



**PRIVACY POLICY**

Applies to: Staff members, Management Committee Members, Volunteers/Students.
<b>Specific responsibility:</b> Manager and Management Committee.

Version: 5
Date approved: 28 <sup>th</sup> Aug 2020
Next review date: Aug 2023

<b>Policy context:</b> This policy ensures that all individuals can feel confident that their Privacy Rights are upheld.	
Standards or other external requirements	<ul style="list-style-type: none"> <li>- National Disability Insurance Scheme Guidelines (Quality Indicators) 2018</li> <li>- National Disability Insurance Scheme (Restrictive Practices and Behaviour Support) Rules 2018</li> <li>- National Disability Insurance Scheme (Incident Management &amp; Reportable Incidents) Rules 2018</li> </ul>
Legislation or other requirements	<ul style="list-style-type: none"> <li>- Privacy Act 1988</li> <li>- NDIS Terms of Business for Registered Providers</li> <li>- National Disability Insurance Scheme Act 2013</li> </ul>
Contractual obligations	<ul style="list-style-type: none"> <li>- Employment Agreements</li> <li>- Client Service Agreements and Schedule of Supports</li> <li>- NDIS Service Registered Service Provider obligations</li> <li>- DoE (Sector Capacity Building project contract) Funding Terms and Conditions (Funding Agreement)</li> </ul>

**POLICY STATEMENT**

Early Connections- Manning and Great Lakes 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 Early Connections- Manning and Great Lakes 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.

Early Connections- Manning and Great Lakes requires staff, student, 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.

Early Connections- Manning and Great Lakes is subject to legislation applying to the organisation and/or its client group. The organisation will follow the guidelines of the *Australian Privacy Principles (see attached)* in its information management practices.

Early Connections- Manning and Great Lakes 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 *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, Early Connections- Manning and Great Lakes staff will:

- 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 a parent/carer
- ensure that parents/carers 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.
- Manager is responsible for content in Early Connections- Manning and Great Lakes publications, communications and web site and must ensure the following:
  - appropriate consent is obtained for the inclusion of any personal information or images about any individual including Early Connections- Manning and Great Lakes 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.
- Manager is responsible for safeguarding personal information relating to Early Connections- Manning and Great Lakes staff, Management Committee members, volunteers, contractors and Early Connections- Manning and Great Lakes members.
- **The Privacy Contact Officer:** The Privacy Contact Officer will be the Manager. The 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

On Intake/Enrolment parents/carers will be informed about 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 that private spaces are made available when required.
- Ensure that sensitive phone calls are made or taken in a private space.
- Ensure that staff shares client information with other staff or other agencies in a sensitive manner.
- Ensure that enrolment Privacy Consent is adhered to.

### DOCUMENTATION

Documents related to this policy	
Related policies	<ul style="list-style-type: none"> <li>- Access to Children and Information Policy and Procedure</li> <li>- Confidentiality Policy</li> <li>- Child Protection Policy</li> <li>- Ethical Conduct Policy</li> <li>- Access to Confidential Information</li> </ul>
Forms, record keeping or other organisational documents	<ul style="list-style-type: none"> <li>- Enrolment Forms</li> <li>- Service Agreement</li> <li>- Keeping Them Safe Documents</li> <li>- Client Files</li> <li>- Electronic information storage system (Echidna Online)</li> </ul>

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

Policy review and version tracking			
Review	Date Approved	Approved by	Next Review Due
1	October 2014	Management Committee	October 2015
2	July 2016	Management Committee	July 2017
3	17 <sup>th</sup> Feb 2017	Management Committee	Feb 2018
4	18 <sup>th</sup> Apr 2019	Management Committee	Apr 2020
5	26 <sup>th</sup> Aug 2020	Management Committee	Aug 2023

**The Management Committee**  
**Aug 2020**

Signed:

A handwritten signature in cursive script, appearing to read "M Richardson", enclosed in a large, light-colored circular mark.

Name: Michelle Richardson

Date: 26-Aug-2023