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## SD – Privacy Policy

Headway Gippsland is committed to protecting and upholding the right to privacy of all clients, staff, volunteers and the board members, we deal with. In particular, Headway Gippsland is committed to protecting and upholding our clients' right to privacy in the way we collect, store and use information about them, their needs and the services we provide to them.

Headway Gippsland requires staff, volunteers and Board 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.

Headway Gippsland 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 by receiving the Participant handbook and also their service agreement;
- All staff, board members and volunteers understand what is required in meeting these obligations; and

This policy conforms to the *Privacy Act 1988 (Cth)* and the *Australian Privacy Principles* which govern the collection, use and storage of personal information. (Note: The Privacy Act 1998 (Cth) applies to organisations with an annual turnover over \$3m or organisations that are health service providers, operators of a residential tenancy database, a contractor that provides services under a Commonwealth contract, an organisation that is related to a larger organisation or one which trades in personal information. Many funding contracts may require that funded organisations comply with the Australian Privacy Principles).

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.

### Procedures

#### Dealing with personal information

In dealing with personal information, Headway Gippsland staff will:

- Ensure privacy for clients, staff, volunteers or board 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 for and 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;

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- 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.

### Responsibilities for managing privacy

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.

CEO and/or their delegate is responsible for content in Headway Gippsland 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 Headway Gippsland 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.

CEO and/or their delegate is responsible for safeguarding personal information relating to Headway Gippsland staff, Board members, and volunteers.

**The Privacy Contact Officer:** The Privacy Contact Officer will be the CEO. The [insert staff position] 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.

### Privacy information for clients

At the point of intake, clients will be told what information is being collected, how their privacy will be protected and their rights in relation to this information.

### Privacy for interviews and personal discussions

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

- Use a private meeting room
- Close any doors to keep privacy

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.