



**Coota Girls**  
Aboriginal Corporation

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## PRIVACY POLICY

**Policies** can be established or altered only by the Board: **Procedures** may be altered by the Coordinator.

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## INTRODUCTION

The Board of the Coota Girls Aboriginal Corporation is committed to protecting the privacy of personal information which the organisation collects, holds and administers. Personal information is information which directly or indirectly identifies a person.

## PURPOSE

The purpose of this document is to provide a framework for the Coota Girls Aboriginal Corporation in dealing with privacy considerations.

## POLICY

The Coota Girls Aboriginal Corporation collects and administers a range of personal information for the purposes of the Coota Girls Aboriginal Corporation members and associate members. The organisation is committed to protecting the privacy of personal information it collects, holds and administers.

The Coota Girls Aboriginal Corporation recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – protected on one hand, and made accessible to them on the other. These privacy values are reflected in and supported by our core values and philosophies and also reflected in our Privacy Policy, which is compliant with the Privacy Act 1988 (Cth).

The Coota Girls Aboriginal Corporation is bound by laws which impose specific obligations when it comes to handling information. The organisation has adopted the following principles contained as minimum standards in relation to handling personal information.

The Coota Girls Aboriginal Corporation will

- Collect only information which the organisation requires for its primary function;
- Ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered;
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- Store personal information securely, protecting it from unauthorised access; and
- Provide stakeholders with access to their own information, and the right to seek its correction.

## AUTHORISATION

Signature of Board Secretary

Date of approval by the Board

Coota Girls Aboriginal Corporation

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# PRIVACY PROCEDURES

## RESPONSIBILITIES

The Coota Girls Aboriginal Corporation's Board is responsible for developing, adopting and reviewing this policy.

The Coota Girls Aboriginal Corporation's Coordinator is responsible for the implementation of this policy, for monitoring changes in Privacy legislation, and for advising on the need to review or revise this policy as and when the need arises.

## PROCESSES

### Collection

The Coota Girls Aboriginal Corporation will:

- Only collect information that is necessary for the performance and primary function of the Coota Girls Aboriginal Corporation
- Notify stakeholders about why we collect the information and how it is administered.
- Notify stakeholders that this information is accessible to them.
- Collect personal information from the person themselves wherever possible.
- If collecting personal information from a third party, be able to advise the person whom the information concerns, from whom their personal information has been collected.
- Collect Sensitive information only with the person's consent. (Sensitive information includes health information and information about religious beliefs, race, gender and others).
- Determine, where unsolicited information is received, whether the personal information could have collected it in the usual way, and then if it could have, it will be treated normally. (If it could not have been, it must be destroyed, and the person whose personal information has been destroyed will be notified about the receipt and destruction of their personal information).

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## Use and Disclosure

The Coota Girls Aboriginal Corporation will:

- Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose.
- For other uses, the Coota Girls Aboriginal Corporation will obtain consent from the affected person.
- In relation to a secondary purpose, use or disclose the personal information only where:
  - a secondary purpose is related to the primary purpose and the individual would reasonably have expected us to use it for purposes;  
or
  - the person has consented; or
  - certain other legal reasons exist, or disclosure is required to prevent serious and imminent threat to life, health or safety.
- In relation to personal information which has been collected from a person, use the personal information for direct marketing, where that person would reasonably expect it to be used for this purpose, and the Coota Girls Aboriginal Corporation has provided an opt out and the opt out has not been taken up.
- In relation to personal information which has been collected other than from the person themselves, only use the personal information for direct marketing if the person whose personal information has been collected has consented (and they have not taken up the opt-out).
- State in the Coota Girls Aboriginal Corporation's privacy policy whether the information is sent overseas and further will ensure that any overseas providers of services are as compliant with privacy as the Coota Girls Aboriginal Corporation is required to be.
- Provide all individuals' access to personal information except where it is a threat to life or health or it is authorised by law to refuse and, if a person is able to establish that the personal information is not accurate, then [organisation] must take steps to correct it. The Coota Girls Aboriginal Corporation may allow a person to attach a statement to their information if the Coota Girls Aboriginal Corporation disagrees it is inaccurate.
- Where for a legal or other reason we are not required to provide a person with access to the information, consider whether a mutually agreed intermediary would allow sufficient access to meet the needs of both parties.
- Make no charge for making a request for personal information, correcting the information or associating a statement regarding accuracy with the personal information.

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## Storage

The Coota Girls Aboriginal Corporation will:

- Implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorized access, interference, unauthorised modification or disclosure.
- Before the Coota Girls Aboriginal Corporation discloses any personal information to an overseas recipient including a provider of IT services such as servers or cloud services, establish that they are privacy compliant. The Coota Girls Aboriginal Corporation will have systems which provide sufficient security.
- Ensure that the Coota Girls Aboriginal Corporation data is up to date, accurate and complete.

## Destruction and de-identification

The Coota Girls Aboriginal Corporation will:

- Destroy personal information once is not required to be kept for the purpose for which it was collected, including from decommissioned laptops and mobile phones.
- Change information to a pseudonym or treat it anonymously if required by the person whose information the Coota Girls Aboriginal Corporation holds and will not use any government related identifiers unless they are reasonably necessary for our functions.

## Data Quality

The Coota Girls Aboriginal Corporation will:

- Take reasonable steps to ensure the information the Coota Girls Aboriginal Corporation collects is accurate, complete, up to date, and relevant to the functions we perform.

## Data Security and Retention

The Coota Girls Aboriginal Corporation will:

- Only destroy records in accordance with the organisation's Records Management Policy.

## Openness

The Coota Girls Aboriginal Corporation will:

- Ensure stakeholders are aware of the Coota Girls Aboriginal Corporation's Privacy Policy and its purposes.
- Make this information freely available in relevant publications and on the organisation's website.

## Access and Correction

The Coota Girls Aboriginal Corporation will:

- Ensure individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading or not up to date.

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### Anonymity

- Allow people from whom the personal information is being collected to not identify themselves (deidentify) or use a pseudonym unless it is impracticable to deal with them on this basis.

### Making information available to other organisations

The Coota Girls Aboriginal Corporation can:

- Release information to third parties where it is requested by the person concerned.

## RELATED DOCUMENTS

- Confidentiality Policy

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## PRIVACY POLICY – FOR EXTERNAL USE/PRIVACY ACT COMPLIANCE

### PRIVACY POLICY

#### Your privacy is important

This statement outlines the Coota Girls Aboriginal Corporation's policy on how the Coota Girls Aboriginal Corporation uses and manages personal information provided to or collected by it.

The Coota Girls Aboriginal Corporation is bound by the Australian Privacy Principles contained in the Australian Commonwealth Privacy Act 1988 and is compliant with the Privacy Amendment (Australian Privacy Principles) Act 2014. In relation to members and associate member's personal records, the Coota Girls Aboriginal Corporation is also bound by the New South Wales Privacy Principles which are contained in the NSW Privacy Act 2014.

The Coota Girls Aboriginal Corporation may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to the Coota Girls Aboriginal Corporation's operations and practices and to make sure it remains appropriate to the changing legal environment.

#### What kind of personal information does the Coota Girls Aboriginal Corporation collect and how does the Coota Girls Aboriginal Corporation collect it?

The type of information the Coota Girls Aboriginal Corporation collects and holds includes (but is not limited to) personal information, including sensitive information, about:

- The Coota Girls Members and Associate Members
- The Cootamundra Aboriginal Girls Home NSW personal records
- History documents in relation to the Cootamundra Aboriginal Girls Home

#### Personal Information you provide:

The Coota Girls Aboriginal Corporation will generally collect personal information held about an individual by way of *phone calls, forms, meetings etc.* You do have the right to seek to deal with us anonymously or using a pseudonym, but in almost every circumstance it will not be practicable for us to deal with you or provide any services to you except for the most general responses to general enquiries, unless you identify yourself.

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### Personal Information provided by other people:

In some circumstances the Coota Girls Aboriginal Corporation may be provided with personal information about an individual from a third party, for example children and families of the Cootamundra Aboriginal Girls Home.

### How will the Coota Girls Aboriginal Corporation use the personal information you provide?

The Coota Girls Aboriginal Corporation will use personal information it collects from you for the primary purpose of informing members and stakeholders about the Coota Girls Aboriginal Corporation events and relevant news within the Coota Girls Newsletter and membership notifications with regards to ORIC under which the Coota Girls are registered as a Corporation, and for any purposes that are related to the primary purpose of collection and reasonably expected, or to which you have consented.

In relation to direct marketing, the Coota Girls Aboriginal Corporation will use your personal information for Coota Girls newsletters, event updates and ORIC updates for the members and you are likely to expect direct marketing of this nature: when you are sent direct marketing you can opt out of direct marketing by contacting the Coota Girls office. If we use your personal information obtained from elsewhere we will still send you direct marketing information where you have consented and which will also contain an opt out option. We will always obtain your consent to use sensitive information as the basis for any of our direct marketing

### Job applicants, staff members and contractors:

In relation to personal information of job applicants, staff members and contractors, the Coota Girls Aboriginal Corporation's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

The purposes for which the Coota Girls Aboriginal Corporation uses personal information of job applicants, staff members and contractors include:

- for insurance purposes;
- check references provided by the applicant;
- obtain police and criminal history checks and reports; (includes; working with children checks)
- to satisfy the Coota Girls Aboriginal Corporation's legal obligations,

Where the Coota Girls Aboriginal Corporation receives unsolicited job applications these will usually be dealt with in accordance with the unsolicited personal information requirements of the Privacy Act.

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### Volunteers:

The Coota Girls Aboriginal Corporation also obtains personal information about volunteers who assist the Coota Girls Aboriginal Corporation in its functions or conduct associated activities, such as to enable the Coota Girls Aboriginal Corporation and the volunteers to work together.

### Marketing and fundraising:

The Coota Girls Aboriginal Corporation treats marketing and seeking donations for the future growth and development of the Coota Girls Aboriginal Corporation as important. Personal information held by the Coota Girls Aboriginal Corporation may be disclosed to an organisation that assists in the Coota Girls Aboriginal Corporation's fundraising.

### Who might the Coota Girls Aboriginal Corporation disclose personal information to?

The Coota Girls Aboriginal Corporation may disclose personal information, held about an individual to:

- government departments and philanthropic funding agencies;
- people providing services to the Coota Girls Aboriginal Corporation; and
- anyone you authorise the Coota Girls Aboriginal Corporation to disclose information to.

### Sending information overseas:

The Coota Girls Aboriginal Corporation will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

We do not use overseas providers of IT services including servers and cloud services.

### How does the Coota Girls Aboriginal Corporation treat sensitive information?

In referring to 'sensitive information', the Coota Girls Aboriginal Corporation means:

“information relating to a person's racial ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences or criminal record, that is also personal information; and health information about an individual”.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

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## Management and security of personal information

The Coota Girls Aboriginal Corporation's staff are required to respect the confidentiality of personal information and the privacy of individuals.

The Coota Girls Aboriginal Corporation has in place steps to protect the personal information the Coota Girls Aboriginal Corporation holds from misuse, loss, unauthorised access, modification, interference or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.

When you use our website, having your cookies enabled will allow us to maintain the continuity of your browsing session and remember your details when you return. We may also use web beacons, Flash local stored objects and JavaScript. If you adjust your browser settings to block, reject or delete these functions, the webpage may not function in an optimal manner. We may also collect information about your IP address, although this may not identify you.

## Updating personal information

The Coota Girls Aboriginal Corporation endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update their personal information held by the Coota Girls Aboriginal Corporation by contacting the Coordinator of the Coota Girls Aboriginal Corporation at any time.

The Australian Privacy Principles and the NSW Privacy Principles require the Coota Girls Aboriginal Corporation not to store personal information longer than necessary. In particular, the NSW Privacy Principles impose certain obligations about the length of time personal records must be stored.

You have the right to check what personal information the Coota Girls Aboriginal Corporation holds about you.

Under the Commonwealth Privacy Act 1988 and the NSW Privacy Act 2014, an individual has the right to obtain access to any personal information which the Coota Girls Aboriginal Corporation holds about them and to advise the Coota Girls Aboriginal Corporation of any perceived inaccuracy. There are some exceptions to this right set out in the applicable legislation. To make a request to access any information the Coota Girls Aboriginal Corporation holds about you, please contact the Coordinator in writing.

The Coota Girls Aboriginal Corporation may require you to verify your identity and specify what information you require. Although no fee will be charged for accessing your personal information or making a correction, the Coota Girls Aboriginal Corporation may charge a fee to retrieve and copy any material. Coota Girls Aboriginal Corporation If the information sought is extensive, the Coota Girls Aboriginal Corporation will advise the likely cost in advance.

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## How long will the Coota Girls Aboriginal Corporation keep my information?

Under our destruction and de-identification policies, your personal information that is no longer required will be de-identified or destroyed. In many circumstances, however it will be kept for marketing purposes, as you will have consented to that in writing with us.

## Enquiries and privacy complaints

If you would like further information about the way the Coota Girls Aboriginal Corporation manages the personal information it holds, please contact the Coordinator. If you have any concerns, complaints or you think there has been a breach of privacy, then also please contact the Coordinator who will first deal with you usually over the phone. If we then have not dealt satisfactorily with your concerns we will meet with you to discuss further. If you are not satisfied with our response to your complaint within 30 days from this meeting then you can refer your complaint to the Office of the Australian Information Commissioner via:

- email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)
- tel: 1300 363 992
- fax: +61 2 9284 9666