



# I CAN Network Ltd.

## Privacy & Health Information Policy

|                           |                 |                              |                    |
|---------------------------|-----------------|------------------------------|--------------------|
| <b>Drafted By</b>         | Tiffany Mumford | <b>Board Approval Date</b>   | <b>3 June 2021</b> |
| <b>Responsible Person</b> | Chris Varney    | <b>Scheduled Review Date</b> | <b>June 2023</b>   |

At I CAN Network, we are committed to protecting and maintaining the privacy, accuracy, and security of all personal and health information we collect. This policy sets out how we manage personal information, health information, and any digital recordings we obtain as part of providing our services. It applies to our staff, program participants, contractors, volunteers, directors, and other relevant stakeholders. The policy will be overseen by the Privacy Officer who will be appointed by the Chief Enabling Officer (CEO).

The Privacy Officer appointed until further notice is Stacey McEwan, National Online Program Manager, available at [privacy@icannetwork.com.au](mailto:privacy@icannetwork.com.au).

### What information does I CAN Network Ltd collect and hold?

In order to provide our programs and services, we collect and hold personal information which may include health and other sensitive personal information. The information we collect and hold includes information about program participants, their parents or guardians, job applicants, staff, volunteers, contractors, donors, and other relevant stakeholders.

Depending on the circumstances, we may hold a range of information relating to our employees and stakeholders including personal information such as their name, address, phone numbers or other contact details, credit card information, details of employment history, and recordings of sessions conducted via the online platform that they have participated in. For program participants, we collect information regarding age, date of birth, interests, limited health information about any medical conditions or dietary requirements, and digital recordings of any online sessions that they have participated in.

### How do we collect personal information?

We may collect information in a number of ways including the following:

- Directly from the employee or program participant
- In the situation where a program participant or employee is under 18 years of age we may collect information from the parent or guardian
- Digital format for online session recordings

If an employee or program participant would prefer not to provide us with the information we request this may impact their ability to participate in our programs or become an employee of I CAN Network Ltd.

### How do we hold personal information?

We take the privacy and security of personal information seriously and we're committed to maintaining the security of this information under our control. We use a combination of technical solutions, security controls, and internal processes to help us protect information from unauthorised access or disclosure. We may store personal information in hard copy or electronic format.

### How do we use personal information?

We may use this information for a range of purposes including:

- To evaluate program effectiveness of provide ongoing improvements to our programs and services
- To ensure that our programs and services suit the needs of our participants
- To look after our program participants and employees participating in or running our programs
- To assess an employee's suitability to work with us
- To let people know about I CAN Network's services and how they can support I CAN Network Ltd.
- For others purposes where consent to using obtained information has been provided

### **How do we use information for marketing and fundraising purposes?**

We may use information provided to us to keep people informed regarding new programs or services that we offer, or seek donations to ensure that we can continue to offer our programs and services.

Marketing can be carried out in a variety of ways (including email, SMS or social media) and may continue after acquired programs or services from us have ceased. Individuals can opt out by emailing our Privacy Officer at [privacy@icannetwork.com.au](mailto:privacy@icannetwork.com.au)

### **When do we disclose obtained information?**

We may disclose obtained information to third parties who provide services to us, including schools, organisations, and contractors that assist us with the purpose for which we use this information. These include:

- Contractors, agents and volunteers who provide or support the programs and services we run. This may include teachers or specialists that support our programs, and other providers such as outdoor activity providers. We will require that they only use the information for the purpose for which it was disclosed
- Fundraisers – we require that fundraisers engaged by I CAN Network only use the necessary information when fundraising for I CAN Network Ltd
- Where we believe the disclosure is necessary to prevent or lessen a threat to the life or health of the individual or another person
- To parents of participants or employees who are under 18
- Where we need to because the disclosure is required, permitted or authorised by law
- Where the disclosure is requested by the individual

### **Do we send information overseas?**

We may disclose obtained information to an overseas company in the situation where 'cloud' service providers utilised by I CAN Network Ltd. are situated outside of Australia.

### **Digital recordings of Mentoring sessions**

All Mentoring sessions conducted in an online format (via Zoom) are digitally recorded to ensure the safety and wellbeing of participants and staff in our sessions. Recordings will be kept for a 12 week period with the commencement date being that of the first session.

Any sessions that need to be reviewed due to safety or wellbeing concerns in which a file note has been recorded will be kept for a duration of 12 months.

All staff that have access to the I CAN Network Zoom accounts and passwords will be required to sign a confidentiality agreement indicating that they will not access any recordings without the written permission of the relevant manager.

Under no circumstance will a session recording link be distributed outside of I CAN Network.

Under no circumstance will a session be downloaded to any employee's personal computer.

### **Accessing or correcting personal information, or making a privacy complaint**

If an individual requests access to their personal information obtained by I CAN Network or would like to correct any errors, this can be achieved by contacting us via email at [privacy@icannetwork.com.au](mailto:privacy@icannetwork.com.au). We may apply an administrative charge for providing access to the personal information we hold.

The above contact details can also be used to notify us of a privacy complaint. We'll acknowledge the complaint promptly and provide an estimated timeframe in which we will respond.

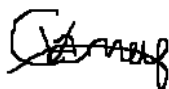
In all situations, our strong preference is to resolve any concerns without involving a third party. Where a third party is required, concerns can be escalated to a regulator such as the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au)).

We are committed to protecting and maintaining the privacy, accuracy and security of all personal and health information we collect.

### **Contact details**

For access to personal information obtained or further questions on how we manage privacy and health information please contact [privacy@icannetwork.com.au](mailto:privacy@icannetwork.com.au)

Authorisation



Chris Varney

Founding Director & Chief Enabling Officer

Date: **03.06.2021**  
I CAN Network Ltd.