

Privacy Policy

Target group

All Staff

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Privacy Policy Summary

Anglicare WA Privacy Policy Summary

This summary sets out the key points about how Anglicare WA handles personal information we collect. More information can be found in our full [Privacy Policy](#).

Our obligations under the Privacy Act

- Compliance with Australian Privacy Law including Privacy Act which sets out 13 Australian Privacy Principles (**APPs**) which regulate how we collect, hold, use and disclose your personal information, and how you may access and correct personal information we hold about you. We are legally bound by the APPs.

Anglicare WA recognises and respects our Clients' rights to privacy, dignity and confidentiality in all aspects of his or her life. Anglicare WA will promote tolerance and respect for each Client's personal needs and circumstances. These obligations relate not just to the legal requirements for privacy, but more fundamentally to the values demonstrated by Anglicare WA in interacting and communicating with Clients.

Collection of your personal & sensitive information

Anglicare WA collects personal and sensitive information only if this is necessary for one of our functions or activities to lawfully and ethically provide Anglicare WA Services.

Anglicare WA sometimes conducts research which may include the collection of personal information. Anglicare WA ensures that research outcomes and reports do not identify any individual, unless the person gives her/his prior consent.

The nature and extent of personal and sensitive information collected by Anglicare WA varies depending on your particular interaction with Anglicare WA. Anglicare WA collects personal and sensitive information from employees, volunteers, clients, donors, business partners and online users.

How we use information we collect

We use the information we collect from all of our services to provide, maintain, protect and improve them, to develop new ones, and to protect Anglicare WA and our users.

We use information collected to communicate with you, to provide related client services.

We will ask for your consent before using information for a purpose other than those that are set out in our full [Privacy Policy](#).

Information security

We work hard to protect Anglicare WA and our users from unauthorised access to or unauthorised alteration, disclosure or destruction of information we hold.

We restrict access to personal information to Anglicare WA employees, volunteers, contractors and agents who need to know that information in order to process it for us, and who are subject to strict contractual confidentiality obligations.

Information we share

We do not share personal information with companies, organisations and individuals outside of Anglicare WA unless:

- We have your consent to do so
- For external processing by trusted businesses or persons to process, based on our instructions and in compliance with our full Privacy Policy and any other appropriate confidentiality and security measures.
- For legal reasons to meet any applicable law, regulation, legal process or enforceable governmental request.

Accessing and correcting your personal information

If you ask, in most cases we must give you access to the personal information that we hold about you, and take reasonable steps to correct it, if it is incorrect. We will try to make the process as simple as possible.

How to make a complaint

You can complain to us in writing about how we have handled your personal information. We will respond to the complaint within 5 business days after receiving your complaint.

Telephone on 1300 11 44 46
Email complaints@anglicarewa.org.au

or

by letter to:
General Manager – Practice Excellence
Anglicare WA
GPO Box C138
Perth WA 6839

Information for under 18s

If you are under 18, be sure to obtain your parent's or guardian's permission before you send any information about yourself (your name, address, e-mail address, etc.) to us or anyone else over the Internet.

How can I change my details?

If an individual is able to establish that personal information Anglicare WA holds about her/him is not accurate, complete or up to date, Anglicare WA will take reasonable steps to correct the records by contacting us anytime at:

Email info@anglicarewa.org.au

Or

by letter to:

Administration Services
Anglicare WA
GPO Box C138
Perth WA 6892

Contents

PURPOSE	5
SCOPE	5
OBJECTIVES	5
DEFINITIONS	5
OVERVIEW OF ANGLICARE WA'S SERVICES	6
COLLECTION OF PERSONAL & SENSITIVE INFORMATION	6
ANGLICARE WA CLIENTS	7
Type of information collected:	7
How Anglicare WA uses the information:	7
How Government departments may use the information:	7
ANGLICARE WA DONORS	7
Type of information collected:	7
How Anglicare WA uses the information:	8
ANGLICARE WA BUSINESS PARTNERS	8
Type of information collected:	8
How Anglicare WA uses the information:	8
PROSPECTIVE VOLUNTEERS AND EMPLOYEES	8
Type of information collected:	8
How Anglicare WA holds the information	9
How Anglicare WA uses the information:	9
Additional information	10
ONLINE USERS	10
Type of information collected	10
How Anglicare WA uses the information:	10
Additional Information	10
Collection of Information	10
USE AND DISCLOSURE OF PERSONAL INFORMATION	11
RELEASE OF IMAGES OR PERSONAL INFORMATION FOR ANGLICARE WA PUBLICITY PURPOSES	12
SECURITY OF PERSONAL AND SENSITIVE INFORMATION	13
PRIVACY ISSUES	14
COMPLAINTS PROCEDURE	14
CHANGES TO THIS PRIVACY POLICY	15
POLICY REVIEW	15
SUPPORTING DOCUMENTATION(S) & RESOURCES	15
Internal Documentation	15
Commonwealth Act	16
Resources	16

Introduction

This Privacy Policy seeks to explain how Anglicare WA collects, uses, discloses and otherwise handles personal information. It also seeks to explain how you can ask to access and correct the personal information we hold about you or complain about any suspected privacy breach.

Purpose

Anglicare WA respects the privacy of employees, volunteers, students, donors, clients and others including on-line users and business partners.

Anglicare WA is committed to safeguarding the personal and sensitive information that is provided to us.

Our Privacy policy outlines how we handle all personal information and the responsibilities of Anglicare WA and Anglicare WA stakeholders when dealing with personal information.

Anglicare WA takes all reasonable steps to ensure that all personal and sensitive information is protected and treated confidentially. This includes protecting your privacy in accordance with the Australian Privacy Principles as contained in the *Privacy Act 1988 (as amended)*.

Scope

This policy and procedure applies to all Anglicare WA employees, volunteers, students, donors, clients and others including on-line users and business partners.

This policy does not apply to Acts and practices of Anglicare WA which relate directly to the employee records of Anglicare WA's current and former employees.

Objectives

As per Purpose.

Definitions

"Stakeholders" means both paid/unpaid employees, volunteers, students, trainees, donors, funders, community contacts, partner agencies, clients and on-line users.

"Services" in this context means all activities conducted by Anglicare WA in the operations of its core business processes, as described in clause 6 of this Policy.

"Authorised personnel" means anyone who occupies an Anglicare WA position with an inherent requirement to access personal information.

"Business partners" means a business that provides support to Anglicare WA via the provision of funds, time or services, including suppliers.

"Clients" refers to an individual who receives support, goods or services from Anglicare WA either regularly, on a short term basis or during an emergency.

"Donors" referred to collectively, but comprising of:

- **"donor"**- person who makes a one-off, occasional or regular financial contribution to Anglicare WA or an Anglicare WA appeal;

- **“in kind donor”** – a company or organisation that gives goods or services during an event or on an on-going basis to Anglicare WA or to clients through Anglicare WA.
- **“personal information”** as defined by the *Privacy Act 1988* (as amended), means information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.
- **“sensitive information”** as defined by the *Privacy Act 1988* (as amended), is information or 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 practices; criminal record or health information about an individual, that is also personal information.
- **“The website”** means the Anglicare WA website: www.anglicarewa.org.au
- **“on-line users”** refers to anyone that accesses the Anglicare WA website: www.anglicarewa.org.au or our social media platforms

Overview Of Anglicare WA's Services

Anglicare WA (the Agency) is a not for profit community service organisation that supports people, families and communities to move from 'surviving to thriving'. Our Corporate Purpose is to work with and advocate for vulnerable people and families by providing innovative and integrated social services.

Anglicare WA holds an extensive range of contracts to deliver State and Federal Government programs across multiple service domains including Family Law, Children & Families, Youth, Housing & Homelessness, Family Violence & Justice, Mental Health & Trauma, Financial Services, First Nations Engagement and Disability Services.

Anglicare WA has a training department which provides both internal and external workplace training packages to build community capacity across a range of professional development areas. In addition, Anglicare WA has a network of Op Shops which provide affordable merchandise and clothing to the community and play an important role in recycling, while contributing to Anglicare WA's fundraising effort.

In carrying out this work Anglicare WA engages employees and volunteers, receives donations, funding and support from members of the community, corporations, groups and government. In providing such services, we comply with the Australian Privacy Principles and any additional obligations under the appropriate contracts.

Collection Of Personal & Sensitive Information

Anglicare WA collects personal and sensitive information only if this is necessary for one of our functions or activities to lawfully and ethically provide Anglicare WA Services. It is possible and lawful to request access to any Anglicare WA Services on an anonymous basis and we will take all reasonable steps to accommodate with your request where possible. However, we may at times be restricted in our capacity to provide anonymous services by contractual requirements.

Anglicare WA sometimes conducts research which may include the collection of personal information. Anglicare WA ensures that research outcomes and reports do not identify any individual, unless the person gives her/his prior consent. Anglicare WA, in most cases, will provide those participating in research with the option to provide information anonymously; if anonymous participation is not possible, Anglicare WA will provide information to potential participants to indicate how their data will be used and reported. Any person participating in Anglicare WA research is invited to contact the relevant Service/Regional Manager and/or Director of Services to discuss any concerns.

The nature and extent of personal and sensitive information collected by Anglicare WA varies depending on your particular interaction with Anglicare WA. Anglicare WA collects personal and sensitive information from employees, volunteers, clients, donors, business partners and online users. Further information about the type of information collected from each of these groups and the usage of such information is detailed below.

Anglicare WA Clients

Type of information collected:

- contact details (name, address, phone, email etc.);
- personal details including: date of birth, gender and sexual orientation, marital status, family structure, ethnicity, cultural identity, income bracket, information on personal issues and experiences, relationships;
- history of mental health, legal status, criminal history, physical/medical history, substance use
- family background, peer and social supports clients may have in the community;
- other agencies and professionals involved
- areas of interest; and
- Financial and transaction data, such as credit or debit card number and bank account

How Anglicare WA uses the information:

- to provide Anglicare WA services;
- to conduct intake and assessment processes to ascertain eligibility for certain programs
- to enable holistic and appropriate services for their needs;
- to meet any requirements of government funding for programs;
- to monitor and evaluate existing services and plan for future services;
- to produce annual reports and for research purposes which may involve contracted organisations; and
- to comply with legal obligations.

How Government departments may use the information:

- to ascertain quality and quantity of services provided
- to ascertain the impact of services provided
- to verify that assistance was provided or events took place;
- to obtain your views as part of program evaluation;
- to include in the annual report or for other research conducted by it or by a contracted organisation or agency; and
- where identifying information is provided, the department will safeguard this information in accordance with privacy legislation

Anglicare WA Donors

Type of information collected:

- contact details (name, address, telephone numbers, email etc.);
- personal details including: date of birth, gender, marital status, employer, areas of interest;
- donation history and preferences;
- credit card numbers or bank account details of all our donors; and
- expiration date of credit card

How Anglicare WA uses the information:

- to directly market to potential and existing supporters;
- to process donations and provide accurate receipts;
- to facilitate on-going fundraising and marketing activities to comply with legal obligations; and
- to provide transparency relating to donated funds, particularly for Appeals for donations.

Anglicare WA Business Partners

Type of information collected:

- contact person's name, the name of the organisation which employs the person, telephone numbers, fax number, street and postal address, email address and position title;
- areas of interest by category and industry;
- bank details (if Anglicare WA is to receive payment or make payment for services received);
- Australian Business Number (ABN); and
- type of support (eg. workplace giving, goods in kind, program support, volunteering)

How Anglicare WA uses the information:

- to provide Anglicare WA services;
- to process donations and provide accurate receipts to pay for services;
- to establish and manage partnerships;
- to receive services from you or the organisation which employs you;
- to manage Anglicare WA's relationship with the business partner to provide information about Anglicare WA's services; and
- to update the company on Anglicare WA appeals for public donations, programs and services.

Prospective Volunteers and Employees

Type of information collected:

- contact details (name, address, telephone numbers, email etc.);
- personal details including personal details of emergency contact person(s);
- date of birth;
- country of birth, citizenship, residency and/or visa details;
- details of current/previous employment or volunteer involvement skills and experience;
- languages spoken and written qualifications, drivers licence details;
- information and opinions from referees for prospective employees and candidates for volunteer work;
- a Police Clearance is required for all positions within Anglicare WA; a Working with Children Check may also be required for some roles (particularly those involving children, young people and other vulnerable groups), all information received is stored securely;
- Volunteers will be required to provide certain information for the Police Clearance. This Police Clearance will be obtained directly by Anglicare WA and then stored securely; and
- in some situations it may be necessary for Anglicare WA to collect or receive information about an individual's health. In this circumstance, Anglicare WA will advise why the information is being collected and whether and to whom it will be released.
- Certain roles (in particular senior roles) may be required to undergo a background check conducted by an external agency.

How Anglicare WA holds the information

- Anglicare WA holds personal information in a variety of formats including in databases, in hard copy files and on personal devices including laptop computers, mobile phones, cameras and other recording devices.
- The security of your personal information is of utmost importance to us and we take all reasonable steps to protect the personal information we hold about you from misuse, loss, unauthorised access, modification or disclosure.

These steps include:

- Restricting access to information on Anglicare WA databases on a need-to-know basis with different levels of security being allocated to staff based on their roles and responsibilities and security profile.
- Ensuring all staff are aware that they are not to reveal or share personal passwords.
- Ensuring where sensitive and health information is stored in hard copy files that these files are stored in lockable filing cabinets in lockable rooms.
- Access to these records is restricted to staff on a need-to-know basis
- Implementing physical security measures around Anglicare WA buildings and grounds to prevent break-ins
- Implementing ICT security systems, policies and procedures, designed to protect personal information storage on our computer networks
- Implementing human resources policies and procedures, such as email and internet usage, confidentiality and document security policies, designed to ensure that staff follow correct protocols when handling personal information.
- Undertaking due diligence with respect to third party service providers who may have access to personal information, including cloud service providers, to ensure as far as practicable that they are compliant with the Australian Privacy Principles

How Anglicare WA uses the information:

- to provide Anglicare WA services;
- to process an application to become a member, trainee, student, volunteer or paid/unpaid employee of our organisation;
- to facilitate a placement in an appropriate service or position;
- to assist with services whilst the individual is employed or engaged as a volunteer with Anglicare WA;
- to provide feedback on performance as a volunteer or employee to meet legislative responsibilities to all volunteers and employees;
- to obtain feedback from individuals about their experiences;
- to assist Anglicare WA to review and improve its programs and services to keep individuals informed about Anglicare WA developments and opportunities;
- to provide information about Anglicare WA's services; and
- to facilitate further involvements with Anglicare WA (e.g. donor or volunteer).

Additional information

- Information relating to unsuccessful candidates for employment or volunteer work will be destroyed in a secure manner, deleted or de-identified as appropriate after 6 months unless the individual provides specific permission to retain the details on file for future vacancies. Information relating to candidates short-listed but not appointed to the role may be retained in the Recruitment file held by the HR Department or Volunteer Coordinator for a period of up to 6 months and then destroyed.
- As set out above, the Privacy Act and this Policy do not apply to acts or practices which directly relate to employee records of Anglicare WA's current and former employees.

Online Users

To the extent that this Privacy Policy applies to online privacy issues, it is to be read as forming part of the terms and conditions of use for the Anglicare WA website.

Type of information collected:

- contact details (name, address, telephone numbers, email etc.);
- credit card number;
- expiration date of credit card;
- non-personal information e.g. visitor navigation and statistics, server address, browser type, date and time of visit; and
- personal information.

How Anglicare WA uses the information:

- to process donations, purchase orders, online bookings purchases/transactions (e.g. booking a course for our Education and Training arm);
- to analyse website usage and make improvements to website;
- to track online user behaviours in order to improve and maintain the website.
- Anglicare WA does not match the personal information collected with the non-personal information

Additional Information

- The website does contain links to other websites. Anglicare WA stresses that when an online user accesses a website that is not the Anglicare WA website, it may have a different privacy policy. To verify how that website collects and uses information, the user should check that particular website's policy.

Collection of Information

- Where possible, we collect your personal and sensitive information directly from you. We collect information through various means, including telephone and in-person interviews, appointments, forms and questionnaires. If you feel that the information that we are requesting, either on our forms or in our discussions with you, is not information that you wish to provide, please feel free to raise this with us.
- In some situations we may also obtain personal information about you from a third party source. If we collect information about you in this way, we will take reasonable steps to contact you and ensure that you are aware of the purposes for which we are collecting

your personal information and the organisations to which we may disclose your information, subject to any exceptions under the Act. For example, we may collect information about you from a health care professional, such as your doctor.

Use and Disclosure of Personal Information

We will use and disclose your personal information for the purpose for which it was collected. We may also use and disclose it for related purposes.

We may share your personal information with our associated services if you transfer from one service to another.

For the purposes referred to in this Policy, we may also disclose your personal information to other external organisations including:

- Government departments/agencies who provide funding for Anglicare WA services, with your consent;
- Emergency Services such as ambulance, police, fire brigade etc., who may be called upon to assist us during an accident or fire;
- contractors who may manage some of the services we offer to you, such as distribution centres who may send information to you on Anglicare WA's behalf. Steps are taken to ensure they comply with the APPs when they handle personal information and are authorised only to use personal information in order to provide the services or to perform the functions required by Anglicare WA;
- other regulatory bodies, i.e. Equal Opportunities or Industrial Relations Commissions, with your consent;
- referees and former employers of Anglicare WA employees and volunteers, and candidates for Anglicare WA employee and volunteer positions, with your consent;
- credit agencies or other agencies as part of our program service, with your consent; and
- our professional advisors, including our accountants, auditors and lawyers.

Except as set out above, Anglicare WA will not disclose an individual's personal information to a third party unless:

- The individual has consented to the release; or
- The release is authorised or required by law. Our policy is only to make such disclosures in accordance with the Privacy Act; or
- Anglicare WA is satisfied that harm will come to an individual or the public if the release is not made; or
- The individual was told at the time the information was collected that a release to a nominated party would be made; or
- The release is necessary to protect public revenue or for law enforcement purposes:
 - In the context of court-reportable programs;
 - In the context of court-mandated programs;
 - In the case of client files being lawfully requested by court order or subpoena.
 - in which case a record of the release for that purpose is to be made
- We guarantee that we will not sell your personal information to any third party.

Release of Images or Personal Information for Anglicare WA Publicity Purposes

Anglicare WA produces publications and runs public promotional campaigns from time to time to promote programs, raise funds and provide information to stakeholders of developments within the organisation. Publications include, but are not limited to, photographs in the print media; our Annual Report, the use of video footage and sound recordings in electronic media; external publications such as newspapers and magazines; Anglicare WA publications such as posters, flyers, brochures, displays, websites, social media; television or radio segments or advertisements.

Consent will be obtained from individuals prior to the use of the photograph or video and from parent/guardian's to use an image of a child.

Access to and correction of your Personal and Sensitive Information

Under the Australian Privacy Principles (APP's), it is an individual's right to access and view personal and sensitive information which Anglicare WA holds about her/him, subject to some exceptions [e.g. *a document is an exempt document under Part IV, Division 2 of the FOI Act, for example, the document is a Cabinet document, is subject to legal professional privilege, contains material obtained in confidence, or a secrecy provision applies*].

There is also a right to ask Anglicare WA to correct personal information or sensitive information which is inaccurate, incomplete or out of date.

The following principles apply to requests for access and correction:

- all requests will be dealt with promptly and in a confidential manner;
- any inaccurate or out of date information will be noted and/or corrected; and
- your request to access your personal information will not affect any commercial or professional arrangements between you and Anglicare WA.

Requests for access and/or correction should be made to Anglicare WA via the local Service Manager. For security reasons, you will be required to put your request in writing and have your identity verified. This is necessary to ensure that personal information is provided only to the correct individuals and that the privacy of others is not undermined.

Your file notes contain information about you but also may contain information regarding family members and staff members and/or internal practices. For this reason information not directly related to you will be redacted from the file you are provided access to.

In the first instance, Anglicare WA will generally provide a summary of the information held about the individual who has requested the information. It will be assumed (unless told otherwise) that the request relates to *current* records. These current records will include personal information which is included in Anglicare WA databases and in paper files, and which may be used on a day to day basis.

We will provide access by allowing you to inspect, take notes of personal information that we hold about you. If personal information (for example, your name and address details) is duplicated across different databases, Anglicare WA will generally provide one printout of this information, rather than multiple printouts.

We will take all reasonable steps to provide access to the information requested within 14 working days of your request. In situations where the request is complicated or requires access to a large volume of information, we will provide access to the information requested within 30 working days.

Anglicare WA may charge you reasonable fees to reimburse us for the cost we incur relating to your request for access to information.

How Can I Change My Details?

If an individual is able to establish that personal information Anglicare WA holds about her/him is not accurate, complete or up to date, Anglicare WA will take reasonable steps to correct the records by contacting us anytime at:

Email info@anglicarewa.org.au

Or

by letter to:

Administration Services
Anglicare WA
GPO Box C138
Perth WA 6892

Access will be denied if:

- the request does not relate to the personal information of the person making the request;
- providing access would pose a serious and imminent threat to the life or health of a person;
- providing access would create an unreasonable impact on the privacy of others;
- the request deems to be frivolous and vexatious;
- the request relates to existing or anticipated legal proceedings;
- providing access would prejudice negotiations with the individual making the request;
- access would be unlawful;
- denial of access is authorised or required by law;
- access would prejudice law enforcement activities;
- access discloses a 'commercially sensitive' decision making process or information; or
- any other reason that is provided for in the APP's or in the Privacy Act.

If we deny access to information we will set our reasons for denying access. Where there is a dispute about your right of access to information or forms of access, this will be dealt with in accordance with the complaints procedure set out below.

Security of Personal and Sensitive Information

Anglicare WA will take all reasonable steps to ensure the security of personal and sensitive information it holds and to protect it against such risks as loss or unauthorised access, destruction, use, modification or disclosure. Anglicare WA's IT systems are password protected and comply with relevant security standards, and if personal information is held on paper files, it is stored in locked files or compactuses. Only authorised personnel are permitted to access these details.

Privacy Issues

To raise any questions or comments about the Privacy Policy, or to make a complaint about how Anglicare WA has handled personal information, please contact our Head Office by:

Telephone on 1300 11 44 46
Email complaints@anglicarewa.org.au
or

by letter to:
General Manager – Practice Excellence
Anglicare WA
GPO Box C138
Perth WA 6839

Complaints Procedure

If you have provided us with personal and sensitive information, or we have collected and hold your personal and sensitive information, you have a right to make a complaint and have it investigated and dealt with under this complaints procedure.

If you have a complaint about Anglicare WA's privacy practices or our handling of your personal and sensitive information please contact the Practice Excellence department

Telephone on 1300 11 44 46
Email complaints@anglicarewa.org.au

Or by letter to:
General Manager – Practice Excellence
Anglicare WA
GPO Box C138
Perth WA 6839

A privacy complaint relates to any concern that you may have regarding Anglicare WA's privacy practices or our handling of your personal and sensitive information. This could include matters such as how your information is collected or stored, how your information is used or disclosed or how access is provided to your personal and sensitive information.

The goal of this policy is to achieve an effective resolution of your complaint within a reasonable timeframe, usually 30 working days or as soon as practicable. However, in some cases, particularly if the matter is complex, the resolution may take longer.

Once the complaint has been made, we will try to resolve the matter in a number of ways such as:

- **Request for further information:** We may request further information from you. You should be prepared to provide us with as much information as possible, including details of any relevant dates and documentation. This will enable us to investigate the complaint and

determine an appropriate solution. All details provided will be kept confidential.

- **Discuss options:** We will discuss options for resolution with you and if you have suggestions about how the matter might be resolved you should raise these with our Privacy Officer.
- **Investigation:** Where necessary, the complaint will be investigated. We will commence the investigation within 10 working days. It may be necessary to contact others in order to proceed with the investigation.
- **Conduct of our employees:** If your complaint involves the conduct of our employees we will raise the matter with the employee concerned and seek their comment and input in the resolution of the complaint.
- **Escalate internally:** If your complaint is not able to be resolved at a local level it will be referred to the General Manager – Practice Excellence for internal investigation.
- **The complaint is substantiated:** If your complaint is found to be substantiated, you will be informed of this finding. We will then take appropriate agreed steps to resolve the complaint, address your concerns and prevent the problem from recurring.
- **If the complaint is not substantiated**, or cannot be resolved to your satisfaction, but this Policy has been followed, Anglicare WA may decide to refer the issue to an appropriate intermediary. For example, this may mean an appropriately qualified lawyer or an agreed third party, to act as a mediator.
- **At the conclusion of the complaint**, if you are still not satisfied with the outcome you are free to take your complaint to the Office of the Federal Privacy Commissioner.

We will keep a record of your complaint and the outcome.

We are unable to deal with anonymous complaints. This is because we are unable to investigate and follow-up such complaints, due to anonymity, it is possible we may not be able to investigate or follow up if essential information is missing.

Changes to this Privacy Policy

Anglicare WA reserves the right to review, amend and/or update this policy from time to time.

We aim to comply with the APPs and other Codes of Conduct required to be observed under Commonwealth and State Government contracts.

If further privacy legislation and/or self-regulatory codes are introduced or our Privacy Policy is updated, we will summarise any substantial modifications or enhancements in this section of our Privacy Policy.

Policy Review

This policy will be reviewed every 12 months or as deemed appropriate. Any changes and adjustments will be made accordingly

Supporting Documentation(s) & Resources

Internal Documentation

- [AWA Policies](#)
- [Services Policies & Manuals](#)
- [Data Breach Management Plan](#)
- [Cyber Security Information & Resources](#)
- [Client File Policy](#)
- [Complaints Services - Informal and Formal Policy](#)
- [Retention and Disposal of Records Policy and Procedure](#)

Commonwealth Act

- [Privacy Act 1988](#)
- [Office of the Australian Information Commissioner](#)

Resources

- [Dealing with requested for access to personal information](#)
- [Privacy agency resource 7 : The Australian Government Agencies Privacy Code Checklist](#)