

Hebron Youth Directions Pty Ltd

Privacy Policy

1. Purpose and Scope

The Privacy Policy for Hebron Youth Directions Pty Ltd (“Hebron”) has been developed in accordance with the Privacy Act 1988 (the Privacy Act), and the Privacy Amendment (Enhancing Privacy Protection) Act 2012, which includes the Australian Privacy Principles (APPs). The Australian Privacy Principles regulate the handling of personal information by Australian government agencies and some private sector organisations.

Hebron’s main mission is to bring hope, justice and opportunity to young people by providing life skills, vocational training and also finding employment so they can lead successful lives. All information collected is for the purpose of the operations of Hebron, or where dictated by legislative guidelines.

This Privacy Policy applies to the collection, storage, use, disclosure and access to personal information relating to all individuals who have cause to liaise with Hebron. Personal and sensitive information may be collected and stored in electronic and/or paper format.

This Privacy Policy does not apply to employment records used for employment purposes at Hebron, as per the Privacy Act.

2. Objectives

All individuals are entitled to protection of their privacy and Hebron is committed to the protection of personal information. Hebron recognises its obligation under the Privacy Act and will take necessary measures to ensure privacy is protected. All individuals have the right to access their personal information held by Hebron in accordance with the Privacy Act.

Hebron will ensure that it promotes the privacy principles throughout the company’s operations. Hebron will monitor privacy compliance and handle any complaints in an appropriate manner.

3. Implementation

The overall responsibility for privacy of information for Hebron resides with the Hebron CEO, with day to day management delegated to the Manager, who is the first point of contact for privacy matters including general information, requests to access and/or amend personal information, and for internal review and resolution of complaints. Staff and participants are responsible for being aware of and complying with this Policy.

4. Procedure

4.1. Collection of Personal Information

Hebron will only collect personal information directly from individuals:

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- in circumstances where it is necessary for its main purpose of providing products and/or services, and for the purpose of administering those products and services;
- where it is reasonable and practicable;
- in a fair and transparent manner in keeping with the Australian Privacy Principles.

Individuals (whether directly providing personal information or as an authorised third party) will be advised that Hebron will take reasonable steps to ensure that the individual is aware of:

- the purpose for collecting the information;
- the types of organisations that Hebron may need to disclose such information, including information that may be transferred to overseas entities;
- the option to be anonymous or pseudonymous where possible and practicable (noting that this is only possible for general enquiries);
- their rights to access their personal information within reasonable timeframes;
- the need for consent to collect health or sensitive information.

Hebron may collect personal information from members of the public in relation to addressing enquiries from the public. Hebron may collect health and sensitive information, where relevant, from participants or from staff in relation to their employment at Hebron. Personal information collected may include: names; addresses and contact details; date of birth; educational and work history; academic results; emergency contact details; credit card details; racial or ethnic origins; English language proficiency; healthy or disability (where relevant); professional membership information (where relevant); government related identifiers.

Hebron may also collect personal information for ancillary purposes related to the primary purpose of collection, including:

- maintaining information technology services, customer service and data storage;
- marketing the services of Hebron to prospective, current and past participants;
- planning, monitoring, evaluating and improving service provision, including conducting market research and surveys and assessing satisfaction;
- otherwise communicating with individuals.

Minors and Privacy

When Hebron has knowledge that an individual is under age 18 and is providing personal information, Hebron requires the individual to obtain parental/guardian permission and consent to provide this information to us.

Personal Information from Websites or Third Parties

Generally, personal information is collected directly from the individual, although there may be times when information is collected from third parties, such as a family member who contacts us on the individual's behalf, contractors who supply services to us, through partner institutions or from a publicly maintained record.

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If personal information is provided to Hebron about someone else, the individual must ensure that they are entitled to disclose the information to us, and that without us taking any further steps, Hebron may collect, use and disclose such information for the purposes described in this Privacy Policy. For example, if an individual is aware of this Policy, the individual must also provide the required consent regarding personal information.

Links to external websites, including social media sites, are not controlled by Hebron and therefore are not accounted for under this Privacy Policy.

Collection of Personal Information from Prospective Employees

Hebron may collect personal information from prospective employees. For prospective employees this may include: name, address and contact details; educational and work history. Information may also be collected regarding referees and their contact details, which provides consent for Hebron to collect personal information from said referees.

Additional information may be collected in the process of hiring staff such as: date of birth; tax file number; emergency contact details; bank details; superannuation information; passport and visa details; licence details; academic information including qualifications, awards, publications; working with children and police checks (if relevant).

5. Use and Disclosure of Personal Information

Hebron uses and discloses personal information for the purposes disclosed at the time of collection or as set out in this Policy. Personal information will not be disclosed for any other purpose unless consent has been given to Hebron or it is required to do so by law.

Hebron will not disclose or externally publish personal information to third parties with a view to allowing them to direct market their products or services without your consent. Personal information is also collected to enable Hebron to correspond with participants and attend to administrative matters, which may require disclosure to third parties such as: work-integrated learning; other services; emergency circumstances; benchmarking and quality assurance purposes; compliance with reporting requirements; and other uses as permitted by the Privacy Act.

Hebron staff may require access at times to personal information about participants. To the extent that the information is private, Hebron will restrict access to those staff who need the information in order to carry out their responsibilities in the personal and/or other interests of the participants.

Critical Incidents

There are certain extenuating circumstances under the Privacy Act where Hebron may disclose limited personal information to meet or maintain its duty of care responsibilities such as where:

- there is a serious and imminent threat to an individual's life, health or safety;
- there is a requirement under law, or authorised by law; or
- there is a requirement under an enforcement body.

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Disclosure of such information will be carried out as necessary to prevent or lessen a serious and or imminent threat, or for example when Hebron has been unable to contact a participant for an unreasonable period. In this situation the disclosure of information will need to be approved by the Hebron CEO.

If an individual is alleged to have committed an offence, Hebron may be requested to assist the police or other authorised persons by providing personal information about that individual for enforcement of the law.

Other Circumstances

No attempt will be made to identify individual users of the Hebron website except in the unlikely event of an investigation or legal proceedings, or where otherwise permitted to do so under the Privacy Act. In such circumstances, Hebron may be required to gather more extensive information than stated above, in cases such as:

- unauthorised attempts to access files other than those published on our website;
- unauthorised tampering or interference with files published on our website;
- unauthorised attempts by other websites to index the contents of our website;
- attempts to intercept messages of other users of our website;
- communications which are defamatory, abusive, vilify individuals or groups or give rise to a suspicion that an offence is being committed;
- attempts to otherwise compromise the security of the Hebron web server, breach the laws of the Commonwealth or a state of Australia, or interfere with the use of the Hebron website by other users.

Hebron will only publish personal information on its website, where the individual has consented to personal information being collected and disclosed for that particular purpose. Individuals should be aware that personal information may be indexed by search engines, and that it may be copied and used by any web user. Once personal information is published on the Hebron website, it will not be possible to control subsequent use and disclosure. Where the Hebron website contains external links to other sites, we are not responsible for the privacy practices or the content of such websites.

Under no circumstances will Hebron sell or receive payment for licensing or disclosing personal information. Hebron may receive unsolicited information. In such circumstances, Hebron will dispose of and de-identify the unsolicited information as soon as practicable.

6. Transfer of Personal Information Outside of Australia

Hebron may retain other companies and contractors to provide services, including entities located outside Australia, who will need to have access to your personal information to perform their obligations. Hebron may also use a cloud-based service to store and process personal information.

If Hebron has cause to transfer personal information outside of Australia; it will do so in keeping with the Privacy Act. Hebron will ensure that the recipient is subject to a binding agreement that is similar to the Australian Privacy Principles, and take reasonable steps to ensure recipients do not breach the APPs.

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Hebron will seek consent where possible, prior to transferring personal information outside of Australia. However, Hebron is not responsible for a failure of the overseas recipient to comply with Australian privacy laws.

7. Security and Quality of Personal Information

Hebron takes reasonable steps to ensure that personal information is protected against loss, unauthorised access, use, modification or disclosure, other misuse, as required by law and generally accepted industry standards. However, to the extent permitted by law, Hebron excludes any liability in contract, tort or otherwise for any security breach.

Hebron takes all reasonable steps to destroy or de-identify hard copies of personal information that is no longer required, and that destruction of personal information is undertaken by secure means, as required by the Privacy Act.

Hebron uses password protection and other measures to protect personal information, and software programs to monitor network traffic and identify unauthorised attempts to upload or change information, or otherwise cause damage.

Hebron will take reasonable steps as required by the Privacy Act to ensure that personal information is accurate, complete and up to date.

Unauthorised attempts to access or tamper with information held by Hebron may lead to the gathering of more extensive information than usual, and possible legal action.

8. Right to access and correct records

Individuals have the right to access or obtain a copy of the personal information that Hebron holds about them. Requests to access or obtain a copy of personal information must be made in writing. Where it is reasonable to do so, access to the information will be provided in the manner requested by the individual.

If an individual considers their personal information to be incorrect, incomplete, out of date or misleading, they can request that the information be amended. Where a record is found to be inaccurate, a correction will be made as soon as practical. Where an individual requests that a record be amended because it is inaccurate but the record is found to be accurate, the details of the request for amendment will be noted on the record. There is no charge for making a request to correct personal information.

9. Complaints and Grievances

If an individual believes that their personal information has not been dealt with in accordance with the Privacy Act, they may lodge a complaint. The complaint should be lodged with the CEO in the first instance for resolution by emailing info@hebronyouthdirections.com.

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If the complainant is not satisfied with the outcome, they may refer the matter to the Office of the Australian Information Commissioner at:

- Website: <http://www.oaic.gov.au/> or
- Phone: 1300 363 992

All staff will be provided with this policy at induction. All staff will be informed of any changes to this policy via the internet and/or email.

10. Definitions

- **Personal Information:** information or an opinion (including information or an opinion forming part of a database) that is recorded in any form and whether true or not about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion. Personal information includes sensitive information. For the purposes of the Privacy Act 1988 (Cth) the personal information does not have to be in a recorded form. For further information visit the Office of the Australian Information Commissioner website, <http://www.oaic.gov.au/>.
- **The Privacy Act 1988** (Privacy Act) is an Australian law which regulates the handling of personal information about individuals. This includes the collection, use, storage and disclosure of personal information, and access to and correction of that information.
- **Sensitive Information:** personal information or an opinion about an individual's: racial or ethnic origin; political opinions and memberships; religion; sexual preference; criminal record; professional memberships including trade unions.

11. Revision History

Approval Authority	Contact Person	Revision Due Date	Revision Date	Approved Date	Version No.	Revision Description
Board of Directors	Chair	03/04/26		03/04/24	1.0	Preparation of new document