



# Privacy Policy

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## **Confidential and Commercially Sensitive**

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# 1. Privacy Policy

## 1.1 Huber Social

Huber Social's Vision is a world that is systematically working towards Collective Wellbeing.

Our Mission is to find and accelerate the most promising opportunities to create Collective Wellbeing and ensure no one is left behind.

To achieve this, Huber Social applies a universally applicable Wellbeing Measurement Framework and Social Value Metric to determine the social value that an organisation has created and to identify how to maximise it.

The **Huber Social Wellbeing Measurement Framework** recognises that the overall goal of all social impact is to put people in the best position to fulfil their potential and achieve Wellbeing. To measure the effectiveness of a social intervention, Huber Social measures shifts in Wellbeing to be able to prove the impact, as well as shifts in the capability and opportunity needs of people to inform how the impact may be improved.

The social value of the intervention is then calculated, using **the Huber Social Value Metric**, as the product of the 'Impact' achieved (shift in Wellbeing after accounting for contribution), the relative 'Need' for the intervention and the 'Reach' of the intervention in terms of the number of people impacted.

The measurement plan, including scope of metrics and approach, is agreed in a co-design planning process involving the organisation delivering the services directly. Data is collected using a mix of qualitative and quantitative activities with a focus on the use of surveys and mapping of secondary data sets. To calculate results statistical analysis is performed to understand what matters for that person at that point in time.

Huber Social is developing a global Wellbeing database to inform decision making at every level – from service delivery, to investment, to policy.

## 1.2 Purpose of the Privacy Policy

To protect the integrity of Huber Social Impact Measurement it is critical that the collection and treatment of personal information by Huber Social is clear to all.

The Privacy Policy aims to achieve this by:

- clearly communicating the personal information handling practices of Huber Social Pty Ltd;
- give individuals clear understanding of the sort of personal information that Huber Social holds, and the way we handle that information; and
- set out the rights of individuals in relation to their personal information held by Huber Social.

## 1.3 Ethics

Social Impact Measurement is an emerging field that sits between continuous internal improvement and research. As such, Social Impact Measurement projects do not fit clearly under any existing industry standards for Ethic procedures.



For some sectors there are relevant Ethics Review bodies that will accept a submission for social impact measurement projects, such as the Aboriginal and Torres Strait Islander Studies Ethics Review Board or the Australian Research Council's National Health and Medical Research Council (NHMRC). However, for many projects there are no appropriate entities.

Therefore, to ensure Huber Social's impact measurement projects 'do no harm' and the integrity of our work is maintained, where there is no relevant entities, Huber Social has adopted an Ethics Approval process based on the Australian NHMRC and Universities Australia Conduct of Research 2018<sup>1</sup>.

Once agreed with an organisation, the implementation plan will be presented to the Huber Social Ethics Review Board for consideration. Any adjustments required to the implementation plan will be presented to the organisation for approval and Huber Social will provide notice to the organisation if this process will, or is likely, to cause delay to the agreed implementation plan.

Huber Social will notify an organisation once the implementation has been approved by the Huber Social Ethics Board.

## 1.4 Obligations under the Privacy Act

This privacy policy sets out how we comply with our obligations under the *Privacy Act 1988* (Privacy Act). In this privacy policy, "personal information" has the same meaning as defined by section 6 of the Privacy Act:

information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

## 1.5 Types of Personal Information we collect

Personal information collected from participants may include: the participant's name; address, gender, date of birth, occupation, education, income, personality/temperament, personal strengths, interpersonal relationships (with parents, peers, partners), and life events. Similar information may be collected for others in the household, family or teachers of the participant.

Sensitive information collected from participants may include: relationship information or status; attitudes to/experiences of marriage, cohabitation, and children; health or medical information; details of contact with legal system or courts; sexuality; history of violence; emotional adjustment (e.g., depression, anxiety); licit and illicit substance use; antisocial behaviour (including contact with the criminal justice system); risky driving practices (e.g., driving while under the influence of alcohol or drugs); child maltreatment; and religion.

Participant contact details and responses to surveys or interviews that include personal information are kept as records. The records are securely kept in a variety of formats, including computer, paper, audio, video and digital media.

## 1.6 Data Collection

It is our usual practice to collect personal information directly from the individual or their authorised representative.

We only collect personal information for purposes that are reasonably necessary for, or directly related to, our functions or activities in accordance with the *Family Law Act 1975*, and the *Privacy Act 1988*, and only when it is necessary for or directly related to such purposes.

These purposes are listed below.

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<sup>1</sup> Australian Research Council's National Health and Medical Research Council (NHMRC) and Universities Australia Conduct of Research 2018, available for download via <https://www.nhmrc.gov.au/guidelines-publications/r41>



### **1.6.1 Conduct research and communicate findings**

Personal information is collected when an individual takes part in a Huber Social Wellbeing measurement project and provides personal information as part of responding to a Wellbeing survey or interview.

All survey data remains de-identified, unless the specific survey allows for the collection of personal contact details for the individual to elect to have their response sent to them. Deidentified survey data is to be entered and stored on a secure, password protected, Australian based data storage platform.

For longitudinal studies, each participant is given a unique identifier number so that Huber Social can determine individual 'shifts' in any longitudinal studies as required.

### **1.6.2 Administrative activities**

Personal information is collected when we manage the personnel and corporate service functions of Huber Social, including the sales process, human resource management, and other corporate service functions.

## **1.7 Use and disclosure**

We only use personal information for the purposes for which it was collected, either for a particular purpose (primary purpose) or for a related purpose (secondary purpose).

The usual purpose for collecting data is as follows, however the specifics are detailed in participant information sections of each measurement project. The usual purposes are as follows:

- Primary - to measure the impact of a client's service or intervention on an individual including the impact in terms of overall Wellbeing and the specific program outcomes.
- Secondary - to be consolidated into the Huber Social Global Wellbeing database that tracks global Wellbeing longitudinally.

We do not give personal information to a third party unless one of the following applies:

- the individual has consented
- the individual would reasonably expect, or has been told, that information of that kind is usually passed to those individuals, bodies or agencies
- it is otherwise required or authorised by law
- it will prevent or lessen a serious and imminent threat to somebody's life or health
- it is reasonably necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of public revenue.

## **1.8 Data quality**

We take reasonable steps to ensure that the personal information we collect is accurate, up-to-date and complete. These steps include maintaining and updating personal information when we are advised by individuals that their personal information has changed, and at other times as necessary.

## **1.9 Data Security and Storage**

Generally, all survey data remains de-identified, unless the specific survey allows for the collection of personal contact details for the individual to elect to have their response sent to them. Deidentified survey data is to be entered and stored on a secure, password protected, Australian based data storage platform.

If personal information is collected that could potentially be used to identify an individual, it is removed from the records as early as possible so that records being analysed are in a de-identified format.

In most projects, the data collected from research participants are either anonymous or are de-identified to protect the privacy of participants.



For longitudinal studies, each participant is given a unique identifier number so that Huber Social can determine individual 'shifts' in any longitudinal studies as required.

We take reasonable steps to protect the personal information we hold against interference, loss, unauthorised access, use, modification or disclosure, and other misuse, in line with the *Australian Government's Protective Security Policy Framework (PSPF)*. These steps include password protection for accessing our electronic IT systems, securing paper files in locked cabinets, and implementing physical access restrictions. In addition, we also manage personal information in accordance with our records management policies and procedures.

When no longer required, personal information is destroyed in a secure manner, or deleted according to the *Archives Act 1983*.

### **1.9.1 Storage of Hard Copy Surveys**

Hardcopy surveys are scanned and digitally stored for 7 years on the Dropbox secure data storage platform.

- Dropbox files at rest are encrypted using 256-bit Advanced Encryption Standard (AES) Dropbox uses Secure Sockets Layer (SSL)/Transport Layer Security (TLS) to protect data in transit between Dropbox apps and our servers.
- SSL/TSL creates a secure tunnel protected by 128-bit or higher Advanced Encryption Standard (AES) encryption
- Dropbox applications and infrastructure are regularly tested for security vulnerabilities, and hardened to enhance security and protect against attacks
- Two-step verification is available for an extra layer of security at login
- Storage servers are located in data centers across the United States. Additionally, storage servers are available in Germany, Australia, and Japan for some Dropbox Business users.

### **1.10 Access and correction**

Individuals maintain the right to request all data be returned to them and records destroyed on the Huber Social database.

If an individual requests access to the personal information we hold about them, or requests that we change that personal information, we will allow access or make the changes unless we consider that there is a sound reason under the Privacy Act, *Freedom of Information Act 1982* or other relevant law to withhold the information or not make the changes.

If we do not agree to provide access to personal information or to amend or annotate the information we hold, an individual may lodge a formal complaint with Huber Social.

If we do not agree to make requested changes to personal information the individual may make a statement about the requested changes and we will attach this to the record.

Individuals can obtain further information about how to request access or changes to the information we hold about them by contacting us at [info@hubersocial.com.au](mailto:info@hubersocial.com.au).

### **1.11 Complaints**

An individual may wish to complain about an act or practice undertaken by Huber Social that the individual considers to be an interference with their privacy.

If an individual wishes to make a complaint, they should contact us at [info@hubersocial.com.au](mailto:info@hubersocial.com.au).

