

PRIVACY

Policy Statement

From time to time MHCC may collect information from individuals and organisations. MHCC will therefore take all reasonable steps to ensure we comply with, and store all information in line with the Australian Privacy Principles as outlined in the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*.

Background

MHCC may collect information from organisations and individuals for a variety of reasons. Information may be collected for membership, event attendance, training purposes, information dissemination or project and research purposes. Except as outlined in this policy MHCC will not on-sell or disclose, any information collected to another person, organisation or agency unless, permission has been granted or where required or authorised by or under Australian law, or a court/ tribunal order.

Procedure

MHCC will take reasonable steps to ensure it complies with the Australian Privacy Principles (APP). As such the below indicates how MHCC addresses the APP.

For MHCC's privacy policy specific to training services through MHCC Learning and Development please refer to 'Training Privacy and Confidentiality Policy for Participants'.

Part 1 - Consideration of personal information privacy

Open & transparent management of personal information – APP 1

MHCC believes in being open and transparent about the personal information we collect, how we collect it, why we collect it and how we will use it. Whilst being open and transparent about our processes, privacy and confidentiality of information we collect and store is paramount to us and as such we will only discuss information we have collected with relevant individuals, i.e. if the individual has given MHCC permission or as required or authorised by or under Australian law, or a court/ tribunal order.

Anonymity & pseudonymity – APP 2

When providing information or making an enquiry to MHCC individuals have the right to remain anonymous or use a pseudonym.

When utilising the MHCC website only low level non identifying metadata including IP address is collected to enable statistical analysis of views per page on our website etc.

Part 2 - Collection of personal information

Collection of solicited personal information – APP3

- Information will be collected through registration forms, during the process of registering for MHCC communications such as our e-newsletter (FYI), and during membership application and renewal processes. Information provided during the membership process may include individual information as well as organisational information. Any individual information provided on behalf of an organisation will be used solely for the purpose of disseminating member relevant information to the member organisation.
- Information relating to individuals (including internal and external staff/ consultants) and organisations will be stored within the MHCC Customer Relations Management (CRM) Database.
- Except where information is collected for the purposes of projects and research (where additional information may be collected with the consent of the individual) the information collected about an individual may include:
 - Name (First and Last)
 - Contact details (address, phone numbers, email address)
 - Organisation of employment

- Job Title
- information collected about an organisation may include:
- Organisations Name
 - Organisations Parent Company
 - Primary Account Contact details (will be entered as an individual)
 - Organisational contact details (Phone, Address, email, website)
 - Organisational service areas
- Where information is provided by an individual for payment of a service such as credit card details this information will not be stored once the payment has been processed.

Dealing with unsolicited personal information – APP4

In the event that MHCC receives unsolicited personal information about any individual, and it is unlikely that MHCC would have been provided with this information, then MHCC will destroy or de-identify the information as soon as practical and if lawful to do so. If it is likely the information could have been collected from an individual or a third party organisation (such as in the case of membership of MHCC) the following will apply.

Notification of the collection of personal information – APP5

In the event MHCC receives unsolicited information about an individual and the information is relevant and it is likely MHCC could have collected it from the individual through our processes, MHCC will inform the individual, including how MHCC will use the information as soon as practical.

Part 3 - Dealing with personal information

Use or disclosure of personal information – APP6

- Information will only be provided to third parties required for the storage of and dissemination of contact details unless required or authorised by or under an Australian law, or a court/ tribunal order.
- Information collected by MHCC will be used for the following purposes:
 - Information about upcoming events (including possible training events)
 - Information MHCC considers relevant to our members
 - Information MHCC considers relevant to the broader mental health sector
- Information will not be used for other purposes unless:
 - The individual has consented
 - It is somehow required or authorised by or under an Australian law, or a court/ tribunal order.
 - It is required to locate a missing person
 - It is required for the purpose of a confidential alternative dispute resolution

Direct marketing – APP7

MHCC will only use personal information collected from an individual for the purpose of direct marketing where MHCC believes the individual may have an interest in the material. All direct marketing will provide a simple way of requesting to not receive any future direct marketing campaigns.

Cross-border disclosure of personal information – APP8

- Information is stored within Australia, however one of the dissemination third parties utilised by MHCC will store information on a secure server located in America. This dissemination third party maintains compliance with the U.S.-E.U. and U.S.-Swiss Safe Harbor Framework.
- In the unlikely event that the location of information storage changes in the future MHCC will update this policy.

Adoption, use or disclosure of government related identifiers – APP9

MHCC utilises Unique Student Identifiers (USIs) for the purposes of delivering Nationally Accredited Qualifications and Courses. For more information on USI usage please refer to the 'Training Privacy and Confidentiality Policy for Participants'

MHCC does not use other government related identifiers. MHCC will not disclose a government identifier should we become aware of it unless permission has been given for us to disclose it, or it is reasonably necessary for MHCC to carry out its activities or obligations or unless required or authorised by or under Australian law, or a court/ tribunal order such as in the instance of an USI.

Part 4 - Integrity of personal information

Quality of personal information – APP10

MHCC will take reasonable steps to ensure information collected and stored by MHCC about an individual or organisation is accurate, up-to date and complete.

Security of personal information – APP11

- Information stored within the CRM will only be available to internal MHCC staff. Staff will only use information stored within the CRM that is relevant to their specific role or assigned tasks for MHCC operations.
- Where personal information is no longer required (or requested by the individual) MHCC will destroy, delete or de-identify the information as long as it is legal to do so.
- All hard copy forms that contain personal information will be stored securely until such time as they are no longer required in hard copy at which time they will be securely disposed of.
- Soft copy forms that contain personal information will be stored securely on our server with restricted access.
- All MHCC staff sign and agree to maintaining confidential, information they are privy to during the course of their employment with MHCC.
- All third party service providers used for storing and transmitting data have agreed to maintain the privacy of MHCC data.

Part 5 - Access to, and correction of, personal information

Access to personal information – APP12

- Access to information stored within the MHCC CRM will only be provided to the individual seeking access, unless the information relates to an organisation in which case access to information will only be provided to the nominated contacts within the CRM.
- Requests for access to information are to be made in writing to MHCC and will be responded to within a reasonable timeframe and where possible within the format requested.
- MHCC may reasonably refuse to provide an individual access to the information stored where
 - It would pose a serious threat to life, health or safety of any individual, or to public health or public safety
 - Giving access would have an unreasonable impact on the privacy of other individuals
 - The request for access is frivolous or vexatious
 - The information relates to existing or anticipated legal proceedings between the entity and the individual, and would not be accessible by the process of discovery in those proceedings
 - Giving access would reveal the intentions of the entity in relation to negotiations with the individual in such a way as to prejudice those negotiations
 - Giving access would be unlawful

- Denying access is required or authorised by or under Australian law or a court/tribunal order
- Both of the following apply:
 - The entity has reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to the entity's functions or activities has been, is being or may be engaged in;
 - Giving access would be likely to prejudice the taking of appropriate action in relation to the matter
- Giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body
- Giving access would reveal evaluative information generated within the entity in connection with a commercially sensitive decision-making process
- In the event MHCC is unable to provide access to information, MHCC will provide the reason access has not been granted and provide information on how to make a complaint about access not being granted.

Correction of personal information – APP13

- MHCC will work to ensure information maintained within our CRM remains accurate, current and complete, however in the event that we are notified of inaccurate information we will make the requested changes within 2 working days of receiving written notification from the relevant person.
- Where MHCC is unable to make the requested changes, MHCC will provide the reason the request will not be actioned and information on how to make a complaint.

Complaints

Complaints about breaches of privacy can be made directly to MHCC. MHCC can be contacted at the below details:

MHCC
 PO Box 668
 Rozelle NSW 2039
 02 9555 8388
info@mhcc.org.au
<http://www.mhcc.org.au>

Alternatively complaints about breaches or privacy can also be made to:

Office of the Australian Information Commissioner
 GPO Box 5218
 Sydney NSW 2001
 1300 363 992
enquires@oaic.gov.au
<http://www.oaic.gov.au>

MailChimp
 Privacy Department
 657 Ponce de Leon Ave NE, Suite 5000
 Atlanta, GA 30308

Related Policies

Confidentiality

Confidentiality – MHCC Board

Disposal of Confidential Information

External Conflict Resolution/ Complaints

Relevant Standards & Legislation:

ACHS Standards	Legislation
1.1.4, 2.3.1, 2.3.2	<ul style="list-style-type: none"><li data-bbox="472 481 1404 517">• Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth)

Approved by

Board

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