

PRIVACY POLICY

Number:	1.2
Code:	DSS
Name:	PRIVACY POLICY
Policy Statement	<p>Sunnyhaven 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 Sunnyhaven 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.</p> <p>Sunnyhaven 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.</p> <p>Sunnyhaven is subject to the Disability Service Standard Act. The organisation will follow the guidelines of the <i>Australian Privacy Principles</i> in its information management practices.</p> <p>Sunnyhaven will ensure that:</p> <ul style="list-style-type: none"> • 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. <p>This policy conforms to the <i>Federal Privacy Act (1988), the</i></p>

Privacy Amendment (Enhancing Privacy Protection) Act 2012 and *the Australian Privacy Principles* which govern the collection, use and storage of personal information.

(Note: The Federal Privacy Act 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.

The employees of Sunnyhaven are bound to comply with this policy. The policy does not form part of the contract of employment. Sunnyhaven may change, vary or modify this policy from time to time.

Procedures

Dealing with personal information

In dealing with personal information, Sunnyhaven 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 it 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
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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 CEO is responsible for content in Sunnyhaven 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 Sunnyhaven 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.
- Managers and Team Leaders are responsible for safeguarding personal information relating to Sunnyhaven staff, Board members, volunteers, contractors and Sunnyhaven members.
- **The Privacy Contact Officer:** The Privacy Contact Officer will be the Office Manager. The Office Manager 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 intake and the initial assessment, responsible clients will be informed in clear and understandable manner the information that 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:

layout of public spaces, position of desks where phone calls may be made by staff discussing clients, private interview space, home visits, appointments outside opening hours.

Participants in research projects

People being invited to participate in a 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 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 Sunnyhaven research, unless the nature of a particular project requires anonymity or an organisation specifically requests it.

RELATED DOCUMENTS

Policy context: This policy relates to	
Standards or other external requirements	DSS Standard 1 - Rights
Legislation or other requirements	Privacy and Personal Information Act 1988 Privacy Amendment (Enhancing Privacy Protection) Act 2012 Australian Privacy Principles (APP)
Contractual obligations	

Documents related to this policy	
Related policies	DSS 1.2.1 Privacy, Dignity and Confidentiality
Forms, record keeping or other organisational documents	

Policy review and version tracking		
Review	Date Approved	Approved by
01	13/06/15	Elaine Cohen