

PRIVACY & PERSONAL INFORMATION POLICY

Shield and Rebuild Charity LTD

Version: 2.1 - Approved

Original draft date: 12 September 2026

Revision / Board approval date: 13 October 2026

Effective date: 13 October 2026

Status: Approved by Board

Policy owner: Board / Responsible People

Review cycle: At least annually and after material changes

Next review: October 2027

This policy was approved by the Board on 13 October 2026. It is an organisational policy, not an ACNC-approved document or legal advice.

1. PURPOSE

To explain how Shield and Rebuild collects, uses, stores, discloses, protects and manages personal and sensitive information in connection with referrals, assistance, donations, volunteering, employment, contracting, complaints and governance.

2. SCOPE

This policy applies to the Board / Responsible People, employees, volunteers, contractors, consultants, students, partner organisations and any person acting for or representing Shield and Rebuild. Contractual arrangements should require relevant third parties to meet equivalent standards where appropriate.

3. PRIVACY APPROACH

Shield and Rebuild will comply with privacy laws that apply to it and, as a governance standard, seek to follow privacy-by-design principles, including transparency, data minimisation, purpose limitation, security and controlled access, even where a particular statutory obligation may not apply.

4. INFORMATION WE MAY COLLECT

Identity and contact information; referral details; residential, property and tenancy information; communications and application records. Information about incidents, police/QPRIME references, court or protection-order information, alleged offenders and site-safety risks. Sensitive information where reasonably necessary and lawful, including health or disability information, criminal-record information and experiences of violence or abuse. Evidence relevant to approved program eligibility criteria, including citizenship evidence where required. Insurance, funding, landlord/housing-provider and support-agency information; donation, volunteer, employment, contractor, complaint and governance records. Website and technical information where collected through digital services.

5. HOW INFORMATION IS COLLECTED

Information may be collected directly from the person, through referral or other operational forms, from an authorised representative or referrer, or from police, insurers, landlords, housing providers, support organisations, contractors or other sources where the person has consented or collection is otherwise lawful and appropriate. Public story submission is not offered.

6. PURPOSE OF COLLECTION AND USE

Information may be used to assess and verify eligibility; understand requested assistance; assess worker and beneficiary safety; obtain property authority; prevent duplicate assistance or misuse; coordinate approved services; manage complaints and incidents; comply with law; administer volunteers, staff, contractors and donors; protect the charity; and maintain appropriate governance records. Assistance is considered case by case and is not guaranteed.

7. SENSITIVE INFORMATION AND VERIFICATION

Sensitive information will only be sought where reasonably necessary for a legitimate function or activity and where collection is lawful. Personnel must not collect graphic or intrusive trauma details merely because they may be available. Verification requests should be limited to what is needed for the decision or safety purpose.

8. DISCLOSURE

Information may be disclosed to authorised personnel and, where necessary and lawful, to contractors delivering approved work, insurers, professional advisers, police/emergency services, regulators, landlords/property managers, support organisations or other parties involved in verification or service delivery. Only the minimum reasonably necessary information should be disclosed.

9. SECURITY AND ACCESS

Shield and Rebuild will use reasonable administrative, physical and technical safeguards appropriate to the sensitivity of the information. Access should be role-based and need-to-know. Security-system layouts, access codes, addresses, police information and safeguarding records require particular care. Access to systems and records should be reviewed and removed when no longer required.

10. WEBSITE, EMAIL AND SERVICE PROVIDERS

The charity may receive information through its website forms, business email and service providers used for hosting, communication, donations and administration. It should disclose the relevant providers and practices accurately in its public-facing notices. Implementation verification outstanding: confirm actual website hosting, email processing, analytics/cookies, payment-provider arrangements, where information is stored or accessed, and whether any overseas disclosures occur before publication of this section as a definitive description.

11. RETENTION AND DESTRUCTION

Personal information should not be kept indefinitely without a lawful or operational reason. Records must be retained for applicable legal, insurance, governance, safeguarding, financial and dispute-management periods and then securely destroyed or de-identified where appropriate. Implementation action outstanding: approve a records-retention schedule identifying record categories, retention triggers, applicable periods and secure disposal responsibilities.

12. ACCESS AND CORRECTION

Individuals may request access to or correction of personal information held about them by emailing contact@shieldandrebuild.com. The charity should acknowledge requests, verify identity appropriately and respond within a reasonable period in accordance with applicable law. Requests may be limited or refused where permitted or required by law, including where disclosure would unreasonably affect another person's privacy, compromise safety, reveal confidential material or prejudice an investigation.

13. DATA BREACHES

Suspected loss, unauthorised access, disclosure or misuse of personal information must be reported internally immediately. Shield and Rebuild will contain, assess and remediate incidents and make notifications required by applicable privacy or other laws, including the Notifiable Data Breaches scheme where it applies. The charity should maintain an internal incident-response procedure.

14. PRIVACY ENQUIRIES AND COMPLAINTS

Privacy enquiries, access or correction requests and complaints can be sent to contact@shieldandrebuilt.com. Complaints will be handled under the Complaints, Feedback & Whistleblowing Policy. Where applicable, a person may also have rights to complain to the Office of the Australian Information Commissioner. Website: www.shieldandrebuilt.com.

15. DOCUMENT CONTROL AND REVIEW

The Board / Responsible People will review this policy at least annually and sooner following a serious incident, complaint trend, material change to services, legislative change, regulatory guidance or identified control weakness. Superseded versions should be retained in accordance with recordkeeping requirements.

BOARD APPROVAL RECORD

Board meeting date: 13 October 2026

Board resolution / minute reference: Not provided - confirm against Board records

Date adopted: 13 October 2026

Effective date: 13 October 2026

Authorised signatory / role: Travis Casuscelli - Director

Next scheduled review: October 2027

Outstanding implementation checks: Confirm digital service providers and overseas access/disclosures; approve a records-retention schedule; check operational implementation and legal applicability. These matters have not been represented as completed.