



Dogs' Refuge Home (W.A.) Privacy Policy

Policy Hierarchy		Governance	
Policy Owner		Board	
Document Owner		General Manager	
Current Version	Approved By	Date Approved	Date Effective
V1.1	Board	May 2020	May 2020
Document Review Date: 20 November 2020			



CONTENTS PAGE

1.0 Purpose	3
2.0 Scope	3
3.0 Policy Statement	3
4.0 Policy	3
5.0 Responsibilities	3
6.0 Processes	4
7.0 Related Documents	6
7.1 Dogs' Refuge Home Documents.....	6
8.0 Definitions	6

1.0 PURPOSE

The purpose of this document is to provide a framework for the Dogs' Refuge Home (the Home) to appropriately manage privacy considerations.

2.0 SCOPE

This policy applies to all members of the Board, the General Manager and staff.

3.0 POLICY STATEMENT

The Board of the Home 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.

4.0 POLICY

The Board collects and administers a range of personal information for the purposes of rescuing and rehoming its dogs. The Home is committed to protecting the privacy of personal information it collects, holds and administers.

The Home 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 Home 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 Home will:

- Collect only information which the organisation requires for its primary function;
- Ensure that customers and 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 customers and stakeholders with access to their own information, and the right to seek its correction.

5.0 RESPONSIBILITIES

The Home's Board is responsible for developing, adopting and reviewing this policy. The Home's General Manager 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.

6.0 PROCESSES

Collection

The Home will:

- Only collect information that is necessary for the performance and primary function of The Home
- Notify customers and stakeholders about why we collect the information and how it is administered.
- Notify customers and 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).

Use and Disclosure

The Home 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 Home 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 [organisation] 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).
- Provide all individuals access to personal information except where it is a threat to life or health or it is authorized by law to refuse and, if a person is able to establish that the personal information is not accurate, then the Home must take steps to correct it. The Home may allow a person to attach a statement to their information if the Home disagrees it is inaccurate.

- Where for a legal or other reason the Home is 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.

Storage

The Home will:

- Implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorized access, interference, unauthorized modification or disclosure.
- Ensure that the Home's data is up to date, accurate and complete.

Destruction and de-identification

The Home 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 Home holds and will not use any government related identifiers unless they are reasonably necessary for our functions.

Data Quality

The Home will:

- Take all reasonable steps to ensure the information the Home collects is accurate, complete, up to date, and relevant to the functions it performs.

Data Security and Retention

The Home will:

- Only destroy records in accordance with its Records Management Policy.

Openness

The Home will:

- Ensure customers and stakeholders are aware of the Home's Privacy Policy and its purposes.
- Make this information freely available in relevant publications and on the Home's website.

Access and Correction

The Home 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.

Anonymity

The Home will:

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





Making information available to other organisations

The Home can only :

- Release information to third parties where it is requested in writing and signed by the person concerned.

7.0 RELATED DOCUMENTS

7.1 DOGS’ REFUGE HOME DOCUMENTS

-  Board Confidentiality Policy 
-  Code of Conduct 

8.0 DEFINITIONS

Term	Definition
Staff	Includes employees, contractors or sub-contractors, apprentices or trainees and volunteers involved with the activities of the DRH. It also includes the DRH Board, and any person serving the DRH on a sub-Committee or advisory capacity.
General Manager	The position which the Board delegates authorities to run the business of the DRH and in turn through the GM to the staff.
The Home	Dogs’ Refuge Home (WA) Inc.
Board	The DRH Board