

Org 1.8	PRIVACY POLICY
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Applies to: All employees, Board members, contractors and volunteers
Specific responsibility: Manager

Version: 1
Date approved: 20 th June 2019
Next review date: One year from date of approval

Policy context: This policy relates to	
Standards or other external requirements	Aged Care Quality Standards NDIS Practice Standards
Legislation or other requirements	Privacy Act 1988 (Cth) Australian Privacy Principles Privacy Regulation 2013 Plus any other relevant State and Commonwealth legislation
Contractual obligations	Funding Agreements

POLICY STATEMENT

The Neighbourhood Centre is committed to protecting and upholding the right to privacy of personal information of service users, employees, volunteers, Board members, contractors and representatives of agencies with whom The Neighbourhood Centre works. The Neighbourhood Centre is committed to protecting the right of privacy by the following methods:

- the way information is collected about individuals
- what information is collected from individuals
- why the information is collected
- how information is used and disclosed
- how the information is stored
- how the information is accessed and
- how complaints and questions about information are managed.

The Neighbourhood Centre will ensure that:

- it meets its legal and ethical obligations as an employer and service provider in relation to protecting the privacy of service users, employees, volunteers, Board members and contractors
- service users, staff, volunteers, contractors and Board members are provided with, and understand, information about their rights regarding privacy
- service users, employees, volunteers, contractors and Board members are provided with privacy when they are being interviewed or discussing matter of a personal or sensitive nature

- all employees, Board members, contractors and volunteers understand their responsibilities in meeting these obligations.

DEFINITIONS

Personal Information: is information or opinion which constitutes personal information about an individual for example, names, addresses, telephone numbers, email addresses, date of birth, gender and passport numbers. Personal information does not include information when it is contained in a publicly available publication.

Sensitive Information: is a type of personal information that also includes information or opinions about:

- racial or ethnic origin
- political opinion
- membership of a political association, professional or trade association or trade union
- religious beliefs or affiliations or philosophical beliefs
- sexual preferences or practices
- criminal record
- health information or disability.

IMPLEMENTATION OF POLICY

Responsibilities:

Management will:

- Ensure that all employees, volunteers, contractors and Board members are familiar with this Privacy Policy and the procedures for handling personal information.
- Ensure the safeguarding of personal information relating to The Neighbourhood Centre employees, Board members, volunteers, contractors, members of The Neighbourhood Centre and service users.
- Ensure that service users and individuals are provided with information about their rights regarding privacy.
- Ensure that any complaints or queries about a privacy issue are managed in a professional manner.
- Be responsible for the content of The Neighbourhood Centre publications, communications, website and social media pages and ensure the following:
 - Appropriate consent is obtained for inclusion of any personal information about any individual including The Neighbourhood Centre employees, volunteers, contractors, Board members and service users.
 - Information being provided by other agencies conforms to privacy principles.

- That The Neighbourhood Centre website contains a Privacy Statement that makes it clear the conditions that apply to the collection of personal information from the public through their visit to that website.

All employees, volunteers, contractors and Board members will:

- Be responsible for the correct management of personal information which they collect and have access to in the conduct of their daily activities and/or research.
- Ensure privacy of service users, employees, volunteers, contractors or Board members when they are being interviewed or discussing matters of a personal or sensitive nature.

Collection of Personal Information

- Personal information collected by The Neighbourhood Centre may include an individual's name, date of birth, gender, contact information, and other information about their history with or relationship to The Neighbourhood Centre.
- Personal Information will be collected only for purposes necessary to the functions and activities of The Neighbourhood Centre i.e. will be used only for the purpose for which it was provided.
- Personal information will be collected only with the consent of the individual.
- Individuals will be informed what personal information will be collected, what purposes it is used for, what is disclosed and who will have access to the information.
- Information collected will be accurate, complete and up to date.
- The Neighbourhood Centre will obtain an individual's consent when collecting sensitive information.
- Where possible The Neighbourhood Centre will collect personal information directly from the individual concerned. This may be in person, on the telephone or electronically.
- Personal information may be collected when an individual interacts with The Neighbourhood Centre online (including but not limited to The Neighbourhood Centre websites and social media channels (for example Facebook, LinkedIn).

Why The Neighbourhood Centre collects personal information

- Personal information may be collected:
 - For employment purposes.
 - To provide details to The Neighbourhood Centre for an application form, consent form, survey, feedback form or incident report.
 - To provide the individual with information and support services, and to evaluate and report on these services.
 - To register as a volunteer to assist The Neighbourhood Centre with volunteering, advocacy and other activities.

- To communicate with individuals in relation to The Neighbourhood Centre's operations, activities and objectives, to verify an individual's identity, to evaluate programs and services and to comply with relevant laws.
- For election to the Board.
- To become a member of The Neighbourhood Centre.
- The Neighbourhood Centre may aggregate information for internal reports to identify usage of its services and to maintain services. It will not identify individuals and will not include personal information.
- The Neighbourhood Centre will limit the collection of any sensitive information to the minimum amount required to perform its services.

Use and Disclosure of Personal Information

- The Neighbourhood Centre will not disclose personal information without an individual's consent unless otherwise authorised by law. However, The Neighbourhood Centre may disclose personal information to a third party if the disclosure is necessary to prevent or lessen a serious and imminent threat to the life or health of another person or if required by law.

Storage of Personal Information

- Personal information will be stored on password protected electronic databases. Hardcopy information will be stored in The Neighbourhood Centre's offices, which are secured to prevent entry by unauthorised people.
- The Neighbourhood Centre will take all reasonable steps to protect all the personal information it holds from misuse, interference and loss, from unauthorised access, modification or disclosure.
- The steps that The Neighbourhood Centre will take include strict confidentiality requirements of its employees, volunteers, contractors and Board members, security measures for system access and security measures for its websites such as firewalls and system encryption.
- Personal information that is no longer required and/or after the legal requirements for retention of those records will be destroyed or permanently de-identified.

Accessing Personal Information

- Access will be provided to individuals to review their personal information held. Individuals can request amendment to that information if the individual believes that it is incorrect.
- The Neighbourhood Centre will take reasonable steps to verify the identity of the individual before granting access or making corrections to or deleting personal information.

Complaints

- Individuals may make complaints about the information handling practices of The Neighbourhood Centre or breaches of an individual's privacy by The Neighbourhood

Centre. Access and amendment requests, complaints and other privacy enquiries will be directed to the Manager.

Employee, Volunteer and Contractor Records

- An employee record is a record of personal information in either paper or in an electronic format. This record comprises information about employment, including health, recruitment and selection, terms and conditions of employment, performance, discipline and resignation.
- Employee records are confidential and will be kept in locked storage.
- A Fair Work Inspector can request information about employees to establish that The Neighbourhood Centre is meeting its employment obligations under the Fair Work Act. The Neighbourhood Centre is required to provide this information.
- The Neighbourhood Centre will take reasonable steps to ensure that government agencies such as the Australian Taxation Office have the power to request personal information.

Participants in Research Projects

- Individuals who are invited to participate in research projects must be:
 - Given a choice about participating or not
 - Given the right to withdraw at any time
 - Informed about the purpose of the research project, the information to be collected and how the information they provide will be used
 - Given copies of any subsequent publications.
- The collection of information will be limited to that which is required for the conduct of the project. Individual participants will not be identified.

Breach of Privacy Policy

A failure to comply with this Policy will be viewed seriously and may, in line with The Neighbourhood Centre's Disciplinary Policy, result in disciplinary action including termination of employment.

Employees, volunteers, Board members and contractors must report breaches of this Policy to the Executive Officer or to the Board Chairperson.

DOCUMENTATION

Documents related to this policy	
Related policies	Confidentiality Policy Recruitment and Selection Policy Conditions of Employment EEO Policy Disciplinary Policy Whistleblower Policy
Forms, record keeping or other organisational documents	Employment related documents

Reviewing and approving this policy		
Frequency	Person responsible	Approval
Annually	Executive Officer and Governance and Risk Committee	Board

Policy review and version tracking			
Review	Date Approved	Approved by	Next Review Due