



A compassionate world where all are valued and supported to live joyful, meaningful and sustainable lives.

# Dharma CARE Inc. (DCI) Privacy Policy

Policy number	PrP001	Version	1
Drafted by	Davin Shellshear	Approved by Board on	19 Sept 2020
Responsible person	Irwan Wyllie	Scheduled review date	19 Sept 2022

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# 1 INTRODUCTION

DCI is committed to protecting personal information which DCI collects, holds and administers. Personal information is information which directly or indirectly identifies a person.

Beyond legal requirements, there are community expectations about the way a charity manages the information and data of its donors, supporters, staff and volunteers, and the people it helps. Understanding and meeting these expectations is crucial for protecting a charity's reputation and public support for its work. People are becoming increasingly aware of the importance of privacy and information and data protection. DCI intends that their processes for managing people's information and data ensures that they reflect DCI's values and meet the community's reasonable expectations.

# 2 PURPOSE

The purpose of this document is to provide a framework for DCI in dealing with privacy considerations.

# 3 DEFINITIONS

*Board* refers to members of DCI's Board.

*CEO* is the Chief Executive Officer.

*Staff* includes employees and contractors, but does not include *Occupants* (tenants, residents, guests and visitors) or *Stakeholders* (as defined in the Stakeholder Management Plan).

# 4 CHARITIES NEED TO COLLECT INFORMATION AND DATA

DCI collects and stores:

- names, addresses, and phone numbers,
- some health information related to Sine Cera guests,
- ages or dates of birth,
- email addresses,
- bank account details for deposit refunds'
- credit card details for donors and deposit payers,
- signatures,
- employment details, and
- details of service and product purchases and preferences.

From time to time, DCI may also need to collect much more detailed information and data, such as those contained in health or education records.

DCI needs to collect and store information and data to:

- provide effective services to clients,
- maintain membership lists,
- maintain client databases,

- manage donor and supporter lists,
- co-ordinate and manage volunteers,
- send newsletters or updates to donors, supporters and members,
- account for activities or expenses, and
- provide supporting evidence when seeking grants or other funding.

DCI must be clear about the purposes for which it is collecting individual's information and data, and must be careful to only collect, store or use the information and data for those purposes. DCI must ensure that the individuals from whom the information and data is being collected have given consent for it to be collected, stored and used for those purposes – especially when this involves the information and data of the charity's beneficiaries.

Whatever the purposes may be, the Board must consider the need for the information and data being collected about people, and the obligations that come with its collection, storage and use. Importantly, not all information and data is subject to the same laws.

#### **4.1 CHARITY RESPONSIBILITIES AND PUBLIC EXPECTATIONS**

The donors, members and supporters of DCI expect it to operate responsibly, honestly and ethically. This includes the way it collects, stores and uses the information and data it holds about people.

The ACNC requires charities to comply with its five Governance Standards. Within these standards, Governance Standard 5 outlines the duties of a charity's responsible persons. This standard requires a charity to ensure its responsible persons act with reasonable care and diligence and that they act honestly and fairly in the best interests of the charity for its charitable purposes.

However, simply complying with all the base requirements of the law may not necessarily meet reasonable community expectations of responsible, honest and ethical practice. Aspiring to best practice should be DCI's aim.

DCI relies heavily on public trust and confidence for support. A good relationship with the public and a committed supporter base can take years – even decades – to build, but can take a fraction of that time to fall apart. It is important that DCI's Board, CEO and Staff consider the public perception of the way it – or the external service providers it has contracted – collects, stores and uses people's information and data. Maintaining public trust, confidence and support is crucial for DCI's work, and good governance practices are the foundation for this.

#### **4.2 LEGAL OBLIGATIONS**

There are laws at both the federal and state level that may apply to the way DCI collects, stores and uses information and data about people. The Board and CEO must be aware of the laws that apply to DCI, and ensure DCI's staff and volunteers follow processes that comply with these laws.

### **4.3 FEDERAL LEVEL**

A charity that collects and stores information and data about people may be subject to the federal Privacy Act 1988 (Cth) (the Privacy Act). The Privacy Act applies to organisations based on several criteria, which may include charities. At this stage, the Privacy Act 1988 does not apply to DCI, but the Board considers it to be best practice to establish a Privacy Policy that does comply with the act.

## **5 POLICY**

DCI collects and administers a range of personal information for the purposes of conducting its social enterprise and charitable activities. DCI is committed to protecting the personal information it collects, holds and administers.

DCI 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 as well as in our Privacy Policy, which is compliant with the Privacy Act 1988 (Cth).

DCI 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.

DCI 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.

## **6 OTHER RELEVANT POLICIES**

DCI Confidentiality Policy For Approval 260820

DCI Data Management Policy - v0.2 - 200820

DCI Record Management Policy -v0.2 -190820 (002)

## **7 POLICY REVISION**

This policy will be reviewed every three years and amended as necessary, or earlier in accordance with any forthcoming legislation.

## 8 AUTHORISATION

Approved by the DCI Board on 19 September 2020

A handwritten signature in black ink, appearing to read "J. Sheehan", is centered within a light gray rectangular box.

Signed ..... (Chairman of Board)