

INSTITUTE FOR HEALTHY COMMUNITIES AUSTRALIA GROUP

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1. Purpose

The policy sets out the commitment by the Institute for Healthy Communities Australia Ltd (IHCA) and the Institute for Healthy Communities Australia Certification Pty Ltd (IHCAC) to collect, use, hold and disclose personal information consistent with Commonwealth privacy laws.

2. Scope

The policy applies to all activities conducted by the Boards, committees, staff and sub-contractors of IHCA and IHCAC.

3. Definitions

Not applicable

4. References

- i. *Privacy Act 1988*
- ii. *Privacy Amendment (Enhancing Privacy Protection) Act 2012.*

5. Policy

- i. IHCA and IHCAC, in the course of promoting the concepts of quality assurance and continuous quality improvement and undertaking accreditation and certification of agencies against international, national, government and industry standards, are required to collect and access personal information relating to staff, clients, consumers and other stakeholders associated with the separate services of each company.
- ii. IHCA and IHCAC will deal with personal information in accordance with the Australian Privacy Principles. This means both companies will only collect personal information necessary for the effective delivery and management of services, and only through lawful, fair and non-intrusive means.
- iii. IHCA and IHCAC will use, hold or disclose personal information only:
 - for the reason it was collected,
 - for directly related secondary purposes if the individual concerned would reasonably expect these to be the case,
 - if the individual gives consent to the proposed use of disclosure, and
 - the individual gives consent for disclosure.
- iv. The overarching objective of IHCA and IHCAC in the collection of, and dealing with, information is to ensure a balanced approach to the operational requirements of the respective companies and the reasonable expectations of the individuals concerned.
- v. IHCA and IHCAC implements steps to ensure information collected is accurate, up to date and complete for the purpose for which it is collected.
- vi. IHCA and IHCAC ensures information collected remains secure and confidential to the staff performing the service for which the information is collected.

PRIVACY POLICY

- vii. IHCA and IHCAC will, on request, provide a detailed explanation to clients and individuals from whom information is collected of how the information is intended to be used.
- viii. IHCA and IHCAC will provide individuals with advice on personal information held about them, on application to the Chief Executive Officer, unless the release of this information poses a genuine risk to the health or welfare of an applicant.
- ix. IHCA and IHCAC will correct any inaccuracies with regards to personal information held about individuals if details are brought to the attention of the Chief Executive Officer or the companies are satisfied the information needs to be corrected.
- x. IHCA and IHCAC will not charge a fee for requests by individuals for details of personal information held by the companies or for correction of information.
- xi. IHCA and IHCAC do not use Australian Government personal identifiers for their record keeping systems.
- xii. IHCA and IHCAC will, wherever lawful and practicable, give individuals the option of not identifying themselves or using a pseudonym in their association with the respective business activities of the companies.
- xiii. IHCA and IHCAC will only transfer information about an individual outside Australia with the consent of the individual concerned.
- xiv. IHCA and IHCAC will only collect sensitive information with an individual's consent, unless the information is required by law, necessary to prevent or lessen an imminent threat to the life or health of an individual, where the individual is physically or legally incapable of giving consent, or cannot communicate consent.
- xv. IHCA and IHCAC will ensure complaints made to the Chief Executive Officer regarding alleged breaches of privacy are quickly investigated. If a complaint is not resolved by management to the satisfaction of the individual concerned, the complainant can refer the matter direct to the Australian Information Commissioner.

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