

Privacy Policy

Policy no: 012

Version 3

Approved on: 26 June 2025

Approved by: Health Equity Matters Board

1. Purpose

Health Equity Matters is committed to protecting the privacy of those with whom it works. In carrying out its work, Health Equity Matters manages personal information in accordance with the [Privacy Act 1988 \(Cth\)](#) (the Act) and Australian Privacy Principles (APPs), outlined in Schedule one of the Act.

This policy outlines Health Equity Matters personal information handling practices and explains:

- what personal information is collected;
- the purposes for which that information is collected, used and disclosed, and stored;
- how that information is collected, used and disclosed, and stored;
- how personal information can be accessed and updated; and
- how individuals can raise privacy concerns and complaints.

2. Scope

This policy applies to all of Health Equity Matters programs and operational activities. While the Privacy Act 1988 (Cth) is Australian, it is applied by Health Equity Matters through this policy across its Australian and international operations.

This policy does not apply to the collection, holding, use or disclosure of personal information of current and former employees that is an employee record. Once a job applicant becomes an employee, all pre-employment checks are considered part of the employment record.

3. Definitions

Term	Definition
Employee record	<p>A record of personal information relating to the employment of the employee. Examples include health information about an employee, as well as personal information relating to their:</p> <ul style="list-style-type: none"> • engagement, training, disciplining, resignation or termination of employment of an employee; • terms and conditions of employment including salary and hours of work; • personal and emergency contact details; • performance or conduct; • membership of a professional organisation or trade union; • leave; and • taxation, banking and superannuation affairs.¹
Personal Information	<p>Information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.²</p>
Sensitive information	<p>A subset of personal information, which is defined as information or an opinion about the racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs, membership of a trade union, sexual orientation, criminal record, health information or genetic information³</p>

4. Policy Statement

Health Equity Matters collects, holds, uses and discloses personal information to assist it achieve its vision and mission, manage its relationships with a wide range of stakeholders, ensure people are informed about its activities, and strengthen the organisation through fundraising and ensuring compliance with all legal and regulatory requirements. Health Equity Matters has a designated Privacy Officer who is the primary Health Equity Matters source of information regarding privacy matters.

5. Types of Information that We Collect

The types of information that Health Equity Matters collects includes:

- a. *International program partners*: Health Equity Matters may collect and hold information gathered from you in relation to integrity checks, due diligence assessments, capacity assessment and development plans, and key

¹ Australian Privacy Act 2018 (Cth)

² Australian Privacy Act 2018 (Cth)

³ Australian Privacy Act 2018 (Cth).

organisational and financial documents. Where you receive program funding from Health Equity Matters, banking/payment information will also be collected and held.

- b. *Job applicants:* Health Equity Matters may collect and hold information including your name, contact details, gender, age, references, CV, emergency contact, taxation details, qualifications and bank/payment details.
- c. *Consultants, volunteers and Board and Committee members:* if you are a consultant, volunteer or Board or Committee member, Health Equity Matters may collect and hold personal information including your name, contact details, gender, age, CV, qualifications, references, emergency contact, taxation details, payment details, background integrity checks, declarations of interests, and any complaints and incidents.
- d. *Members, affiliates and partners:* Health Equity Matters may collect and hold information including staff names and contact details, the organisation's physical and postal addresses, photos and logos.
- e. *Suppliers:* Health Equity Matters may collect and hold information including your name, contact details, services agreement contracts, billing information, information about goods and services supplied, references, and background integrity checks.
- f. *Donors:* we may collect and hold information including your name, contact details, contractual agreements, and background integrity checks.
- g. *Community members:* Health Equity Matters may collect your photo and story subject to your informed consent and in accordance with our Communications Policy.
- h. *Online information:* Health Equity Matters collects standard information about website visitors, including cookies provided by a third party. This anonymised information is accessed by Health Equity Matters in aggregate in order to enable the organisation to track statistics about website usage. This information may also be accessed by Google Analytics. Health Equity Matters will make no attempt to identify individual users or their browsing activities except where required by law. In addition, personal information is collected through the website or other online channels when individuals make a financial transaction, sign up to receive information from the organisation, send a message through our contact form, or submit personal information on our website.
- i. *Sensitive information:* we generally only collect sensitive information where you consent to the collection of the information and the information is reasonably necessary for one or more of Health Equity Matters' s functions or activities. However, the collection of sensitive information about an individual will be permitted where the collection is required or authorised by law or a court/tribunal or a health situation exists.

6. How We Collect Personal Information

Health Equity Matters will only collect personal information by lawful and fair means. We will collect personal information directly from you if it is reasonable or practicable to do so.

We may collect personal information in a number of ways, including without limitation:

- through application forms;
- by email or other written mechanisms;
- over a telephone call;
- in person;
- through financial transactions;
- through our website;
- by technology that is used to support communications between us;
- through publicly available information sources (which may include the internet and social media sites); and

- direct marketing database providers.

When Health Equity Matters collects personal information about you through publicly available information sources, it will manage such information in accordance with the Australian Privacy Principles (APPs). Health Equity Matters will notify an individual at the time of, or as soon as practicable thereafter, that this information is being collected and why it is being collected.

Unsolicited personal information is personal information that Health Equity Matters receives which it did not solicit. Unless Health Equity Matters determines that it could have collected the personal information in line with the APPs or the information is contained within a Commonwealth record, it must destroy the information.

7. Reasons for Collecting Personal Information

Health Equity Matters will collect personal information if it is reasonably necessary for one or more of its functions or activities.

The main purposes for which Health Equity Matters may collect, hold, use and/or disclose personal information may include but are not limited to:

- recruitment functions;
- screening and engagement of prospective program partners and consultants;
- training and events;
- surveys and general research;
- communications activities; and
- stakeholder relationship management.

Health Equity Matters may also collect, hold, use and/or disclose personal information if you consent or if required or authorised under law.

Health Equity Matters may use or disclose personal information (other than sensitive information) about you for the purpose of direct marketing (for example, advising you of new activities being undertaken by Health Equity Matters), if you have consented to the use or disclosure of the information for that purpose.

You can opt out of receiving direct marketing communications from Health Equity Matters by contacting the Privacy Officer in writing, emailing hello@healthequitymatters.org.au or if possible accessing Health Equity Matters' website and unsubscribing appropriately.

8. Disclosure of Personal Information

Health Equity Matters may disclose your personal information for any of the purposes for which it is was collected, as indicated under section 7 of this policy, or where it is under a legal duty to do so.

Disclosure will usually be internally and to related entities or to third parties such as contracted service suppliers.

Before Health Equity Matters discloses personal information about you to a third party, it will take steps as are reasonable in the circumstances to ensure that the third party does not breach the APPs in relation to the information.

9. Access to Personal Information

All individuals have the right to request access to the personal information Health Equity Matters holds about them. You may request access to that information by putting the request in writing and e-mailing it to the Privacy Officer.

Health Equity Matters will provide you with the information you requested in the manner you requested, where it is reasonable and practical to do so, or to provide it in some other way that meets the interests of Health Equity Matters and you.

There are certain circumstances in which Health Equity Matters may refuse to grant you access to the personal information. In such situations we will give you written notice that sets out: (a) the reasons for the refusal, where it is reasonable to provide these (b) mechanisms available to you to make a complaint.

10. Correcting Personal Information

Health Equity Matters aims to ensure that all personal information that it holds is accurate, complete and up-to-date. Please advise us if you become aware that any information we hold is inaccurate or incomplete so that it can be corrected.

If you want to change any information that you have previously provided us, if you want to opt out of future communications, if you do not want your donation details to be published by us, or if you would like to access the information we hold about you, please email that request to our Privacy Officer.

Health Equity Matters will take all reasonable steps to comply with your request.

11. Integrity and Security of Personal Information

Health Equity Matters will take all reasonable steps to:

- ensure that the personal information it collects is accurate, up-to-date and complete;
- ensure that the personal information that it uses or discloses is accurate, up-to-date and complete;
- protect the personal information from misuse, interference, loss and from unauthorised access, modification or disclosure; and
- destroy or de-identify information that it no longer needs (ensuring first, that it is not contained in any Commonwealth record and is not required by law to be retained).

12. Anonymity and Pseudonymity

You have the option of not identifying yourself, or using a pseudonym, when dealing with Health Equity Matters in relation to a particular matter. This does not apply:

- where Health Equity Matters is required or authorised by or under an Australian law, or a court/tribunal order, to deal with individuals who have identified themselves; or
- where it is impracticable for Health Equity Matters to deal with individuals who have not identified themselves or who have used a pseudonym.

However, in some cases if you do not provide Health Equity Matters with your personal information when requested, we may not be able to respond to your request or provide you with what you are requesting.

13. Privacy Enquiries and Complaints

Health Equity Matters is committed to working with individuals to obtain a fair resolution of any privacy concerns. If you are concerned about the way in which we are managing your personal information and think we may have breached the Australian Privacy Principles, or any other relevant obligation, please contact us using the contact details set out below. We will strive to resolve these matters as promptly as possible. Complaints may be required in writing and will be resolved as promptly as possible.

Any enquiries or complaints about Health Equity Matters handling of personal information should be directed to the Privacy Officer, the Principal Director, Corporate Services on +61 2 9557 9399 or at admin@healthequitymatters.org.au

If you are unhappy with Health Equity Matters response to your complaint, you may refer your complaint to the Office of the Australian Information Commissioner (OAIC):

- visiting their website at <http://www.oaic.gov.au>;
- calling their Privacy Hotline on 1300 363 992; and/or
- writing to:
The Australian Information Commissioner
GPO Box 5218
Sydney NSW 1042

14. Breach of this Policy

Any employee who is found to have breached this policy may be subject to disciplinary action, up to and including termination of employment.

15. Roles and Responsibilities

Who	Responsibility
Board	<ul style="list-style-type: none"> • Assure itself that Health Equity Matters is meeting its legal obligations under this policy. • Approve this policy and any updates.
CEO	<ul style="list-style-type: none"> • Foster a workplace culture that respects the privacy of personal information.

Privacy Officer (Principal Director, Corporate Services)	<ul style="list-style-type: none"> • As Privacy Officer, oversee and promote improvements to the policy and respond to privacy queries and complaints. • Initiate reviews and updates to the policy.
Managers	<ul style="list-style-type: none"> • Reinforce the policy and its application in their area of operation and with staff.
Health Equity Matters Personnel	<ul style="list-style-type: none"> • Adhere to this policy.

16. Related Policies and Documents

Policy	Title and Hyperlink
006	Code of Conduct Policy
038	Communications Policy
042	Complaints Handling and Whistleblower Policy
022	Recruitment and Selection Policy
041	Safeguarding Policy and Code of Conduct
016	Social Media Policy

17. Policy History

Date of update	Version	Key changes	Endorsed by	Approved by	Next review
26 June 2025	3	<p>Updated to change the name of Finance and Audit Committee to Audit and Risk Committee noting the name change was endorsed at 16 April 2025 Board meeting.</p> <p>*Note any references to Finance and Audit Committee in the Policy History is accurate as the name did not change until 16 April 2025</p> <p>Removal of “Business Operations and Finance Manager” and replacing with “Principal Director, Corporate Services”</p> <p>Amendment to who we collect information from – specifically the staff of our members (not just CEO/President) and on rarer occasions volunteers.</p> <p>Removal of “permissible” replaced with “if possible”</p> <p>Addition of Acronym for Australian Privacy Principle</p>	Audit and Risk Committee	Board	June 2028
11 July 2024	2	<p>Updated to strengthen the purpose statement, include definitions of key terms, and incorporate changes to privacy legislation. The latter changes were agreed in the Management Response to the Legal Compliance Review of Corporate Policies conducted by Corrs Chambers Westgarth in May 2024.</p>	Finance and Audit Committee	Board	July 2027
25 October 2018	1	<p>Establishment of inaugural Privacy Policy</p>	Principal Quality Lead	CEO	April 2020