

Privacy Policy

Version 1, January 2024

Authorisation	Chief Executive Officer
Policy Domain	Exec, People & Systems
Policy Type	Privacy and Data Collection
Policy Setting	Administration
Effective Date	January 2024

Policy Context

Standards of other external requirements	Australia Privacy Principles WA State Records Standards and Principles
Legislation or other requirements	Injury Control Council of Western Australia Constitution Privacy Act 1988 (Cth) Electronic Transactions Act 1999 Electronic Transactions Regulations 2020 WA State Records Act 2000 Financial Management Act 2006
Contractual obligations	Injury Matters Employment Contracts Department of Health Funding Contract Road Safety Commission Funding Contract

Policy Statement

Injury Matters is committed to protecting the privacy of personal information that the organisation collects, retains, discloses, and administers in accordance with the Privacy Act 1988. Personal information refers to data that either directly or indirectly identifies an individual. By using our website and services, you consent to the practices described in this Privacy Policy.

Purpose

This document serves as a framework for Injury Matters to address matters pertaining to privacy considerations for Community Members, Team Members, Board Members, students and volunteers and all individuals who have connected with the organisation.

Scope

Injury Matters operates within the bounds of legal obligations that dictate specific responsibilities regarding information handling. The organisation has adopted the following principles in this policy as minimum standards for handling personal information.

Injury Matters collects and administers a range of personal information for various purposes, as described in the Data Collection section below. The organisation is committed to protecting the privacy of the personal information it collects, retains, discloses and administers.

Injury Matters is bound by Australian laws that impose specific obligations when it comes to the handling of personal information. The organisation has adopted the following principles as minimum standards for handling personal data.

Injury Matters will:

1. Collect only information that the organisation requires for its primary function;
2. Ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered;
3. Use and disclose personal information only for our primary functions or a directly related purpose or for another purpose with the person's consent;
4. Storing or disposal of personal information securely, protecting it from unauthorised access; and
5. Provide stakeholders access to their information and the right to seek its correction or removal from our records.

Data Collection

Injury Matters may collect personal information from individuals when visiting the website, engaging with our services, or interacting with Injury Matters in other ways. The types of information that may be collected include Systems we use that adhere to Australian data security and privacy laws.

1. Personal Information: Name, address, email address, phone number, and other contact details.
2. Sensitive Information: Demographic, health information, and other sensitive data relevant to our services.
3. Website Usage Information: Information about how you use and interact with our website, such as but not limited to your IP address, browser type, device information, pages visited, broad demographic information (internationally) and referring Uniform Resource Locator (URL).
4. Social Media Platforms: Information obtained via interactions with posts from Injury Matters on Twitter, LinkedIn and Facebook is subject to the terms outlined in each platform's respective privacy policies. Identifiable information associated with your social media profile is collected when you interact with our page and content, including but not limited to comments and likes. It's important to note that Injury Matter may, at its discretion, remove interactions (not limited to comments, posts and tags) made via

social media if deemed unnecessary, inappropriate, harmful, spreading misinformation or not aligned with our [Service Charter](#).

5. Images: Images may appear in digital and print formats, including website, social media, newspaper, reports or other print media relating to Injury Matters. Images may be shared with Injury Matters Partner organisations when taken at an event in partnership with Injury Matters. The collection of images and consent process is detailed in our [Photo Consent Guide](#).

Team Members

As part of our recruitment and onboarding process, Injury Matters collects and stores personal data, employment details, health information, educational certification and training information, superannuation and taxation and financial information (e.g., bank details for salary payment and reimbursements), leave information, identification documents and reimbursement data. This information is securely stored on individuals' online files and through [HR Partner](#). With the support of our Information Technology provider, Winthrop, we may be required to share personal information in relation to your work device. You can find their Privacy Policy [here](#).

Community Members & Professionals

Information collected includes personal data obtained via verbal, written and other communication mediums. Information that is received at community events will be stored in accordance with our third-party software applications Keeper, Eventbrite, QuickMail, Survey Monkey, CorePlus and [Salesforce](#) privacy policy.¹

¹ Injury Matters has selected third-party applications due to their adherence to the required Australian privacy principles and requirements.

Students, Volunteers and Board Members

Injury Matters collects and stores personal data, employment details and health information from potential Student placements, Volunteers and Board Members as part of our recruitment and onboarding process. This information is securely stored on individuals' online files and through [HR Partner](#). Occasionally, should you require any technical assistance, we may use your personal data to connect you to our Information Technology provider, Winthrop.

Counselling Clients

As part of Injury Matters' counselling services, personal information will be documented and stored within CorePlus in accordance with their [Privacy Policy](#). While individuals have the choice not to provide all of their personal details, it's important to recognise that not providing certain information may limit the extent of counselling services that can be provided.

Clients who access our counselling services will have their personal data stored in CorePlus for up to seven years. Please be aware that individuals accessing our counselling services prior to turning 18 will have their personal information maintained in CorePlus for an additional seven years from the date they are over the age of 18.

All personal information shared during counselling sessions is treated with confidentiality and maintained securely unless the following conditions apply:

1. It's legally required due to a subpoena;
2. Non-disclosure could result in serious and immediate harm to the individual or another individual;
3. We have received your prior written consent to discuss the content with another party (e.g., a family member) and/or
4. Disclosure is mandated or authorised by law in other circumstances.

Disclosure

We will not disclose your personal information to any third party unless otherwise advised to you prior and/or you have consented to such disclosure or where we are required to do so by law. Should your actions breach our terms and conditions, or if we are obliged to disclose or share your personal data to comply with any legal obligation, we may disclose your information to a relevant authority. This may include exchanging information with other companies and organisations for fraud protection and credit risk reduction. Any disclosure of personal data will be strictly controlled and made in accordance with current Australian law. Injury Matters may sometimes share de-identified information with our funding bodies, such as the Department of Health or Road Safety Commission. This sharing of de-identified data is essential to enhance and support the effective delivery of services to our communities.

If identifiable information with these funding bodies needs to occur, Injury Matters will contact the affected individuals to seek informed consent before disclosing any personally identifiable information.

Health, Safety & Wellbeing

Injury Matters holds the right to use or disclose personal information where it is unreasonable or impractical to obtain consent as part of our Duty of Care, and we believe the use or disclosure is necessary to prevent a serious threat to the life, health or safety of any individual, or public health or safety. Personal information is primarily used to refer individuals to organisations and services where they can receive relevant assistance, but it is not limited to.

Accidental or Unauthorised Disclosure of Personal Information

Injury Matters places utmost importance on promptly addressing any unintended or unauthorised disclosure of personal information.

Injury Matters operates under the scope of the Notifiable Data Breaches Scheme (NDB Scheme) as outlined in the Privacy Act. Injury Matters is committed to adhering to the stipulations of the NDB Scheme in our assessment and response to suspected data breaches. If a breach involving personal information occurs, particularly if it is anticipated to result in significant harm to individuals, appropriate steps will be taken to notify the affected individuals.

Website Data

Injury Matters primarily gathers personal information from our website when individuals choose to provide such details through online forms.

Individuals who access our website to read or download information may have specific technical data captured that does not reveal the individuals' identity. This data includes general geographic location information and the timestamp of the visit. This data is used for statistical and developmental purposes only. Filling out personal information into any forms or subscriptions (e.g. eNews and eDirectory) incurs the storage of personal identifiable data; either via contact form, subscription form, or other forms.

We do not manage some features of the Injury Matters website and are instead facilitated by third parties. Acknowledging that these third parties might collect and store your personal information is essential. Examples of such third parties include Facebook, LinkedIn, YouTube, Campaign Monitor, SurveyMonkey, Twitter, and Google. These entities may not be subject to the Privacy Act in the same manner as Injury Matters under Australian law. We do not assume responsibility for the privacy practices of these third parties and recommend that you review each website's privacy policies and independently assess their reliability.

Data Security Measures

Two-factor authentication

Injury Matters strives to take a proactive approach to privacy and data security by implementing Two-factor Authentication, regular password refreshes, and e-learning to increase awareness of Phishing to mitigate risk. Two-factor authentication (2FA) is a multifactor authentication that requires Team Members to prove their identity using two methods/factors. The first factor is something the Team Member should know, such as their username and password combination. The second factor is a verification method that the user has in their possession. A typical example is entering a username and password, entering a code received via text message or entering a one-time code that refreshes every 30-60 seconds using an authentication app. Injury Matters has enabled 2FA on the applicable applications.

Injury Matters has recently introduced a password management program that enables role-based access control (RBAC) to support least-privileged access and tracks all user activity from every location and on every device.

While Injury Matters has made every effort to ensure that the cloud computing system provider it utilises enforces security measures to protect the confidentiality of individuals' information, it's important to acknowledge that we cannot provide an absolute assurance of data security.

Accessibility

Team Members' roles and responsibilities determine access to folders within the organisation's systems. Each team member is granted access only to the folders and data relevant to their assigned tasks and duties.

External Links

The Injury Matters website and internal systems may contain links to third-party websites. Injury Matters is not responsible for those sites' privacy practices or content. Individuals are encouraged to review the privacy policies of any third-party websites they visit.

Complaints, Feedback & Questions

Feedback & Questions

Injury Matters values and fosters a culture of open feedback and endeavours to provide prompt responses to any questions. If you have any feedback or questions, kindly use the contact options outlined below. We encourage all individuals who believe that Injury Matters may have infringed upon their privacy rights to contact us via the contact information outlined below. Upon receipt of the complaint or request, Injury Matters will promptly initiate a review as per our Complaints & Grievance procedure. Injury Matters is committed to achieving a swift and equitable resolution to all complaints, ensuring that Individuals' concerns are treated with the utmost seriousness.

How to Contact Us

General enquiries, requests to update personal information or complaints can be provided as below:

Email: info@injurymatters.org.au

Telephone: (08) 6166 7688

Post: PO Box 208, LEEDERVILLE WA 6903

Documentation

Documents related to this policy

Related policy	Code of Ethics and Conduct Delegation of Authority Policy Information and Communication Policy Microsoft 365 Governance Policy Risk Management Policy
Related processes	Complaints and Grievance Procedure Records Management Procedure Risk Management Procedure
Forms, record-keeping or other organisational documents	Service Charter

Document revision history

Version	Approval date	Review date	Prepared by	Comments
1	January 2024	January 2025	Toni Williams	Created