GOV 1.7.1 Privacy Policy	**Privacy**

The Port Douglas Community Service Network Inc (PDCSN Inc) 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 the PDCSN Inc 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.

The PDCSN Inc 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 PDCSN Inc is subject to legislation, including the requirements of ASIC, the Commonwealth Department of Social Services, Queensland Department of Communities, Disability Services & Seniors, Good Shepherd Microfinance, Douglas Shire Council, other funding organisations and any other organisations having contact with our services.
The organisation will follow the guidelines of the *Australian Privacy Principles* in its information management practices.

The PDCSN Inc 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

- 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.

This policy conforms to the *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.

Record of policy development		
Version	**Date approved**	**Date for review**
2020 V1	February 2020	As required

Responsibilities and delegations	
This policy applies to	The Management Committee, staff,volunteers and visitors.
Specific responsibilities	The Management Committee will ensure that all staff and volunteers are aware of their responsibilities in line with this policy, at the time of their induction. The Manager or delegate will be responsible for the day-to-day implementation, and ensure that all staff and volunteers comply with privacy procedures. All staff and volunteers have responsibility for understanding the policy and report any serious breaches to the Manager or delegate.
Policy approval	The PDCSN Inc, Management Committee.

Policy context – this policy relates to:	
Standards	The Management Committee, staff and volunteers to adhere to the privacy requirements.
Legislation	The Privacy Act (1988), and all relevant legislation, including the requirements of ASIC and ACNC. In addition to the requirements of any Commonwealth and State legislation to comply with the requirements of any funding bodies.
Contractual obligations	The Commonwealth Department of Social Services, Queensland Department of Communities, Disability Services & Seniors, Good Shepherd Microfinance, Douglas Shire Council, other funding organisations and any other organisations having contact with our services.
Organisation policies	Policies and Procedures as approved by the Management Committee, based on standards recommended by HSQF.
Forms, record keeping, other documents	Forms and documents for record keeping, to include the appropriate wording to comply with this policy.

Procedures

Dealing with personal information

In dealing with personal information, the PDCSN Inc staff will:

- ensure privacy for clients, staff, volunteers or Management Committee members and ordinary 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 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
- 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.
- The Manager or delegate is responsible for content in the PDCSN Inc's 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 PDCSN Inc 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 Manager or delegate is responsible for safeguarding personal information relating to PDCSN Inc staff, Management Committee members, volunteers, contractors and PDCSN Inc members.
- **The Privacy Contact Officer:** The Privacy Contact Officer will be the Manager or delegate. The Manager or delegate will be responsible for:
  – ensuring that all staff and volunteers 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 assessment, the client/s 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 the staff use a private room, when interacting with clients or making a telephone available to the client.

A separate area is available in reception for those accessing the Centrelink computer.

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 the PDCSN Inc research, unless the nature of a particular project requires anonymity or an organisation specifically requests it.

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