

*HECIS: Privacy Policy*

<b>1.7</b>	<b>PRIVACY</b>
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Applies to: Staff, Management Committee, volunteers
Specific responsibility: Staff, Management Committee

Version:
Date approved: <b>21/02/2023</b>
Next review date: <b>Jan 2024</b>

<b>Policy context:</b> This policy relates to	
Standards or other external requirements	
Legislation or other requirements	Australian Privacy Principals (APP) Federal Privacy Act (1998)
Contractual obligations	

**POLICY STATEMENT**

HECIS is committed to protecting and upholding the right to privacy of clients, staff, volunteers, Management Committee members and representatives of agencies we deal with. In particular HECIS 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.

HECIS requires staff, volunteers and Management 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.

The organisation will follow the guidelines of the *Australian Privacy Principles* in its information management practices.

- HECIS 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, Management Committee members and volunteers understand what is required in meeting these obligations.

This policy conforms to the *Federal Privacy Act (1998)* and the *Australian Privacy Principles* which govern the collection, use and storage of personal information.

*(Note: The Federal Privacy Act does not apply to organisations with an annual turnover under \$3m, but many funding contracts require that funded organisations comply with the 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, HECIS staff will:

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- ensure privacy for clients, staff, volunteers or Management 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 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.
- Staff to ensure that the removal of all files/documents containing all/any personal information taken outside the HECIS Office (including for assessment or support visits) is necessary and that all files/documents are securely stored and managed until return to HECIS Office.
- Staff to ensure an appropriately secure password (that is unique and not easily predicted e.g. not password 123 etc.) is applied to their individually issued Laptop/Computer, and to be updated/changed if any breach/disclosure is suspected.  
Password to be provided to HECIS CoOrdinator who will disclose to HECIS IT Manager (in need).
- The HECIS CoOrdinator is responsible for content in HECIS 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 HECIS personnel
  - 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 HECIS CoOrdinator is responsible for safeguarding personal information relating to HECIS staff, Management Committee members, volunteers, contractors and HECIS members.
- **The Privacy Contact Officer:** The Privacy Contact Officer will be the HECIS CoOrdinator. The HECIS CoOrdinator 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

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### Privacy information for clients

As a part of the HECIS referral process 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:

- all discussions take place in an office or private interview space,
- all phone calls are made within a HECIS office area,
- all private information is stored within a locked HECIS office when not in use
- all private information removed from the HECIS premises by staff is to remain under their personal care/security at all times.

### DOCUMENTATION

Documents related to this policy	
Related policies	Client Records Confidentiality
Forms, record keeping or other organisational documents	

Reviewing and approving this policy		
Frequency	Person responsible	Approval
Annually	HECIS CoOrdinator	HECIS Management Committee

Policy review and version tracking			
Review	Date Approved	Approved by	Next Review Due
1		HECIS Co-Ordinator	
2		HECIS CoOrdinator	
3		HECIS CoOrdinator	
4		HECIS CoOrdinator	
5		HECIS CoOrdinator	
6		HECIS CoOrdinator	