



BUNJUM ABORIGINAL CORPORATION LIMITED
ABN 99 527 548 145

PRIVACY POLICY

Table of Contents

- Board Vision and Commitment
 - Date of Approval and Version Number
 - Purpose of Policy
 - Definitions
 - Application of Coverage
 - Risk of Non Compliance
 - Legal and Regulatory Reference
 - Reporting Arrangements
 - Monitoring Arrangements
 - Training on Policy
 - Connecting Policies
-

Important Facts

- Bunjum is committed to maintaining a privacy policy to protect your personal information provided
- This policy links with the internet usage and email policy
- Some of this information may be sensitive and is only required for the service that you request.
- Policy extends to all subsidiary programs provided by associated companies

Vision Statement

The vision of Bunjum Aboriginal Corporation Ltd is to proactively aspire to rise above the inequalities, by maintaining our cultural identity and values through the provision of holistic, integrated services and programs, which enables and empowers local Aboriginal Community Members

Board Commitment

Bunjum Aboriginal Corporation Limited (Bunjum) and the subsidiary companies Ballina Aboriginal Early Childhood & Family Services and Bunjum Employment Services Pty Ltd are committed to operating a privacy policy to ensure that information collected within the programs and services provided by Bunjum are maintained to protect the personal information of clients and community members.

Date of Policy and approval version

This policy was approved at Ballina on the 16 May 2016 and is version 2. The Systems Co-ordinator is responsible for ensuring the policy is reviewed bi-annually.

Purpose of policy

To promote a professional and ethical approach to obtaining, maintaining, and storing of personal information by clients and community members. This approach is based on the importance that clients and community members attach to their own circumstances and Bunjum is committed to protecting their privacy.

Definitions

The following regulations or meanings apply;

Bunjum	Bunjum Aboriginal Corporation Limited
Co-op act	NSW Co-operative Act administered by NSW Fair Trading
Workcover	NSW Workcover obligations
Directors	Elected Directors of Bunjum
Employees	Staff working for Bunjum in whatever Form of casual, part time or full time Employment
Associated Companies	Ballina Aboriginal Early Childhood & Family Services Limited & Bunjum Employment Services Pty Ltd

Application/ coverage

The nature of personal information provided to the staff of Bunjum and its subsidiary companies relates around the services that the client may be seeking and is required to enable the service to be completed. This may include your name and address, your contact details, date of birth, employment services identification numbers, employment details and in some situations family details. Most of this information is obtained with the completion of the various forms for client information and application request forms for service delivery and this information is maintained in our client data base. This may include seeking forms of identification and this may be copied for the service requested.

We will only use the information you provided for the purpose of providing you with the program service(s) you requested, unless;

- You consent to us using this information for another service
- It is permitted or required by law

Personal information may only be disclosed to;

- Service providers who are sought to assist you with the provision of the service you requested or other services
- Anyone authorised by you in writing; and
- Regulatory authorities as authorised by law

This policy also extends to the information of the services provided by Bunjum and its own business details of a confidential nature.

Bunjum also can take into account the guidelines that are available from the NSW Ombudsman Fact Sheet 7 which covers Confidentiality and its practical alternatives.

Risk of non-compliance

Bunjum has regulatory, operational and reputational risks to consider for this policy.

- **Regulatory risk** relates around the formal Corporation & Regulatory laws that apply under which Bunjum operates and includes possible legal action against directors and executive staff for non compliance
- **Operational risk** covers the formal business operations and how this applies to the various policies and operational procedures for the programs that Bunjum operate
- **Reputational risk** covers the potential loss of community faith in the programs operated by Bunjum and the ongoing loss of actual program funding and therefore loss of services to the Aboriginal community in this area. This may cause future financial problems and risk the financial viability of the organisation.

Legal and Regulatory Reference

Bunjum has to follow the Corporations laws that apply to all Co-operatives (NSW Registered) and for the ASIC regulations for the various companies operated in the Bunjum group.

Reporting arrangements

Bunjum will review the process for obtaining personal information, the use of this information and storage facilities on a regular basis. This will link in with the confidential nature of each item of information to ensure it is not used for purposes outside of those requested.

Monitoring Procedures

It is vital for the ongoing operational success of Bunjum for all records to be maintained in a professional manner and includes;

- Financial records
- Client records
- Program records
- Service delivery partnerships
- Operational processes
- Banking records and arrangements

These are required as per the regulations and or the guidelines for the various programs that Bunjum operates.

How we store your personal information

Whether you interact with us personally, by phone, mail, over the internet, or other electronic medium, safeguarding the privacy of your personal information is one of our key goals. We hold personal information in lockable storage cabinets and paper based files and access is restricted to staff members. Electronic information has password code access restrictions and is only available to staff for program use.

We are required to maintain records for seven years after which they are destroyed.

Training

Training on policy will be provided on approval of this policy and then as per the timetable outlined.

Item	When due for training
What is a records keeping policy Bunjum's obligation Storage records Destruction records Bank signatories and authorities Delegation authority	Annually for all items listed

Connecting Policies

The following policies also link in with this policy;

WH&S

Service User Rights and Responsibilities