

Privacy Policy

Applies to

- All Australian Breastfeeding Association (ABA) members including trainees, volunteers, staff, management and to ABA's contractors.

Definitions

Word or Phrase	Definition
Personal Information	Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect include: names, date of birth, addresses, email addresses and phone numbers, etc
Sensitive Information	Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.
Health Information	Health information is any personal information about an individual's health or disability. It includes information or opinion about an individual's illness, injury or disability. Some examples of health information include: notes of child development, infant feeding, medical advice received
Unsolicited personal information	Unsolicited personal information is personal information received by ABA where we have taken no active steps to collect the information.

Scope

The Australian Breastfeeding Association (ABA) is a non-profit organization offering counselling, information, education and support services to the community. It has many sectors and activities. Through these varied operations, ABA gathers information to enable delivery of services and to improve the nature of the services provided. ABA understands the concerns of individuals regarding confidentiality and this policy outlines how we will meet our ongoing obligations to manage the Personal, Sensitive and Health Information we collect.

The Australian Breastfeeding Association is committed to being consistent to its mission and compliant with the laws of Australia. We have adopted the [13 Australian Privacy Principles](#) (APPs) in the *Privacy Act 1988*. The APPs govern the way in which we collect, use, disclose, store, secure and dispose of information.

Policy Statement

Unless where specifically stipulated, all personal, sensitive and health information will herein be referred to as “personal information”.

All personal information collected by the Australian Breastfeeding Association (ABA) will comply with the 13 Australian Privacy Principles (APP) as detailed below and as amended from time to time.

Collection

ABA collects an individual’s personal information for the primary purpose of providing quality breastfeeding support and information services and for marketing in accordance with the requirements of the *Privacy Act 1988*. We may also use an individual’s Personal Information for secondary purposes closely related to the primary purpose, in circumstances where the individual would reasonably expect such use of disclosure. An individual may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

The type of personal information collected depends on a person’s relationship with ABA, the nature of the interaction or service being provided and any legal obligations ABA may have. When ABA collects personal information, it will whenever practical, outline why this information is being collected.

The Personal Information of individuals applying for employment with ABA will only be collected for the purpose of the recruitment process. ABA may also store information about an unsuccessful application for the purposes of future recruitment.

Communication and Dissemination

ABA makes available, in plain English, information on an individual’s rights to privacy and what to do if they believe the organisation is in breach of their privacy in a variety of formats, including but not limited to:

- this Policy is available to clients and the community via the ABA website
- brochures about its services
- verbally when collecting information and consent
- forms that require information (e.g. application forms for volunteering).

Australian Privacy Principles

1. *Open and transparent management of personal information*

ABA has ongoing practices, procedures and systems in place to ensure that personal information is managed in an open and transparent way.

ABA will document how personal information is managed and what purpose it serves;

how it collects, holds, uses and discloses the information. ABA will ensure that the most current copy of this document can be readily obtained free of charge in PDF format via the [ABA website](#). If a person or body requests a copy of the ABA *Privacy Policy*, ABA will take reasonable steps to give the person or body a copy in that form.

2. *Anonymity and pseudonymity*

Where practical, individuals may deal with ABA on an anonymous basis. However, it is often necessary to collect personal information whilst providing a range of our services.

Individuals have the option of not identifying themselves, or of using a pseudonym when dealing with ABA, such as accessing ABA's counselling, information and support services. However, for some services, personal information will be collected where it is impractical for ABA to deal with individuals who have not identified themselves or who have used a pseudonym.

3. *Collection of solicited personal information*

Personal information:

ABA will only collect personal information (other than sensitive or health information) if the information is reasonably necessary for one or more of ABA's functions or activities.

The information ABA collects in most cases relates to members, subscribers and employees and also relates to suppliers and other third parties. Personal information is gathered for a range of purposes, including:

- the provision of information
- provision of counselling
- group and Association services
- the compiling of subscriber and membership lists
- fundraising within the Association

Sensitive & Health information:

Unless an exception applies, sensitive and health information will only be collected with an individual's consent and if the collection is reasonably necessary for one or more of ABA's functions or activities. As a provider of information and counselling services, ABA will only collect sensitive and/or health information from the individual where we believe it is necessary to know that information in the course of providing our services.

Means of collection:

Where reasonable and practicable to do so, we will collect personal information directly from the individual. This may be via phone or in documents or webforms such as application forms. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that the individual is made aware of the information provided to us by the third party.

4. Dealing with unsolicited personal information

In the case that ABA receives unsolicited personal information from an individual that could not have been collected under APP 3, and the information is not contained in a Commonwealth record, ABA will destroy or ensure that the information is un-identifiable as soon as it is practicable, lawful and reasonable to do so.

5. Notification of the collection of personal information

When personal information is collected from an individual, they will be advised at the time of collection, or as soon as practicable after its collection, as to the purpose of collection and the fact that they can gain access to their personal information.

ABA will also notify individuals about the access, correction and complaints processes, and the location of any likely overseas recipients of individuals' information.

6. Use or disclosure of personal information

Personal information will not be used by ABA for a secondary purpose unless the individual has consented, or a prescribed exception applies.

An individual's Personal Information will only be disclosed in the following circumstances:

- Third parties where the individual has given consent to the use or disclosure; and
- Where required or authorised by law.

7. Direct Marketing

An individual's personal information will never be sold to any marketing company or third party. ABA may use personal information to market directly to an individual for the provision of fundraising or regarding any other Association services, products and activities. The individual has the right to opt-out of this type of communication from ABA.

8. Cross-border disclosure of personal information

An individual's privacy protections apply to the transfer of personal information out of Australia. Although it is not usual for ABA to transfer personal information overseas, if personal information is transferred overseas, ABA will wherever practical obtain written consent before doing so. If obtaining consent is not practical, then the information may still be transferred if, as part of the agreement for the transfer of that information, the other organisation agrees to comply with ABA's *Privacy Policy*.

9. Adoption, use or disclosure of government related identifiers

Commonwealth Government related identifiers (e.g. Medicare number or tax file number) will only be used for the purposes for which they were issued. ABA will not adopt, use or disclose unique identifiers except where it is necessary to carry out its functions efficiently. ABA does not use any prohibited identifiers.

10. Quality of personal information

ABA will take all reasonable steps to ensure that the personal information it collects, uses or discloses is relevant, accurate, complete and current.

ABA will ensure that the information provided from an individual is relevant correct and any third-party information received can be verified for accuracy, currency and completeness.

11. Security of personal information

Personal information is securely stored in hard copy and/or digital form. ABA will take reasonable steps to protect the personal information it holds from interference, in addition to misuse and loss, and unauthorised access, modification and disclosure.

ABA will take reasonable steps to regularly destroy or de-identify personal information if the information is no longer required for any authorised purpose, with the following exceptions:

- The personal information is contained in a Commonwealth record;
- ABA is required under an Australian law or a court/tribunal order to retain the information.

12. Access to personal information

An individual will be given access to their information held with ABA, except to the extent that prescribed exceptions apply as per the *Privacy Act 1988*.

ABA will provide access in the manner requested by the individual within 30 days if it is reasonable to do so. If ABA decides not to give an individual access, a written reason for the refusal and the mechanisms available to complain about the refusal will be issued.

In certain circumstances, ABA may charge a minimal administration fee to provide access to an individual's personal information; however, this does not apply to the making of the request.

13. Correction of personal information

ABA will take reasonable steps to ensure that personal information is accurate, complete and provide opportunities for individuals to update their personal information. An individual can request in writing to update their personal information at any time and at no charge. ABA will respond to a correction request within 30 days if it is reasonable to do so.

In the case whereby ABA may refuse an individual's correction request, ABA will provide the individual with written reasons for the refusal and notify them of available complaint mechanisms.

Privacy Policy Complaints and Enquiries

If an individual feels that ABA may be in breach of any of the APPs listed in this policy, a formal complaint can be lodged by accessing the [Complaints Form](#) on the ABA website

Approved by

ABA may modify this Privacy Policy and the way it handles personal information at any time at its sole discretion. Such modifications will be consistent with current privacy legislation.

Revision history

Revision	Date	Description of modifications
V1.3	20 06 17	Placed in approved policy template
V1.4	15/06/2020 - Draft	Subject to approval
V1.5	28/11/2020	Approved by the Board