

PRIVACY POLICY



Privacy Policy

Document number: MGT-POL-002-V2

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1. Purpose

- 1.1. Carrie's Place is committed to protecting and upholding the right to privacy of clients, staff, volunteers, Governance Committee members and representatives of agencies we deal with. In particular, Carrie's Place is committed to protecting and upholding the rights of our clients to privacy in the way we collect, store and use information about them, their needs and the services we provide to them.
- 1.2. Carrie's Place requires staff, volunteers and Governance Committee members to be consistent and careful in the way they manage what is written and said about individuals and how they decide who can see or hear this information.
- 1.3. Carrie's Place is subject to the *Associations Incorporation Act 2006* and the *Associations Incorporation Regulation 2010*. The organisation will follow the compliance requirements of the ACNC and the guidelines of the *Australian Privacy Principles* in its information management practices.
- 1.4. Carrie's Place 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 organisational personnel;
 - Clients are provided with information about their rights regarding privacy;
 - Clients and organisational personnel are provided with privacy when they are being interviewed or discussing matters of a personal or sensitive nature;
 - All staff, Governance Committee members and volunteers understand what is required in meeting these obligations; and
 - It will adhere to all requirements imposed under the *Privacy Act 1988*, including the requirements imposed by the *Privacy Amendment (Notifiable Data Breaches) Act 2017*, to strengthen the protection of personal information.
- 1.5. This policy conforms to the *Privacy Act (1988)* and the *Australian Privacy Principles* which govern the collection, use and storage of personal information.
- 1.6. This policy will apply to all records, whether hard copy or electronic, containing

personal information about individuals, and to interviews or discussions of a sensitive personal nature.

2. Procedures

2.1 Dealing with personal information

In dealing with personal information, Carrie's Place staff will:

- Ensure privacy for clients, staff, volunteers or Governance Committee members when they are being interviewed or discussing matters of a personal or sensitive nature;
- Only collect and store personal information that is necessary for the functioning of the organisation and its activities;
- Use fair and lawful ways to collect personal information;
- Collect personal information only by consent from an individual;
- Ensure that people know what sort of personal information is held, what purposes it is held it for, how it is collected, used, disclosed and who will have access to it;
- Ensure that personal information collected or disclosed is accurate, complete and up-to-date, and provide access to any individual to review information or correct wrong information about themselves;
- Take reasonable steps to protect all personal information from misuse and loss, and from unauthorised access, modification or disclosure;
- Destroy or permanently de-identify personal information no longer needed and/or after legal requirements for retaining documents have expired; and
- Notify individuals and the Office of the Australian Information Commissioner (OAIC) when there has been a data breach (or suspected breach) of personal information, if it is likely to result in serious harm to individuals whose privacy has been breached.

2.2 Responsibilities for managing privacy

2.2.1 All staff are responsible for the management of personal information to which they have access, and in the conduct of research, consultation or advocacy work.

2.2.2 The CEO is responsible for content in Carrie's Place publications, communications and web site; and must ensure the following:

- Appropriate consent is obtained for the inclusion of any personal information about any individual including Carrie's Place personnel;
- Information being provided by other agencies or external individuals conforms to privacy principles; and
- That the website contains a Privacy Statement that makes clear the conditions of any collection of personal information from the public through their visit to the website.

2.2.3 The CEO is responsible for safeguarding personal information relating to Carrie's Place staff, Governance Committee members, volunteers, contractors and Carrie's Place members.

2.2.4 The Privacy Contact Officer: The Privacy Contact Officer will be the CEO. The CEO will be responsible for:

- Ensuring that all staff are familiar with the Privacy Policy and administrative procedures for handling personal information;
- Ensuring that clients and other relevant individuals are provided with information about their rights regarding privacy; and
- Handling any queries or complaint about a privacy issue.

2.3 Privacy information for clients

2.3.1 At the initial point of contact with a client i.e. intake assessment, clients will be told what information is being collected, how their privacy will be protected and their rights in relation to this information.

2.4 Privacy for interviews and personal discussions

2.4.1 To ensure privacy for clients or staff when discussing sensitive or personal matters, the organisation will:

- Ensure layout of at least one public space in Carrie's Place venues allows for a private conversation between staff and client to occur;
- Staff will make use of private meeting rooms when making phone calls which discuss confidential client information;
- Private interview spaces are made available for both staff and clients; and
- When home visits are conducted, where possible, private conversations may be made possible at the request of a staff member or client.

2.5 Participants in research projects

2.5.1 People being invited to participate in a research project 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 information they provide will be used; and
- Given copies of any subsequent publications.

The collection of personal information will be limited to that which is required for the conduct of the project. Individual participants will not be identified.

Organisational participants in research projects will generally be identified in Carrie's Place research, unless the nature of a particular project requires anonymity, or an organisation specifically requests it.