

## **Flo Harris Lodge Privacy Policy**

1. Flo Harris Lodge (**FHL**) retains a large amount of documents, data, and information from a variety of parties. This policy is to govern and regulate the manner in which FHL gathers, stores, and uses information.
2. In general, when FHL deals with data, we should seek to:
  - a. Be transparent about how we are using the data;
  - b. Have explicit and legitimate purposes for collecting any personal information from people;
  - c. Not collect more information than we need to for those purposes;
  - d. Keep the information that we hold accurate and up-to-date;
  - e. Store data in a reasonably secure way.

### **Residents**

3. Personal information we gather about residents might include:
  - Basic personal information like names, contact details, next of kin, etc;
  - Religious beliefs or affiliations;
  - Information about physical and mental health (like allergies, dietary requirements, current prescriptions, particular health needs and vulnerabilities) that is necessary to ensure FHL is a safe environment for each resident;
  - Information we need for our safe organisation policy, like any previous criminal convictions or a Working With Children Check;
  - Records about ongoing issues like incident reports, correspondence with residents, visitors logs and sign-in/sign-out books.
4. All of the above personal information is gathered in order to help FHL run safely and smoothly for the people who live there, and to achieve our constitutional purposes. If the information is not reasonably necessary for these purposes, FHL will not collect it.
5. When we gather this information, we will always seek to get the information from the resident directly if possible. Unless the purpose of the information is immediately obvious, we should always provide an explanation for why we are gathering this information.
6. The personal information that we gather about residents will be available to the FHL Committee, either immediately or upon request.
7. The personal information that we gather about residents will be available to the Leadership Team of Petersham Baptist Church, either immediately or upon request.
8. The personal information that we gather about residents will only be made available to staff members who might reasonably need to know it as part of their duties.

### **Staff**

9. Personal information we gather about staff might include:
  - Basic personal information, like names, contact details, next of kin, etc;
  - Certain financial information like tax file numbers, bank details, superannuation, etc;
  - Records of training and qualifications;
  - Personnel records such as leave data, information gathered in performance reviews, etc;
  - Religious beliefs or affiliations;
  - Information about physical and mental health (like allergies, dietary requirements, current prescriptions, particular health needs and vulnerabilities) that is necessary to ensure FHL is a safe environment for staff;

- Information we need for our safe organisation policy, like any previous criminal convictions or a Working With Children Check;
  - Records about ongoing issues like incident reports, correspondence with residents, visitors logs and sign-in/sign-out books.
10. All of the above personal information is gathered in order to help FHL run safely and smoothly as a business and an employer, and to obtain our constitutional purposes. If the information is not reasonably necessary for these purposes, FHL will not collect it.
  11. When we gather this information, we will always seek to get the information from the staff member directly if possible. Unless the purpose of the information is immediately obvious, we should always provide an explanation for why we are gathering this information.
  12. The personal information that we gather about staff will be available to the FHL Committee, either immediately or upon request.
  13. The personal information that we gather about staff will be available to the Leadership Team of Petersham Baptist Church, either immediately or upon request.
  14. Personal information held by FHL about staff members will only be made available to other staff members where:
    - a. It is necessary as part of a direct staff reporting relationship; or
    - b. It is necessary for the other staff member(s) to conduct their duties.

Policies applying to specific categories of information held by FHL listed in legislative schemes

15. Some categories of information, such as financial records, reports of serious incidents, or information relevant to possible serious criminal conduct, might need to be retained in line with specific legal requirements. Where this happens, FHL will keep the information securely for the period required.
16. In particular, this includes:
  - a. Risk assessment and child safety information;
  - b. Financial information;
  - c. Operational records.

Child Safety information

17. Documents relating to FHL's child safety obligations must be treated in a particular way. This includes:
  - a. Risk assessment forms;
  - b. Staff and volunteer files;
  - c. Attendance (sign-in, sign-out sheets);
  - d. Our Safe Organisation Register;
  - e. Any completed Safe Organisation Concerns report forms, any contemporaneous notes regarding reporting decisions, and detailed notes of action taken in relation to Concerns raised;
  - f. Records of any complaints received, and investigations conducted, in relation to inappropriate conduct of staff or volunteers;
  - g. Any external report made by FHL staff, Committee, or volunteers to bodies such as the police or government authorities about risks of significant harm to a child or young person;
  - h. Annual Safe Organisation Commitments by third parties and affiliated entities;
  - i. Dated copies of the Safe Organisation Policy, Procedure, Form or associated documents.
18. These documents will be stored by FHL for at least 45 years.

19. Where these records contain, or may contain, sensitive information, they will be kept in a manner that protects confidentiality and will only be accessed by the FHL Committee, Chaplains, and Managers.
20. Where records are kept in hard copy, they will be held in a secure location with proper consideration of access, and physical conditions.
21. Where records are kept electronically, they will be monitored to ensure security and ongoing accessibility. This will typically be either through secured physical hard drives, or via the Committee's secured Google Drive.

#### Financial information

22. In line with section 8 of the FHL constitution, FHL must make and keep written records that:
  - a. correctly record and explain FHL's transactions and financial position and performance;
  - b. enable true and correct financial statements to be prepared and to be audited;
  - c. correctly record its operations
23. These records include:
  - a. records of transactions and banking arrangements;
  - b. records of debts owed and paid;
  - c. tax invoices and other tax records;
  - d. records of contracts, grants;
  - e. employee payments;
  - f. asset lists;
  - g. emails, letters and other communication about finance.
24. These records will all be stored for at least 7 years.

#### Operational Information

25. In line with section 8 of the FHL Constitution, FHL must keep written records that correctly record its operations, and be able to produce these records if required by law.
26. These records include:
  - a. our governing documents;
  - b. meeting minutes;
  - c. operating policies and procedures;
  - d. annual reports or other reports;
  - e. strategic plans and program plans;
  - f. monitoring and evaluation reports;
  - g. contracts and agreements;
  - h. promotional material; and
  - i. any other records that show that FHL is working towards its charitable purpose.
27. These records will be stored for at least 7 years.

#### Policies applying to all information and data held by FHL

28. These policies apply to any information not covered by the specific categories above.
29. FHL stores records, documents, and information electronically. Where these contain individuals' personal information, FHL will ensure that they are stored:
  - a. On a secure web server controlled by password access, such as Google Drive, where they are only accessible to people as provided per this policy; or
  - b. On secure hard drives/other electronic storage devices owned and controlled by either FHL, or individual people who may have access to them as per this policy.

30. In some circumstances, FHL may use images, videos and/or quotes of/from residents for marketing purposes. FHL will only do so if every person in the image/video, or who made the quote, has given their consent.
31. FHL will never sell or intentionally release any personal information to other organisations, including for the purpose of marketing, without the express consent of the person the information is about.
32. Where FHL is required to do so by law or for other specific and urgent purposes (such as for healthcare assistance, or responding to emergencies), FHL may release personal information to specific parties without obtaining prior consent. FHL will only do so in the event that the disclosure is necessary, and it is not reasonably practicable to obtain consent first (for example, because of urgent time constraints).
33. Where any person – including current or former residents or staff – contacts FHL and requests that FHL delete personal information about them, FHL will do so within a reasonable time unless:
  - a. FHL is required to retain the information for a legal purpose; or
  - b. There is a good operational reason why FHL may require that information.
34. Where any person – including current or former residents or staff – contacts FHL and requests that FHL correct personal information it holds about them, FHL will do so within a reasonable time as long as:
  - a. The request for the correction is made in writing; and
  - b. FHL does not reasonably suspect the requested correction would be inaccurate.

This policy was approved on 10 August 2023.