

15. PRIVACY POLICY STATEMENT

Holland Park & District Meals on Wheels 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 Holland Park & District Meals on Wheels 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.

Holland Park & District Meals on Wheels 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.

Holland Park & District Meals on Wheels Inc 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.

Holland Park & District Meals on Wheels 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.

This policy conforms to the *Federal Privacy Act (1988)* 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.

15.1 PROCEDURES

15.1.1 Dealing with personal information

In dealing with personal information, Holland Park & District Meals on Wheels Inc 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 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.

15.1.2 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 is responsible for content in Holland Park & District Meals on Wheels Inc 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 Holland Park & District Meals on Wheels 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 is responsible for safeguarding personal information relating to Holland Park & District Meals on Wheels Inc staff, Management Committee members, volunteers, contractors and Holland Park & District Meals on Wheels Inc members.

15.1.3 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 complaints about a privacy issue

15.1.4 Privacy information for clients

At initial assessment clients will be told what information is being collected, how their privacy will be protected and their rights in relation to this information.

15.1.5 Privacy for interviews and personal discussions

To ensure privacy for clients or staff when discussing sensitive or personal matters, the organisation will speak to the client/staff member in the administration office with the door and window closed.

15.1.6 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 Holland Park & District Meals on Wheels Inc research, unless the nature of a particular project requires anonymity or an organisation specifically requests it.

15.2 Client's Right to Access Information

Clients of Holland Park Meals on Wheels have a right to read any personal information kept about them. A request from a Client (or their advocate) to access information is referred to the Administration Officer who confirms the request with the Manager and then arranges for the Client to view their information.

Access is provided to the Client within two weeks from the date of the request.

The Manager is available to assist the Client in understanding the information and to explain terminology or other assistance.

On advice from Holland Park Meals on Wheels legal representative, access to a Client's record may be denied. This will be discussed with the Client/advocate should this situation arise.

15.3 Monitoring and Evaluating Privacy and Confidentiality Processes

Privacy and confidentiality processes and systems are regularly audited as part of the Holland Park Meals on Wheels audit program and staff, clients and other stakeholders are encouraged to provide ongoing feedback on issues and areas where improvements can be made (see Section 5: Continuous Improvement)