

Footprints in Brisbane Inc. (Footprints) recognises the importance of protecting the personal information of individuals. This Privacy Policy explains how we manage your personal information in accordance with the Australian Privacy Principles (APPs) contained in the *Privacy Act 1988* (Cth) (The Act) and other relevant State laws governing the protection of personal information.

## Definitions

For the purposes of this Policy:

- **Personal information** is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not, and whether the information or opinion is recorded in a material form or not (e.g. your name and address, your date of birth).
- **Sensitive information** is a subset of personal information, attracting a higher level of protection under the Act (e.g. health information as well as information about race or ethnic origin, political opinions, sexual orientation, criminal record).
- **Health information** is information or an opinion about an individual's physical or mental health or disability, health preferences including future provision of health services.

## Why we collect your personal information?

We collect personal information so that we can provide you with appropriate services. We only collect information necessary for our activities. More information on our services is available on our website: [www.footprintsinc.org.au](http://www.footprintsinc.org.au).

## What personal information do we collect and hold?

The types of personal information that we collect about you will depend on your relationship with us, the nature of the services we are providing you or the activities that you are involved in, and any legal obligations we may have. For example, if you:

- **seek care and support services**, we may collect your name, contact details, details of your authorised representative (if applicable), government identifiers (e.g. Medicare card), financial details (if necessary to assist with accessing government assistance or where claiming financial hardship for client contributions/fees), information about your circumstances (e.g. prescribed medications, allergies), any special needs (e.g. communication and language needs/preferences) as well as what you are seeking assistance with
- **provide care and support services to our clients**, we may collect your name, organisation, background and screening checks, insurance details and contact details
- **make a donation to Footprints**, we may collect your name, contact details, the amount and frequency of your donation and payment details
- **attend a Footprints event**, we may collect your name, organisation, contact details, payment details (if applicable) and any dietary and accessibility requirements
- **participate in our surveys**, we may collect your name, organisation, contact details and your survey responses
- **send us an enquiry**, we may collect your name, contact details, information about your circumstances and details of your query
- **make a complaint**, we may collect your name, contact details, the details of your complaint, information collected in any investigation of the matter and details of the resolution of the complaint
- **apply for a role at Footprints**, we may collect the information you include in your application, including your cover letter, resume, contact details and referee reports as well as background and screening checks.

We also collect some information that is not personal information because it does not identify you or anyone else (e.g. collection of anonymous answers to surveys, aggregated information about how users use our website for statistical purposes only).

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## Sensitive information

We may collect your sensitive information when we have your consent and when the collection is reasonably necessary for us to carry out one or more of our functions or activities.

Sensitive information is generally relevant to an assessment of whether a person is eligible for our services, and for the delivery of care and support services. This might include information about whether a person has a mental illness or disability.

## Employees

The Act does not apply to personal information about current or former employees and this Policy does not apply to that information. Instead, workplace laws prescribe the personal information to be held in employee records and the way in which employees may access their employee records.

## What if you don't provide us with your personal information?

In some circumstances individuals can choose to deal with us anonymously or use a pseudonym (e.g. when viewing our website or making general phone queries). However, if you do not provide us with your personal information we may not be able to provide the required information or requested services, progress a complaint nor issue a tax-deductible receipt for donations.

## How do we collect your personal information?

In most cases, we will collect your personal information directly from you. We collect this information from you through several different channels including:

- through our website or social media pages
- when you correspond with us (e.g. by letter, email or telephone)
- on hard copy forms (e.g. assessment forms, volunteer/employment applications, purchase orders)
- in person (e.g. at job interviews, meeting with a client face-to-face)
- at events and forums.

We endeavour to gain your consent when collecting your personal information. This may happen before, during or after the process. Once you have provided your consent, you are able to withdraw it at any time by [Contacting Us](#). By withdrawing your consent, we may not be able to provide you with the services you require.

If we are unable to collect personal information from you directly, we may obtain further information from:

- your authorised representative (e.g. guardian, family member)
- another organisation/s (e.g. during recruitment to conduct a background/screening check)
- referrers who refer to us for assistance (e.g. Queensland Health)
- other sources where necessary to assist us in providing services to you.

## What if we receive unsolicited personal information?

If we receive unsolicited personal information, we will make an assessment as to whether we could have collected the personal information from you ourselves. If we could not, we will destroy or de-identify it as soon as it is lawfully and reasonably possible to do so. This can be affected by the options available to us and the resources and costs of taking such action.

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

We will only collect, hold, use and disclose your personal information where necessary to perform our activities and functions, and to provide the best quality service. There are various exceptions to this:

- you have consented to the use of your personal information for another purpose
- your personal information is used or disclosed for another related purpose
- in relation to your sensitive information, the other purpose is directly related to the reason why it was collected

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- we are required or authorised by law to disclose your information for another purpose
  - the use or disclosure is otherwise permitted by the Act.

Here are some examples of how your personal information may be used and disclosed:

- answer enquiries, provide information and advice about care and support service options available to you
- providing care and support services to you
- enabling better co-ordination between us and others involved in your care and support (e.g. independent contractors, organisations)
- update our records and keep your contact details up-to-date
- providing information to an authorised representative (e.g. enduring power of attorney) if you are incapable or cannot communicate, unless you have requested that we do not disclose your health information
- management
- funding and accreditation bodies
- service/quality improvement, monitoring, planning and evaluation
- feedback and incident management
- contracted service providers and suppliers (e.g. auditors, insurer or legal services, information technology, marketing and communication agencies, freight and courier services, printers and distributors of marketing material, consultants, web hosting providers)
- client satisfaction and stakeholder surveys
- staff education and training
- invoicing, billing and account management
- provision of reminders for appointments or follow-up care
- inviting you to participate in events and fundraising
- referees whose details are provided to us by job applicants.

### Duty of Care

In certain circumstances, if your communication with us raises safety concerns, we will try to contact you to check that you and/or others are safe. If necessary, we may need to pass on your contact information to authorities who can help protect you and/or others (e.g. Police). Where possible we will work with you openly, letting you know if our concerns reach the point where we need to involve other services. We are obliged to try to protect you and/or others if the information you submit causes us to suspect that:

- you are being seriously hurt by someone else
- you are thinking of seriously harming yourself
- someone else is being, or is likely to be, seriously hurt by you or another person.

### Closed Circuit Television Surveillance (CCTV)

We use CCTV at our premises to maintain the safety and security of our staff, clients, visitors and property. These systems may collect and store personal information. Where in use, we will assess how the CCTV is positioned in order to minimise impact on our neighbours. CCTV footage is securely stored and destroyed when business use is finalised.

### Media

Our staff are not permitted to comment about Footprints and/or staff and clients on social media or to the media unless as an authorised Footprints spokesperson.

### Overseas disclosure

We will not knowingly disclose personal information to anyone located overseas.

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## Donations

You may choose to provide your personal and financial information when you make a donation either by [Contacting Us](#) or online via our website. Donations can be made using EFTPOS or Westpac's secure Payway which is compliant with the Act and the Payment Card Industry (PCI) Data Security Standard. We will only use your credit card details to process the donation; we do not store your credit card details on our website or elsewhere.

## Direct marketing

We will not use your personal information nor provide your information to other organisations for the purpose of direct marketing.

## Our website and social media pages

When you visit our website, we do not try to identify you or collect personal information.

To help keep our website working optimally, our site may collect statistics about visits (e.g. how many people visit our site, the user's IP address, which pages people visit, the domains people come from and which browsers they use). This information will not be used to identify you.

Our website may contain links to other websites that are not ours.

If we obtain your consent to post your personal information on our website or social media pages, that personal information will be made public.

You may also wish to participate in our social media pages by commenting or sharing information. We however cannot be held responsible if you share personal information on these pages that is subsequently used, misused or otherwise appropriated by another user.

Other websites referenced on our website as well as social media platforms are not subject to this policy and we are not responsible for the privacy practices of these sites/platforms. These sites/platforms may have their own privacy and security policies, which we encourage you to read before supplying any personal information to them.

## Law enforcement

It is also important to know that we may, at times, be obliged by law to allow law enforcement agencies and other government agencies with relevant authority, to inspect our IP logs.

## How do we store and manage your personal information?

We understand the importance of protecting your personal information and will take all reasonable steps to keep personal information you provide us secure and protected from misuse, interference and loss as well as unauthorised access, modification or disclosure.

We hold personal information in both hard copy and electronic formats. Hard copies not being actively used are stored in secure cabinets onsite. They may also be archived in boxes and stored offsite in secure facilities.

If you are a client, we maintain a record of assessments, consent, referrals, support plans, progress notes and any other correspondence required in the provision of services. These records will generally be kept for adults for 10 years after the last service.

All other correspondence is generally kept for 7 years or until superseded, depending on legislative and funding obligations. When information we hold is identified as no longer needed for any purpose, we ensure it is destroyed, deleted or de-identified.

Our security measures include but are not limited to:

- a consent process to limit the disclosures of personal information
- website and email protection measures (e.g. SSL certificate)
- regular system patching and updates for security vulnerabilities by our external IT service provider
- having business continuity plans
- entering into agreements with contractors that may have access to personal information

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- access restrictions to our computer systems (e.g. login and password protection, server protection with built-in firewalls and anti-virus software, password protection on Footprints' issued mobile phones)
  - restricted access to our office premises (e.g. limiting key access and access to duplicate keys)
  - requiring staff adhere to our Code of Conduct
  - informing and educating staff about this Policy and privacy practices (e.g. not leaving documents unattended)
  - undertaking privacy impact assessments for new project that deal with personal information or that may have privacy implications (e.g. new programs or systems).

## How you can access and correct your personal information

If you would like to see information that we hold about you, you can ask by [Contacting Us](#). These requests can be limited to exceptions permitted by law (e.g. we may refuse access if granting access would interfere with the privacy of others or if it would breach confidentiality). We will try to provide you with a suitable means of accessing your information (e.g. in person, by mail). Depending on the personal information you seek, you may be charged a fee to cover our administrative and other reasonable costs in providing the information to you. There is no charge for simply making the request.

We will always aim to keep the most accurate, complete, up-to-date and relevant personal information. You may seek correction of any personal information we hold by [Contacting Us](#). We will take reasonable steps to correct your personal information if we are satisfied that it is inaccurate, out-of-date, incomplete, irrelevant or misleading. There is no charge for requesting the correction.

Note that we will need to verify your identity before processing your request and we will endeavour to respond to your request within 30 days.

If we do not agree with your request to access or correct your information, we will provide you with written reason/s for our decision and available complaint mechanisms.

## Contacting Us

If you have any questions or feedback about this Policy, would like to correct or access your personal information, or wish to make a complaint, please contact us: 07 3252 3488 or [admin@footprintsinc.org.au](mailto:admin@footprintsinc.org.au).

If you believe your privacy has been breached please contact us and provide details so that we can investigate. We will endeavour to respond to your complaint within 30 days of receipt of your complaint (while complex cases may take longer to resolve, we will keep you updated on the progress of your complaint). We will attempt to confirm as appropriate and necessary your understanding of the conduct relevant to the complaint and what you expect as an outcome. After we have completed our enquiries, we will contact you to advise the outcome.

If you are unhappy with our response, you can refer your complaint to the:

- [Office of the Australian Information Commissioner](#) or
- in some instances other regulatory bodies such as the [Office of the Information Commissioner Queensland](#), [National Disability Insurance Scheme \(NDIS\) Quality and Safeguards Commission](#).

## Change to this Policy

We will update this Policy from time to time. Any updated versions of this policy will be posted on our website. Please review it regularly.

## Where to find further information

Detailed information on privacy and the APPs is available on the Office of the Australian Information Commissioner's website: [www.oaic.gov.au](http://www.oaic.gov.au).