

Document ID	BS-IM-POL-002	Program	[Program]	Last Review Date	13/01/2026	Version	3	 AnglicareWA
Approver	Executives	Author	Manager Quality & Risk	Next Review Date	13/01/2029			
Privacy Policy								

1. Introduction

We recognise and respect your right to privacy, dignity and confidentiality.

Anglicare WA is dedicated to managing personal information in a lawful manner that safeguards individuals and upholds the trust of the community.

Anglicare WA recognises and respects your rights to privacy, dignity and confidentiality. Anglicare WA is committed to safeguarding the personal and sensitive information that is collected, used and stored by us.

This policy sets out the principles that Anglicare WA must follow when handling personal information, to ensure compliance with its obligations under the *Privacy Act 1988 (Cth)* and other applicable laws.

In this policy:

- “**you**” and “**your**” refers to you and any person whose personal information is collected by Anglicare WA;
- “**Anglicare WA**”, “**we**”, “**us**” or “**our**” means Anglicare WA, ABN 32 797 454 970, of 23 Adelaide Terrace, East Perth, WA 6004.

What does “personal information” mean?

Personal information is any information or an opinion about an identified individual or an individual who can be reasonably identified from the information or opinion. Information or an opinion may be personal information regardless of whether it is true. Some examples of personal information include a person’s name, home address, email address, date of birth or bank account details.

Certain types of personal information are given a higher level of protection by privacy law, this is called “**sensitive information**”. Some examples of sensitive information are information about a person’s health, ethnic origin, religious beliefs or criminal record.

This policy does not apply to personal information about the employment of current or former employees. For more information about employee records, please refer to Anglicare WA’s relevant policy.

Any records created by Anglicare WA are owned by Anglicare WA. You have the right to choose who you share your personal information with, and how much of your personal information you want to share.

Privacy Policy					
Document ID	BS-IM-POL-002	Program	[Program]	Version	3
Next Review Date	13/01/2029	Last Review Date		13/01/2026	

What is the purpose of this policy?

This policy is our way of being transparent about how we handle your personal information, so you can feel confident when engaging with us.

This policy provides important information about:

- how and why we collect, use, store, disclose and destroy your personal information;
- how you can access and correct the personal information we hold about you; and
- how you can make a complaint about the way we have handled your personal information.

You consent to Anglicare WA collecting, holding, using and disclosing your personal information in accordance with this policy.

Who does this policy apply to?

Anglicare WA requires that all aspects of its business operations and all our employees, officers, contractors, volunteers, students, and business partners (collectively “**workers**”) must comply with this policy and the privacy laws.

How can you contact us?

If you have any questions about this policy, please contact Anglicare WA by:

	Emailed to: privacy@anglicarewa.org.au
	Addressed to: Privacy Officer Anglicare WA GPO Box C138, Perth WA 6839
	Dial: 1300 11 44 46

Privacy Policy					
Document ID	BS-IM-POL-002	Program	[Program]	Version	3
Next Review Date	13/01/2029	Last Review Date		13/01/2026	

 In person	See receptionist at Anglicare WA
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You can obtain a copy of this policy from Anglicare WA's website or by contacting Anglicare WA at the contact details above.

Who is responsible for this policy?

This policy will be managed by Anglicare WA's Privacy Officer.

Any questions, requests, and complaints about this policy or the way Anglicare WA handles personal information will be directed to our Privacy Officer to provide a response.

2. Why does Anglicare WA collect, hold, use and disclose personal information?

We collect personal information for the purpose of providing our services, or for fundraising or conducting our business.

The personal information that Anglicare WA collects depend on the service, product, activity or program you are looking at or are participating in. We will only collect the minimum amount of information needed to perform our functions and activities and meet our obligations and to support you.

Anglicare WA's functions and activities arise under:

- law (e.g. child protection and family law, health and safety laws); and
- contract (e.g. funding agreements and service agreements with contractors or professional advisors).

The nature and extent of personal and sensitive information collected by Anglicare WA varies depending on your interaction with Anglicare WA.

Anglicare WA may collect, hold, use and disclose personal information for reasons such as:

- providing you with our services and otherwise managing Anglicare WA's relationship with you;
- planning or improving Anglicare WA's current services or developing new services;
- receiving donations from you or bequests from your family members;

Privacy Policy					
Document ID	BS-IM-POL-002	Program	[Program]	Version	3
Next Review Date	13/01/2029	Last Review Date		13/01/2026	

- undertaking research or advocacy activities;
- marketing or promotional activities;
- investigating complaints or concerns;
- processing job or volunteer applications;
- complying with Anglicare WA's legal obligations and assisting government and law enforcement agencies.

3. What if you want to remain anonymous?

You are in control of who you share your personal information with.

Upon request, Anglicare WA may give you the option of not identifying yourself, or of using a pseudonym, provided it is lawful and practicable to do so.

However, there are potential consequences of not allowing Anglicare WA to collect and hold the personal information, such as:

- we may not be able to provide you with our services or meet your care/service requirements;
- we may not be able to communicate with you or respond to your enquiries; or
- we may not be able to offer employment to a job candidate or engage with contractors or volunteers.

4. What personal information does Anglicare WA collect and hold?

We collect personal information about you to provide you with our services and programs and run our business.

Generally, Anglicare WA collects personal information about our service recipients and their representatives, people enquiring about Anglicare WA's services, website users, job applicants and workers.

The types of personal information Anglicare WA may collect about you will depend on the nature and purpose of Anglicare WA's interaction with you. This may include:

- identity details (e.g. name, date of birth, gender/gender identity, pronoun preference);
- contact details (e.g. address, telephone number, email address);

Privacy Policy					
Document ID	BS-IM-POL-002	Program	[Program]	Version	3
Next Review Date	13/01/2029	Last Review Date		13/01/2026	

- service-related information (e.g. service or transaction history, service agreements, information about your activities, information about involvement in other programs you participate in, accident and incident information);
- government identifiers (e.g. Medicare reference numbers, drivers' licence);
- financial information (e.g. payment/billing information, bank account);
- employment information (e.g. employment history and qualification, academic records, references, medical information, tax file number and superannuation information);
- digital or technical details (e.g. Internet Protocol (IP) address, device attributes, browser type, language and operating system); or
- representative or family details (e.g. personal information about your next of kin, power of attorney).

Anglicare WA may also obtain photos, video and other visual/audio recording where necessary to monitor your health or service needs or maintain your safety and security or that of other service recipients, workers and visitors of Anglicare WA (e.g. as captured on closed-circuit television within or around our premises). You will be notified of such recordings either directly or through clear signage indicating that you are being recorded.

With your consent, we may collect sensitive information where necessary to provide you with our services and programs.

Anglicare WA will only collect and store your sensitive information with your written consent or where authorised or required by law. The types of sensitive information Anglicare WA may collect includes:

- social care information (e.g. foster care and adoption records, community services records, care records, medical and allied health information, service needs, progress notes);
- health information (e.g. clinical information, mental health information, hospital admissions);
- religion, nationality, race or ethnicity;
- marital status or sexual orientation; or
- criminal history or other relevant probity checks.

Privacy Policy					
Document ID	BS-IM-POL-002	Program	[Program]	Version	3
Next Review Date	13/01/2029	Last Review Date		13/01/2026	

5. **How does Anglicare WA collect your personal information?**

We collect personal information about you directly from you.

Generally, Anglicare WA collects your personal information directly from you (e.g. when you call or email us), unless it is unreasonable or impracticable to do so. This ensures that you have control over what personal information Anglicare WA is collecting from you.

We may also collect personal information about you from third parties.

Sometimes we collect personal information through third parties that we interact with to provide our services, including:

- your current or previous health care provider that holds medical records;
- an accountant holding financial records or Centrelink;
- your authorised representatives, guardian or next of kin;
- recruiters, current or previous employers, referees;
- government agencies, police agencies to obtain your criminal history record;
- other service providers or partner organisations.

What if you provide us with information about someone else?

If you intend to provide Anglicare WA with personal information about another person, please make sure that you tell them about this policy and obtain their consent before providing Anglicare WA with their information.

If Anglicare WA receives personal information which it did not request, Anglicare WA will consider whether it is appropriate for Anglicare WA to keep the information in accordance with this policy. If Anglicare WA does not consider that it is appropriate to collect that personal information, Anglicare WA will, as soon as practicable, destroy the information or ensure that it is permanently de-identified.

We may collect personal information from our website.

Anglicare WA does not collect personal information or any information that identifies you purely from your access to or use of Anglicare WA's website.

However, when you use Anglicare WA's website, certain technical data will be collected (e.g. IP address assigned to your computer, time and date of your visit, your use of our

Privacy Policy					
Document ID	BS-IM-POL-002	Program	[Program]	Version	3
Next Review Date	13/01/2029	Last Review Date		13/01/2026	

website, search engine referrals, other websites you visit etc). This information is collected by Anglicare WA's use of:

- tracking tools (including cookies); and
- internet service provider.

A 'cookie' is a small file stored on your computer's browser which assists in managing customised settings of the website and delivery content. You can stop cookies collecting your personal information by selecting the appropriate settings on your browser. However, if you do this, you may not be able to use the full functionality of Anglicare WA's website. Please refer to Anglicare WA's website [Terms of Use and Disclaimer | Anglicare WA](#) for terms and conditions.

We may collect personal information from publicly available sources.

We may also collect personal information from publicly available sources, including social media.

If you engage with Anglicare WA via social media platforms (e.g. Facebook), please note that these platforms are operated by third-party platforms. As such, Anglicare WA is not in control and will not be responsible for the collection and use of your personal information by the relevant third parties. Anglicare WA encourages you to read any terms and conditions and privacy policies that relate to those third-party platforms to ensure you understand and agree to the way your personal information will be handled by those third parties.

6. How and why does Anglicare WA use and share your personal information?

Anglicare WA will only use or share your information with other people or organisations:

- if you have agreed;
- where you would expect Anglicare WA to use or share it for purposes which are directly related to one of Anglicare WA's functions or activities;
- to keep you or other people safe and health; and
- to comply with law or to assist the government.

If you are unable to provide consent, Anglicare WA may seek to obtain consent from your guardian or other authorised representatives.

Privacy Policy					
Document ID	BS-IM-POL-002	Program	[Program]	Version	3
Next Review Date	13/01/2029	Last Review Date		13/01/2026	

We use and share personal information to provide you with our services.

Some examples of the way Anglicare WA may use your personal information to provide and manage our services for you include to:

- verify your identity and assess your eligibility for our services;
- provide you with information about programs and services, or otherwise answer your queries or communicate with you;
- provide you with social, financial and emergency assistance;
- provide you with other services, including referring you to other support providers or engaging with authorities or other organisations on your behalf;
- take action in response to any safety and wellbeing concerns for you or others.

We use and share personal information to run our business.

Anglicare WA will share your personal information with our workers (on a 'need-to-know' basis) so that they may perform services for or on behalf of Anglicare WA.

Other examples of the way Anglicare WA may use your personal information to manage our business and commercial operations, include:

- plan, fund, monitor and evaluate our services and programs;
- report to government or other funding bodies about how funding is used;
- undertake quality assurance, training and compliance purposes;
- improve user experience, and functionality of, Anglicare WA's website.
- perform research to improve the way we provide our services and programs;
- receive feedback and complaints;
- for billing purposes and to determine if you need to make any payments;
- consider your suitability as a volunteer, contractor or for employment;
- comply with our reporting obligations to regulatory bodies and our legal obligations;
- investigate complaints/incidents;
- process and manage donations and gifts.

Privacy Policy					
Document ID	BS-IM-POL-002	Program	[Program]	Version	3
Next Review Date	13/01/2029	Last Review Date		13/01/2026	

We may use personal information for marketing purposes.

Anglicare WA will only use or disclose your personal information (excluding sensitive information) for marketing communications, where:

- Anglicare WA collected the information directly from you (or your representative);
- you have consented to, or would reasonably expect Anglicare WA to, use or disclose the information for that purpose; and
- you have not opted-out of receiving marketing communications from Anglicare WA.

Please contact Anglicare WA if you do not want to receive marketing communications, please follow the “opt-out” instructions which will be clearly marked in each communication. If you previously agreed to receive marketing communications from Anglicare WA, you can change your mind at any time.

7. Who does Anglicare WA share your personal information with?

We may disclose personal information for the purpose you have agreed to, or would expect it, or if we are required or authorised by law to share your information.

In the normal course of business, Anglicare WA may share your personal information with:

- your authorised representatives or your health care team where necessary to engage with them in the provision of Anglicare WA's services;
- service providers engaged for the purpose of running Anglicare WA's business operations (e.g. IT systems, marketing, fundraising, printing, payment processing and website analytics);
- emergency services (e.g. ambulance, police, fire or SES) where we are concerned about a serious threat to the life, health or wellbeing of a person or you have agreed for us to contact them;
- government agencies to meet our legal and regulatory compliance obligations;
- community partners for the purpose of child protection, vulnerable adult safeguarding or managing risk relating to domestic violence;
- other external organisations where Anglicare WA has a lawful requirement to disclose the information.

Privacy Policy					
Document ID	BS-IM-POL-002	Program	[Program]	Version	3
Next Review Date	13/01/2029	Last Review Date		13/01/2026	

If the ownership or control of all or part of Anglicare WA's business changes, Anglicare WA may transfer your personal information to the new owner, subject to legal requirements.

We may disclose personal information for research purposes.

Anglicare WA engages with Australian universities and research groups to enable research relating into important issues including housing stress, family violence, mental health, and poverty. For more information, please refer to Anglicare WA's website [Anglicare WA/our-initiatives/research](#).

Anglicare WA's Recovery Framework, which is a guide designed to embed recovery-oriented practices across all levels of the organisation is also available [The Recovery Framework | Research | Anglicare WA](#).

All data used for analysis, reporting, or any other purpose is de-identified to ensure that no personal information can be linked back to an individual. De-identification involves removing or masking any direct or indirect identifiers in accordance with applicable privacy laws and standards. This process ensures that the data cannot reasonably be used to identify a person.

We do not disclose personal information to overseas recipients.

Anglicare WA does not disclose your personal information to recipients that are located outside of Australia, except in relation to onboarding employment applicants from overseas (and in such cases, appropriate controls are in place to comply with the requirements of the privacy laws and this policy).

Anglicare only uses cloud services that retain data within Australian borders.

8. How does Anglicare WA keep your personal information safe?

We have systems in place to protect the personal information from misuse, interference and loss and from unauthorised access, modification or disclosure.

We store most information in computer systems and databases, which are operated by Anglicare WA or its external service providers. Some information is recorded in paper files, which we have processes in place to ensure it is stored securely.

The current security processes and measures include:

- premises and systems which hold personal information are locked and access is limited to authorised workers who require the information for the purpose of carrying out their duties;

Privacy Policy					
Document ID	BS-IM-POL-002	Program	[Program]	Version	3
Next Review Date	13/01/2029	Last Review Date		13/01/2026	

- storing hardcopy information on secure premises only accessible by authorised workers;
- providing workers with training to ensure that personal information is handled in accordance with this policy;
- using multi-factor authentication for access to business systems, including periodic resetting of passwords;
- ensuring all external email communications sent from Anglicare WA are encrypted;
- using cyber-security protections for Anglicare WA computer systems;
- monitoring and regularly reviewing Anglicare WA's third-party providers (including cloud computing) to ensure compliance with privacy law.

What happens if the personal information is subject to a data breach?

In the event personal information held by Anglicare WA has been accessed, disclosed without authorisation, or is lost, Anglicare WA will take immediate action to contain, assess and remediate the incident in accordance with Anglicare WA's data breach response procedure.

If a data breach is likely to cause serious harm to a person, Anglicare WA will contact the person and any relevant regulators as soon as possible to let them know about the breach (unless the law requires or authorises otherwise).

9. What does Anglicare WA do with personal information it no longer needs?

Anglicare WA will only keep personal information until it is no longer required for the purpose it was collected, or otherwise as permitted or authorised by law.

Anglicare WA will take all reasonable steps to destroy, delete or permanently de-identify personal information it no longer needs, in line with Anglicare WA's retention and destruction policy and applicable law.

Please note some laws require Anglicare WA to retain certain records indefinitely.

10. How does Anglicare WA ensure the personal information it collects is relevant and accurate?

To ensure Anglicare WA only collects personal information that is relevant and accurate, Anglicare WA workers will ask questions to check:

Privacy Policy					
Document ID	BS-IM-POL-002	Program	[Program]	Version	3
Next Review Date	13/01/2029	Last Review Date		13/01/2026	

- your personal information has been recorded accurately; and
- whether it is necessary for Anglicare WA to collect and record the personal information.

From time to time, Anglicare WA will also take steps to check the personal information held in its records is accurate, current, complete and relevant by, for example, asking you to confirm your personal information when Anglicare engages with you.

11. How can you ask Anglicare WA to change or access the personal information it holds about you?

You have the right to access or correct the personal information we hold about you.

You have the right to request access to the personal information we hold about you and to ask for it to be corrected if you believe it is inaccurate, incomplete, or out-of-date.

To request access to or correction of your personal information, please send a written request to our Privacy Officer.

There is no charge for making a request for access to or correction of your personal information.

After receiving your request, we will take reasonable steps to verify your identity to ensure the security of your information. We will respond to your request within a reasonable time.

We will respond to requests to access personal information.

You may be required to pay any reasonable costs incurred by Anglicare WA in providing you with access (e.g. workers time collating the information, photocopying costs, postage costs).

We will provide you with access to your personal information unless we are legally permitted or required to refuse your request. If we refuse your request, we will provide you with a written notice explaining the reasons for the refusal and details on how you can make a complaint about our decision.

We will respond to requests to correct personal information.

If we agree that the information we hold is incorrect, we will update our records promptly. If we do not agree that the information is incorrect, we will notify you in writing of our decision. You can then ask us to attach a statement to your record indicating that you believe the information is inaccurate.

Privacy Policy					
Document ID	BS-IM-POL-002	Program	[Program]	Version	3
Next Review Date	13/01/2029	Last Review Date		13/01/2026	

12. How can you tell us about a problem or make a complaint relating to Anglicare WA's privacy practices?

If you have a complaint about the way in which Anglicare WA has handled your personal information. More information can be found on Anglicare WA's website [Feedback and Complaints | Contact Anglicare WA](#).

Your request can be submitted in whatever manner is best for you (e.g. by calling Anglicare WA's reception desk, by sending Anglicare WA an email or by speaking to Anglicare WA workers in person).

It is helpful (and sometimes necessary) for you to provide Anglicare WA with the following information with your request:

- your name;
- your preferred contact details;
- a description of your concern/complaint;
- the action you would like Anglicare WA to take; and
- any supporting information.

Once Anglicare WA has received your complaint, Anglicare WA will consider the issues you have raised and, where appropriate, undertake an investigation into your complaint.

Anglicare WA will do its best to respond to your request:

- in the manner you have requested that Anglicare WA communicate with you; and
- within 30 days (or such other time as agreed).

Our response will explain:

- the outcome of the investigation;
- the action is proposed to prevent similar complaints in the future (where applicable); and
- how you can lodge a complaint with external organisations if you consider the outcome of Anglicare WA's investigation to be unsatisfactory.

If you are unhappy with the way we have handled your complaint, you may approach an independent adviser or contact the Office of the Australian Information Commissioner for guidance on alternative courses of action that may be available.

Privacy Policy

Document ID	BS-IM-POL-002	Program	[Program]	Version	3
Next Review Date	13/01/2029	Last Review Date		13/01/2026	

The Office of the Australian Information Commissioner can be contacted by:

 Email	Emailed to: enquiries@oaic.gov.au
 Post	Addressed to: Office of the Australian Information Commissioner GPO Box 5218 Sydney NSW 2001
 Telephone	Dial: 1300 363 992
 Online form	Available at: www.oaic.gov.au/privacy/privacy-complaints