



Operational Management

OM:01

Privacy

Policy No. OM 01 : Privacy

INTRODUCTION

3Bridges Community Limited (3BC) respects the privacy of clients, team members and other workplace participants. Furthermore, 3BC is committed to ensuring that all Board members and others involved in the management of the organisation comply with their obligations (where applicable) under the Privacy Act 1988 and Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Commonwealth). 3BC is committed to the Australian Privacy Principles and has reviewed this policy to ensure it is aligned to the new harmonised privacy principles. 3BC Board does not condone the abuse of privacy of clients, team members and other workplace participants and has therefore produced clear policy and procedure for team members to follow.

PURPOSE

The purpose of this policy is to provide clear guidelines for the Board and team members in relation to Privacy requirements.

PROGRAMS/POLICY APPLIES TO

All programs operating through the 3BC, the Board, Chief Executive Officer and all team members.

POLICY STATEMENT

3BC is committed to protecting and upholding the right to privacy of clients, staff, volunteers, Board members and representatives of agencies we deal with. In particular 3BC 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.

3BC 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.

3BC is subject to various contractual obligations around privacy and confidentiality with various government agencies. The organisation will follow the guidelines of the *Australian Privacy Principles* in its information management practices.

3BC 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, Board members and volunteers understand what is required in meeting these obligations.

This policy conforms to the *Federal Privacy Act (1988)* and the *Australian Privacy Principles* which govern the collection, use and storage of personal information.

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, 3BC 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
- destroy or permanently de-identify personal information no longer needed and/ or after legal requirements for retaining documents have expired.

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.
- The Manager, Philanthropy, Partnerships and Innovation is responsible for content in 3BC 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 3BC personnel, including the use of photographs.
 - information being provided by other agencies or external individuals conforms to privacy principles.
 - 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.
- The Director, Finance is responsible for safeguarding personal information relating to 3BC staff, Board members, volunteers, contractors and 3BC members.
- **The Privacy Contact Officer:** The Privacy Contact Officer will be the Director, Operations and Integration. The Director, Operations and Integration 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

- handling any queries or complaint about a privacy issue

Privacy information for clients

At the initial point of contact with a client (eg. intake, initial assessment etc), 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:

- Ensure discussions are conducted out of hearing of other clients, staff members or members of the public.

Participants in research projects

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.
- 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 3BC research, unless the nature of a particular project requires anonymity or an organisation specifically requests it.

Further Actions

<p>File</p>	<p>Documentation</p> <p>Privacy Amendment (Enhancing Privacy Protection) Act 2012</p> <p>Privacy Act 1988 (Cth) which incorporates the amendments made to it by the Privacy Amendment (Private Sector) Act 2000 (Cth).</p> <p>Privacy & Confidentiality Agreement - Team members form (HR/F20)</p> <p>Privacy & Confidentiality Agreement - Board form (OM/F9)</p>
<p>Retain</p>	<p>Other relevant policy/procedure</p>