

Footsteps Community Services Privacy Statement



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System: Governance

Purpose:

This Privacy Statement describes how we collect, hold, use and disclose your personal information and how we maintain the quality and security of your personal information.

Statement:

Footsteps Community Services (FCS) is committed to ensuring individuals' personal and sensitive information is managed safely in line with relevant legislation. This statement outlines what you can expect of FCS when personal information is collected, held, and used.

1. General:

Footsteps Community Services Pty Ltd ("Footsteps", "FCS", "we", "us", "our") values and respects the privacy of the people we serve. Footsteps is committed to protecting your privacy and complying with the Privacy Act 1988 (Cth) (Privacy Act) and other applicable privacy laws and regulations.

This document contains detailed information about FCS's responsibilities, rights of individuals, and the information that FCS may collect and how it might be used.

FCS also has a Privacy and Confidentiality Policy (and associated procedures) that further details the actions FCS takes to protect individuals' privacy. This Policy is available on demand.

What is personal information?

"Personal information" means any information or opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable. In general terms, this includes information or an opinion that personally identifies you either directly (e.g. your name) or indirectly.

Why do we collect information?

The primary purpose for FCS collection of personal information from individuals is to support marginalised Australians through the provision of specialist services. This includes planning, funding management, monitoring, and internal/external evaluation of our services. We collect your personal information so that we may contact you for several reasons, including but not limited to providing you with services, information, and marketing distribution in relation to our services, initiatives, and products we provide.

What personal information do we collect?

The personal information we collect about you depends on the nature of your dealings with us or what you choose to share. The personal information we collect about you may include:

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- Name.
- Mailing or street address.
- Date of birth.
- Email address.
- Phone number.

Under certain circumstances, Footsteps may need to collect sensitive information about you. This might include any information or opinion about your mental and physical health, racial or ethnic origin, criminal record, political opinions, political association, religious or philosophical beliefs, trade union or other professional body membership, or sexual preferences. If we collect your sensitive information, we will do so only with your consent, if it is necessary to determine whether we can provide you with services, prevent a serious and imminent threat to life or health, or as otherwise required or authorised by law, and we take appropriate measures to protect the security of this information.

You do not have to provide us with your personal information. Where possible, we will give you the option to interact with us anonymously or by using a pseudonym. However, if you choose to deal with us in this way or choose not to provide us with your personal information, we may not be able to provide you with our services or otherwise interact with you.

How do we collect your personal information?

We collect your personal information directly from you when you:

- Interact with us over the phone, in person or online.
- Participate in surveys or questionnaires.
- Attend a Footsteps event.
- Subscribe to our mailing list.
- Submit an enquiry.
- Apply for a position with us as an employee, contractor, or volunteer.

Collecting personal information from third parties

FCS usually collects personal information directly from individuals.

However, we sometimes collect personal information from a third party such as a carer, authorised representative or from a publicly available source, but only if:

- Individuals have consented to such collection or would reasonably expect FCS to collect their personal information in this way; or
- It is reasonable and necessary for the purpose of delivering services.

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How do we use your personal information?

We use personal information for many purposes in connection with our functions and activities, including the following purposes:

- Provide you with information or services that you request from us.
- Deliver to you a more personalised experience and service offering.
- Provide individuals with relevant educational information and resources.
- Report to the government or other funding bodies how the funding is used.
- Process individual purchases and provide receipts.
- Communicate with individuals about how a person's funding is used or about FCS services, causes, events, products and services, which FCS believes may be of interest to individuals.
- Respond to individuals' feedback or complaints.
- Answer personal queries.
- Improve the quality of the services we offer.
- Internal administrative purposes.
- Marketing and research purposes.
- It may also be used for:
 - Any other purposes for which it was requested and the individual consented.
 - Directly related purposes.

Disclosure of personal information to third parties

We may disclose your personal information to third parties per this statement and associated Policy in circumstances where you reasonably expect us to disclose your information. For example, we may disclose your personal information to:

- Our third-party service providers (for example, our IT providers).
- Our marketing providers.
- Our professional services advisors.

We might also disclose your personal information if we have received your approval to do so in the context of the services we provide to you and when other parties are involved.

Transfer of personal information overseas

Some of the third-party service providers we disclose personal information to may be based in or have servers located outside of Australia, including, but not limited to, in the United Kingdom and United States.

Where we disclose your personal information to third parties overseas, we will take reasonable steps to maintain data security and appropriate privacy practices. We will only disclose to overseas third parties if:

- You have given us your consent to disclose personal information to that third party; or
- We reasonably believe that:

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- the overseas recipient is subject to a law or binding scheme that is, overall, substantially similar to the APPs; and
- the law or binding scheme can be enforced; or
- the disclosure is required or authorised by an Australian law or court/tribunal order.

How do we protect your personal information?

Footsteps will take reasonable steps to ensure that the personal information that we hold about you is kept confidential and secure, including by:

- Having robust physical security of our premises and databases/records.
- Taking measures to restrict access to only personnel who need that personal information to effectively provide services to you.
- Having technological measures in place (for example, anti-virus software, fire walls).

Wherever possible FCS also uses information in a de-identified form.

2. Online activity

Emails

FCS's privacy principles apply to all emails originating from FCS email addresses.

FCS's internet service provider or information technology staff may monitor email traffic only for system troubleshooting and maintenance.

If individuals are listed on one or more of FCS's mailing or e-mail lists, they can unsubscribe and opt-out (as detailed in the Direct Marketing section below).

Cookies

The Footsteps website uses cookies. A cookie is a small file of letters and numbers the website puts on your device if you allow it. These cookies recognise when your device has visited our website(s) before, so we can distinguish you from other users of the website. This improves your experience and the Footsteps website(s).

We do not use cookies to identify you, just to improve your experience on our website(s). If you do not wish to use the cookies, you can amend the settings on your internet browser so it will not automatically download cookies. However, if you remove or block cookies on your computer, please be aware that your browsing experience and our website's functionality may be affected.

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Website analytics

Our website uses Google Analytics and other similar services to help us better understand visitor traffic, so we can improve our services. Although this data is mostly anonymous, it is possible that under certain circumstances, we may connect it to you.

Direct marketing

We may send you direct marketing communications and information about our services, opportunities, or events that we consider may be of interest to you if you have requested or consented to receive such communications.

These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the Australian Spam Act 2003 (Cth).

You consent to us sending you those direct marketing communications by any of those methods. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical.

You may opt-out of receiving marketing communications from us at any time by following the instructions to "unsubscribe" set out in the relevant communication, or by contacting us using the details set out in the "How to contact us" section below.

In addition, we may also use your personal information or disclose your personal information to third parties for the purposes of advertising, including online behavioural advertising and website personalisation, and to provide targeted or retargeted advertising content to you (including through third-party websites).

3. Information governance

Retention of personal information

We will not keep your personal information for longer than we need to. In most cases, this means that we will only retain your personal information for the duration of your relationship with us unless we are required to retain your personal information to comply with applicable laws, for example record-keeping obligations.

How to access and correct your personal information

Footsteps will endeavour to keep your personal information accurate, complete and up to date. If you wish to access and/or correct the personal information we hold about you, you should request by contacting us using the details in the "How to contact us" section below.

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Links to third-party sites

Footsteps website(s) may contain links to websites operated by third parties. If you access a third-party website through our website(s), personal information may be collected by that third-party website.

We make no representations or warranties regarding the privacy practices of any third-party provider or website and are not responsible for their privacy policies or content. Third-party providers/websites are responsible for informing you about their own privacy practices, and we encourage you to read their privacy policies.

Inquiries and complaints

If you have complaints about how Footsteps handles, processes, or manages your personal information, please use the details in the "How to contact us" section below.

Note we may require proof of your identity and full details of your request before we can process your complaint in accordance with our complaint process.

If you are dissatisfied with our response to a complaint regarding your privacy, you have the right to contact the Office of Australian Information Commissioner (www.oaic.gov.au).

Security

FCS recognises there may be risks in transmitting electronic information (for example, e-mail). We will notify you in the unlikely event that any personal information is not transmitted securely.

In accordance with the requirement of the Privacy Act, FCS will develop a Notifiable Data Breach Policy when and if necessary.

How to contact FCS

If you have a question or concern in relation to our handling of your personal information or if you would like further information about FCS's Privacy Policy and practices, please contact us:

Telephone: (04) 67 374 123

E-mail: admin@footstepscs.org

Mail: 26-28 Oakleigh Court, Woodhill, Qld 4285

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Australian Privacy Principles (APPs)

Privacy Act 1988

Privacy Amendment (Enhancing Privacy Protection) Act 2012

Information Privacy Act 2009 (Qld) (IP Act)

Scheduled Review Date:

This document will be reviewed as required or within five (5) years from the date of authorisation.

Authorisation:

Initially Approved by directors on 06/10/2022.

Reviewed and approved by Directors as per below.

Changes History

Date	Summary of changes	Responsible individual
19/09/2022	Draft	Mickael Blanc (GM)
06/10/2022	Review	Jay Harrison (CEO)
09/04/2024	Review with input from Rhi	Mickael Blanc (GM)

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