

Privacy and Confidentiality Policy

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Purpose

In accordance with Australian Privacy Principles (APPs) that set minimum standards for collection and handling of personal information, the CRC for Water Sensitive Cities (CRCWSC) is obliged to implement practices, procedures and systems to ensure compliance and appropriately deal with any complaints and enquiries when they arise. The CRCWSC is bound by these Privacy Principles that govern how private sector organisations collect, use, disclose, protect and provide access to personal information. The CRCWSC respects the privacy of all individuals and organisations that may have details recorded in our registers or databases. Such information is primarily collected to improve the dissemination of information relevant to the promotion of CRCWSC activities.

Privacy in Australia is protected by an array of Federal, State and Territory legislation:

- *Privacy Act 1988* (Cth)
- *Privacy and Data Protection Act 2014* (Vic)
- *Health Records Act 2001* (Vic)
- *Spam Act 2003* (Cth) prohibits a person or an organisation from sending commercial electronic messages except in certain circumstances
- Do Not Call regime – prohibits telemarketing calls or marketing faxes from being made/sent to a number on the DNCR unless consent has been given or an exemption applies.

The National Privacy Principles and Information Privacy Principles are also applicable to organisations and Australian Government agencies.

The purpose of this policy is to provide guidance to the CRCWSC in developing and implementing privacy and confidentiality strategies. This policy applies to all Board Directors, personnel and students. It is to be used in addition to the privacy statement on the CRCWSC website, describing in more detail what data we collect and why, how it is used and who we work with.

Risk Management

The CRCWSC has mechanisms in place to ensure that privacy and confidentiality are effective, secure and regularly monitored to ensure they comply with Australian law.

All CRCWSC personnel are made aware of this policy during orientation and advised that under the Privacy Act, they have the right to seek access to information which the CRCWSC holds about them and have the right to ask us to update or correct their personal information when it is inaccurate, incomplete or out of date.

Any individual or organisation that provides personal information via the CRCWSC website has access to this policy and our privacy statement on the CRCWSC website:

<https://watersensitivecities.org.au/about-the-crcwsc/resources-for-participants/corporate-policies/>

This Policy may change from time to time and will be made available free of charge to anyone who requests it.

Policy Implementation

This policy is developed in consultation with personnel and approved by the CRCWSC Board of Directors. It forms part of all personnel orientation processes and all personnel are responsible for understanding and adhering to this policy.

This policy should be referenced in relevant policies, procedures and other supporting documents to ensure that it is familiar to all personnel and actively used. It will be reviewed in line with the CRCWSC quality improvement program.

CRCWSC will not collect personal information unless 'reasonably necessary' for one of its functions or activities; and by 'lawful and fair means'. Personal information can only be used or disclosed for the primary purpose of collection. Secondary use and disclosure is only permitted if the individual has consented to the use or disclosure of the information.

Policy Detail

Purpose of privacy and confidentiality policy

CRCWSC privacy and confidentiality policy seeks to:

- (i) Protect individuals from the unfair or unauthorised use of their personal information.
- (i) Cover the life-cycle of information – collection, use, storage, disclosure and destruction.
- (ii) Ensure that the CRCWSC will not disclose any personal information for any purpose without consent, except where the use or disclosure is required or authorised by or under law. The CRCWSC will take reasonable steps to protect any personal information it holds from misuse, loss, unauthorised access, modification or disclosure. The CRCWSC does not sell, in whole or part, the personal information it collects and does not disclose it to other organisations, except as provided above.
- (iii) Ensure that the CRCWSC is committed to private and confidential dissemination and receipt of information and communication within the organisation and with participants, stakeholders, personnel, students and the media.

Types of information that is collected

- (i) **Personal information:** personal information the CRCWSC collects may include name, address, telephone and fax numbers, DOB, email address, and any further information provided. Credit card details, where provided, are not retained by the CRCWSC. Event Management/online ticketing to CRCWSC events is provided by online secure ticketing services (such as Eventbrite).

CRCWSC collects and holds the following types of information that is subject to the APPs:

- Personal information of employees, interns, visiting scholars, directors, consultants and contractors
- Personal information of CRCWSC participants and stakeholders
- Personal information of individuals and organisations with an interest in the activities of CRCWSC

CRCWSC collects personal information in verbal, electronic, and hard copy format via the following methods:

- from the CRCWSC website
- from meetings, training courses, workshops, seminars, webinars and events conducted by CRCWSC
- from forms issued by CRCWSC in connection with our policies, including staff and CRCWSC Board Directors and Executives
- from emails received by CRCWSC, whether solicited or not
- from phone calls received by CRCWSC, whether solicited or not
- from correspondence received by CRCWSC, whether solicited or not
- from industry publications

CRCWSC holds personal information by the following methods:

- in hard copy files and records, including business cards
- in CRCWSC's electronic filing systems
- in CRCWSC's CRM database
- on Monash University's computer network
- in CRCWSC's cloud based email service
- on CRCWSC's web server and campaign database
- on electronic storage media, including hard drives and USB memory sticks

(ii) **Sensitive information:** sensitive information includes information 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.

CRCWSC will only collect sensitive information about an individual by lawful and fair means and if:

(a) An individual or organisation consents to the collection of the information; and

(b) The information is reasonably necessary for one or more of CRCWSC's functions or activities;

Or

(c) Both of the following apply:

- the information relates to the activities of the organisation; and
- the information relates solely to the members of the CRCWSC or to individuals who have regular contact with CRCWSC in connection with its activities.

Information collection and storage

(i) **Website/campaign database:** personal information, such as name and email address is collected via the CRCWSC website, www.watersensitivecities.org.au, when individuals use the enquiries email address or fill in and submit order forms, such as the register for the E-Newsletter, or download our publications and Contact Forms. CRCWSC may send individuals marketing and promotional materials about the availability of new resources of interest. Information collected via the website is stored via the secure cloud based email service called Campaign Monitor. The information provided is administered from time to time by a secure contracted third part), who manages the database on which the information is stored. This agency helps carry out our E-newsletter mailings and perform data analysis on our behalf. All external agencies are bound by agreements with the CRC for Water Sensitive Cities Ltd prohibiting them from using the information for purposes other than those covered by these agreements.

- (ii) **Electronic files/email:** additional personal details, such as frequent flyer numbers, that have been collected for the purpose of organising travel for CRCWSC related activities, are filed and stored on CRCWSC's secure electronic CRM database and are used for internal purposes only.
- (iii) **Event Management:** Event Management/online ticketing to CRCWSC events is provided by secure on-line ticketing services (such as Eventbrite).
- (iv) **Customer Relationship Management system (CRM Database):** CRCWSC has adopted an online secure CRM database, titled Zoho.

Outcomes of privacy and confidentiality policy

- CRCWSC will ensure that the information collected is accurate, up to date, relevant and complete.
- CRCWSC will ensure that the information it uses or discloses is accurate, up to date, complete and relevant (i.e. only disclose to a third party personal information that is relevant for the purpose of the disclosure).
- CRCWSC will ensure that the personal stored information is secure and protected from misuse, interference, loss, unauthorised access, modification or disclosure.
- An individual, upon request to admin@crcwsc.org.au, can enquire, access, and seek correction of their personal information. Following authentication, CRCWSC will take reasonable steps to ensure that it is corrected.
- Individuals have the option to "opt-out" of receiving further email communications at any time by emailing CRCWSC at admin@crcwsc.org.au. The individual will be 'unsubscribed' and their email address deleted from the secure cloud management system.
- If an individual does not consent to the CRCWSC using his/her personal information as detailed, they can email admin@crcwsc.org.au and an appropriate stop will be put in place.
- The CRCWSC privacy policy is available free of charge and can be sent in an appropriate form as requested.
- CRCWSC recognises the right to deal with the CRCWSC anonymously and will provide this option where appropriate but the general nature of CRCWSC activities will require individuals to identify themselves when dealing with us.
- Unsolicited information is afforded the same protections as solicited information, that is; CRCWSC must determine, within a reasonable period of time, whether it would be permitted to collect the information and if not, must destroy the information or ensure it is de-identified as soon as practicable.
- This policy is kept up to date and available on our website via the Privacy Statement on our home page.

Supporting Policies and Guidelines

Privacy statement on the CRCWSC website.

Document Control

VERSION	DATE	RESPONSIBLE	APPROVED	REVIEW DATE
1	Mar14	R. McLachlan, COO	Mar14, CRC Executive	Mar17
2	Nov17	B. Furmage, COFO	27Nov17, Board	Nov19
3	25Feb20	V McDonald	Board	Sep21