

Interplast Australia & New Zealand

Privacy Policy

Policy Status:
Approved

Initial CEO Endorsement:	27 March 2007
Board Approval Date:	27 February 2024
Last Review Date:	28 September 2023
Future Review Date:	01 February 2026
Frequency of Review:	Every 2 years
Policy Owner:	Head of Corporate Services

Revisions to Policy

Significant Changes	Endorsed by CEO	Approved by Interplast Board
Initial creation	27 March 2007	
Annual review and updates including compliance with new Australian Privacy Principles, review by MinterEllison, and minor wording and grammatical changes		2012 - 2017
Additional of Quality Principal Reference from ACFID Code of Conduct	9 May 2018	15 May 2018
Policy reviewed by MinterEllison to extend coverage to New Zealand as well as Australia.	13 August 2018	21 August 2018
Review and minor modification of Policy	15 June 2020	
Updated to reflect current Policy template, minor modifications and assessment against current legislation	17 January 2023	3 February 2023
Updated to reflect new template and new definitions, added details of information collected, and how it is collected. Removed reference to complying with Health Records VIC.	28 September 2023	27 February 2024

Table of Contents

Revisions to Policy	2
Section 1: Purpose	4
Section 2: Scope.....	4
Section 3: Policy Statement	4
Section 4: Policy	4
4.1: Collecting personal information	4
4.2: Providing personal information to Interplast anonymously	6
4.3: Using and disclosing personal information	7
3.4: Accessing and correcting personal information	7
3.5: Maintaining quality data	7
3.6: Securing, storing, and retaining data	7
3.7: Disposing of and destroying personal information	8
3.8: Questions and complaints.....	8
Section 5: Monitoring and Review of this Policy	8
Section 6: Related Documents and Legislation.....	9
Section 7: Definitions.....	10

Section 1: Purpose

The purpose of the Privacy Policy is to outline Interplast Australia & New Zealand's (Interplast) commitment to protecting an individual's right to privacy.

This policy details how Interplast collects, uses, discloses, and holds an individual's personal information and provides a consolidated statement of Interplast's approach to and expectations regarding privacy.

Section 2: Scope

The Privacy Policy applies to all Interplast personnel, observers and third-party service providers undertaking any activities that involve creating, collecting, accessing, using, storing, processing or the transferring of private and personal information as part of their association with Interplast.

The policy covers the management of all personal and sensitive information held by Interplast.

Section 3: Policy Statement

Interplast values the privacy of all individuals and is committed to handling their personal information in a lawful, transparent and respectful manner.

Interplast recognises that everyone has the right for their personal information to remain confidential, and to be used exclusively for the purpose for which it was shared.

This policy has been informed by the Australian Council for International Development (ACFID) Code of Conduct and the Australian Government Privacy Act 1988 (Privacy Act). The Privacy Act is an Australian law which regulates the handling of personal information about individuals. This includes the collection, use, storage and disclosure of personal information, and access to and correction of that information.

Interplast does not sell or rent personal data to third parties. Interplast does not pass on personal information (except in limited circumstances with individual informed consent).

Personal identity is kept confidential, and any personal information an individual or organisation chooses to provide to Interplast is only used for the purposes outlined in this policy.

Section 4: Policy

4.1: Collecting personal information

Interplast will collect personal information only as reasonably necessary to carry out our function and activities.

Interplast collects personal information for:

- Enabling individuals to access and use our services and website
- Organising fundraising and events
- Providing training, education and mentoring programs for medical professionals
- Providing and managing patient care
- Operating, protection, improving and optimising our business services
- Processing donations, sponsorships, volunteer reimbursements
- sending service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by individuals
- sending marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners that we think you may find interesting
- seeking continued support from donors and sponsors
- responding to questions and obtaining feedback, including via researching donor attitudes
- considering employee or volunteer applications
- comply with our legal obligations and processes, resolving disputes and enforcing agreements with third parties
- internal reporting.

Personal information provided to Interplast, may include:

- Contact information (such as name or pseudonym, date of birth, phone number/s, mailing address and email address)
- individual's own credit card number, name and expiry date and/or bank account details, for the purpose of processing transactions, issuing receipts and collecting information relevant to the donation or transaction
- Donor preferences (such as communication preferences or areas of special interest)
- Employment history, educational qualifications, tax file numbers and volunteering history – in respect of prospective employees and volunteers
- Online activity via surveys, social media (Facebook, Instagram etc)
- Patient identifying information – address, date of birth, medical information.

Interplast personnel will endeavour to collect personal information by lawful and fair means and not in an unreasonably intrusive way or by trickery or deception. When collecting personal information from an individual, the individual should be advised of the following:

- the purpose for which Interplast is collecting the information
- how the individual can contact Interplast and access their information
- to whom the information will be disclosed to
- whether the collection is required by law
- the main consequences of not providing the information, and
- that we use personal information for the purpose of direct marketing.

Personal information is collected either:

Online

- Online payments (donations) are processed in real time using a secure and compliant payment gateway
- Personal information is collected through the Interplast website or other online channels when individuals make a financial transaction; sign up to receive information from Interplast or submit personal information into our website
- Credit card details collected through the Interplast website are held securely by a secure and compliant third-party payment gateway. Interplast does not store these details
- All other personal information collected by Interplast through our website is stored securely and only accessible by authorised Interplast representatives.

Offline:

- Personal information is collected over the phone or in person when individuals provide it to us for any reason, including to donate or other financial transaction, or to request information from Interplast
- Credit card details collected over the phone or in person are destroyed after processing a transaction, and all personal information is stored securely where it is only accessible by authorised Interplast representatives.

Provision of opt-out opportunities:

- Where personal data is used to send out Interplast fundraising information by post, email, or phone, Interplast will use its best endeavours to provide opportunity for opting-out of receiving such communications
- If a person does not advise that they wish to opt-out, Interplast will assume their implied consent to receiving further communications in the future.

Interplast will only collect personal information directly from the person it belongs to unless this is impossible or not practical to do so. If personal information about an individual is to be collected from someone other than that individual, Interplast must have the individual's written permission.

Interplast will only collect sensitive or health information:

- if the individual has provided informed consent
- if required by law
- If the information is reasonably necessary for Interplast's functions or activities.

4.2: Providing personal information to Interplast anonymously

Where lawful and practicable, individuals may choose not to identify themselves when dealing with Interplast. However, Interplast may be unable to provide services in these circumstances.

4.3: Using and disclosing personal information

In most cases, Interplast will only use or disclose an individual's personal information for the purpose for which it was collected – known as the primary purpose.

However, Interplast may use and disclose personal information for a secondary purpose if the secondary purpose is:

- related to the primary purpose in the case of personal information; or
- directly related to the primary purpose in the case of health and sensitive information; and the individual would reasonably expect Interplast to use or disclose the information for that secondary purpose.

In all other cases, Interplast may use and disclose the personal information if:

- the individual has consented to the use and disclosure; or
- the disclosure is authorised or required by law or relevant legislation.

Interplast may share information to partner organisations / recipients overseas, but only if it is deemed necessary to carry out our functions or activities.

3.4: Accessing and correcting personal information

Interplast will provide individuals with access to personal information it holds about them, subject to legal requirements.

Requests for access to personal information will be considered in accordance with the applicable legislation and the Privacy Procedure.

If an individual establishes and notifies Interplast that their personal information is inaccurate, incomplete or not up to date, Interplast will take reasonable steps to correct the information or to record that the individual disagrees with the information on file.

3.5: Maintaining quality data

Interplast must take reasonable steps to ensure that any information collected, used, or disclosed is accurate, complete and up to date.

3.6: Securing, storing, and retaining data

Interplast will take reasonable steps to ensure that the personal information it handles is protected from misuse, loss, unauthorised access, modification and disclosure.

Interplast's requirements in relation to information technology security are set out in the Information Security Policy and relevant associated procedures.

Interplast will take reasonable steps to store health information following the principles of the Health Records Act 2001 (Vic.)

3.7: Disposing of and destroying personal information

Interplast will take reasonable steps to destroy or permanently de-identify personal or sensitive information if it is no longer legally required to be held. Interplast's requirements in relation to the destruction of documents are governed by the Records Management Policy and related procedures.

When destroying or permanently de-identifying health information, Interplast will endeavour to follow the principles of the Health Records Act 2001 (Vic.)

3.8: Questions and complaints

Interplast will make this policy as available as is practically possible. It can be viewed on our website, in an accessible version, it can be downloaded from our website and if anyone asks for a copy of Interplast's Privacy Policy, it will be provided in the format requested (post hard copy, email or link to website).

Questions about how Interplast handles personal or sensitive information, and/or complaints about Interplast's information handling practices should be directed to the Privacy Officer as below:

Privacy Officer

Interplast Australia & New Zealand

250 – 290 Spring Street

EAST MELBOURNE VIC. 3002

PH: + 61 3 7042 5460

contactus@interplast.org.au

The Board of Directors and management team of Interplast are fully committed to the principles of this policy. Any breach of strategic significance or any material risk associated with this policy will be reported to the Board in a timely manner.

Section 5: Monitoring and Review of this Policy

This policy will be monitored and reviewed at intervals as indicated in this policy and following the process outlined in Interplast's Policy Framework.

The Chief Executive Officer is ultimately accountable to the Board for managing and maintaining this policy and is responsible for the implementation of this policy. The Board is responsible for adopting this policy.

The Head of Corporate Services is accountable to the Chief Executive Officer for ensuring the currency of this policy and all supporting procedures and relevant manuals and has responsibility for operationalising the policy.

Where compliance issues are identified, they will be addressed promptly. The Chief Executive Officer is responsible for taking any recommended amendments to this policy to the Interplast Board for its approval.

Section 6: Related Documents and Legislation

Interplast is a signatory to the ACFID Code of Conduct and is committed to recognising the importance and value of protecting an individual's right to privacy. Interplast is committed to the collecting and using of information truthfully and ethically (ACFID Code Quality Principle 7, Commitment 7.2).

Interplast acknowledges and complies with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APP) outlined in the Act, the Spam Act 2003 (Cth), the Do Not Call Register Act 2006 (Cth) and the Payment Card Industry Data Security Standards.

In addition, Interplast recognises and is committed to following the principles of the Victorian Health Records Act 2001 and the Health Privacy Principles outlined in that Act, when it collects, holds, uses and discloses patient information.

Name of document/legislation	Location/hyperlink
Privacy Procedure	Interplast Key Documents
Privacy Security Breach Procedure	
Records Management Policy	
Access to Records Procedure	
Disposal of Records Procedure	
Information Security Policy	
Privacy Act 1988 (Cth)	https://www.legislation.gov.au/ Link to all federal legislation
Spam Act 2003 (Cth)	

Do Not Call Register Act 2006 (Cth)	
Payment card Industry Data Security Standard	https://listings.pcisecuritystandards.org/documents/PCI_DSS-QRG-v3_2_1.pdf
Victoria Health Records Act 2001	https://www.legislation.vic.gov.au/in-force/acts/health-records-act-2001/048

Section 7: Definitions

Word / Phrase	Definition
Personnel	<p>Personnel includes all employees, consultants, volunteers, Board Directors, Committee members, Working Group members and Ambassadors that are engaged by Interplast to perform the work of Interplast.</p> <p>Volunteers include both professional (e.g. administrative roles) and medical volunteers (e.g. surgeons, anaesthetists, nurses or allied therapists), students, interns, or any other person who has entered into a volunteer arrangement or agreement with Interplast.</p>
Observer	<p>Observers are individuals accompanying an Interplast program, delivered by volunteers in a partner country (e.g. representing a donor organisation or students on an observational placement). Observers do not have a clinical role but may assist the clinical team by completing tasks related to program delivery.</p>
Partner	<p>Partner includes organisations that work with Interplast to implement a joint project with mutually agreed outcomes, and/or with whom Interplast has a signed partnership agreement and/or memorandum of understanding. Partner organisations may or may not be recipients of funds through Interplast.</p>
Beneficiary	<p>Beneficiary 1) a patient receiving treatment through an Interplast activity (this may include a consult only, surgery, allied health treatment or other clinical care, and could be provided by an Interplast volunteer, or a local partner clinician during an Interplast activity), or 2) local partner personnel participating in training delivered by Interplast.</p>

Stakeholder	Stakeholders include all personnel, observers, partners, beneficiaries and supporters, community members in the country where we work, funders, international development peers and organisations, or any other individuals or organisations that connect with Interplast.
Personal information (as defined by the Privacy Act 1988)	<p>Personal information includes a broad range of information, or an opinion, that could identify an individual.</p> <ul style="list-style-type: none"> • An individual's name, signature, address, phone number or date of birth • Sensitive information • Credit information • Employee record information • Photographs • Internet protocol (IP) addresses • Voice print and facial recognition biometrics (because they collect characteristics that make an individual's voice or face unique) • Location information from a mobile device (because it can reveal user activity patterns and habits).
Sensitive information (as defined by the Privacy Act 1988)	<p>Sensitive information is personal information that includes information or an opinion about an individual's:</p> <ul style="list-style-type: none"> • Racial or ethnic origin • Political opinions or associations • Religious or philosophical beliefs • Trade union membership or associations • Sexual orientation or practices • Criminal record • Health or genetic information • Some aspects of biometric information.
Confidential information (as defined by Interplast)	Organisational information, know how, technical data or specifications, financial information, employee, donor, patient or stakeholder records (both sensitive and personal).