



Privacy Policy

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1. INTRODUCTION

Lifeline South Coast is committed to protecting the privacy of personal information which it collects, holds, and administers in accordance with the *Privacy Act 1988* and the Australian Privacy Principles (APPs) contained within.

2. DEFINITIONS

<p>Personal Information</p>	<p>Personal information includes a broad range of information, or an opinion, that could identify an individual:</p> <ul style="list-style-type: none"> • an individual's name, signature, address, phone number or date of birth • sensitive information • credit information • employee record information • photographs • internet protocol (IP) addresses • voice print and facial recognition biometrics (because they collect characteristics that make an individual's voice or face unique) • location information from a mobile device (because it can reveal user activity patterns and habits)
<p>Sensitive Information</p>	<p>Sensitive information is personal information that includes information or an opinion about an individual's:</p> <ul style="list-style-type: none"> • racial or ethnic origin • political opinions or associations • religious or philosophical beliefs • trade union membership or associations • sexual orientation or practices • criminal record • health or genetic information • some aspects of biometric information
<p>Health Information</p>	<p>Health information' includes information or opinions about a person's:</p> <ul style="list-style-type: none"> • physical and mental health • disability (at any time) • health preferences (including future provision of health services) • use of health services • bodily donations (for example, blood, organs), and • genetics
<p>Crisis Supporter</p>	<p>A crisis supporter is a person who interacts directly with the help seeker when providing Lifeline Crisis Support services.</p>

<p>Australian Privacy Principles</p>	<p>There are 13 Australian Privacy Principles (APPs) and they govern standards, rights and obligations around:</p> <ul style="list-style-type: none"> • the collection, use and disclosure of personal information • an organisation or agency's governance and accountability • integrity and correction of personal information • the rights of individuals to access their personal information.
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3. PURPOSE

The purpose of this policy is to provide a framework for Lifeline South Coast in dealing with privacy considerations.

This Privacy Policy provides information and aims to be transparent around how Lifeline South Coast collects, handles and safeguards personal information. It also outlines how you can seek to access and correct your personal information and make a privacy complaint.

Appendix A to this Privacy Policy demonstrates Lifeline South Coast's compliance with the APPs.

4. POLICY

We will only collect personal information from you that is necessary for or directly related to our activities, programs, functions, events, and when you otherwise interact with us. We may also collect your personal information from third parties, such as social media.

The main way we collect personal information about an individual is when it is provided directly by you when accessing a Lifeline South Coast service, or when you work with Lifeline South Coast as a volunteer or paid staff member. The types of information collected will depend on who you are and the nature of your interaction.

Activities where we collect personal information include:

- providing crisis support and suicide prevention services;
- conducting education and training in suicide prevention, crisis support and mental health and wellbeing to Lifeline Crisis Supporters and external individuals and organisations;
- conducting research and evaluation and assurance activities to ensure the delivery of quality services and achieve continuous improvement in service delivery;
- training of Crisis Supporters and front-line workers to support individuals impacted by domestic violence, and Lifeline employees and contractors in other supporting programs. This includes trainers and students;
- conducting fundraising activities to raise funds to support the services of the Lifeline South Coast;
- receive a donation from you;

- assessing suitable candidates for career opportunities within Lifeline South Coast and managing your employment with us if you are an employee;
- assessing suitable candidates for volunteering opportunities within Lifeline South Coast;
- communicating with the public and the media, including through websites and social media, to raise public awareness of Lifeline services; and
- conducting investigations, and managing responses, in relation to complaints concerning Lifeline services and the operations of Lifeline South Coast.
- Complying with our legal obligations; and
- Assisting investigations and information requests from third parties, such as the police or the coroner, in accordance with the law.

4.1 Anonymous Interactions

Where possible, Lifeline South Coast will allow you to interact anonymously unless it is impractical, or an applicable Australian law requires us to only deal with an identified individual.

You can choose the information you provide, however some information that makes you reasonably identifiable may be collected.

If you choose not to share the information we request or to identify yourself, we may not be able to provide you with some or all our services.

4.2 Use for Primary Purpose and Certain Secondary Purposes

Lifeline South Coast must only use individuals' personal information for the primary purpose for which it was collected, a secondary purpose to which the individual has consented, or for a purpose related to the primary purpose of collection and the individual would reasonably expect the personal information to be used for such purpose.

Primary purposes (and secondary purposes for which consent is required) should be set out in collection notices, and may include:

Crisis Support Services	Providing crisis support and suicide prevention services to all Australians suffering emotional distress.
Service Quality	Recording interactions between Crisis Supporters or other Lifeline staff and the individual for the purpose of service quality, training, and improvement purposes in relation to Lifeline Australia's services.
Training	Delivering accredited training programs to students under the Lifeline Australia RTO and delivering non-accredited training programs to our community and other organisations, and for related program quality and continuous improvement purposes. This includes trainers and students.
Information Requests	Supporting Lifeline Australia and Lifeline South Coast's requirements in relation to investigating and facilitating the complaints process, in addition to assisting information

	requests from third parties, such as the police or the coroner, to undertake investigations.
Marketing & Fundraising	Communicating with individuals about donations, products, services, campaigns, causes, and events.
Research	Conducting and/or fund research into Lifeline Australia and Lifeline South Coast's programs and services or research into supporter attitudes and understanding how to improve crisis support services.
Volunteering & Other Support	Enabling individuals to assist with volunteering, community fundraising, advocacy, or other activities where community's assistance is sought.
Other Issues	Communicating with individuals in relation to Lifeline South Coast operations, activities, and objectives, to verify their identity, to improve and evaluate programs and services and comply with relevant laws.

Table: Lifeline Australia Privacy Policy v3.2

4.2.1 Disclosure of personal information

In addition to section 4.2, APP section 6.2 applies in relation to the use of personal information about an individual if:

- Disclosure of the information is required or authorised under an Australian law,
- A permitted general situation exists in relation to the use or disclosure of the information by us,
- If a permitted health situation exists in relation to use or disclosure of the information,
- We reasonably believe that the disclosure of the information is reasonably necessary for one or more enforcement body related activities.

In accordance with the *Privacy Act 1988, subsection 16B(2)*, where personal information is collected in accordance with rules established by competent health or medical bodies that deal with obligations of professional confidentiality which bind the organisation, we must take reasonable steps to ensure that the information is de-identified prior to disclosing that information in accordance with APP 6.1 or 6.2.

4.3 Consent to Collect & Use Personal Information

Consent for recording of interactions

Lifeline Australia may record calls received on its crisis support telephone lines for the primary purposes described above. Lifeline Australia does record calls received through CAREinMIND, MensLine Australia, MindHealth Regional Access, the Suicide Call Back Service, and SuicideLine Victoria.

Lifeline may use the call recording for the primary purposes, but only where the individual has been clearly informed that the call will be recorded, and the relevant individual has consented to the call recording.

How consent will be obtained

At the beginning of the call	Individuals whose personal information is collected will be notified using an Interactive Voice Response (IVR) which references this Privacy Policy prior to being connected to a Crisis Supporter. Individuals are taken to consent to the call recording for Lifeline's primary purpose unless once connected, they ask the Crisis Supporter to stop recording at the beginning of the call.
During the call	If individuals wish to terminate the call recording during their call with the Crisis Supporter or counsellor, they may request the Crisis Supporter or counsellor to terminate the recording. Any portion of the call recorded until the point of termination will be maintained by Lifeline Australia in accordance with this Privacy Policy.

Table: Lifeline Australia Privacy Policy v3.2

In relation to employees and volunteers of Lifeline using a Lifeline Australia service:

- Employees and volunteers conducting a call that is recorded must be provided with a written notice that the calls they answer on the service line will be recorded and of the primary purposes of the call recording.
- Employees and volunteers will be given reasonable opportunity to give their consent to the call recording.

Consent for direct marketing

Lifeline South Coast may use individuals' 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.

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.

Opting out of direct marketing

Email direct marketing communications should contain an 'unsubscribe' link that provides individuals with the opportunity to opt out of direct marketing communications. In other circumstances, individuals who do not wish to receive direct marketing communications from Lifeline South Coast may contact us at (02) 4228 1311 or admin@llsc.org.au to opt out or use the opt out provided on the direct marketing material.

Lifeline South Coast must take all necessary steps to opt such individuals out of direct marketing communications. Requests to opt out of direct marketing

communications should be treated in the first instance as a request to opt out of the campaign or event to which the communication relates. However, individuals must be given the opportunity to contact Lifeline South Coast (for example, by phone) to opt out of all direct marketing communications, across all programs, events, and channels.

Individuals have the right to request that Lifeline South Coast do not use or disclose personal information that may have been collected for the purpose of direct marketing, as well as request Lifeline South Coast to provide how the personal information was obtained. Lifeline South Coast will endeavour to respond to requests of this kind within a reasonable timeframe unless it is impractical to do so.

Removal of opt-outs

Individuals who register for events, make a donation or otherwise provide their personal information for marketing-related purposes after they have previously opted out of direct marketing communications should be taken to have 'opted in' once again and may receive direct marketing communications. However, all such direct marketing communications must give the individual the opportunity to opt out as described above.

4.4 Collection and Use of Personal Information

4.4.1 Information Collected

Lifeline South Coast tries to only collect personal information that is reasonable and necessary for, or directly related to, an activity we are undertaking to carry out our objectives. This may include, but not limited to, when you contact us:

- via telephone, in person, email, social media or website;
- when you join our customer loyalty program;
- when you register for training.

The kind of personal information we may collect, and its uses are described below.

Information collected in provision of a Lifeline crisis support telephone service

Lifeline collects information you provide to the voice support service through providing services to you.

Personal information, such as your name and contact details, will not be recorded unless you provide this information to Lifeline, or if this information is otherwise captured by its systems or call recordings. The following personal information which may include your sensitive such as health information, may be collected depending on your interaction with Lifeline:

Your name or the names of people you tell Lifeline about	Such as friends or family you are concerned about.
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Your telephone number	If you use Lifeline's text-based service, then this will be used to communicate with you. Lifeline's telephone system might also display the number you call us from, or you might give your number to Lifeline for Lifeline Australia to contact you again.
Your address or location	If Lifeline need to make sure you are in a safe space, or if Lifeline need to support you by asking authorities to visit your location.
Details about you and others which are relevant to the call	For example, if you tell Lifeline about your health, about the loss of a loved one, about a drug or alcohol problem affecting you or someone you know, or if you are thinking about suicide or are worried that someone you know might attempt suicide. Lifeline take notes about the things you say to us so that we can figure out the best way to help you.
If Lifeline make a care plan for you	Then Lifeline might make notes about the actions recommended for you to take or the information given to you.
If you use Lifeline's telephone service, then the system will record and store any information	Noises or other sounds captured by the call recording, in addition to call time and duration, originating area of the call, and telephone number (if unblocked). This information is stored separately to other information Lifeline collect when individuals access its services.

Table: Lifeline Australia Privacy Policy v3.2

These records are stored in a system managed and maintained by Lifeline Australia.

Information collected when you volunteer

Personal or sensitive information necessary to enable us to assess your application is collected. Depending on the role, this may include

- Your resume, statement addressing the criteria and referee reports
- Proof of Australian citizenship or residency
- Employment and volunteer history
- Copies of academic qualifications
- Criminal history and/or a working with children background check
- Health related information supplied by an employee or their medical practitioner
- Information relating to training and development

Volunteers for Board member positions may also have to provide information relevant to assessing conflict of interests and ACNC disclosure.

Information collected when you seek employment

We collect personal or sensitive information necessary to enable us to assess your application for employment, such as

- Resume, statement addressing the criteria and referee reports
- Written tasks undertaken by you during the selection process
- Copies of academic qualifications

- Criminal history and/or a working with children background check

Information collected in relation to employment

- Employment contract
- Information collected in relation to employment
- Proof of Australian citizenship or residency
- Copies of academic qualifications
- Health related information supplied by an employee or their medical practitioner
- Taxation details
- Banking details
- Superannuation details
- Information relating to training and development

As an employer Lifeline South Coast is a TFN recipient in accordance with s17 of the Privacy Act 1988, Privacy (Tax File Number) Rule 2015. Under the TFN Rule, a TFN recipient must not record, collect, use or disclose TFN information unless this is permitted under taxation, personal assistance or superannuation law.

Lifeline Australia facilitates the use of a Workforce Management System (WFMS) by the Lifeline Members for the purpose of forecasting call demand and the allocation of resources across the Lifeline Member network (to support voice and digital (text and chat) services).

The WFMS holds details of each Crisis Supporter's name and contact details; skills and training, rostered shifts, and employment status (employee or volunteer).

Information collected in relation to CSWT, DV and Other Training

We collect personal information such as student contact details, Unique Student Identifier (USI), enrolment forms and academic records which are required by law to be collected on behalf of Lifeline Australia as a Registered Training Organisation (RTO).

This is following the Lifeline Australia RTO Compliance Manual. RTO number is 88036.

We collect information from trainers and assessors to verify they possess the requisite qualifications to deliver training and education.

Information collected when you seek Financial Counselling Services

The Financial Counselling service closed on 30th June 2023. Personal information was collected during the operation of the service, records are archived for seven years.

Personal information collected included address, date of birth, living arrangements, income, employment, cultural background including if you identify as CALD, Aboriginal or Torres Strait Islander. The information collected was necessary to enable us to assess eligibility for service, this may include presenting issues, referral points, support services.

An electronic account of client's situation, work undertaken, and outcomes are recorded on a secure archived data base.

Information collected in relation to Fundraising or Purchase payments

For the avoidance of doubt, fundraising refers to the activities undertaken by Lifeline South Coast to raise funds to support its services. This includes (but is not limited to), facilitating donations, sponsorships, workplace giving and fundraising campaigns.

When you make a donation, we collect your name and contact details, your credit card number, the card expiry date and the amount donated. The only information that is required when you make a donation via our website is your credit card details.

Donors also have the availability to 'opt in' to providing other information such as date of birth, employment information, including but not limited to job title, opinions via surveys and questionnaires. This information can be provided to Lifeline South Coast in an 'opt in' basis, and donors may opt out of this at any time.

Purchases refers to payment for goods or services from Lifeline South Coast. This may include, but not limited to:

- Name and contact details, if consented
- Electronic registration and payment of training
- EFTPOS payment of goods in one of our shops or events

4.4.2 Collection Notices

Where Lifeline South Coast collects personal information from an individual in relation to fundraising, that individual should be provided with a collection notice.

Collection notices should generally be provided at the time the information is collected. Where this is not practical (for example, where information is collected from a third party), the collection notice should be provided at the time of first contact with the individual.

The collection notice should cover as many of the following matters as is reasonably practicable in the circumstances:

- Lifeline South Coast's name and contact details
- If the personal information was collected from a third-party source, how it was collected
- Where the personal information is required or authorised under an Australian law or a court/tribunal order – the fact that the collection is required / authorised
- The purposes for which the information is being collected
- The consequences to the individual of not providing the information
- To whom Lifeline South Coast usually discloses that kind of personal information
- Information about how to find or obtain our Privacy Policy, as well as information on access to and correction of personal information and how an individual may complain about a breach of the Australian Privacy Principles

- Whether we are likely to disclose personal information to overseas recipients, and if practicable, the countries where they are located.

4.4.3 Direct Marketing

Lifeline South Coast may use individuals' 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.

4.5 Personal Information Collected from Third Parties

From time to time, we collect personal information from a third party or a publicly available source, only where the individual has consented to such collection or would reasonably expect us to collect their personal information in this way.

For example, we collect personal information:

- from referees provided by you in support of an application for a Lifeline South Coast position with us (either as an employee or as a contractor);
- from third parties such as contractors (including fundraising service providers) and list vendors;
- from other organisations that you have donated to, where you have consented to receiving information from like-minded organisations such as Lifeline Australia; and
- from academic and training organisations where required to verify a person's educational status.

We may also collect personal information about you from a third party during a person calling a Lifeline service such as the 13 11 14 telephone service. As we do not create records that identify people who use Lifeline services, personal information about you that is provided by another person in these circumstances, will not be contained in a record that is easily linked to you.

4.5.1 Unclear Consent

If personal information about an individual is collected from a third party and it is unclear that the individual has consented to the disclosure of their personal information to Lifeline South Coast, reasonable steps should be taken to contact the individual and ensure they are aware of the collection. In most cases, this can take place simultaneously with the first use of the information.

4.5.2 Unsolicited Information

If Lifeline South Coast receives personal information that was not solicited, and it is reasonable that we would not have collected the information in accordance with APP 3, we will destroy the information and ensure it is de-identified.

4.6 Minors

With specific reference to donations made to Lifeline South Coast:

Lifeline South Coast makes no active effort to collect personal information from children under the age of 18. Children who do wish to submit information to Lifeline South Coast (to process a donation) should secure permission from their parent or legal guardian prior to doing so.

4.7 Collecting Information via Websites

Lifeline South Coast has its own public website — www.lifelinesouthcoast.org.au. There are several ways in which we collect information through our website.

Analytics

We use Google Analytics to collect data about your interaction with our website. The sole purpose of collecting your data in this way is to improve your experience when using our site.

The types of data we collect with these tools include:

- your device's IP address (collected and stored in an anonymized 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; and
- date and time when website pages were accessed.

Cookies

Cookies are small data files transferred onto computers or devices by websites for recordkeeping 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 our 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.

Social Media

We use social media sites such as Facebook, Instagram, and LinkedIn to communicate with the public about Lifeline South Coast services. When you communicate with us using these social networking services we may collect your

personal information, but we only use it to help us to communicate with you and the public.

Social media sites will also handle your personal information for its own purposes. These services have their own privacy policies. You can access the privacy policies for Facebook, Instagram, and LinkedIn on their websites.

NB: Lifeline South Coast does not provide crisis support or suicide prevention services via Lifeline South Coast's social media platform (Facebook, Instagram, or LinkedIn).

4.8 Disclosure

Lifeline South Coast 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 consented to the disclosure of their 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:
 - o 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 is directly related to the primary purpose for which it was collected; or
 - o relates to collection from a third party outlined in this policy, 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; or
 - o Contractors and service providers who perform services on our behalf, such as mailing houses, printers, information technology service providers, data matching and data washing service providers, database contractors and telemarketing agencies.
- the disclosure is otherwise required or authorised by law;
- we reasonably believe 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 Lifeline South Coast personnel;
- the individual repeatedly makes nuisance contact including calls, chats or emails; or
- the disclosure is to a Lifeline South Coast service provider as described below.

From time to time, we may compile statistical data from the personal information we have collected. In these instances, the data will be aggregated and de-identified before it is disclosed to third parties.

4.9 Quality of Personal Information

To ensure that the personal information we collect is accurate, up-to-date, and complete we apply the following data quality processes:

- we record information in a consistent format through an IT system provided by Lifeline Australia that enables 13 11 14 and supports consistent recording;
- where necessary, confirm the accuracy of information we collect from a third party or a public source;
- promptly add updated or new personal information to existing records; and
- regularly audit our contact lists to check their accuracy.

We also review the quality of personal information before we use or disclose it. The way we apply the above data quality procedures depends on the nature of the personal information. For example:

- we do not create customer specific records (or records which are attributed to a specific person) for people who use Lifeline services such as the 13 11 14 telephone service and accordingly, have little reason to update personal information that may be included in such records;
- we do not, as a matter of standard practice, confirm the accuracy of personal information provided by a third-party using Lifeline services. We would only act on the information (irrespective of its quality) by disclosing it if we reasonably believe that the disclosure is necessary to prevent or lessen a serious and imminent threat to somebody's life, health or safety or serious threat to public health or public safety; and
- we keep employee specific employment and volunteer records and accordingly update those records to include new personal information.

4.10 Storage & Security of Information

Lifeline South Coast takes steps to protect the personal information we hold 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 our IT systems and records;
- password protection for accessing our electronic IT systems; and
- securing paper files in locked cabinets and physical access restrictions.

We may also store personal information electronically in the cloud.

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

4.11 Access & Correction

Australian Privacy Principles (APPs) 12 and 13 give you the right to access personal information we hold about you and to request corrections to that personal information.

You may at any time request access to, or correction of, the personal information we hold about you. Lifeline South Coast will seek to respond to your request within 30 days.

A written request to access and/or correct your personal information should be addressed to the Privacy Officer and sent either via email to admin@llsc.org.au or via post to PO Box 404, Wollongong, NSW 2500.

If you ask for access to personal information that Lifeline Australia holds about you, individuals will be required to provide the following information before access or correction is undertaken:

- A written request for access and/or correct addressed to the Privacy Officer and sent either via email to secretariat@lifeline.org.au or via post to PO Box 173, Deakin West, ACT 2600.
- In order to enable Lifeline Australia to conduct a record search of our crisis support and suicide prevention service data bases we require you to provide us the following information:
 - the date, time and number used to contact Lifeline's 13 11 14 service or Text4Good service; or
 - the date, time and IP address used to access Lifeline's online crisis support chat service.
- Proof of identity (this may be achieved through a number of means, including using the 100-point identification system and proof of contact number, certified through a legal practitioner, pharmacist, police officer or GP with an accompanying statutory declaration).

Lifeline South Coast will not provide access to personal information unless we have verified that 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 have to be denied because ownership of a record cannot be proven.

If we refuse to give you access to, or correct, your personal information, we will notify you in writing setting out the reasons.

If we make a correction and we have disclosed the incorrect information to others, you can ask us to tell them about the correction. We must do so unless there is a valid reason not to.

If we refuse to correct your personal information, you can ask us to attach a statement which indicates that you believe the information is incorrect, and why.

4.12 Complaints

If you wish to contact us about a privacy matter or are concerned about the way Lifeline South Coast have handled your personal information, you can lodge a written request or complaint with our Privacy Officer at either of the following addresses:

Postal Address: PO Box 404, Wollongong, NSW 2500; or
Email Address: admin@llsc.org.au

We will investigate any complaint and will notify you of our decision in relation to your complaint as soon as is practicable after it has been made (usually within 30 days).

If you are dissatisfied with our investigation of your concerns, you can lodge a complaint to the Office of the Australian Information Commissioner who is independent of Lifeline Australia.