

Privacy Policy

1.0 PURPOSE

True Relationships and Reproductive Health's ('True') privacy policy is intended to:

- support an open and transparent approach to promoting and respecting the privacy and personal information of everyone with whom we interact
- demonstrate our commitment to aligning our processes and practices with the *Privacy Act 1988* (Cth) ('Privacy Act') and Australian Privacy Principles (APPs)
- support us to align our practices with other applicable privacy legislation, such as the *Information Privacy Act 2009* (QLD), where this is required under agreements with our funders and partners.

2.0 SCOPE

True's privacy policy is for anyone we collect personal information about and anyone who is involved in handling personal information at True.

3.0 TRUE'S VALUES

True is committed to protecting the privacy of all our community members, in accordance with our values:

- **Respect** – we strive to uphold the privacy and dignity of all people we interact with, and to ensure their rights and choices around how we handle their personal information are respected.
- **Excellence** – we aim to ensure our processes and practices for handling personal information maintain the highest standards and are aligned with applicable legislation, regulations and professional guidance.
- **Courage** – we speak up and stand up for our principles and values and act with integrity when handling the personal information that is entrusted to us.
- **Partnership** – through collaboration, we strive to ensure our privacy processes and practices reflect our communities' values and expectations support trust in True.

4.0 DEFINITIONS

4.1 Personal information

Personal information is any information or opinion, whether or not it is true, about an identified individual, or an individual who is reasonably identifiable. Personal information can be in any form, including:

- written or typed, such as letters, emails, text messages, healthcare records, forms, signs, displays on electronic devices, transcriptions of meetings, and outputs of artificial intelligence (AI) scribing tools
- spoken, such as voicemail messages, recordings of meetings and information shared during discussions and meetings
- images, such as video recordings, photos, and closed circuit television (CCTV)
- sign language, gestures, and information shared using alternative and augmentative communication
- medical information such as DNA obtained from a blood sample.

4.2 Sensitive information

Sensitive information is any information that includes information or opinion about an individual's:

- 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.

4.3 Health information

Health information is personal information that includes information or opinion about an individual's health, illness, injury or disability, including:

- notes of symptoms and diagnoses
- information about a health service a person has received or will receive
- specialist reports and test results
- prescriptions
- dental records
- genetic information
- wishes about future health services, such as an advance health directive
- wishes about organ donation
- appointment and billing details, such as Medicare numbers.

All information that True collects about people who receive health care through our clinics and other health and wellbeing services is considered 'health information'.

4.4 Employee record information

Employee record information is any information kept in an employee record related to current and former employment relationships, including information related to:

- personal details, including diversity information
- the appointment of an employee
- terms and conditions of employment
- qualifications and licences
- emergency contact details
- performance management
- resignation and termination of employment
- training, education and development
- membership of a professional or trade association or trade union membership
- all kinds of leave
- tax, banking and superannuation.

Employee record information, in certain circumstances, is exempt from the requirements of the Australian Privacy Principles, as outlined in the Privacy Act.

5.0 KINDS OF PERSONAL INFORMATION TRUE HANDLES

Table 1 sets out the kinds of personal information that are handled at True.

Table 1. Kind of personal information we handle at True.

Situations where we collect personal information	Who do we collect personal information from?	When do we collect this information?
Visits to our websites and social media accounts.	Anyone who interacts with True online.	<ul style="list-style-type: none"> Someone makes a purchase from our online shop. A client makes an appointment via our website. Participants engage with our online learning platform.
Events we organise, such as training, conferences, and community events.	Anyone who registers for and attends a True event.	<ul style="list-style-type: none"> People register for an event or request information about an event. When we take photos or make video recordings of people at our events. When we ask for feedback about an event.
Providing education services to schools, community organisations and other partners.	Anyone who registers for and attends an education session delivered by True.	<ul style="list-style-type: none"> When people register for and attend a webinar. When someone enquires about an education program via our website.
General business, such as responding to enquiries and feedback, and corporate functions (e.g., finance, contracts and procurement).	<p>Anyone who contacts True via phone, email or other method.</p> <p>Contractors.</p> <p>Business partners.</p>	<ul style="list-style-type: none"> An individual phones or emails us with an enquiry. When we receive feedback about our services and programs. When we interact with our business partners, such as holding meetings or signing contracts.
Our health and wellbeing services.	Clients.	<ul style="list-style-type: none"> When clients register for and attend our clinics and other services. When someone is referred to one of our clinics or services by another healthcare provider. When we receive information about a client from another healthcare provider or organisation as part of their care and treatment.
Human resources, including job applications and employment related information.	<p>All True employees and prospective employees.</p> <p>Volunteers.</p> <p>Students.</p>	<ul style="list-style-type: none"> When someone applies for a job with us, a new employee joins us, or an existing employee updates us about their personal information. In the general course of people management, such as performance management, grievance procedures and managing leave.

6.0 HOW TRUE COLLECTS PERSONAL INFORMATION

- Generally, all personal information True collects is collected directly from the individual, parents/guardians for children and young people (who are not *Gillick* competent), or substitute decision-makers for people who lack decision-making capacity for specific decisions related to collection of their personal information (e.g., the person's next of kin, emergency contact or enduring power of attorney).
- We may collect personal information in several ways, including:
 - during a conversation in person, on the phone or during a video call
 - text message
 - email
 - forms on our website
 - posts on social media
 - through the websites of our business partners (e.g., if you book an appointment using our online appointments service, HotDoc)
 - taking photos or making video/audio recordings (e.g., at an event).

- When we collect sensitive and health information, we will generally ask for consent first.
- There are some situations where we may collect sensitive and health information without consent, such as in an emergency where we urgently need information about a person to keep them safe and there isn't time to ask for consent to collect this information.
- We may collect personal information from other people or organisations in some circumstances, such as:
 - a person is referred to one of our clinics or services and their personal information is provided by the referrer
 - requesting information about an individual's health history from a responsible person, such as a relative or friend, if they attend an appointment with the individual or the individual is unable to provide the information themselves
 - a client's My Health Record, Queensland Health Viewer record, Australian Immunisation Register record, National Cancer Screening Register records, or Medicare registration
 - someone is planning to attend one of our training and education events and their personal information is provided by an organisation arranging their involvement, such as a school or employer
 - someone applies for a job with us and we request a reference from one of their referees.

7.0 WHY TRUE HANDLES PERSONAL INFORMATION

True handles personal information for many different purposes, including:

- to provide services to support our clients' health and wellbeing, including liaising with other healthcare and support organisations to ensure care is comprehensive, holistic and coordinated
- to evaluate, monitor and improve our services
- managing Medicare and other payments
- professional supervision and mentoring for our staff
- administering human resources and payroll functions for our employees
- planning, delivering and evaluating education, training and other community events
- developing website content and social media posts
- marketing our clinics, programs and services
- developing health promotion materials
- collecting and responding to feedback about our services
- processing requests to access and/or correct personal information we hold
- reviewing clinical and work health and safety incidents
- monitoring visitors to and activity on our websites and social media accounts
- research.

8.0 HOW TRUE STORES AND PROTECTS PERSONAL INFORMATION

8.1 General

- If someone asks us not to share their personal information with particular individuals or organisations, we will respect their decision, unless a lawful exception applies.
- When our employees sign employment agreements, they confirm they will keep confidential information (including personal information) secret while they work with us and when they are no longer employed by us.
- We only allow certain staff to access certain personal information. Access to our systems for storing personal information is provided on a strictly 'need to know' basis.
- We hold personal information in both paper-based and electronic formats.
- All personal information that True holds is stored in locations and data centres in Australia. If we share information with other organisations or agencies, we cannot guarantee that they will store the information in Australian-based locations and data centres.

8.2 Health information

- Our clients' health information is held securely in our electronic health information system.
- We use the HotDoc platform to manage our clinic bookings. HotDoc collects the personal information of our clients and may disclose this information overseas. HotDoc's privacy policy is available [here](#).

8.3 Employee record information

- Employee record information is held securely in our electronic human resources information system, our electronic payroll and finance systems and other secure electronic locations accessible by only by staff who require this information for their roles.
- True may from time to time use online employment services to advertise jobs and manage job applications. Job applicants who apply via this route will share their personal information with these services via their websites. All services should have privacy policies available on their websites.

9.0 ANONYMITY

- We provide people with the option of interacting with us anonymously (without telling us their name or any other identifying information) or using a pseudonym (a name that is different to their real name), if this is reasonably possible in the circumstances.
- In most situations, we are likely to need to know the person's name, contact details and enough information to allow us to deal with their issues effectively.
- If someone tells us they would like to deal with us anonymously or using a pseudonym, we will always consider this and discuss potential risks and benefits, although there may be situations where we will not be able to agree to the request.

10.0 HOW TRUE USES AND DISCLOSES PERSONAL INFORMATION

- True only uses and discloses personal information for the specific purpose/s for which it was collected. If we wish to use personal information for a different purpose, we will ask permission first (unless a lawful exception applies).
- If personal information we hold is used for research, procedures for handling this information must meet strict ethical requirements and be authorised by one of our senior leaders. We will always try to ask for consent to use personal information for research purposes if possible, but sometimes when it is not possible to ask for consent, we may be allowed to use personal information for research without consent. When we are considering using personal information for research purposes without consent, we undertake a careful risk assessment, including considering what our clients' expectations would be and take into account the views expressed during any engagement activities. Where personal information is used to inform research, no individuals will be identified in any related publications without explicit consent.
- Sometimes it may be necessary to disclose personal information without consent, such as:
 - to lessen or prevent a serious threat to the life, health or safety of any individual, or to public health and safety
 - taking appropriate action in relation to suspected unlawful activity or serious misconduct
 - locating a missing person
 - managing a legal claim or participating in confidential mediation or other alternative dispute resolution
 - other situations allowed by law.
- We may disclose information about our clients to other healthcare providers or support agencies where this is an agreed part of their care and treatment.
- We may disclose information about our clients to our funders, where this is contractually required. Information provided to funders is generally deidentified unless explicit consent is provided.

- Questions about how True handles personal information can be directed to True's Privacy Officer at:
Email: governance@true.org.au
Telephone: 07 3828 3600
Post: PO Box 215, Fortitude Valley, QLD, 4006

11.0 QUALITY OF PERSONAL INFORMATION

- True is committed to ensuring all personal information we hold is accurate, up-to-date and complete. We act to update or amend personal information promptly when we become aware that changes are needed.

12.0 DESTRUCTION AND DELETION OF PERSONAL INFORMATION

- We securely destroy and delete personal information when it is no longer needed or when we are required to or allowed by law.
- Sometimes we may remove information that identifies individuals and keep information in this deidentified form. Once information no longer identifies an individual, it is no longer considered 'personal information'.

13.0 TRUE'S WEBSITES, SOCIAL MEDIA PLATFORMS AND ELECTRONIC COMMUNICATIONS

13.1 Website

- True's website – true.org.au – is hosted in Australia.
- When people visit our website, we collect data that helps us learn about how people use our website and provides information such as the number of people who access our website, how long they spend on the website, the pages they visit, general information about their location and information about their browsers and devices. The data collected is not personal information and cannot identify individuals.
- Cookies are small data files that are created when someone visits our website and are stored on their devices. True uses cookies for record-keeping purposes and to improve users' experience of our website. Information collected using cookies will usually not be personal information. Most internet browsers give the option to accept or not accept cookies.
- True's website may contain links to third party websites. True is not responsible for the content or privacy practices of third party websites. Third parties' privacy policies should be available on their websites.
- True uses software provided by Arlo to manage and deliver our online education packages via our website. Arlo may collect and hold personal information outside Australia. Arlo's privacy policy is available [here](#).
- True uses Stripe, an online payments application, to manage payments in our online shop and donations page. Stripe may disclose personal information overseas. Their privacy policy is available [here](#).

13.2 Social media

- True uses [Facebook](#), [Instagram](#), [TikTok](#), [LinkedIn](#) and [YouTube](#) to provide information about our services and general health and wellbeing advice. Personal information posted on social media is covered by each platform's privacy policy, which is available via the links above.
- When people interact with our social media accounts, True collects any personal information they share.

13.3 Email

- True's internet service provider and information and communications technology staff may monitor email traffic for system troubleshooting and maintenance purposes only.

14.0 ARTIFICIAL INTELLIGENCE (AI)

- True acknowledges that AI is a growing and rapidly evolving part of our work. Our use of AI is changing quickly, as are our relevant policies and procedures. Privacy and personal information handling are key considerations when we contemplate any new uses of AI and we regularly review the privacy implications of our existing AI tools.
- For further information regarding how True uses AI and how we keep your personal information safe, contact True's Privacy Officer at: email governance@true.org.au ; telephone 07 3828 3600; post PO Box 215, Fortitude Valley, QLD, 4006.

15.0 MAILING LISTS AND DIRECT MARKETING

- True will ask for consent before an individual is included on any of our mailing lists or receives any other form of direct marketing.
- Individuals can choose not to be on a mailing list or receive direct marketing at any time by:
 - replying using the contact details in the message and asking to be removed from the mailing list
 - telling us during a phone call that they no longer want to be contacted
 - using the 'unsubscribe' link in an email (if there is one)
 - directly contacting the clinic, service or person who sent a message or called
 - contacting *True's Privacy Officer at: email governance@true.org.au ; telephone 07 3828 3600; post PO Box 215, Fortitude Valley, QLD, 4006.*
- True uses Mailchimp to manage our mailing lists. Mailchimp's privacy policy is available [here](#).

16.0 HOW PERSONAL INFORMATION CAN BE ACCESSED AND CORRECTED

- Everyone whose personal information True holds has the right to request access to and correction of their personal information.
- True needs to clearly identify anyone who asks to access or correct their personal information. Requests made in writing are best if possible, but we will accept requests to access or correct personal information in any reasonable format, as long as we can verify the person's identity, or if someone is acting on their behalf, verify that this person has permission to do so.
- We aim to respond to requests, provide the information or make corrections within 30 days of receiving the request.
- Requests to access or correct personal information can be directed to:
True's Privacy Officer
Email: governance@true.org.au
Telephone: 07 3828 3600
Post: True, PO Box 215, Fortitude Valley, QLD, 4006.
- True needs the following information to respond to a request to access or correct personal information:
 - the name and contact details of the person to whom the request relates
 - the personal information that is the subject of the request (try to be as specific as possible, for example, 'the record of my appointment with the nurse on 20 April', or 'You have my name wrong in the email you sent me on 31 May')
 - preferences regarding how the personal information will be accessed (for example, look at it on a computer at one of our clinics, by post or email)
 - if someone is acting on an individual's behalf, their name and contact details.
- If we decide not to grant a request to access or correct personal information, we will inform the person (or their representative) in writing and let them know how to complain or ask for more information about our decision. We may not grant a request to access or correct personal information if:

- giving access would pose a serious threat to the life, health or safety of any individual or to public health or public safety
- giving access would have an unreasonable impact on the privacy of others
- we think the request might not be serious or is intended to harass or intimidate our staff (for example, if the request contains abusive language)
- the person has previously made similar requests and the relevant information has already been provided
- the personal information is part of, or expected to become part of legal proceedings between the individual and True
- giving access would be unlawful
- giving access would be likely to interfere with investigating unlawful activity or misconduct
- giving access would reveal commercially sensitive information.
- True will never charge a fee for an individual to just ask for access to their personal information. We may charge for giving access to the requested personal information if giving access involves significant staff and/or administrative costs. We will always inform the person in advance if there is likely to be a cost for providing access to the requested personal information and what the cost is likely to be.

17.0 FEEDBACK ABOUT TRUE'S HANDLING OF PERSONAL INFORMATION

- We welcome feedback about how we have handled personal information. Feedback can be provided by contacting:

True's Privacy Officer

Email: governance@true.org.au

Telephone: 07 3828 3600

Post: True, PO Box 215, Fortitude Valley, QLD, 4006.

- We aim to respond to feedback and complaints within 30 days.

17.1 Complaints to the Office of the Australian Information Commissioner

- If a complaint has been made to True about personal information handling and we do not respond within 30 days or the complainant is unhappy with our response, a complaint can be made to the Office of the Australian Information Commissioner. Complaints to the Office of the Australian Information Commissioner can only be made in writing.
- The Office of the Australian Information Commissioner can accept written complaints:
 - through their [online privacy complaint form](#)
 - on a [privacy complaint form](#) downloaded from their website
 - in a letter (GPO Box 5288, Sydney, NSW, 2001) or fax (02 6123 5145).

18.0 OVERSEAS DISCLOSURE

- In general, True does not disclose personal information overseas. There may be very limited situations where this is necessary, such as when a client moves overseas and requests access to their healthcare records or in emergency situations.
- When people interact with us through our social media accounts, websites and applications hosted by our business partners, those platforms, websites and applications (and other organisations associated with them) may collect and hold personal information overseas.

19.0 BREACH

Any breach of this policy must be reported immediately to a manager or senior leader.

True will follow relevant policies and procedures including but not limited to those related to professional development, performance management, disciplinary processes, grievances, complaints, and whistleblowing when responding to breaches of this policy.

Where necessary True may report relevant matters to other agencies, such as the Office of the Australian Information Commissioner.

20.0 SUPPORTING DOCUMENTS AND REFERENCES

20.1 Legislation

- *Privacy Act 1988* (Cth)

20.2 Guidance

- Australian Privacy Principles Guidelines (Office of the Australian Information Commissioner, 2025)
- Guide to Developing an APP Privacy Policy (Office of the Australian Information Commissioner, 2014)

20.3 True policies and procedures

- Confidentiality Procedure
- Confidentiality, Privacy and Management of Client Information Policy and Procedure
- Data Governance Policy
- Privacy Policy Summary

21.0 AUTHORITIES AND RESPONSIBILITIES

Board	<ul style="list-style-type: none"> • Approve policy.
CEO	<ul style="list-style-type: none"> • Accountable to the Board for implementation of the policy.
Privacy Officer (Governance Manager)	<ul style="list-style-type: none"> • Draft policy. • Monitor for legislative changes that would require updates to the policy. • Operational responsibility for True's privacy and personal information handling practices.
Senior Leadership Team Managers	<ul style="list-style-type: none"> • Ensure staff understand and comply with the policy. • Immediately act on breaches of the policy.
People & Culture	<ul style="list-style-type: none"> • Ensure all staff review this policy as part of their induction and at regular intervals during their employment.
All staff	<ul style="list-style-type: none"> • Read, understand and comply with the policy. • Immediately report any breaches of the policy to a manager or senior leader.

22.0 REVIEW

This document will be reviewed regularly following material organisational or legislative changes or, as a minimum, every three years.

23.0 DOCUMENT HISTORY

Version	Approval date	Authorised by	Sections modified and summary of changes
1			Release
2	18/9/2011	CEO	Review
3	18/9/2013	CEO	Review
4	18/6/2014	CEO	Major review in accordance with amendment to Privacy Act. Policy updated.
5	2/10/2015	HR, WH&S and Quality Coordinator	Logo and format update only. No changes made to content.
6	19/7/2016		Revised. Format changes, "We" changed to "True" and "You" changed to the client or removed.
7	31/7/2017	Board	Revised, no updates.

8	11/2/2021	Board	Revised to include Ransomware.
8.1	Draft	Draft	Major revision to ensure compliance with the <i>Privacy Act 1988</i> (Cth) and Australian Privacy Principles and reflect current circumstances at True.
9.0	23/04/2026	Board	Minor updates following review by the Governance, Risk & Culture Committee and Board.
