



Privacy Policy

Details

Policy & Procedure Owner	ERFA Board	
Approved by	ERFA Board of Directors	
Date Approved	Date of Last Revision	Next Review
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Abbreviations

ACFID	Australian Council for International Development
APPs	Australian Privacy Principles
ERFA	Edmund Rice Foundation Australia
PCI DSS	Payment Card Industry Data Security Standards

Definitions

Associates	Anyone in the community who interacts with ERFA Staff and Partners
ACFID Member	A not-for-profit organisation that has obtained accreditation with ACFID
Donors	Members of the public who contribute to ERFA in cash or in kind
Partner	Any organisation which has an MOU / contract with / or receives funding from ERFA
Program	Programs are overarching development approaches and initiatives that set priorities and guide project outcomes, results and activities. Programs can comprise ministries or entities
Projects	Projects are the development activities of a Program supported by ERFA
Project Beneficiaries	Children and adults who participate in and benefit from ERFA-funded programs
Staff	Employees, contractors, subcontractors, outworkers, apprentices and trainees, work experience students, volunteers, employers and any other person who performs work for ERFA or ERFK

Contact information

Chief Executive Officer	Bren Arkinstall - barkinstall@edmundrice.org
Programs Director	Emily Faller – eifaller@edmundrice.org
ERFA Board Chair	Paul Gallagher – chair@erf.org.au
ERFA	www.erf.org.au or +61 7 3621 9649
ACFID	http://www.acfid.asn.au or +61 6 02 6285 1816

Attached documents

- Image & Story Use Consent Form
- Program Story Form
- Questionnaire Forms
- ERFA Clauses for Collection of Personal Information

Related policies

- Child Protection Policy
- Complaints Handling Policy
- Human Resources Policy

Related forms

- ERFA Ethical Decision Making Framework
- The Australian Privacy Principles Summary

Implementation plan

- Included as part of staff induction
- Refresher trainings when revised

Compliance

Adherence to this Privacy Policy is a mandatory requirement for all Staff that act for, represent or visit ERFA and ERFA funded programs.

Organisational overview

The Edmund Rice Foundation Australia (ERFA) believes education is the key to sustainable change. We are an international development organisation that focuses on sustainable and transformational education. We operate in some of the poorest communities in the world, including Africa, East Timor, the Philippines, and Papua New Guinea. We also run domestic programs in Australia. ERFA's goal is to design and implement high impact education programs that will enable our beneficiaries to stand independently and break free from the cycle of poverty. ERFA-funded education programs range from kindergartens to advanced microfinance projects and are designed with the needs of the community at their core.

Legal definitions

Edmund Rice Foundation (Australia) is a company limited by guarantee. The objects of the company are set out in clause 3 of ERFA's constitution. Clause 3 (f) reads as follows:

To develop partnerships with overseas aid agencies or formal arrangements with other delivery agents related to the Company but resident in Developing Countries for the implementation of the objects in paragraph (a).

One of ERFA's roles is to act as trustee of the Edmund Rice Overseas Aid Fund.

Throughout its policies and official documentation ERFA uses the term **Partners** for those organisations with which it has formed alliances in developing countries for the receipt of overseas aid funding for the in-country delivery of education programs. Whilst ERFA has an active, engaged and qualitative role with these programs, working to build capacity and maximise the impact of best practice development outcomes, these are not partnerships in the legal sense. Rather they are alliances that ERFA has formed with in-country organisations with whom ERFA has communicated its vision, mission, values, policies and expectations with respect to sustainable development and whose own vision, mission, values, policies and development goals are congruent with those of ERFA. The in-country organisations implement the programs and ERFA supports them.

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1.0 Policy overview

Edmund Rice Foundation (Australia) (ERFA) is committed to protecting the privacy of all of its stakeholders, including Staff, Partners, Project Beneficiaries, Donors and any other Associates who otherwise interact with ERFA or its programs. We ensure that our methods of private information management are transparent at all stages of the information collection, usage and storage process. The information contained within this policy is in accordance with the Australian Privacy Act (1988) and the Australian Privacy Principles (APPs) enclosed within the Act. This policy indicates sections where conditions of one of the 13 APPs are satisfied.

Where necessary, this policy makes a distinction between ERFA's stakeholder categories of: Staff and Partners, Program Beneficiaries and Donors. The organisational relationship that ERFA maintains with its Staff and Partners, including matters of information collection and privacy protection, is made explicit to them. The information collected from these stakeholders is critical to the functioning of a secure and honest workplace; as such, Staff and Partners are unable to refuse the collection of certain personal information such as criminal record checks and employment history. Details of the organisation-employee relationship are further enclosed within ERFA's Human Resources Policy.

Project Beneficiaries represent ERFA's most vulnerable stakeholder category. Hence, extra precautions are taken to secure their personal information: they are entitled to refuse the collection of their personal information of any kind. Most Project Beneficiaries will not be requested to provide their personal information from ERFA. The information collected from a select few of these stakeholders is typically of a statistical nature, used to provide insight into the impact of ERFA's programs, or of an anecdotal nature, used for marketing communications.

Compared to other stakeholders, Donors maintain a more temporal, implicit and customer-oriented relationship with ERFA; as such, donors might interact with ERFA without knowledge of our organisation's specific privacy policies. For certain procedures, ERFA assumes lengthier, context-specific measures to safeguard the privacy of its Donors. Donors comprises those stakeholders that either have a history of donating to ERFA or have the potential to donate to ERFA in the future, in other words, those stakeholders who don't assist in delivering ERFA's projects and who aren't the beneficiaries of ERFA's services.

1.1 Free, prior and informed consent

ERFA's definition of consent:

- **Free:** the contributor experiences no coercion or manipulation in providing consent for the collection, storage and disclosure of their personal information. The most appropriate form of consent (i.e., written, vocal) commensurate to the context is solicited from the contributor. The contributor is in a position to comprehend the process and understand their rights in approving or refusing consent. If consent is being provided by a guardian on behalf of a contributor, the guardian can be reasonably deemed as having the contributor's safety and wellbeing at heart.
- **Prior:** consent is sought sufficiently in advance of authorisations or disclosures of personal information. Sufficient time is provided between a contributor providing their consent and the disclosure of their personal information to allow them to withdraw their consent.
- **Informed:** the contributor is provided with all information relevant to their disclosure. They are not deceived by the information collector either deliberately or by omitting pertinent information. The contributor is informed of their ability to remain anonymous if they prefer. The contributor is provided with a reasonable account of the purposes of disclosing their personal information. The contributor is provided with a reasonable account of the audience profile who may be privy to their personal information.

2.0 ACFID context

The ACFID Code of Conduct requires that members have in place a Privacy Policy that satisfies the following conditions as a minimum:

- meets the requirements of privacy legislation and which is available on the organisation's website;
- relates to the full range of member's stakeholders - its supporters, workers, volunteers and the children and communities it works with;
- complies with the APPs and the Payment Card Industry Data Security Standard (PCIDSS).

This Privacy Policy completely satisfies these conditions.

The ACFID Code of Conduct also makes recommendations for the following conditions to be met:

- a policy statement or guidance document that addresses expectations for transparency, including what information is made public and when

These conditions are also addressed within this Privacy Policy.

3.0 Collection and usage of information

3.1 Soliciting of personal information

ERFA collects solicited personal information directly from our stakeholders when they make contact with us through various channels, including in-person, online, over the phone or in written form. By visiting our website at erf.org.au, making a donation, signing up to our newsletter, filling out a survey, applying for employment, or providing us with their information by any other means, our stakeholders acknowledge that their information is being solicited, collected, used and stored in accordance with this Privacy Policy ([APP 3](#)).

ERFA takes reasonable steps to ensure that stakeholders are informed when their information is being collected ([APP 5](#)). In these instances stakeholders are provided with the following information from ERFA:

- ERFA's contact details;
- the nature of the information and the manner in which it was collected;
- whether ERFA's collection of information is authorised by law;
- the reasons ERFA collected personal information;
- the consequences for ERFA if personal information is not collected;
- ERFA's usual disclosure procedures of collected information;
- reference to ERFA's Privacy Policy;
- whether ERFA is likely to disclose personal information to overseas recipients.

3.1.1 ERFA Clause for Collection of Personal Information (see page 18)

Such information is consolidated into a clause visible on the ERFA website by navigating through the pages: [About] – [Policies] – [Privacy Policies]. The clause is included below:

"Edmund Rice Foundation (Australia) is committed to the lawful collection of personal information under the Australian Privacy Act (1988). We collect personal information for marketing and communications purposes. Without such information we are unable to conduct stakeholder engagement and fundraising activities to the best of our ability. By visiting our website, making a donation, signing up to our newsletter, filling out a survey, applying for employment, or providing us with your information by any other means, you agree to the collection, usage, disclosure and storage of, and access to your personal information, as contained in our Privacy Policy. ERFA does not disclose personal information to any overseas recipients. For further enquiries regarding our privacy measures or to update your personal information please contact us at +61 7 3621 9649 or info@erf.org.au."

3.1.2 Shortened ERFA Clause for Collection of Personal Information

A shortened version of this clause, including a link to ERFA's full Privacy Policy, is included within all communications distributed to stakeholders where it is reasonable to do so, such as within online and written communications. The shortened clause is provided below:

"Edmund Rice Foundation (Australia) is committed to the lawful collection of personal information under the Australian Privacy Act (1988). For further enquiries regarding our privacy measures or to update your personal information please see our Privacy Policy or contact us at +61 7 3621 9649 or info@erf.org.au"

Stakeholders who contact an ERFA representative in-person or over the phone will be directed to ERFA's Privacy Policy webpage if they have enquiries relating to the collection of personal information.

3.2 Staff and Partners

Personal information that ERFA may collect from Staff and Partners includes:

- personal details such as name, signature, or date of birth;
- contact details;
- employment history, educational qualifications, tax file numbers and volunteering history – with respect to prospective employees and volunteers.

Such information is reasonably necessary for ERFA to liaise with and to assess the employment credentials of its Staff and Partners. ERFA does not collect sensitive information from any of its stakeholders, excepting Staff and Partners who are subject to a criminal record check ([APP 3](#)). This is a necessary step to ensure the safety of our projects and the integrity of our stakeholders. All Staff and Partners are asked for their consent before conducting a criminal record check ([APP 3](#)). However, parties that refuse to the collection of this information will not be permitted to work for or alongside ERFA. ERFA maintains separate policies that pertain to the collection and security of the personal information of our Staff and Partners, as contained in our Human Resources Policy.

3.3 Project Beneficiaries

Personal information that ERFA may collect from Project Beneficiaries includes:

- personal details such as name;
- on a limited basis, contact details such as phone number or email address;
- the location and nature of the ERFA-affiliated project the beneficiary is engaged in;
- images and video footage of project beneficiaries;
- 'stories': personal accounts of a project beneficiary's experience with an ERFA-affiliated project.
- sensitive information such as a Beneficiary's health status. ERFA ensures that the express consent of a Beneficiary is obtained when collecting such sensitive information ([APP 3](#)).

Such information is reasonably necessary for ERFA to conduct impact reporting and fundraising activities. Impact reports are necessary to monitor the success of ERFA projects. On occasion, surveys of Project Beneficiaries are necessary to gauge the reception of our projects and identify areas for improvement. Likewise, impact reports are critical to communicate our efforts to Donors and maintain transparency. In particular, anecdotal impact evaluations, the type we obtain by collecting images of and individual 'stories' from our Project Beneficiaries, are the most successful at spurring Donor engagement.

A child or their guardian must give their free, prior and informed consent for ERFA to collect and publish their personal information and identifying images for communications purposes. They can do this by either:

- signing a locally-translated copy of ERFA's Story & Image Use Consent Form (see page 16)

which permits ERFA to use their personal information indefinitely and without compensation.

- signing their Program's general consent form which contains ERFA's Clause for Collection and Publication of Personal Information (see page 17).

For the sake of convenience, some Programs might ask Beneficiaries, including children, to sign a general consent form, rather than administer consent forms every time personal information is collected. These Programs are required to include within their consent form a clause that commits the beneficiary to their information being used indefinitely and without compensation by ERFA.

When soliciting consent to use a Beneficiary's image, video or story, details should be provided as to how and where their image, video or story might be used, such as in social media posts, supporter newsletters, quarterly impact publications and annual impact publications. The Beneficiary must also be informed of their ability to use a pseudonym when filling out surveys, providing a 'story' or otherwise engaging us in one-off correspondence.

3.4 Donors

Personal information that ERFA may collect from donors includes:

- personal details such as name, signature, or date of birth;
- contact details;
- payment details;
- donation history.

Such information is reasonably necessary for ERFA to process donations and to send relevant information to donors such as tax-deductible receipts and remittance advices. ERFA has limited access to donors' payment details, restricted to information necessary for identification purposes, such as the last 4 digits of a donor's payment card; the remainder of a donor's payment details are encrypted. ERFA maintains a register of the personal, contact and payment details of its historical donors. Donors have the option to deal with ERFA on an anonymous basis or to use a pseudonym when making a donation or otherwise engaging us in one-off correspondence ([APP 2](#)). Donors are entitled to decline the collection of their personal information by contacting ERFA directly. ERFA's contact details are clearly displayed in the ERFA Clause for Collection of Personal Information (see section 3.1.1). However, donors that wish to initiate an ongoing relationship with ERFA, or to receive payment information such as tax-deductible receipts may have to provide us with their personal details. ERFA does not collect sensitive information from any of its donors ([APP 3](#)).

3.4.1 Direct marketing:

Such information is also reasonably necessary for ERFA to perform fundraising and direct marketing activities ([APP 3](#)). ERFA uses donor's personal information to conduct direct marketing ([APP 7](#)). Direct marketing may include contacting our stakeholders via email, postage or phone call. For example, ERFA may wish to send newsletters, publications and event communications to donors. Within ERFA's register of donor information, a field is included to specify those donors who have opted-in to receive direct marketing communications. Donors are able to opt out of receiving direct marketing communications at any time ([APP 7](#)). All email and postage direct marketing communications provide the shortened ERFA Clause for Collection of Personal Information (Section 3.1.2) and a link for stakeholders to unsubscribe from future ERFA correspondence. Donors contacted by phone have the option to opt out of future direct marketing communications by expressing such to the contacting ERFA representative. Alternatively, donors can opt out of direct marketing communications at any time by contacting ERFA on +61 7 3621 9649 or info@erf.org.au.

3.5 Website visitors

Personal information that ERFA may collect from website visitors includes:

- Personal details such as name, signature, or date of birth
- Contact details
- Statistical data such as IP address, web browser, or website pages visited

ERFA may request visitors to our website (<https://erf.org.au/>) to voluntarily provide personal information, such as in the event of a competition where it is necessary to record the visitor's name and contact details.

ERFA tracks the traffic patterns of all website visitors through the URL registered to us. By navigating our website, website visitors' basic data can be tracked through the use of 'cookies'. A 'cookie' is a small amount of data generated by a website and saved to the web browser of a computer user when they visit that site. Cookies are used by web browsers to save a user's preferences for a particular website. Every time the user visits that website basic data such as their IP address, their web browser, the dates they visited the website and the pages they visited are sent from the web browser to the website. Cookies sent to the ERFA website do not enable us to view a particular website visitor's personal information. Rather, cookies provide useful aggregate diagnostics such as total website visitors and the most visited pages. Such information is reasonably necessary for ERFA to perform marketing and communications operations effectively and to continue to optimise our site for the benefit of our stakeholders. We may provide such information to third parties, but are not permitted to disclose visitors' personal information without first obtaining their consent (see section 4.0). Visitors are able to disable their web browser from accepting cookies, however certain functions of the ERFA website might become unavailable as a result.

3.6 Immersion participants

Personal information that ERFA may collect from its immersion participants includes:

- personal details such as name, signature, or date of birth;
- contact details;
- sensitive information such as passport details. ERFA ensures that the express consent of immersion participants is obtained when collecting such sensitive information ([APP 3](#)).

ERFA occasionally conducts immersions to our overseas programs. To handle the booking details of and ensure the security of immersion participants, ERFA will collect and disclose their passport details to the Australian Government's SmartTraveller website and to our registered insurance company.

3.7 Collection of unsolicited information

In the event that an ERFA representative receives personal information that was not solicited by the entity that it concerns, and that information could not otherwise have been collected in a solicited manner in accordance with ERFA's Privacy Policy, the representative will either lawfully destroy of said information or de-identify it as soon as is reasonably possible ([APP 4](#)).

4.0 Disclosure of information

ERFA does not disclose personal information about its stakeholders to any other entity except in the following circumstances ([APP 6](#)):

- to disclose a Staff member's name, contact or employment details on official ERFA correspondence.
- to disclose a project beneficiary's name, image, or story to ERFA's network of donors for the purposes of marketing and communications material;
- to disclose a donor's payment details to their bank or financial institution;

In each of these instances consent to disclose private information is either explicitly, or when

reasonable to do so, implicitly obtained from the stakeholder in question (see section 3.0).

ERFA may disclose personal information about its stakeholders, including sensitive information, in the following exceptional circumstances ([APP 6](#)):

- When it is permitted or required to do so by law such as to avoid an imminent threat to a person's life or to public safety.
- When ERFA reasonably believes that the use or disclosure of the information is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

In these instances an ERFA representative must make a written note of the use or disclosure of personal information.

4.1 Disclosure of information to an overseas entity

ERFA will not send personal information about an individual to any location outside Australia without first obtaining the consent of the individual ([APP 8](#)).

4.2 Disclosure of government-related identifiers

ERFA will not use or adopt the government related identifiers of its stakeholders to refer to them. ERFA will not disclose the government related identifiers of its stakeholders, such as Medicare numbers, Australian Passport numbers or driver license numbers, to any entity ([APP 9](#)).

5.0 Access

5.1 Ensuring the quality of personal information

ERFA takes reasonable steps to ensure that the personal information it collects, uses and discloses is accurate, up-to-date, complete and relevant. Information quality verifications are made at the time information is first collected ([APP 10, 13](#)). ERFA representatives are also required to verify the quality of personal information when they are satisfied, independent of any request, that personal information held may be incorrect, or when an external stakeholder makes a request for their personal information to be corrected ([APP 13](#)).

5.1.1 Donors

ERFA has protocols to ensure that Donor information is collected in a consistent format that includes recording the date when information was collected. Such steps ensure that the quality of Donor's personal information can be easily verified by navigating through the ERFA register of historical Donors ([APP 10](#)). Donors have the ability to update their personal information by contacting ERFA directly ([APP 13](#)). ERFA's contact details are clearly displayed in the ERFA Clause for Collection of Personal Information (see section 3.1.1). ERFA's Database Coordinator will be the first point of contact for donors wishing to update their personal information.

In direct marketing correspondence distributed via postage or email, the shortened ERFA Clause for Collection of Personal Information reminds donors to keep their personal information up to date (see section 3.1.2).

5.2 Allowing stakeholders to access their personal information

ERFA's maintains an Open Information Policy and will take all necessary steps to respond to stakeholder's requests for information. Stakeholders have a right to access the personal information that ERFA holds about them and to advise ERFA of any perceived inaccuracy. To gain access to their information a stakeholder must verify their identity to an ERFA stakeholder. In this event, the ERFA stakeholder will seek the minimum amount of personal information needed to establish a stakeholder's identity. Exceptions where ERFA is entitled to refuse a stakeholder access to their

personal information is outlined in [APP 12](#) under section 12.34. When a stakeholder advises an ERFA representative of a perceived inaccuracy in their stored personal information, ERFA will correct its records as soon as is practically possible. A small fee may be charged to cover the cost of verifying applications and locating, retrieving, reviewing and copying material requested. Cases where ERFA is entitled to charge for the cost of information retrieval are outlined in [APP 12](#) under section 12.78. If the information sought is extensive, ERFA will advise the likely cost to the stakeholder in advance ([APP 12](#)).

ERFA's Database Coordinator will be the first point of contact for inquiries about privacy issues for individuals wishing to make an inquiry or complaint regarding privacy.

6.0 Storage and security of personal information

6.1 Storage of personal information

ERFA does not hold personal information longer than necessary: the point when ERFA no longer has reasonable cause to use or disclose that information. When this point is reached an ERFA representative will take steps to either lawfully destroy of said information or de-identify it as soon as is reasonably possible. ERFA destroys hard-copy information by shredding it. ERFA destroys electronic information by deleting it from its databases in a way that is irretrievable ([APP 11](#)).

6.1.1 Staff and Partners

Staff and Partner's personal information is kept up until the point when they have no ongoing professional relationship with ERFA.

6.1.2 Project Beneficiaries

ERFA stores information only for as long as it is useful. ERFA uses the personal information of its beneficiaries, such as images and stories on an ongoing basis. It is useful to have a historical collection of images and stories to draw upon for the following reasons:

- Past stories can be used to monitor the progress of ERFA and its supported Programs over time.
- Past images may be used for generic updates where no up-to-date image is available.

Project Beneficiaries, or are informed of ERFA's policy for ongoing storage of personal information of image and story contributors in ERFA's Image and Story Use Consent Form and are asked to provide free, prior and informed consent for ERFA to store and use their personal information indefinitely with no compensation to them.

6.1.3 Donors

Donor's personal information is contained in ERFA's register of historical donors up until the point where an individual donor advises ERFA they would like their information to be de-identified. This is a reasonable protocol for ERFA to observe as past donors are important stakeholders who have the potential to submit future donations to ERFA; ERFA requires the contact details of past donors to continue an ongoing relationship with them through the distribution of marketing and communications material.

6.2 Security of personal information

ERFA holds personal information securely through physical and electronic means and will take all reasonable steps to ensure that personal information is protected from misuse, interference and loss, and from unauthorised access, modification and disclosure. Physical means to secure personal information include locked storage of paper records. Electronic means to secure personal information include password access rights to electronic records. ERFA stores electronic data in its online database, Citrix *Sharefile*, which is a secure file sharing and transfer service for business. Staff members are granted permission by ERFA's administrator to access files according to their individual clearance levels. Only certain Staff members are granted permission to access files that are deemed confidential. ERFA's website is protected with security software and SSL certification. ERFA Staff are required to

respect the confidentiality of personal information and the privacy of stakeholders. Such requirements are communicated to ERFA Staff in Staff training (APP 11).

6.3 Responding to data breaches

In accordance with the Privacy Act (1988), ERFA has various strategies in place to respond to a data breach of the personal information of its stakeholders. A data breach occurs when personal information that an entity holds is subject to unauthorised access or disclosure, or is lost. For example, data breaches commonly manifest themselves through the loss or theft of a personal device or paper records, or inadvertent disclosure of personal information to an unauthorised third party, either due to human error or inadequate identity verification of a scammer.

By maintaining compliance to all 13 of the APPs ERFA systematically reduces the risk of a data breach. As contained on the website of the Office of the Australian Information Commissioner: "Compliance with the APPs as a whole will reduce the risk of a data breach occurring." This is because the APPs ensure that ERFA assumes privacy safeguarding strategies at every stage of the personal information handling process, including the collection, storage, use, disclosure and destruction of personal information. For example, by maintaining compliance to APP 11, such as ensuring that unnecessary personal information is destroyed in a way that is irretrievable, ERFA minimises that the amount of data that it holds at any one time. By maintaining compliance to APP 3, namely, by only collecting sensitive personal information that is essential to ERFA's core activities and with the express consent of its stakeholders, ERFA minimises the amount of sensitive personal information held.

Complying with the Notifiable Data Breach (NDB) scheme as contained in Part IIIC of the Privacy Act (1988), ERFA will notify the individuals affected and the Commission in the event of certain instances of a data breach:

- There is unauthorised access to or disclosure of personal information held by an entity (or information is lost in circumstances where unauthorised access or disclosure is likely to occur).
- This is likely to result in serious harm to any of the individuals to whom the information relates.
- The entity has been unable to prevent the likely risk of serious harm with remedial action.

In the event of uncertainty whether an eligible instance of data breach has occurred, ERFA will conduct an internal assessment to determine whether the steps of the NDB scheme need be followed.

7.0 Transparency

7.1 Disclosing information to the public

ERFA maintains a commitment to transparency in the information it discloses to the public. As a not-for-profit organisation that funds its projects through the benevolent donations of its donor network, and that carries out operations in diverse countries to assist vulnerable communities of beneficiaries, ERFA's stakeholders have a right to access information regarding ERFA's impact and operations. Information that ERFA publicly discloses to its stakeholders and the wider public include the following regular publications: the Annual Report, the Annual Financial Report, the Impact Report (annual) and a biannually printed newsletter. ERFA's Annual Report, Annual Financial Report and Impact Report (annual), including their historical iterations, are accessible from the ERFA [website](#) by navigating to [Learn More] from the Home Page. ERFA also publicly discloses one-time publications to its stakeholders and the wider public, such as the Strategic Plan (2018-2020), accessible from the ERFA [website](#) by navigating to [Learn More] from the Home Page. In addition, relevant organisational information relating to ERFA's purpose, vision, governance structure and Constitution are accessible from the ERFA [website](#) by navigating to [About] from the Home Page.

ERFA also disseminates information pertaining to its operations in monthly email newsletters, press releases and through its website and social media channels. Within these publications and content updates ERFA makes regular use of the 'stories' provided to it by project beneficiaries (see section

3.3). Only when the stipulations set out in this Privacy Policy have been met is the personal information regarding one of ERFA's project beneficiaries used and disclosed (see sections 3.3, 5.1.1).

7.2 Inviting feedback from the public

To aid in its commitment to transparency and an Open Information Policy ERFA actively seeks feedback from its stakeholders. ERFA recognises the value in all types of feedback from its stakeholders, including but not limited to: compliments, constructive input and complaints. As of the most recently updated publication date of this Privacy Policy, all of ERFA's physical publications include organisational contact details for stakeholders to use if they wish to submit feedback. Organisational contact details are also readily available from ERFA's [website](#) by navigating to [About] from the Home Page. Depending on the nature of the feedback submitted and the organisational departments it relates to, an ERFA representative will strive to respond to the stakeholder as soon as is reasonably possible. For further details regarding ERFA's handling of complaints, see ERFA's [Complaints Handling Policy](#).

8.0 Payment card security

ERFA is committed to the ongoing security of cardholder data. Although ERFA is a small, low-risk organisation with a limited scope for information security measurement, it takes every step to be compliant with the Payment Card Industry Data Security Standards (PCI DSS). Contained below are some recommendations for maintaining PCI DSS compliance and ERFA's accompanying policies.

8.1 Develop program, policy and procedures

ERFA uses a payment gateway, *Payments2Us*, to process virtual credit card information. When a donor makes a contribution to ERFA their credit card information is transferred from the payment gateway to ERFA's designated bank, *Commonwealth Bank of Australia*. All of this data is encrypted and cannot be accessed by ERFA employees. The privacy policy of Payments2Us can be viewed from: <https://www.payments2us.com/privacy/>.

8.2 Assign ownership for coordinating security activities

ERFA's Database Coordinator is the sole person permitted to coordinate data security activities. The Database Coordinator's responsibilities include updating the personal information of donors and contacting donors in the event of a failed payment. Donors' personal information that the Database Coordinator has access to includes personal details such as name, signature and date of birth, contact details, payment details and donation history (See Section 3.4 Donors).

8.3 Detect and respond to control failures

In the event of an unsecure payment the Database Coordinator will receive an automated notification from Payments2Us via ERFA's designated CRM, *Salesforce*. To solve the issue the Database Coordinator will review the notification and notify the relevant parties, including the donor themselves and *Payments2Us*. To contact the donor directly the Database Coordinator Contact will access the donor's personal information, such as their contact information. The only payment details that the Database Coordinator has access to includes those necessary for identification purposes, such as the last 4 digits of a donor's payment card; the remainder are encrypted (See Section 3.4 Donors).

8.4 Evolve the compliance program to address changes

ERFA's Privacy Policy will be reviewed every two years. ERFA Board will manage the review and evaluate the relevance and quality of ERFA's data security measures. Changes to data security will be implemented where ERFA no longer complies with the PCI DSS.



Image & Story Use Consent Form

Consent clause

By signing this Image and Story Use Consent Form you consent to giving free, prior and informed consent for Edmund Rice Foundation Australia (ERFA) to collect and publish your personal information and identifying images for communications purposes. In this relationship, ERFA regards you as the “Contributor”. If you consent to this relationship, personal information that ERFA might collect and publish includes:

- photographs and video footage;
- your voice;
- your name;
- your quotations or story: i.e., your experience with an ERFA-supported Project;
- the name, location and nature of the ERFA-supported Project that you are engaged in.

Purpose of collecting and publishing personal information

The personal information of Contributors is reasonably necessary for ERFA to conduct impact reporting and fundraising activities. Publishing images and stories of Contributor’s experiences with the Projects we support is a major way we engage with our community of supporters and encourage donations. ERFA does not disclose personal information about its Contributors for any other purpose and to any other entity other than its supporter community.

The types of publications where Contributor’s personal information might be used includes:

- social media posts;
- supporter newsletters;
- quarterly impact publications such as our “Reaching Out” flyer;
- annual impact publications such as our “Impact Report”.

Access to information

Contributors have a right to access the personal information that ERFA holds about them to:

- Amend their personal information. When a stakeholder advises an ERFA representative of an inaccuracy in their stored personal information, ERFA will correct its records as soon as possible.
- Withdraw previously given consent. When a stakeholder advises an ERFA representative that they wish to withdraw their previously given consent, ERFA will permanently destroy the Contributor’s personal information from its records as soon as is practicably possible.

To gain access to their personal information a Contributor should inform the Program Manager of the Project which they participate in, who will then contact ERFA on the Contributor’s behalf.

Storage of information

ERFA stores information only for as long as it is useful. ERFA uses the personal information of its beneficiaries, such as images and stories on an ongoing basis. It is useful to have a historical collection of images and stories to draw upon. For example, past stories can be used to monitor the progress of ERFA and its supported Programs over time. Past images may be used for generic updates where no up-to-date image is available.

Name (print)	
Do you wish to be referred to by a pseudonym?	
Relationship to child under 18 (if applicable)	
Signature	
Date	

By signing this form you agree to the above clauses and authorise ERFA to use your personal information indefinitely and without compensation.

Guidelines for Photographers/Interviewers

Free, prior and informed consent

- Before you begin an interview or take photographs of primary stakeholders (beneficiaries), ensure that the person you are interviewing understands the context of how their image and/or story will be used and that they are made fully aware that their story and any photographs taken may be used to communicate with donors and published in Australia through ERFA's newsletter, website, presentations, social media or other forms of communication.
- It can help to show a copy of a ERFA's newsletter or any other publications as an example of how the information or images may be used.
- Ask the person to read and sign the Image & Story Use Consent Form before you begin the interview to show that they understand that the information and images may be used for communications purposes.
- For people with low literacy please read and explain the form in full and ask them to confirm their consent with a fingerprint. Where possible, the form should be available in the language spoken by project participants. Where this is not possible, the form should be translated verbally to acquire consent.
- If you are interviewing a child under the age of 18, please clearly explain how the information and images will be used and seek the permission of both the child and their parent or guardian. It is important that the child has the opportunity to decline to be photographed or interviewed without consequence if she or he chooses so.
- Inform the contributor of their ability to remain anonymous if they prefer.
- Provide the contributor with a reasonable account of the purposes of disclosing their personal information.
- Provide the contributor with a reasonable account of the audience profile who may be privy to their personal information.

Collection of Images

Photographs should always portray people in a dignified, positive and respectful way, even in difficult conditions. An example of this is ensuring you are standing at the same level as the person you are photographing or by portraying people engaged in activities related to the project (e.g. teaching in the classroom, caring for their children, sewing a product). Some additional points relating to child safeguarding to keep in mind are:

- Present images of all participants in a respectful manner, portraying participants as equal partners in the development process.
- Portray the local context in an honest way, ensuring the complexity and diversity of the community is shown accurately.
- Use positive images, rather than manipulating images to evoke pity.
- Ensure the use of images of local people will not endanger the people they portray.
- Ensure that all people, especially children, featured in images or videos are adequately clothed, including footwear.



Beneficiary Questionnaire Form

ERFA collects stories and images from our stakeholders for marketing and communications purposes. These may be published in Australia through ERFA's newsletter, website, presentations, social media or other forms of communication.

Please sign the Image and Story Use Consent Form with this Form

Project		Country	
Name			
Gender		Age	
How did you come to join [name of project]? What was your life like when you arrived?			
What specific knowledge or skills have you learnt from the project? How long did it take to learn?			
What do you like most about the project?			
Please tell us about your plans for the future now you have participated in the project?			
What do you tell your friends and family about the project?			
Please tell us about the difference the project has made to your life and the lives of people close to you and people in your local community.			
Is there anything you would like to share?			
<i>(For interviewer)</i> Are there any other points that will assist ERFA in raising awareness with our supporters about the importance of the project?			
<i>(For interviewer)</i> Signature of interviewer			



Supporter Questionnaire Form

ERFA collects stories and images from our program participants for marketing and communications purposes. These may be published in Australia through ERFA's newsletter, website, presentations, social media or other forms of communication.

Please attach the signed Image and Story Use Consent Form with this Form

When did you first become involved with the Edmund Rice network? (what inspired you to do that?)

What have you seen/learnt through your involvement that you would like to share with others?

What inspires you most about the work undertaken by ERFA?

What impact has supporting ERFA's work made to your life?

What would you say to people thinking about how best to support ERFA?

Thank you for supporting ERFA and for taking time to provide this story



Staff/Volunteer Questionnaire Form

ERFA collects stories and images from our program participants for marketing and communications purposes. These may be published in Australia through ERFA's newsletter, website, presentations, social media or other forms of communication.

Please attach the signed Image and Story Use Consent Form with this Form

What is your background and how did you come to join [name of Program]? What inspired you to take on the role of staff member/volunteer?

What have you learnt by being part of the project?

What inspires you most in your work?

Please tell us about the difference the project has made to the lives of people you work with.

Thank you for working for ERFA and for taking time to provide this story



ERFA Clauses for Collection of Personal Information

ERFA clause for collection of personal information in internal communications:

“Edmund Rice Foundation (Australia) is committed to the lawful collection of personal information under the Australian Privacy Act (1988). We collect personal information for marketing and communications purposes. Without such information we are unable to conduct stakeholder engagement and fundraising activities to the best of our ability. By visiting our website, making a donation, signing up to our newsletter, filling out a survey, applying for employment, or providing us with your information by any other means, you agree to the collection, usage, disclosure and storage of, and access to your personal information, as contained in our Privacy Policy. ERFA does not disclose personal information to any overseas recipients. For further enquiries regarding our privacy measures or to update your personal information please contact us at +61 7 3621 9649 or info@erf.org.au.”

Shortened ERFA clause for collection of personal information in internal communications:

“Edmund Rice Foundation (Australia) is committed to the lawful collection of personal information under the Australian Privacy Act (1988). For further enquiries regarding our privacy measures or to update your personal information please see our Privacy Policy or contact us at +61 7 3621 9649 or info@erf.org.au”

Purpose:

A shortened version of this clause, including a link to ERFA’s full Privacy Policy, is included within all communications distributed to stakeholders where it is reasonable to do so, such as within online and written communications.

ERFA clause for collection and publication of personal information in Program consent forms:

You consent to ERFA collecting and publishing your personal information indefinitely and without compensation to its network of supporters for the purpose of providing Project updates in marketing and communications material, such as social media posts and annual reports. By consenting, you have the right to update your personal information held or to withdraw previously given consent by informing a Project or Program Manager who will contact ERFA on your behalf. You have the right for your name to remain anonymous and to be referred to by a pseudonym.

Purpose:

For the sake of convenience, some Programs might ask Beneficiaries, including children, to sign a general consent form, rather than administer consent forms every time personal information is collected. These Programs are required to include within their consent form a clause that commits the beneficiary to their information being used indefinitely and without compensation by ERFA.