



Privacy and Data Collection Policy

1. Purpose

The purpose of this policy is to outline our commitments to privacy and confidentiality for our staff and the broader community that use and support our service.

2. Policy Statement

Juno collects a range of personal information for the purposes of employing staff, volunteers, recording donor information and delivering services.

We are committed to protecting the privacy of personal information from unauthorised access and disclosure, unauthorised modification and inappropriate transmission, transportation storage and disposal.

As an organisation we are committed to ensuring all our staff understand their obligations in relation to privacy, we employ the best practice in information management and all our stakeholders know how to access the personal information we collect and hold about them.

Juno will ensure compliance with the Privacy & Data Protection Act 2014, which covers personal information (excluding health information) held by Victorian public sector organisations, and non-government and private sector organisations that are contracted to provide services by the Victorian Government (funded organisations).

Our policy also takes into consideration the Australian Privacy Act 1988, the Charter of Human Rights and Responsibilities Act 2006 (VIC) and the Department of Health and Human Services privacy and information guidelines for funded agencies.

3. Scope

All staff, board members, contractors, consultants, auditors, volunteers, and students are bound by the Juno Privacy Policy and associated procedures.

4. Why we collect information

Juno collects and securely stores personal information about our clients and supporters for the purposes of conducting usual activities and operations. This includes securing support or donations, conducting research and developing and delivering support and advocacy services for women and gender diverse people.

Juno also collects and securely stores personnel information about job applicants, board members, employees and contractors, including resumes and contact details. This information is collected to evaluate suitability for roles and to satisfy our obligations under the law.

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5. Types of personal information collected

Client “personal information” collected may include

- name, address and contact details
- personal circumstances (e.g. age, gender, and information about children)
- identity (date and country of birth)
- government identifiers (e.g. Medicare card)
- financial matters (payment and bank account details)
- referrals from other service providers
- case-notes

Client “sensitive information” and “health information” collected may include racial or ethnic origin and information about mental health or physical health. We may only collect this information with consent and when the collection is reasonably necessary to provide support.

Employee and student placement personal information collected may include

- resumes
- police check and working with children’s check
- banking, tax file and superannuation details
- reference check information about qualifications, experience and suitability for a role
- emergency contact information

Personal information collected when financial donations are made may include credit numbers and contact information (name, address and contact details). This information is used to process donations and provide receipts provided our supporters do not wish to remain anonymous.

6. How we collect personal information

Juno only collects information personal and sensitive information about an individual that is necessary and will only collect this information with the individual’s consent.

We will provide notice of the collection, explain purpose of collection and how individuals can access their information.

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Client personal information may be collected by:

- Completing a form (online or hard copy)
- Formal referral to our services, such as applying for support from a Housing Access Point
- Direct communication in person, via the phone or via email as part of service delivery

Juno will only collect personal information via lawful and fair means. We will collect personal information directly from the client and will only collect information from a third party where the client has given prior consent to the information being shared with Juno.

7. How we use the personal information collected

Juno must only use and disclose personal information for the primary purpose it was collected or a secondary purpose that is reasonably expected under law. This includes the access to and use of information provided to Juno by third party sources.

Juno collects personal information to

- provide individuals with specialist support
- assist us to evaluate and improve our service
- maintain and update our records
- comply with our obligations under law
- fulfil our employer obligations
- process donations and receipts

Juno also from time to time collects information to conduct research and evaluate programs. Any published survey results or research reports will not contain any identifying information about individual respondents without their consent.

Personal information that is collected for research and evaluation will be de-identified.

8. Third party disclosure

Personal information collected by Juno can only be seen by Juno employees. Your personal information can only be disclosed to a third party if you have provided us with your consent.

In some circumstances Juno is obliged by law to release information about our clients, this may include if a court subpoena is received, or if there is a risk to a child's safety or wellbeing.

De-identified client personal information is also provided to the Australian Institute of Health and Welfare. This information is only supplied with our client's consent.

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9. How we store personal information

Juno takes steps to ensure the personal details collected by the organisation are accurate, complete and up to date.

The accuracy of personal information will be verified at the time of collection and checked regularly if it is to be used and disclosed by the organisation.

Juno stores information in hard copy format in secure cabinets onsite. We also store information in electronic format on a secure server where personal information is protected from misuse, loss, unauthorised access, modification, and disclosure.

To protect your privacy we use secure servers and a trusted third party supplier.

Juno will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose in line with the *Public Records Act 1974*.

10. Interstate or International Information Transfer

Juno will only transfer personal information outside Victoria in certain circumstances when the individual consents and/or the recipient of the personal information is subject to a law or binding scheme that is substantially similar to the Victorian IPPs.

11. Accessing and correcting personal information

Individuals have the right to request access to their personal information collected and stored at Juno. Juno will provide access within a reasonable time frame.

It is important that the personal information we hold is accurate and up to date. If an individual advises their personal information is incorrect, out of date or misleading we will take reasonable steps to correct the information.

Individual's may request access to their personal information held by Juno using a request to access personal information form. Requests for access can be made in writing to the Juno Privacy Officer.

Any suspected breach of the Privacy Policy should be reported to the Juno CEO. Suspected breaches will be investigated in a timely manner.

Definitions

'Personal information'

Personal information is defined in the Privacy and Data Protection Act as information or an opinion (including information or an opinion forming part of a database), that is recorded in any form and whether true or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion, but does not include information of a kind to which the Health Records Act applies.

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‘Sensitive information’

Sensitive information is a subset of personal information. It is defined in the Privacy and Data Protection Act. It means information or an opinion about an individual’s racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences, orientation or practices, criminal record.

‘Health information’

Health information is information or an opinion about an individual’s physical health, mental or psychological health, their disability, or any health services provided to them or to be provided.

RELATED FORMS
BROCHURE Protecting your rights to privacy and confidentiality
FORM Privacy and Confidentiality Agreement
FORM Request for Personal Information Access Form
FORM Consent to share information

RELATED POLICIES AND PROCEDURES
PROCEDURE Privacy and Confidentiality Procedure
POLICY Records Management Policy
POLICY Code of Conduct
POLICY Complaints, Compliments and Feedback

LEGISLATIVE AND POLICY CONTEXT
Privacy and Data Protection Act 2014
Charter of Human Rights and Responsibilities Act 2006 (VIC)
Australian Privacy Act 1988

Policy review and authorisation

This policy will be reviewed every two years, following significant incidents if they occur, or as required from time to time. The CEO is responsible for reviewing and the Juno Board are responsible for authorising this policy.

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