

AVI Privacy Policy	Effective date	May 2024
	Next review date	May 2026
	Sponsor	EMCO
	Board committee	People & Culture
Level / Class Organisation	Approval / authorisation	Board

1. PURPOSE

AVI is committed to responsible and respectful use and protection of personal information, in compliance with the Privacy Act 1988 (Cth), the Australian Privacy Principles and ACFID's Code of Conduct.

Under the Privacy Act 1988 (Cth) Australian Volunteers International (**AVI**) has obligations as to how it deals with **personal information** it collects (being information or an opinion about a reasonably identifiable person, whether true or not). The following policy provides an overview of how we are meeting these privacy compliance obligations.

Protecting privacy is important to AVI. The purpose of this policy is to convey why we may collect personal information, the purposes for which we may use that information and to whom we may disclose it.

2. SCOPE / PERSONS AFFECTED

This policy covers AVI's handling of personal and sensitive information collected from members of our community from time to time. A separate policy statement applies to applicants for our volunteer programs and any associates who will travel with them, which is distributed as part of the application process.

AVI takes steps to ensure that personal and sensitive information that is collected is accurate, up-to-date and complete. AVI also ensures that any information used or disclosed is accurate, up-to-date, complete and relevant.

3. POLICY

Collection, storage, use and disclosure of personal information

What is personal information?

AVI only collects personal information that is relevant to our work. Personal information means information or an opinion about a reasonably identifiable person, whether the information or opinion is true or not, and whether recorded in a material form or not. Personal information may include identifying information (name, gender, date of birth, and passport details), contact details (address, email address and/or phone number), information about relevant education and work experience, passport and banking information and information about an individual's emergency contacts and immediate family members or next of kin.

AVI may collect personal information from when:

- An individual contacts us for any reason, including to enquire about volunteering, initiatives, bequests or career opportunities;
- Applies for a volunteer or employment role with AVI;
- Posts or comments on our social media pages;
- Subscribe to our newsletter or make a donation via our website – avi.org.au; or
- Shares feedback or makes a complaint

Why do we collect, use and disclose personal information?

AVI collects personal information and sensitive information that is reasonably necessary for one or more of AVI's functions or activities. Information is collected in order to fulfil our core work: recruiting and placing volunteers/program participants, engaging with the public, raising awareness and fundraising. Information will be collected about an individual from the individual themselves unless the individual consents to information being collected from another party (such as referee checks during recruitment processes) or if AVI are required or authorised to collect information under Australian law or by court/tribunal order. To help us be effective, efficient and informed, we also collect information to ensure a complete and accurate record of an individual's history of engagement with AVI. For example, we often use personal information to keep our donors and stakeholders updated with AVI's work, to provide information about opportunities to support AVI, or to notify of available volunteering roles through our programs. An individual can be removed from any mailing lists or subscriptions at any time by requesting AVI to do so.

Before, during or as soon as practical after the collection of personal or sensitive information, AVI will inform the individual of the purpose of collect the information, any consequences of missing information or information not being disclosed, AVI's privacy policy, access to their information, privacy complaints management, how and when information is disclosed to a 3rd party (such as CSI Watchdog, International SOS and Response Psychological) and how information is shared in the overseas countries in which AVI do business and how this applies to the individual.

Information gathered for the primary purpose of employee and volunteer recruitment may be used for secondary purposes as in some instances it may be necessary to disclose information that is provided to AVI to appropriate third parties such as:

- the Department of Foreign Affairs and Trade (DFAT) and other Australian Government departments or bodies, or other relevant donors or clients
- subcontractors of DFAT and other relevant AVI stakeholders who assist in the implementation and evaluation of volunteer programs;
- overseas government departments or authorities in the countries in which AVI conduct business;
- overseas partner organisations or Australian based partner organisations in the countries in which AVI conduct business;
- providers of police checks or other background checks;
- health service providers; or
- our insurer and auditors.

For personal information relating to safeguarding or fraud incidents, AVI may use or disclose personal or sensitive information for the secondary purpose of investigating and taking appropriate action in response to the incident, for example with the relevant authorities. This may involve disclosing the information to police and law enforcement, or to government agencies or regulators, for compliance with our reporting obligations.

We occasionally require external suppliers to assist us in our activities and may provide personal information to them in order to enable those services to be provided – for example, printing a large number of letters to send to our supporters. When we do so, we reiterate the requirement that personal information shared with suppliers will be securely stored and destroyed when no longer required.

In any case where we need to share personal information with a third party, we'll ensure this is done securely and only for the purposes outlined above.

Why do we collect, use and disclose Sensitive information

Sensitive information is a subset of personal information and may include information based on ethnicity, religious beliefs, disability, health information, passport information and other information of a sensitive nature. Sensitive information is generally afforded a higher level of privacy protection than other personal information. Inappropriate handling of sensitive information can have adverse consequences for an individual or those associated with the individual. For example, discrimination or mistreatment is sometimes based on a person's race or ethnic origin or union membership. Mishandling of sensitive information may also cause humiliation or embarrassment or undermine an individual's dignity.

AVI collects personal information and sensitive information that is reasonably necessary for one or more of AVI's functions or activities. Similar to personal information, in some instances it may be necessary for AVI to disclose information to appropriate third parties such as:

- the Department of Foreign Affairs and Trade (DFAT) and other Australian Government departments or bodies, or other relevant donors or clients
- subcontractors of DFAT and other relevant AVI stakeholders who assist in the implementation and evaluation of volunteer programs;
- overseas government departments or authorities in the countries in which AVI conduct business;
- overseas partner organisations or Australian based partner organisations in the countries in which AVI conduct business;
- providers of police checks or other background checks;
- health service providers; or
- our insurer and auditors.

Information may be exchanged between AVI and 3rd parties such as CSI Watchdog, International SOS and Response Psychological. This information is held securely, and information shared is used for the intended purpose of ensuring an individual's medical and emotional needs are supported. This could include ensuring that AVI can fulfill obligations before and during employment to make any

reasonable and necessary adjustments. Alternatively, sensitive information is used to ensure the safety and wellbeing of volunteers and participants before, during and after their assignment. Together with AVI's 3rd party service providers, collecting and sharing of sensitive information is used to:

- assess, record, maintain or improve the individual's health, or
- diagnose the individual's illness or disability, or
- treat the individual's illness or disability or suspected illness or disability.

Using limited personal information for promotional purposes

AVI may also use a limited amount of personal information for:

- the purposes of evaluating and promoting its programs, which may include public relations or public advertising (such as magazines, brochures, media releases or events)
- inviting participation in alumni and mentoring activities.
- the purpose of inviting members of the public through promotion of AVI's programs; and/or
- the volunteer alumni, other AVI program participants and prospective program participants

When this limited use of personal information is proposed, AVI will seek prior consent.

Storage of personal information

AVI actively seeks to ensure that all personal information we collect is protected from misuse, unauthorised access, modification or disclosure.

AVI has systems in place to ensure that personal and sensitive information is stored securely on AVI's servers, and physically at AVI's offices.

Access to personal information stored on AVI's servers is restricted to relevant staff.

AVI also stores its data using a third-party provider with servers located in Australia and overseas. AVI conducts annual assessments of third-party providers to ensure security compliance standards are met.

Storage timelines are outlined in the Information and Records management policy. AVI needs to comply with DFAT as the owner of documents as outlined in any DFAT Contract and also the Victorian State Gov General Disposal Schedule (GDS) and Records Disposal Schedule (RDS).

Notifiable Data Breaches

The Privacy Act stipulates reporting and management requirements for certain data breaches. An 'eligible data breach' occurs when personal information held by AVI is lost or subjected to unauthorised access, modification, disclosure or other misuse or interference and the access disclosure or loss is likely to result in serious harm to the individual to whom the information relates.

For further details on how AVI responds to eligible data breaches please refer to: AVI's Data Breaches Procedures.

Accessing personal information and making complaints

At all times, AVI will take care to ensure that personal information is dealt with in accordance with the Privacy Act.

Individuals have the right to request access to personal information that we hold about them, and request that their personal information be corrected or deleted. AVI will take reasonable steps to provide access to the information in a way that meets the needs of the entity and the individual. AVI will provide this within 5 business days. If an individual requests a correction to their information, AVI will take reasonable steps to correct the information. If AVI had previously disclosed this information to a 3rd party, then AVI will take all reasonable steps to inform the 3rd party of the correction unless it is impractical or unlawful.

If an individual wishes to have their personal information deleted, AVI will take all reasonable steps to delete it unless we need to keep it for legal, auditing or internal risk management reasons.

An individual or organisation (for example a partner organisation) can request a copy of this policy and AVI is to provide that in the policy form requested.

An individual can also make a complaint about how AVI has dealt with their personal information. To do so, please write to or email the AVI Privacy Officer regarding any request for access, correction or to make a complaint.

Complaints referred to the Privacy Officer will be dealt with in accordance with the principles set out in AVI's Complaints Handling Policy. The Privacy Officer will assess complaints and will provide a response within 30 days.

All privacy related correspondence should be directed to:

Privacy Officer
Australian Volunteers International
PO Box 350
Fitzroy VIC 3065
Email: privacy@avi.org.au

Complaints can be made to the Office of the Australian Information Commissioner if a response from AVI is not received within 30 days, or if an individual is unsatisfied with how AVI has dealt with a complaint. More information can be found at this link: <https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint>

- Additionally a complaint can be made through Stopline, <https://avi.stoplinereport.com/>. The platform is also accessible via AVI's website
- Stopline is AVI's online platform for complaints, and whistleblowing. Once a report has been lodged through the portal it will be sent to AVI's Complaints Officers, who are the People & Culture Manager and the Chief Financial Officer.

4. RELATED POLICIES

- AVI Complaints Handling Policy
- AVI Data Breaches Procedures
- AVI Information and records management

5. REFERENCES

- The Australian Privacy Principles

- Privacy Act 1988 (Cth)

6. EVALUATION AND PERFORMANCE MEASUREMENT

AVI is committed to ensuring that policy, systems, procedures and processes are fit for purpose and to that end undertakes a process of continuous review in relation to privacy and the Australian Privacy Principles. In line with this, this policy will be reviewed at least once every 2 years.

7. Definitions

Personal Information

‘Personal information’ is defined as any ‘information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not’ (s 6(1)).

Common examples are an individual’s name, signature, address, telephone number, date of birth, medical records, bank account details, employment details and commentary or opinion about a person.

‘Sensitive information’ is a subset of personal information and is defined as:

- information or an opinion (that is also personal 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
 - sexual orientation or practices, or
 - criminal record
 - health information about an individual
 - genetic information (that is not otherwise health information)
 - biometric information that is to be used for the purpose of automated biometric verification or biometric identification, or
 - biometric templates
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- Health Information
 - information or an opinion, that is also personal information, about:
 - the health or a disability (at any time) of an individual, or
 - an individual's expressed wishes about the future provision of health services to him or her, or
 - a health service provided, or to be provided, to an individual, or
 - other personal information collected to provide, or in providing, a health service, or

- other personal information about an individual collected in connection with the donation, or intended donation, by the individual of their body parts, organs or body substances, or
- genetic information about an individual in a form that is, or could be, predictive of the health of the individual or a genetic relative of the individual. (Other types of genetic information that are not health information fall within the definition of 'sensitive information'),

8. REVISION HISTORY

Date	Revision Number	Change(s)	Reference Section(s)
May 2022	1	New Policy document	
April 2024	2	Review of full document	