



PRIVACY POLICY 2024

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Privacy Policy of Regional Community Support Ltd group of companies

1. About this Policy

This policy applies to Regional Community Support Ltd (RCS) and all the subsidiaries: Lifeline Central West Ltd, Regional Counselling Ltd, Regional Employee Support Ltd, YarnUp Confidential Ltd. Hereinafter referred to as RCS group. RCS group is committed to protecting the privacy of its employees, clients, volunteers, Board of Directors and representatives of agencies we deal with and meeting any privacy obligations set out in the Privacy Act 1988 (Cth) ('the Privacy Act') that might apply to it. The Privacy Act generally only applies to an organisation that has an annual turnover of more than \$3 million. Any organisation covered by the Privacy Act must have a privacy policy in place which deals with the collection and use of individuals' personal information.

RCS group collects personal information in order to conduct its business and comply with a range of legislative requirements.

This Policy explains how:

- we collect, manage, use, store and secure your personal information.
- you may access and request correction of any record containing your personal information.
- you may make a complaint about a breach of privacy.

RCS GROUP acknowledges:

- that we aim to provide a range of national and local services to individuals who interact with RCS GROUP and may assess, maintain, improve, or otherwise provide support to community members in crisis or in need of one or more of our support services.
- that for the purposes of our privacy obligations, RCS GROUP also complies with the Mandatory Reporting Children and Young Persons (Care and Protection) Act 1998 (the Care Act) and the Health Records and Information Privacy Act 2002 (NSW) (HRIP Act) which includes the privacy rules in the Health Privacy Principles (HPPs) in relation to all individuals who contact RCS GROUP services.

This policy is written in simple language. The specific legal obligations RCS GROUP has when collecting and handling personal information are outlined at a federal level in the Privacy Act, and in particular the Australian Privacy Principles (APPs) found in that Act, and at a State level in the HRIP Act and the HPPs.

2. Scope of this Policy

This policy applies to the Employees, Board of Directors, volunteers, volunteer applicants (including Crisis Support students), other workers, job applicants at RCS Group, contractors and suppliers, auditors, consultants, and researchers who seek access to our records and/or handle personal information collected by RCS Group. It also applies to personal information of individuals who are external to us such as donors, customers, clients and suppliers.

It applies to our handling of personal information, which is broadly defined in, and has the same meaning as defined under, section 6 of the Privacy Act:

Personal information is information relating to an individual which personally identifies an individual or makes the person's identity reasonably apparent.

Personal information may also include 'sensitive information'. Sensitive information is information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences, criminal record, health and biometric information or similar such information.

Sensitive information may be required to be collected in some circumstances. RCS group will only collect sensitive information if it is necessary for business purposes. RCS group will generally only collect sensitive information with your consent (unless otherwise permitted or required by law).

All information collected will be used and disclosed by RCS group only in accordance with this policy and the law. RCS group will take reasonable steps to ensure that all personal information is held securely.

3. How we manage your personal information

We will take all reasonable steps to ensure that we are open and transparent about the way we collect and use your personal information. We will:

- maintain adequate security of personal information to seek to protect it from misuse, interference or loss from unauthorised access, modification or disclosure.
- provide an option for you to use a pseudonym or otherwise be anonymous unless you are accessing a service offered by RCS GROUP which requires your name as part of the personal information needed to comply with applicable legislation, or unless it is impermissible, impractical or inhibits the adequacy or quality of service provided to you.
- no information is kept unless we are specifically asked to inform about on future corporate training or CS training
- provide relevant work training and privacy awareness on how the Australian Privacy Principles (APPs) apply to RCS GROUP and how they are reflected in privacy practices, procedures and systems.
- periodically review this Policy as well as the privacy practices, procedures and systems across our organisation to ensure that they remain appropriate to the changing environment.

4. Personal information we collect and hold

Where possible, personal information is collected directly from you with your consent at the time of your interaction with RCS GROUP. The main way we collect personal information about you is when you provide it directly or through your interaction with any of the following RCS GROUP services or activities:

Crisis support services

National crisis lines and National Digital services
Crisis Support Worker training (CSWT)

Community services

Community Aid
Financial and GambleAware counselling
Emergency Relief
Support groups

Employee Assistance Program

Personal Counselling

Community engagement and fundraising

Book fairs
Fundraising events and promotions
Workplace and community training
Community forums or events

Employment/Volunteering

Paid and volunteer workforce roles in all RCS GROUP teams

- The information collected will depend on the nature of your interaction – for example, whether you use an RCS GROUP service, donate, apply to become a volunteer, apply for employment, wish to partner or undertake research.
- If you share information with RCS GROUP, it will be protected in accordance with all the principles as outlined in Section 3.
- In addition to information collected directly from you, for some services provided by RCS GROUP, personal information is:
 - received from third parties where you are transferred or referred to us for the services that we provide.
 - received from third parties who obtain your personal information from publicly available sources.
 - transferred between our own services provided it relates to the primary purpose for which it was collected.
 - received from parents, other relatives, carers, self-provided, or other service providers.
- Personal information may be collected in hard copy form or electronic form. Hard copy records are required to be held securely. We hold electronic records in databases with security safeguards.

5. What personal information do we collect?

We will only collect personal information about you that is reasonably necessary for, or directly related to, our functions or activities to meet our objectives as discussed in Section 7.

Information collected may include name and contact details, further information about you that is needed to provide the service, and other information required by regulation or legislation. For some Community services, minimum information is required to provide the services.

6. How do we collect your personal information?

We collect your personal information directly from you when you:

- interact with RCS GROUP over the telephone, video conferencing tools such as Zoom, Teams or by text message.
- interact with RCS GROUP in-person.
- participates in surveys or questionnaires
- attend an event
- if requested, when interacting online including via the RCS GROUP website, otherwise contact information is not gathered. 'Followers' may be marketed to.
- communicate with RCS GROUP in writing including via post and email.

Sometimes we collect personal information from a third party or a publicly available source, but only if you have consented to such collection or would reasonably expect us to collect your personal information in this way. For example, we collect personal information:

- from referees provided by you in support of an application for a RCS GROUP position (as an employee, a contractor, or a volunteer)
- from third parties such as contractors (including fundraising service providers)
- from other organisations that you have donated to, where you have consented to receiving information from like-minded organisations such as RCS GROUP.
- from academic and training organisations where required to verify a person's educational status.

Personal information, such as name and contact details, will not be recorded unless you provide this information to us, or if this information is otherwise captured by IT systems or call recordings, and together may create a reasonably identifiable record with RCS GROUP.

Minors

RCS GROUP makes no active effort to collect personal information from Children under the age of 18, with the following exceptions for a specific training program or support group:

- Information may be collected on young people aged 12-25 years old for the youth and young adults training program such as Tackling Tough Conversations, and other programs that RCS GROUP may develop from time to time. We work collaboratively with schools, clubs, and community organisations to identify in-need children/ youth to attend this program. A parental or legal guardian consent is obtained prior to enrolling into the program
- some individual clients are just under 18 years: these records need to be kept until the child is 25 years old to comply with health record legislation.
- personal information may be collected relating to Children where the Child has contacted the support services and provides the information directly, or where another individual contacts RCS GROUP on behalf of the Child with child safety concerns.
- In relation to donations, Children who do wish to submit information to RCS GROUP (to process a donation) should secure permission from their parent or legal guardian prior to doing so.

6.1 Collecting information through websites

RCS GROUP has its own public website — [Home - Lifeline Central West](#) and there are several ways in which information is collected through the website.

Analytics

The RCS GROUP website may use Google Analytics and an internal tool to collect data about your interaction with the website. The internal tool is hosted by RCS GROUP, whilst Google Analytics is hosted by a third party. The sole purpose of collecting your data in this way is to improve your experience when using the website. As an example, the types of data collected with these tools can include:

- your device's IP address (collected and stored in an anonymised format).
- device screen size
- device type, operating system and browser information
- geographic location
- referring domain and out link if applicable
- search terms and pages visited.
- date and time when website pages were accessed.

Cookies

Cookies are small data files transferred onto computers or devices by websites for record keeping purposes and to enhance functionality on the website. Most browsers allow you to choose whether to accept cookies or not. If you do not wish to have cookies placed on your computer, please set your browser preferences to reject all cookies before accessing the RCS GROUP website. The core functionality on these platforms will be largely unaffected if you disable cookies in your browser but you may be unable to access some advanced functions.

Social Networking Services

RCS Group acknowledges that there are several ways social media can be used to benefit the organisation. This includes the use of Facebook and Instagram to create affinity groups (referral networks, testimonials), to run focus groups, for outreach purposes, to monitor public opinion and to engage with supporters/followers.

RCS group uses Facebook and Instagram as the organisational social media platforms and may choose to follow/link to other organisations/people's social media platforms.

RCS group seeks to encourage information and link-sharing amongst its membership, employees and volunteers, and seeks to utilise the expertise of its employees and volunteers in generating appropriate social media content.

When you communicate with RCS GROUP using these social networking services your personal information may be collected, but it is only used to help RCS GROUP to communicate with you and the public.

NB: RCS GROUP does not provide crisis support via RCS GROUP's social media platforms (e.g., LinkedIn, Facebook or Instagram).

7. How do we use your personal information?

At RCS GROUP we only use your personal information for the primary purpose for which it was collected, a secondary purpose to which you have consented, or for a purpose related to (or if sensitive information, directly related to) the primary purpose of collection and you would reasonably expect your personal information to be used for such purpose.

We collect, hold, use and disclose personal information only for primary, secondary and other purposes, with activities to meet RCS GROUP's objectives, including:

- to provide crisis support and suicide prevention services for each area of RCS GROUP's activities.
- to support research relevant to RCS GROUP's objectives
- to comply with the requirements of funding bodies as part of a funding agreement with us
- to operate fundraising and charitable activity in support of our objectives
- to provide customer service functions, including handling customer enquiries, complaints and feedback
- to facilitate proper governance processes such as risk management, incident management, internal audit and external audits, (e.g., required for insurance purposes)
- to gather feedback from you and other individuals about the quality of services that we provide so that the services we provide can be continuously improved.
- to satisfy legal obligations, comply with applicable laws and meet the requirements of bodies which regulate the services we provide.
- to understand, through aggregated information, trends and patterns which we use for research and advocacy to fulfil other purposes which you have consented to.

8. Your consent to collect and use your personal information

- Where consent to collection is sought, it is sought voluntarily from you, and we will inform you of what you are consenting to. Your consent will be specific to the services to be provided to you.
- RCS GROUP may refer you to another service provider in which case your personal information may be sent to them with your consent so that their services can be provided to you.
- We will not collect sensitive information about you unless you have consented; it is required by law; or in other special specified circumstances, for example relating to health services provision and individual or public health or safety, such as our duty of care in responding to a 13 11 14 call.

8.1 Consent for direct marketing

RCS GROUP may use some personal information for direct marketing purposes, but only where:

- The direct marketing communication contains a prominent statement that the individual may opt out of receiving that type of communication, and
- The relevant individual has not made such a request to opt out.

You have the following choices regarding your personal information:

- **Opt-Out:** You can opt-out of receiving marketing communications from us by following the unsubscribe instructions in the emails or contacting us directly.
- **Access and Correction:** You can request access to and correction of your personal information by contacting us at [contact email/phone number].
- **Data Deletion:** You may request the deletion of your personal information, subject to certain legal exceptions.

9. Disclosure to third parties

9.1 General Disclosure Practices

RCS GROUP does not disclose personal information to another person or organisation (including police, emergency services and other government agencies) unless one of the following applies:

- the individual has given express consent to the disclosure of their personal information or implied consent regarding non-sensitive personal information.
- the individual would reasonably expect, or has been told, that information of that kind is usually passed to those individuals, bodies or agencies and the disclosure:
 - in the case of personal information (that is not sensitive information) relates to the primary purpose for which it was collected; or
 - in the case of sensitive information, including health information, is directly related to the primary purpose for which it was collected; or
 - relates to collection from a third party, that being a charitable or other likeminded organisation, including third party service providers who facilitate the sharing of information between such types of charitable or like-minded organisations.
- the disclosure is otherwise required or authorised by law, including a warrant, order or notice issued by a court requires RCS GROUP to provide information, or produce records or documents that are held by RCS GROUP; statutory requirement to report certain matters to an agency or enforcement body such as mandatory reporting requirements in relation to suspected cases of child abuse.
- RCS GROUP reasonably believes that the disclosure will prevent or lessen a serious and imminent threat to somebody's life, health or safety (including your own) or serious threat to public health, property or public safety.
- the individual has made threats to harm third parties.
- the individual has made threats against RCS group personnel.
- the individual repeatedly makes nuisance or unwelcome contact; or
- the disclosure is to a RCS GROUP service provider as described below.

9.2 Confidentiality

All personal information gathered during the provision of any form of counselling at RCS GROUP will remain confidential and secure, except when:

- It is subpoenaed by a court, or
- Failure to disclose the information would place you or another person at risk, or
- Your prior approval has been obtained.
 - To provide written report to another professional agency e.g., GP or a lawyer
 - To discuss the material with another person e.g., parent or employer, or
- Disclosure is otherwise required by law.

9.3 Disclosure to service providers

RCS GROUP uses service providers that have access to personal information. These include providers that:

- host RCS GROUP website servers and case management systems

RCS GROUP may refer you to another service provider in which case your personal information may be sent to them with your consent so that their services can be provided to you.

To protect personal information, RCS GROUP:

- enters into a contract which requires the service provider to only use or disclose the information for the purposes of the contract.

- includes special privacy requirements in contracts, where necessary.

10. Quality of personal information

RCS GROUP aims to ensure personal information is accurate, relevant and not misleading. To achieve this outcome, we apply the following data quality procedures:

- information is recorded in a consistent format.
- where necessary, confirm the accuracy of information collected from a third party or a public source.
- promptly add updated or new personal information to existing records
- review the quality of personal information before use or disclosure.

11. Storage and security of information

RCS GROUP takes steps to protect the personal information held against loss, unauthorised access, use, modification or disclosure, and against other misuse. These steps include:

- only allowing relevant personnel with a 'need to know' to access IT systems and records, including recordings and transcripts
- undertaking background checks on personnel who require access to IT systems and records (where relevant)
- password protection for accessing electronic IT systems.
- securing paper files in locked cabinets and restricting physical access.

RCS GROUP regularly conducts security audits to review and test relevant systems and processes. When no longer required, personal information is destroyed or deleted in a secure manner.

For credit and debit card transactions RCS GROUP complies with the Payment Card Industry Standards, which govern handling of payment card information.

12. Retention of personal information

RCS GROUP will not keep your personal information for longer than we need to. In most cases, this means that we will only retain your personal information for the duration of your relationship with us unless we are required to retain your personal information to comply with applicable laws, for example record-keeping obligations, or by the requirements of any government or other funding body's record keeping requirements.

We do not store any information when Help Seekers (adults or children) contact these services as they are confidential services.

RCS GROUP otherwise will only retain information for the time necessary to provide the requested service.

13. Access and correction

Privacy rules 12 and 13 in the Australian Privacy Principles (APPs) give you the right to ask for and receive access to personal information held about you and to ask for corrections to that personal information.

RCS GROUP will endeavour to respond within 30 days if you ask for access or correction of your personal information. You will be given access to your personal information and reasonable steps taken to correct it, if RCS GROUP considers it is incorrect, unless there is an exception in APP 12 or another law that allows or requires that to be denied. For example, access to your personal information will be denied if it is reasonably believed that:

- giving access would have an unreasonable impact on the privacy of other individuals.
- giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety.
- the request for access is frivolous or vexatious.

Individuals will be required to provide the following information before access or correction is undertaken:

1. A written request for access and/or to correct addressed to

Email: info@lifelinecentralwest.org.au

- a) To conduct a record search of the service data bases, the following information is required:
- I. the date and time the contact was made, or service provided.
 - II. and the number used to contact RCS group services; or
 - III. the date, time and IP address used to access RCS group's service.

2. Proof of identity (this may be achieved by the 100-point identification system and proof of contact number, certified statutory declaration).

- Access to personal information will not be provided unless the person seeking access is the person to whom the information relates, or the law otherwise supports such access. In some cases, additional proof of identity information may be required, or access may be denied because ownership of a record cannot be proven.
- If an access request relates to an individual who is deceased, the personal information will be released to the requester, in accordance with the Privacy Act, unless the information contains the personal information or sensitive information, including health information, of another living person who is reasonably identifiable from the information available.
- If access to, or correction of, your personal information is denied, you will be notified in writing setting out the reasons.
- If a correction is made and the incorrect information was disclosed to others, you can request they be notified about the correction unless there is a valid reason not to.
- If a correction to your personal information is denied, you can ask for a statement which indicates that you believe the information is incorrect, to be attached to the information.

14. How to make a complaint or contact RCS GROUP

If you wish to contact RCS GROUP about a privacy matter or you are concerned about the way your personal information has been handled, you can lodge a written request or complaint with the Marketing Manager at either of the following addresses:

Postal Address: PO Box 9157, Bathurst NSW 2795

Email: info@lifelinecentralwest.org.au

- If a written complaint is received, RCS GROUP will respond within 7 days and aims to investigate and resolve all complaints within 30 days of receipt.
- While we hope to resolve your complaint without needing to involve third parties, if you are not satisfied with the outcome, you can contact the relevant professional body or the Office of the Australian Information Commissioner at www.oaic.gov.au/privacy/privacy-complaints/ who is independent of RCS GROUP.



253 Howick St Bathurst NSW 2795

www.lifelinecentralwest.org.au

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