



PRIVACY POLICY

Applies to: This Policy applies to all Directors, staff and volunteers of Djirra	Version: 5
Specific responsibility: CEO	Date approved: 10 September 2025
	Next review date: Three years after approval

POLICY STATEMENT

Djirra¹ recognises the importance of, and is committed to protecting and upholding, the privacy and rights of individuals Djirra deals with in relation to their personal information. By providing your personal information to Djirra, you consent to its use, storage and disclosure in accordance with this Privacy Policy.

In this Privacy Policy, references to "**Djirra**", "**we**", "**us**" and "**our**" are to the Aboriginal and Torres Strait Islander Corporation Family Violence Prevention and Legal Service Victoria (ABN 47 125 370 108).

Djirra will ensure that:

- it meets its legal and ethical obligations as an employer and service provider in relation to protecting the privacy of clients and others;
- clients are provided with information about their rights regarding privacy;
- clients, staff and others are provided with privacy when they are being interviewed or discussing matters of a personal or sensitive nature; and
- all staff, Board members and volunteers understand what is required in meeting these obligations.

This Privacy Policy explains how Djirra collects, uses, discloses and otherwise handles personal information.

Djirra is subject to:

- the Australian Privacy Principles under the *Privacy Act 1988* (Cth) (**Privacy Act**);
- the Information Privacy Principles under the *Privacy and Data Protection Act 2014* (Vic) (**PDP Act**);

¹ Aboriginal and Torres Strait Islander Corporation Family Violence Prevention and Legal Service Victoria operates as Djirra

- Part 4 of the PDP Act, as if it were a "public sector agency", as that term is defined in the PDP Act;
- The Health Privacy Principles under the *Health Records Act 2001* (Vic); and
- other applicable codes of practices made under the above acts,

(collectively, **Privacy Laws**).

Djirra will follow the guidelines of the Privacy Laws in its information management practices.

What is personal information?

"Personal information" is information or an opinion from which it is possible to personally identify someone. It includes information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable.

The information collected by Djirra about a particular person will vary depending on the circumstances of collection. It may include, but is not limited to, a person's contact details (name, email and/or postal address, phone number), date of birth, gender, credit card details, driver's licence number, passport number, employment history, qualifications or communication history with Djirra.

Personal information does not include anonymous information, aggregated or de-identified information.

What is sensitive information?

"Sensitive information" is a subset of personal information and is given a higher level of protection. Sensitive information is defined in the Privacy Act and includes information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union; sexual preferences or practices; criminal record; health information; or genetic or certain biometric information.

As a recipient of funding from the Victorian Department of Justice and Community Safety (**DJCS**) and Victorian Department of Families, Fairness and Housing (**DFFH**), Djirra must also comply with the *Health Records Act 2001* (Vic) in delivering its services to you. It is therefore relevant to note that under this Act, **"Health Information"** expressly includes information of an individual regarding their:

- physical, mental or psychological health;
- disabilities;
- expressed wishes about the future provision of health services to them;
- health services provided to them;
- the donation of body part, organs or substances; and
- genetic information which is predictive of their future health.

If it is reasonably necessary in the circumstances, Djirra may collect sensitive information such as a person's medical history, nationality, their ethnic background or disabilities.

Djirra is required by law to obtain your consent when collecting your sensitive information, unless a specific exemption applies under the relevant legislation. We will obtain your consent through the collection notice provided to you at the time (or, if that is not practicable, as soon as practicable after) Djirra collects your sensitive information.

What personal information does Djirra collect and hold?

The type of information collected by Djirra will depend on the nature of a person's interaction with Djirra, however Djirra may collect the following types of personal information:

- identification and contact details, such as name, mailing or street address, email address, telephone number, age or birth date;
- family type, country of birth, year of arrival in Australia, language spoken at home;
- financial information, such as housing, occupation, financial status and income;
- credit information, such as credit history, trade references, credit references or reports from a third party, consumer credit reports; information from or in connection with your resume or job application if you apply for a position with us;
- the location from which you have come to our Websites (as defined further below) and the pages you have visited;
- technical data, which may include IP address and types of devices or software you are using to access the Websites;
- details of the services a client has requested or enquired about, or services provided, together with any additional information necessary to respond or deliver those services;
- any additional information relating to a client that a client provides in-person, by telephone, in writing or via email, which is reasonably necessary for, or directly related to, Djirra's services to you; and
- other personal information not covered above which is collected as a direct result of providing you with legal or non-legal advice.

What sensitive information does Djirra collect and hold?

Djirra may also collect sensitive information, including:

- racial or ethnic background;
- criminal history;
- health information, including any disabilities; and
- other sensitive information not covered above which is collected as a direct result of providing you with legal or non-legal advice.

How does Djirra collect your personal information?

Djirra collects personal information directly from the relevant individual unless it is unreasonable or impracticable to do so. This may occur in a range of ways including in person, by letter, fax, email or telephone, on hard copy forms, through the website, from referring or third parties (with your consent), and at events or forums.

Collection from third parties

Djirra may collect personal information regarding a child from the parent or other responsible person associated with that child.

In many circumstances, Djirra collects information from third parties with written client consent. Examples of such third parties could include, without limitation:

- police, courts, corrections agencies;
- hospitals, health services, medical and allied health professionals, counsellors; and
- government agencies, schools, community organisations.

When does Djirra collect your information

We may collect this information when you communicate with us through the Websites, by telephone, by e-mail or through written communication. In some circumstances the collection of personal information may be required by law.

Specifically, we may collect your personal information when:

- you participate in our programs and activities, such as our Koori Women's Place, Community Engagement programs, Legal Services, Individual Support Services;
- when you provide us, or you offer or apply to supply us, with goods or services;
- when you request information about us, our services, programs or events;
- when you provide feedback to us including complaints;
- when you visit, make an inquiry, or fill in a form on the Websites;
- when you register to be a member, donor, volunteer or partner;
- when you visit premises from which we operate;
- when you submit a job application to us;
- when conducting yarning groups, or supporter surveys;
- when you contact us by telephone, email, social media, post or in person; and
- when we are otherwise required or authorised by law.

If the personal information we collect includes sensitive information, we will ask for your consent to collect this sensitive information, unless the law allows us to collect the information without your consent.

Where we collect personal information about children, it is done in a manner that respects the privacy of clients and children. The disclosing of children's personal information is only done when necessary.

Notification of collection of personal information

At or before the time (or, if that is not practicable, as soon as practicable after) Djirra collects personal information, we will provide individuals with a privacy notice (otherwise known as a collection notice) and refer individuals to this Privacy Policy.

Can I remain anonymous?

Individuals engaging with Djirra have the option of not identifying themselves or using a pseudonym unless either it is impractical for Djirra to deal with individuals who have not identified themselves or who have used a pseudonym, or it is a requirement of funding agreements for the delivery of the funded service.

Djirra's ability to communicate with individuals or to provide the requested services may be affected if some information is not provided.

If you wish to remain anonymous when dealing with us via a telephone call, please let the person you are talking to know. Likewise, if you would prefer to speak with an Aboriginal member of staff let the person you are talking to know.

Why does Djirra collect, hold, use and disclose personal information?

Djirra collects, holds, uses and discloses personal information for the following purposes:

- to assess whether a client is eligible for assistance, including assistance in the form of a grant of legal aid from a Legal Aid Commission, and to maintain those grants of aid;
- to provide legal and non-legal support services to clients;
- to answer enquiries and provide information about Djirra's services;
- to recruit staff, contractors and volunteers;
- for planning, quality control and for the creation of anonymous case studies;
- to update our internal records;
- to send support and administrative messages, reminders, technical notices, updates, security alerts, and information to you;
- to send marketing and promotional messages to you and other information that has been requested or which may be of interest;
- for use in monitoring and assessing Djirra's services, including as part of peer review of service, legal needs assessments, reports to funding providers, compliance, quality audits and evaluations including those conducted by external bodies such as Victoria Legal Aid, Department of Health and Human Services and others;
- to process and respond to any queries or complaints you have made; and
- to comply with any law, rule, regulation, lawful and binding determination.

Djirra may use health information to ensure that programs we operate are run safely and in accordance with any special health needs participants may have. Health information may also be kept for insurance purposes. In addition, we may use de-identified information to carry out research, data analysis, to prepare submissions to government, or to plan events and activities. Djirra may also collect, hold, use and disclose personal information for other purposes explained at the time of collection or which are required or authorised by or under law or for which the individual has provided their consent.

Direct marketing

We will assume consent to use non-sensitive personal information for marketing purposes (including disclosure of such information to service providers) unless you advise otherwise.

Every person whose data is collected by Djirra has the option to refuse e-mail, SMS or posted communications by making a request in writing to Djirra via the contact details set out below or by making use of the opt-out procedures included in any communications from us or by contacting our Privacy Officer (see the details below) (however, information relating to the option to unsubscribe from those communications may be retained).

To whom may Djirra disclose your information?

Djirra may disclose your personal information, for the purposes listed above to organisations which include, but are not limited to:

- other organisations involved in providing similar services or programs as Djirra, in Australia;
- companies we engage to carry out functions and activities on Djirra's behalf, including direct marketing;
- professional service providers and advisors who perform functions on our behalf, such as our accountants, barristers, auditors and lawyers;
- Legal aid, barristers, counsellors, psychologist,
- our insurers; and
- in other circumstances required or permitted by law.

In some circumstances, personal information may also be disclosed outside of Australia. When Djirra discloses personal information to third parties, Djirra will make all reasonable efforts to ensure that we disclose only strictly relevant information and that it is accurate, complete and up to date and that the third party will comply with the Privacy Laws in relation to the use, disclosure and storage of your information.

Other permitted disclosures

Djirra may disclose personal information in other circumstances, where the person concerned has consented to the disclosure, or where Djirra is expressly permitted to do so by the Privacy Laws or another law. These other disclosures may include where:

- you would reasonably expect the disclosure to occur (for example, quality assurance purposes or training);
- Djirra is authorised or compelled by law to disclose;

- it will prevent or lessen a serious threat to someone's life, health or safety or a threat to public health or safety;
- it is necessary as part of the establishment or defence of a legal claim;
- it is legally requested by an enforcement agency such as the police (and is not protected by professional privilege); or
- it is a necessary part of an investigation following a complaint or incident.

Individual Support Services (ISS) permitted disclosures to the Victorian Department of Families, Fairness and Housing

As the ISS program is a recipient of funding from the DFFH:

- ISS may collect and disclose your personal information (including sensitive information) (**DFFH Information**) to DFFH for specific purposes, including for the purpose of providing its services to you and for DFFH's auditing and monitoring of Djirra;
- DFFH may disclose the DFFH Information received from Djirra to:
 - other Victorian Governmental Agencies; and
 - if requested by the Victorian Auditor-General, the Victorian Ombudsman, or the Victorian Minister responsible for the portfolio under which the Djirra services operate; and
- unless the personal information is destroyed by Djirra, it will ultimately be disposed of to, or at the direction of, DFFH or the Victorian Keeper of Public Records.

Other uses and disclosures

Djirra may collect, use and disclose your personal information for other purposes not listed in this Privacy Policy. If Djirra does so, Djirra will make it known to you at the time we collect or propose to use your personal information for that other purpose.

Accessing and correcting personal information

An individual may request access to any personal information Djirra holds about them at any time by contacting Djirra at the details provided at the bottom of this Policy. Where Djirra holds information that an individual is entitled to access, we will try to provide the information in the manner requested (for example, photocopies or by viewing a file) and in a timely way.

There may be instances where Djirra cannot grant access to the personal information held. For example, Djirra may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, Djirra will provide written notice outlining the reasons for the decision and available complaint mechanisms.

Djirra will take all reasonable steps to ensure that the personal information it collects, uses or discloses is accurate, complete and up-to-date, including checking the accuracy of personal information at the time of collection and periodically while it is being used and disclosed. However, we rely on the accuracy of personal information as provided to us both directly and indirectly. If an individual believes that personal information Djirra holds about them is incorrect, incomplete or inaccurate, then they may request us to amend it. Djirra will then consider if the information

requires amendment. If we agree that it requires amendment we will take reasonable steps to correct that information. If Djirra does not agree that there are grounds for amendment then the individual may request that Djirra add a note to the personal information stating that the relevant individual disagrees with the information and Djirra will take reasonable steps to do so.

There is no charge for requesting access to your personal information.

If Djirra corrects personal information about an individual and has previously disclosed that information to another agency or organisation that is subject to the Privacy Act, the individual may ask Djirra to notify that other entity and Djirra will take reasonable steps to do so, unless this would be impracticable or unlawful.

Client files

In addition to above, in circumstances where a client requests access to personal information held by Djirra's Aboriginal Family Violence Legal Service, the Director of Legal Services, the Manager of Legal Service or the Legal Practice Standards Coordinator will view the file and approve any copies of material to be given to the client prior to client access. A copy of the relevant part of the file will be made available to the client as soon as practicable after this. Unless it is past the destruction date of the files.

Djirra websites

When users visit the Djirra websites (<https://djirra.org.au/>); and any other websites owned or operated by Djirra from time to time) (**Websites**), our systems may record certain information about their use of the site, including the web pages visited and the time and date of their visit. Djirra uses this information to help analyse and improve the performance of the Websites.

Cookies

We may use "cookies" on the Websites. Cookies are small text files that help a website to remember the preferences of users to improve the experience of using that website. An explanation of cookies can be found on the Office of the Australian Information Commissioner's (**OAIC**) [website](#). In some cases, the cookies that we use may collect some personal information. Djirra will treat this information in the same way as other personal information we collect. You are free to disable cookies on your internet browser to prevent this information being collected; however, you will lose the benefit of the enhanced website experience that the use of cookies may offer.

Web beacons

The website communications generated from using and/or registering on the Websites, such as promotional emails, may contain electronic images known as "web beacons". Web beacons generally work in conjunction with cookies, and we may use them with cookies to, for example, count the number of visitors to the Websites or see whether you have acted on an email or clicked on a link, for example where this is a condition of entering a competition. Mailchimp is an example of a web beacon.

Google Analytics

Our Websites use Google Analytics, a web analytics service provided by Google Inc. (Google). Google Analytics uses cookies to help analyse how users use the Websites. Google Analytics anonymously tracks how users interact with the Websites, including where they came from, what they did on the Websites and whether they completed any transactions on the Websites.

The information generated by the cookie about your use of the Websites (including their IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this

information for the purpose of compiling reports on the Websites' activity and providing other services relating to the Websites and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate a person's IP address with any other data held by Google.

You can opt out of the collection of information via Google Analytics by downloading the Google Analytics Opt-out browser add-on [here](#).

Clickstream data

When you visit our Websites, a record is made of your visit, including the following information:

- your server address;
- your top level domain name;
- the date and time of access to the site;
- pages accessed and documents downloaded;
- the previous site visited; and
- the type of browser software in use.

We analyse this non-identifiable Website traffic data (including through the use of third party service providers) on an aggregated basis to improve our services and for statistical purposes.

No attempt will be made to identify users or their browsing activities except in the unlikely event of an investigation, where a law enforcement agency may exercise a warrant to inspect the Internet Service Provider's log files.

Third party websites

Third party websites linked to the Websites are not subject to Djirra's privacy standards, policies or procedures. Djirra cannot take any responsibility for the collection, use, disclosure or security of any personal information that you provide to a third party website. Once you have left the Websites we cannot be responsible for the protection and privacy of any information which you provide on other third party websites. You should exercise caution and review the privacy statement applicable to the third party website in question.

Complaints

If you have a complaint or concern regarding our handling of your personal information or think that your privacy has been affected, please contact our Privacy Officer at the address provided at the bottom of this Policy.

Djirra treats all complaints confidentially. Djirra will try to resolve all complaints in a timely, fair and reasonable way. We will respond to your complaint within two business days and try to resolve it within 15 business days. If an individual is not satisfied with Djirra's response, a complaint can be made to the Office of the Australian Information Commissioner (**OAIC**) (by telephone: 1300 363 992, by email enquiries@oaic.gov.au or by post: GPO Box 5218 Sydney NSW 2001). Please see the OAIC website (<https://www.oaic.gov.au/>) for more information about how to make a complaint.

Security and integrity of personal information

Djirra stores most information about you in databases operated by either us or our external service providers. When your information is entered into Djirra's database, the information may be combined or linked with other information held about you. Some information about you is recorded in paper files that we store securely.

Djirra takes reasonable steps to ensure that personal information we collect, use and disclose is accurate, up-to-date and complete and relevant.

Security of personal information is important to Djirra. Djirra has taken steps to protect the information we hold from misuse, interference or loss, unauthorised access, modification or disclosure. Djirra's security measures include training our staff, volunteers and service providers in how to keep your information safe and secure.

However, there are inherent risks in transmitting information across the internet, including the risk that information sent to or from a website may be intercepted, corrupted or modified by third parties. If you have security concerns, or wish to provide personal information by other means (e.g. by telephone or paper), you may contact us using the contact details set out at the bottom of this Policy.

If the information we store is no longer required by us for any purpose for which it was collected and is no longer required by law to be retained by us, we will destroy or de-identify the information.

Data breach notification

As outlined above, Djirra seeks to protect your personal information from any unauthorised loss, disclosure or access. In the event of a serious data breach concerning your personal information, Djirra will notify you, DFFH and the Office of the Australian Information Commissioner regarding the circumstances of the breach.

If you believe that there has been unauthorised use or disclosure of your personal information collected by Djirra, please immediately contact our Privacy Officer at the details provided at the bottom of this Policy.

Contacting Djirra

For questions about this Privacy Policy, as well as any concerns or a complaint please contact Djirra at the details provided at the end of this Policy.

Changes to the Policy

Djirra may amend this Privacy Policy from time to time. The current version will be posted on Djirra's website and a copy may be obtained from Djirra.

Contact us

If you:

- have any questions or would like further information about our Privacy Policy or practices;
- wish to make a complaint about the way we have collected, used, held or disclosed your personal information; or
- would like to opt out of receiving our newsletter or information about Djirra services, please contact our Privacy Officer in any of the following ways:

Email: privacy@djirra.org.au

Phone: 03 9244 3333

Mailing address:

Privacy Officer

Djirra's Aboriginal Family Violence Legal Service

292 Hoddle Street, Abbotsford, Victoria 3067

POLICY REVIEW

Reviewing and approving this Policy		
Frequency	Person responsible	Approval
Every three years	Privacy Officer	Board

Policy review and version tracking			
Review	Date Approved	Approved by	Next Review Due
1	23/3/2015	Board	2017
2	22/3/2016	Board	2019
3	29/3/2018	Board	2021
4	3/6/2021	Board	2024
5	10/09/2025	Board	2028