LIFELINE NORTHERN BEACHES, MOSMAN TO KIRRIBILLI

PRIVACY POLICY

Approved by Board	12 December 2024
Next review date	12 December 2026
Responsibility	CEO
Application	All staff & volunteers (**Workplace Participants**)
Version	1.3 (24 June 2026)
THIS POLICY ACTIVE FROM:	**1 December 2024**

Lifeline
NORTHERN BEACHES,
MOSMAN TO KIRRIBILLI

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1. About this Policy

Lifeline Northern Beaches Limited (ABN 205 250 079 849), trading as Lifeline Northern Beaches, Mosman to Kirribilli (**LLNBM2K**) cares about protecting your privacy and is required by law to comply with the Privacy Act 1988 (Cth) (**Privacy Act**).

This Privacy Policy outlines our privacy practices at LLNBM2K. It explains how:

- we collect, manage, use, store and secure your personal information.
- you may access and request correction of any record containing your personal information.
- you may make a complaint about a breach of privacy.

LLNBM2K acknowledges:

- that we aim to provide a range of national and local services and commercial activities to individuals who interact with LLNBM2K and may assess, maintain, improve, or otherwise provide support to community members in crisis or in need of one or more of our support services.
- that for the purposes of our privacy obligations, LLNBM2K also complies with the Mandatory Reporting Children and Young Persons (Care and Protection) Act 1998 (**Care Act**) and the Health Records and Information Privacy Act 2002 (NSW) (**HRIP Act**) which includes the privacy rules in the Health Privacy Principles (**HPPs**) in relation to all individuals who contact LLNBM2K services.

This policy is written in simple language. The specific legal obligations LLNBM2K has when collecting and handling personal information are outlined at a federal level in the Privacy Act, and in particular the Australian Privacy Principles (**APPs**) found in that Act, and at a State level in the HRIP Act and the HPPs.

2. Scope of this Policy

This Policy applies to our staff, volunteers, volunteer applicants (including Crisis Support students), contractors and suppliers, auditors, consultants, and researchers who seek access to our records and/or handle personal information collected by LLNBM2K. It also applies to personal information of individuals who are external to us such as donors, clients and suppliers.

It applies to our handling of personal information, which is broadly defined in, and has the same meaning as defined under, section 6 of the Privacy Act:

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

This Policy also refers to ‘sensitive information’ (a subset of personal information) which includes information or an opinion about racial or ethnic origin, political opinions, philosophical or religious beliefs and affiliations, sexual orientation, gender and gender identification, health or genetic information, and criminal record.

3. How we manage your personal information

We will take all reasonable steps to ensure that we are open and transparent about the way we collect and use your personal information. We will:

- maintain adequate security of personal information to seek to protect it from misuse, interference or loss from unauthorised access, modification or disclosure.
- conduct risk assessments to consider privacy impacts for all new and significant business projects.
- provide an option for you to use a pseudonym or otherwise be anonymous unless you are accessing a service offered by LLNBM2K which requires your name as part of the personal information needed to comply with applicable legislation, or unless it is impermissible, impractical or inhibits the adequacy or quality of service provided to you - For example, for the voice service or our general enquiries and feedback online form, your name and identifying information is not requested unless it is needed to adequately respond to your request or to assist you.
- provide relevant work training and privacy awareness on how the Australian Privacy Principles (**APPs**) and the Notifiable Data Breaches (**NDB**) Scheme apply to LLNBM2K and how they are reflected in privacy practices, procedures and systems.
- periodically review this Policy as well as the privacy practices, procedures and systems across our organisation to ensure that they remain appropriate to the changing environment.

4. Personal information we collect and hold

Where possible, personal information is collected directly from you with your consent at the time of your interaction with LLNBM2K. The main way we collect personal information about you is when you provide it directly or through your interaction with any of the following LLNBM2K services or activities:

Crisis support services
National crisis lines
Crisis Support Worker training (CSWT)

Community Programs
Counselling / Financial Counselling
Lifeline Connect
Support Groups
Aged Care Companion Program
Critical Incident Response

Community engagement and fund raising
Book fairs and book depot
Retail operations
Fundraising events and promotions
Workplace and community training
Community forums or events

Employment/Volunteering
Paid and volunteer workforce roles in all LLNBM2K teams

The information collected will depend on the nature of your interaction – for example, whether you use a LLNBM2K service, subscribe to a mailing list, donate, apply to become a volunteer, apply for employment, wish to partner or undertake research.

- If you share information with LLNBM2K, it will be protected in accordance with all the principles as outlined in Section 1.
- In addition to information collected directly from you, for some services provided by LLNBM2K, personal information is:
    - received from third parties where you are transferred or referred to us for the services that we provide.
    - received from third parties who obtain your personal information from publicly available sources.
    - transferred between our own services provided it relates to the primary purpose for which it was collected.
    - received from parents, other relatives, carers, self-provided, or other service providers.
- Personal information may be collected in hard copy form or electronic form. Hard copy records are required to be held securely. We hold electronic records in databases with security safeguards. Some of those databases are government controlled while some are held by a third-party provider (see Section 9).

5. Kinds of Personal Information

We will only collect personal information about you that is reasonably necessary for, or directly related to, our functions or activities to meet our objectives as discussed in Section 7.

Information collected may include name and contact details, further information about you that is needed to provide the service, and other information required by regulation or legislation. For some Community Programs, minimum information is required to provide the services.

6. When personal information is collected

We usually collect personal information from you when you:

- have contact with LLNBM2K over the telephone, zoom, Microsoft Teams or by text message.
- have contact with LLNBM2K in-person;
- interact online including via the LLNBM2K website, Facebook, Instagram, Tiktok and other social media platforms; and
- communicate with LLNBM2K in writing including via post and email.

Sometimes we collect personal information from a third party or a publicly available source, but only if you have consented to such collection or would reasonably expect us to collect your personal information in this way.

For example, we collect personal information:

- from referees provided by you in support of an application for a LLNBM2K position (as an employee, a contractor, or a volunteer).
- from third parties such as contractors (including fundraising service providers).
- from third party payment or ticketing platforms such as Stripe, Humanitix.
- from third party commerce platforms that facilitate on-line and in-person POS shopping such as Shopify.
- from specialty events platforms that facilitate on-line P2P fundraising, appeals and events such as Funraisin, Grassrootz.
- from other organisations that you have donated to, where you have consented to receiving information from like-minded organisations such as LLNBM2K.
- from academic and training organisations where required to verify a person's educational status.

Personal information, such as name and contact details, will not be recorded unless you provide this information to us, or if this information is otherwise captured by IT systems or call recordings, and together may create a reasonably identifiable record with LLNBM2K.

6.1 Persons under the age of 18

LLNBM2K makes no active effort to collect personal information from persons under the age of 18 (**Child** / **Children**), with the following exceptions for LLNBM2K Community Programs:

- information may be collected on adolescents for support groups.
- some individual clients are under 18 years of age: these records need to be kept until the person is 25 years old to comply with health record legislation.
- personal information may be collected relating to adolescents participating in volunteer activities to qualify for a Duke of Edinburgh Award.
- personal information may be collected relating to Children where the Child has contacted the support services and provides the information directly, or where another individual contacts LLNBM2K on behalf of the Child with child safety concerns.

In relation to donations, Children who do wish to submit information to LLNBM2K (to process a donation) should secure permission from their parent or legal guardian prior to doing so.

6.2 Collecting information through websites

LLNBM2K has its own public website — www.lifelinenb.org.au and there are several ways in which information is collected though the website.

6.3 Analytics

The LLNBM2K website uses Google Analytics to collect data about your interaction with the website. Google Analytics is hosted by a third party. The sole purpose of collecting your data in this way is to improve your experience when using the website. As an example, the types of data collected with these tools can include:

- your device's IP address (collected and stored in an anonymised format).
- device screen size
- device type, operating system and browser information

- geographic location
- referring domain and out link if applicable
- search terms and pages visited.
- date and time when website pages were accessed.

6.4 Cookies

Cookies are small data files transferred onto computers or devices by websites for record-keeping purposes and to enhance functionality on the website. Most browsers allow you to choose whether to accept cookies or not. If you do not wish to have cookies placed on your computer, please set your browser preferences to reject all cookies before accessing the LLNBM2K website. The core functionality on these platforms will be largely unaffected if you disable cookies in your browser but you may be unable to access some advanced functions.

6.5 Social Networking Services

LLNBM2K uses social networking services such as Facebook, Instagram, YouTube, Tiktok and LinkedIn to communicate with the public about Lifeline services and activities. When you communicate with LLNBM2K using these social networking services your personal information may be collected, but it is only used to help LLNBM2K to communicate with you and the public. The social networking service will also handle your personal information for its own purposes. These services have their own privacy policies. You can access the privacy policies for these services on their websites.

NB: LLNBM2K does not provide crisis support via LLNBM2K's social media platforms (e.g. LinkedIn, Facebook, Instagram or Tiktok).

7. Purposes for which we collect, use, and disclose personal information

At LLNBM2K we only use your personal information for the primary purpose for which it was collected, a secondary purpose to which you have consented, or for a purpose related to (or if sensitive information, directly related to) the primary purpose of collection and you would reasonably expect your personal information to be used for such purpose.

We collect, hold, use and disclose personal information only for primary, secondary and other purposes, with activities to meet LLNBM2K's objectives, including:

- to provide crisis support and suicide prevention services for each area of LLNBM2K's activities;
- to provide clients with counselling which follows the Australian Psychological Society (APS) Code of Ethics and the Australian Financial Counselling Code of Ethical Practice, as relevant;
- to support group services;
- to support research relevant to LLNBM2K's objectives;
- to comply with funding body requirements as part of a funding agreement with LLNBM2K;
- to operate fundraising and charitable activity in support of our objectives;
- to provide customer service functions, including handling customer enquiries, complaints and feedback;

- to facilitate proper governance processes such as risk management, incident management, internal audit and external audits, (e.g. required for insurance purposes);
- to gather feedback from you and other individuals about the quality of services that we provide so that the services we provide can be continuously improved;
- to satisfy legal obligations, comply with applicable laws and meet the requirements of bodies which regulate the services we provide; and
- to understand, through aggregated information, trends and patterns which we use for research and advocacy to fulfil other purposes which you have consented to.

8. Your consent to collect and use your personal information

Where consent to collection is sought, it is sought voluntarily from you, and we will inform you of what you are consenting to. Your consent will be specific to the services to be provided to you (see Section 5)

LLNBM2K may refer you to another service provider in which case your personal information may be sent to them with your consent so that their services can be provided to you.

We will not collect sensitive information about you unless you have consented; it is required by law; or in other special specified circumstances, for example relating to health services provision and individual or public health or safety, such as our duty of care in responding to a 13 11 14 call.

8.1 Consent for direct marketing

LLNBM2K may use some personal information for direct marketing purposes, but only where:

- The direct marketing communication contains a prominent statement that the individual may opt out of receiving that type of communication, and
- The relevant individual has not made such a request to opt out.

8.2 How Lifeline will obtain your consent for direct marketing

Individuals whose personal information is collected using a collection notice that references this Privacy Policy are taken to consent to the use of their personal information for direct marketing purposes unless they have specifically opted out.

8.3 Opting out of direct marketing

Email direct marketing communications will contain an ‘unsubscribe’ link that provides individuals with the opportunity to opt out of that specific direct marketing communication. In other circumstances, individuals who do not wish to receive any direct marketing communications from LLNBM2K may contact marketing@lifelinenb.org.au to opt out.

Individuals who have opted out of direct marketing may still receive administrative emails or phone calls, such as reminders to bank funds raised.

8.4 Removal of opt-outs

Individuals who have previously opted out of direct marketing communications may contact LLNBM2K should they wish to opt in once again. However, all such direct marketing communications must give the individual the opportunity to opt out as described above.

9. Disclosure to third parties

9.1 General Disclosure Practices

LLNBM2K does not disclose personal information to another person or organisation (including police, emergency services and other government agencies) unless one of the following applies:

- the individual has given express consent to the disclosure of their personal information or implied consent regarding non-sensitive personal information.
- the individual would reasonably expect, or has been told, that information of that kind is usually passed to those individuals, bodies or agencies and the disclosure:
    - in the case of personal information (that is not sensitive information) relates to the primary purpose for which it was collected; or
    - in the case of sensitive information, including health information, is directly related to the primary purpose for which it was collected; or
    - relates to collection from a third party, that being a charitable or other likeminded organisation, including third party service providers who facilitate the sharing of information between such types of charitable or like-minded organisations.
- the disclosure is otherwise required or authorised by law, including to comply with mandatory reporting requirements in relation to suspected cases of child abuse.
- LLNBM2K reasonably believes that the disclosure will prevent or lessen a serious and imminent threat to somebody's life, health or safety (including your own) or serious threat to public health, property or public safety.
- the individual has made threats to harm third parties.
- the individual has made threats against LLNBM2K personnel.
- the individual repeatedly makes nuisance or unwelcome contact; or
- the disclosure is to a LLNBM2K service provider as described below.

9.2 Confidentiality

All personal information gathered during the provision of any form of counselling at LLNBM2K will remain confidential and secure, except when:

- It is subpoenaed by a court; or
- Failure to disclose the information would place you or another person at risk of life, health or safety; or
- Your prior approval has been obtained:
    - to provide written report to another professional agency e.g. GP or a lawyer or
    - to discuss the material with another person e.g. parent or employer; or
- Disclosure is otherwise required by law.

9.3 Disclosure to service providers

LLNBM2K uses service providers that have access to personal information. These include providers that:

- translate interactions with you, if required, into the language you speak; and
- host LLNBM2K website servers and CRM systems such as Salesforce

LLNBM2K may refer you to another service provider in which case your personal information may be sent to them with your consent so that their services can be provided to you.

To protect personal information, LLNBM2K:

- enters into a contract which requires the service provider to only use or disclose the information for the purposes of the contract; and
- includes special privacy requirements in contracts, where necessary.

9.4 Disclosure of personal information overseas

Web traffic information is disclosed to Google Analytics when you visit LLNBM2K websites. Google stores information across multiple countries.

When you communicate through a social network service such as Facebook or LinkedIn, the social network provider and its partners may collect and hold your personal information overseas.

LLNBM2K's databases are hosted on secure servers and reasonable steps have been taken to ensure:

- the recipient of information is subject to a law, or binding scheme, that is substantially like the way in which the Australian Privacy Principles protect the information; and
- there are mechanisms to access and enforce that protection of the law or binding scheme.

10. Quality of personal information

LLNBM2K aims to ensure personal information is accurate, relevant and not misleading. To achieve this outcome, we apply the following data quality procedures:

- information is recorded in a consistent format;
- where necessary, confirm the accuracy of information collected from a third party or a public source;
- promptly add updated or new personal information to existing records; and
- review the quality of personal information before use or disclosure.

11. Storage and security of information

LLNBM2K takes steps to protect the personal information held against loss, unauthorised access, use, modification or disclosure, and against other misuse.

These steps include:

- only allowing personnel with a 'need to know' to access IT systems and records, including recordings and transcripts.
- undertaking background checks on personnel who require access to IT systems and records (where relevant).
- Using Multi-Factor Authentication.
- password protection for accessing electronic IT systems.
- securing paper files in locked cabinets and restricting physical access.

LLNBM2K regularly conducts security audits to review and test relevant systems and processes.

When no longer required, personal information is destroyed or deleted in a secure manner.

For credit and debit card transactions LLNBM2K complies with the Payment Card Industry Standards, which govern handling of payment card information.

12. Retention of records

In relation to crisis support services, LLNBM2K will store information for the relevant statutory period required.

In relation to children contacting the crisis support service, LLNBM2K will store the personal information for 7 years after the date on which the child turns 18, where their age and identity is disclosed.

Where it is unknown whether a child has contacted the service, LLNBM2K will retain the record for the relevant statutory period required for adults. LLNBM2K holds bankruptcy files and the files of complex financial counselling cases for a period of 5 years.

13. Access and correction

Privacy rules 12 and 13 in the Australian Privacy Principles (**APPs**) give you the right to ask for and receive access to personal information held about you and to ask for corrections to that personal information.

LLNBM2K will endeavour to respond within 30 days if you ask for access or correction of your personal information. You will be given access to your personal information and reasonable steps taken to correct it, if LLNBM2K considers it is incorrect, unless there is an exception in APP 12 or another law that allows or requires that to be denied. For example, access to your personal information will be denied if it is reasonably believed that:

- giving access would have an unreasonable impact on the privacy of other individuals.
- giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety.
- the request for access is frivolous or vexatious.

Individuals will be required to provide the following information before access or correction is undertaken:

1. **A written request** for access and/or to correct addressed to admin@lifelinenb.org.au

   To conduct a record search of the service databases, the following information is required:
   a. the date and time the contact was made, or service provided.
   b. and the number used to contact LLNBM2K's services; or
   c. the date, time and IP address used to access LLNBM2K's service.

2. **Proof of identity** (this may be achieved by the 100-point identification system and proof of contact number, certified statutory declaration).

- Access to personal information will not be provided unless the person seeking access is the person to whom the information relates, or the law otherwise supports such access. In some cases, additional proof of identity information may be required, or access may be denied because ownership of a record cannot be proven.
- If an access request relates to an individual who is deceased, the personal information will be released to the requester, in accordance with the Privacy Act, unless the information contains the personal information or sensitive information, including health information, of another living person who is reasonably identifiable from the information available.
- If access to, or correction of, your personal information is denied, you will be notified in writing setting out the reasons.
- If a correction is made and the incorrect information was disclosed to others, you can request they be notified about the correction unless there is a valid reason not to.
- If a correction to your personal information is denied, you can ask for a statement which indicates that you believe the information is incorrect, to be attached to the information.

14. How to make a complaint or contact LLNBM2K

If you wish to contact LLNBM2K about a privacy matter or you are concerned about the way your personal information has been handled, you can lodge a written request or complaint with the Chief Operating Officer at either of the following addresses:

Postal Address: 310 Sydney Road BALGOWLAH NSW 2093; or

Email: admin@lifelinenb.org.au

- If a written complaint is received, LLNBM2K will respond within 7 days and aims to investigate and resolve all complaints within 30 days of receipt.
- While we hope to resolve your complaint without needing to involve third parties, if you are not satisfied with the outcome, you can contact the relevant professional body or the Office of the Australian Information Commissioner (**OAIC**) at www.oaic.gov.au/privacy/privacy-complaints/. OAIC is independent of LLNBM2K.

If LLNBM2K becomes aware of a privacy breach, we will promptly investigate and, where appropriate, take remedial action and notify the individual affected in accordance with the Privacy Act.

15. References

- Photo, Video, Audio, Story – Consent to Usage Form
- Code of Conduct
- Privacy Act 1988 (Cth)
- Australian Privacy Principles
- Australian Privacy Principles – Implementation Guidelines
- Mandatory Reporting Children and Young Persons (Care and Protection) Act 1998
- Health Records and Information Privacy Act 2002 (NSW)
- Health Privacy Principles (NSW)

16. Version Control

Version No.	Description	Effective Date	Reviewer
v 1.3	Change of logo and legal entity, version control table	24.06.2026	HR Manager
v 1.2			
v 1.1			
v 1.0	Full policy refresh	01/11/2025	HR Manager