



Privacy Policy and Procedures.

The Board of GRAI is committed to protecting the privacy of personal information which the GRAI collects, holds, and administers. Personal information is information which directly or indirectly identifies a person.

Purpose

The purpose of this document is to provide a framework for GRAI in dealing with privacy considerations.

Policy

GRAI collects and administers a range of personal information for the purposes of providing services to older LGBTI people. The GRAI is committed to protecting the privacy of personal information it collects, holds, and administers.

GRAI recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – protected on one hand and made accessible to them on the other. These privacy values are reflected in and supported by our core values and philosophies and reflected in our Privacy Policy, which is compliant with the Privacy Act 1988 (Cth).

GRAI is bound by laws which impose specific obligations when it comes to handling information. The GRAI has adopted the following principles contained as minimum standards in relation to handling personal information.

GRAI will

- Collect only information which the GRAI requires for its primary function.
- Ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered.
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent.
- Store personal information securely, protecting it from unauthorised access; and
- Provide stakeholders with access to their own information, and the right to seek its correction.

Procedures:

Collection

GRAI will:

- Only collect information that is necessary for the performance and primary function of GRAI.
- Collect personal information only by lawful and fair means and not in an unreasonably intrusive way.
- Notify stakeholders about why we collect the information and how it is administered.
- Notify stakeholders that this information is accessible to them.

- Collect personal information from the person themselves wherever possible.
- If collecting personal information from a third party, advise the person whom the information concerns, and from whom their personal information has been collected.
- Collect Sensitive information only with the person's consent or if required by law. (Sensitive information includes health information and information about religious beliefs, race, gender and others).

Use and Disclosure

GRAI will:

- Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose.
- For other uses, GRAI will obtain consent from the affected person.
- In relation to a secondary purpose, use or disclose the personal information only where:
 - a secondary purpose is related to the primary purpose and the individual would reasonably have expected us to use it for that purpose; or
 - the person has consented; or
 - certain other legal reasons exist, or disclosure is required to prevent serious and imminent threat to life, health or safety.
- In relation to personal information which has been collected from a person, use the personal information for direct marketing, where that person would reasonably expect it to be used for this purpose, and GRAI has provided an opt out and the opt out has not been taken up.
- In relation to personal information which has been collected other than from the person themselves, only use the personal information for direct marketing if the person whose personal information has been collected has consented (and they have not taken up the opt-out).
- In each direct marketing communication with the individual, GRAI draws to the individual's attention, or prominently displays a notice, that he or she may express a wish not to receive any further direct marketing communications.
- Provide all individuals access to personal information except where it is a threat to life or health or it is authorized by law to refuse; and, if a person advises that the personal information is not accurate, then GRAI must take steps to correct it.
- GRAI may allow a person to attach a statement to their information if GRAI disagrees it is inaccurate.
- Where for a legal or other reason we are not required to provide a person with access to the information, consider whether a mutually agreed intermediary would allow sufficient access to meet the needs of both parties.
- **Make no charge for making a request for personal information**, correcting the information or associating a statement regarding accuracy with the personal information.
- If GRAI has sufficient reasons to believe that an unlawful activity has been, is being or may be engaged in, and the disclosure of personal information becomes a necessary part of its investigation of the matter or in reporting its concerns to relevant persons or authorities, the GRAI may make such disclosures.
- GRAI may further disclose personal information if its disclosure is mandated by an enforcement body or is required for the following:

- the prevention, detection, investigation, prosecution or punishment of criminal offences, breaches of a law imposing a penalty or sanction or breaches of a prescribed law;
- to prevent the risk of serious harm to an individual or if threats to seriously harm another individual are made.
- the enforcement of laws relating to the confiscation of the proceeds of crime;
- the protection of the public revenue;
- the prevention, detection, investigation or remedying of seriously improper conduct or prescribed conduct;
- the preparation for, or conduct of, proceedings before any court or tribunal, or implementation of the orders of a court or tribunal.

For the purpose of this Clause, GRAI must make a written note of the use or disclosure.

Storage GRAI

- Implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorized access, interference, unauthorized modification or disclosure.
- If any unauthorized access to, or disclosure of personal information occurs quickly assess any data breach, take any appropriate remedial action and notify all relevant parties, including the Privacy Commissioner of any notifiable data breach including what steps should be taken in response.
- Ensure that GRAI data is up to date, accurate and complete.

Destruction and de-identification GRAI

- Destroy personal information once it is not required to be kept for the purpose for which it was collected or after seven years, including from decommissioned laptops and mobile phones.
- Change information to a pseudonym or treat it anonymously if required by the person whose information GRAI holds and GRAI will not use any government related identifiers unless they are reasonably necessary for our functions.

Data Quality

GRAI will:

- Take reasonable steps to ensure the information GRAI collects is accurate, complete, up to date, and relevant to the functions we perform.

Openness

GRAI will:

- Ensure stakeholders are aware of GRAI's Privacy Policy and its purposes.
- Make this information freely available in relevant publications and on the GRAI's website.
- On request by a person, GRAI must take reasonable steps to let the person know, generally, what sort of personal information it holds, for what purposes, and how it collects, holds, uses and discloses that information.

Access and Correction

GRAI will:

- Ensure individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading or not up to date. An individual can email/write

to: secretary@grai.org.au to request access to their information. All requests to change a person's details must be made in writing/email to the chair@grai.org.au

- If the individual and GRAI disagree about whether the information is accurate, complete and up to date, and the individual asks GRAI to associate with the information a statement claiming that the information is not accurate, complete or up to date, the GRAI will take reasonable steps to do so.
- GRAI will provide to the individual its reasons for denial of access or a refusal to correct personal information.
- GRAI can withhold the access of an individual to his/her information if:
 - providing access would pose a serious and imminent threat to the life or health of any individual; or
 - providing access would have an unreasonable impact upon the privacy of other individuals; or
 - the request for access is frivolous or vexatious; or
 - the information relates to existing or anticipated legal proceedings between the GRAI and the individual, and the information would not be accessible by the process of discovery in those proceedings; or
 - providing access would reveal the intentions of the GRAI in relation to negotiations with the individual in such a way as to prejudice those negotiations; or
 - providing access would be unlawful; or
 - providing access would be likely to prejudice an investigation of possible unlawful activity; or
 - an enforcement body performing a lawful security function asks GRAI not to provide access to the information on the basis that providing access would be likely to cause damage to the security of Australia.
- Where providing access would reveal evaluative information generated within the GRAI in connection with a commercially sensitive decision-making process, GRAI may give the individual an explanation for the commercially sensitive decision rather than direct access to the information.
- If GRAI decides not to provide the individual with access to the information based on the above-mentioned reasons, GRAI will consider whether the use of mutually agreed intermediaries would allow sufficient access to meet the needs of both parties.

Anonymity

- Allow people from whom the personal information is being collected to not identify themselves or use a pseudonym unless it is impracticable to deal with them on this basis.

Making information available to other organisations

GRAI can:

- Release information to third parties where it is requested by the person concerned.
- Release information to a funding body where required by a funding contract and individual consent has been given or the information is non identifiable.

Changes in GRAI's privacy policy

- GRAI will review this privacy policy from time to time and inform you of any changes to this policy by placing the revised policy on our internet site.

