health fund details, Medicare number, criminal history check, working with children check, and bank account and credit card details.

## DONORS

The kinds of personal information that we commonly collect and hold from or about financial donors and other supporters of CHIPS include: name, address, phone, fax and mobile numbers, email address, occupation, photographs and video footage, and bank account and credit card details.

## OTHER

When you browse our website, interact with us electronically, or engage with us on social media platforms, we may record: geographical tagging, cookies and statistical data.

## HOW WE COLLECT AND HOLD PERSONAL INFORMATION

We aim to collect personal information only directly from you, unless it is unreasonable or impracticable for us to do so.

We may collect sensitive information from you or about you where there is a legal requirement to do so, or where we are otherwise permitted by law. In all other situations, we will specifically seek your consent.

## INFORMATION YOU PROVIDE

We will generally collect personal, sensitive and health information from you or about you from forms that you fill out and return to us, meetings and interviews with us, telephone calls and other general correspondence with us, as well as your activity on our website and social media platforms.

## INFORMATION PROVIDED BY OTHER PEOPLE

However, in some instances we may receive personal, sensitive and health information about you from third parties, such as your family members, references from schools, churches, community organisations and welfare agencies.

If you provide CHIPS with the personal information of other people (eg. emergency and next-of-kin contacts), we encourage you to inform them that you are disclosing their information to CHIPS, and why.

## ANONYMITY AND PSEUDONYMITY

You can be anonymous or use a pseudonym when dealing with us, unless:

- the use of your true identity is a legal requirement; or
- it is impracticable for us to deal with you on such basis.

## WHY WE COLLECT, HOLD, USE AND DISCLOSE PERSONAL INFORMATION

We collect, hold, use and disclose personal, sensitive and health information from you or about you where it is reasonably necessary for us to carry out CHIPS' functions and activities, and to provide CHIPS' programs.

## CHILDREN AND PARENTS

We collect, hold and use personal, sensitive and health information about children and parents to enable them to participate in CHIPS' programs. This also includes CHIPS' obligations under child protection and mandatory reporting laws.

## SCHOOL COMMUNITIES

We collect, hold and use personal, sensitive and health information about members of school communities to enable them to also participate in CHIPS' programs.

## VOLUNTEERS, JOB APPLICANTS AND STAFF MEMBERS

We collect, hold and use personal, sensitive and health information about volunteers, job applicants and staff members to assess and (if successful) employ or engage the individual, to administer the individual's employment / engagement, and to satisfy CHIPS' legal obligations under legislation including workplace health and safety laws and child protection laws.

## DONORS

We collect, hold and use personal information about donors to administer our funding arrangements and for marketing / promotional purposes.

## GENERAL

If we do not collect, hold, use or disclose your personal, sensitive and health information, or if you do not consent, then we may not be able to offer any, all or our full range of services and programs.

Where we use your personal information for marketing and promotional purposes, you can opt out at any time by notifying us. Opt out procedures are also included in our marketing communications.

Where we wish to use or disclose your personal information for other purposes, we will obtain your consent.

## WHY WE DISCLOSE PERSONAL INFORMATION

CHIPS may disclose personal, sensitive and health information to:

- schools, churches, medical practitioners and allied health professionals;
- government departments for reporting educational, health and statistical purposes;
- people or organisations providing complementary or related services and programs to CHIPS (eg. chaperones, camp providers, holiday program operators etc);
- contracted service providers to CHIPS (eg. IT, marketing and fundraising organisations and associations);
- parents and family members; and
- anyone to whom you authorise CHIPS to disclose information.

We may also disclose your personal information to third parties (including government departments and enforcement bodies) where required or permitted by law.

## HOW WE HOLD AND STORE PERSONAL INFORMATION

Your personal, sensitive and health information is held and stored on paper, by electronic means or both. We have physical, electronic and procedural safeguards in place and take reasonable steps to ensure that your personal, sensitive and health information is protected from misuse, interference and loss, and from unauthorised access, modification and disclosure.

## DESTRUCTION AND DE-IDENTIFICATION

We will retain your personal information whilst it is required for any of CHIPS' functions, or for any other lawful purpose.

We use secure methods to destroy or to permanently de-identify your personal information when it is no longer needed.

## OVERSEAS DISCLOSURE

CHIPS is affiliated with a range of people and organisations located overseas. For example, CHIPS participates in overseas mission trips. In some instances, we are likely to disclose some of your personal, sensitive and health information to overseas recipients. However, we will only do so where:

- it is necessary for you to participate in CHIPS' overseas programs; and
- you have provided consent; or
- we believe on reasonable grounds that the overseas recipient is required to deal with your information by enforceable laws which are similar to the requirements under the APPs, IPPs and HPPs; or
- it is otherwise permitted by law.

Currently, our overseas affiliates are located in Thailand and Uganda.

## REQUESTS FOR ACCESS AND CORRECTION

We have procedures in place for dealing with and responding to requests for access to, and correction of, the personal, sensitive and health information held about you.

CHIPS may require you to verify your identity and specify what information you require. We may charge a fee to cover the cost of verifying your application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, we will advise the likely cost in advance.

In most cases, we expect that we will be able to comply with your request. However, if we do not agree to provide you access or to correct the information as requested, we will give you written reasons why.

For further information, please see our [Access, Correction & Complaints policy](#) or contact us at [enquiries@chips.org.au](mailto:enquiries@chips.org.au).

To assist us to keep our records up-to-date, please notify us of any changes to your personal, sensitive and health information.

## COMPLAINTS AND CONCERNS

We have procedures in place for dealing complaints and concerns about our practices in relation to the Privacy Act, the APPs, the Information Privacy Act, the IPPs, the Health Records Act and the HPPs. We will respond to your complaint in accordance with the relevant provisions of the applicable legislation.

For further information, please see our [Access, Correction & Complaints policy](#) or contact us at [enquiries@chips.org.au](mailto:enquiries@chips.org.au).

### Contact

Privacy Officer  
Christians Helping In Primary Schools, Inc  
PO Box 291  
Narre Warren VIC 3805  
**p:** (03) 9702 5528  
**f:** (03) 97020039  
**e:** [enquiries@chips.org.au](mailto:enquiries@chips.org.au)  
**w:** [www.chips.org.au](http://www.chips.org.au)