

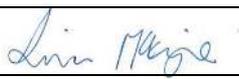


Information Management & Privacy Policy

Scope:

Agency Wide

Approval & Adoption:

Date approved by GSLP Board:	April 2018
Signed by the Executive Officer:	
Review Date:	April 2019

Purpose:

The Greater Shepparton Lighthouse Project (GSLP) has prepared this Information Management & Privacy Policy to describe the way and circumstances under which personal information is collected, stored, used and disclosed. The Policy is intended as a guide to staff, volunteers, clients and for the advice of the broader community.

Underpinning Principles/Values:

GSLP recognises the importance of and is committed to managing the personal or sensitive information of clients or staff members with the utmost care and in accordance with the relevant Commonwealth and State legislation as listed below.

For the purposes of this Policy, no distinction has been made between the handling of personal information and sensitive information (including health information).

'Personal information' may be defined as information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

A key objective of GSLP is to collect, analyse, evaluate information and data regarding service access, usage and identified gaps and to report on findings with a view to strengthening the sector's response. GSLP is committed to undertaking this role in an ethically sound manner and in accordance with legislative obligations as detailed below.

Key References/Legislation (if applicable):

Privacy Act 1988 (Cwlth)
Privacy and Protection Act 2014 (Vic)
Health Records Act 2001 (Vic)

Policy Statement:

GSLP will provide a copy of this Policy to all members of staff and will train staff in the appropriate handling of personal information by the organisation.

This policy is a public document and access to it will be granted on request.

GSLP operates under the **Australian Privacy Principles** (APPs). The following articulates how GSLP will apply the APPs.

APP 1. Open and Transparent Management of Personal Information

GSLP will have a policy document outlining its information handling practices and make this available to anyone who asks.

- If requested by an individual, we will provide more detail about our information-handling practices (i.e. what personal information of theirs is held and how it is handled by the organisation).

APP 2. Anonymity and Pseudonymity

Where it is lawful and practicable to do so, GSLP will allow individuals to provide information anonymously.

- An individual who chooses to access the services of GSLP anonymously will be advised of any potential consequences resulting from their decision e.g. where the lack of a contact name or address may jeopardise care in an emergency situation.
- We will not automatically preclude an individual from participating in the activities of the organisation because they request anonymity.

APP 3. Collection of Solicited Personal Information

GSLP will only collect personal information necessary to undertake our programs, activities or functions.

- Personal information about an individual will only be collected by lawful and fair means and directly from the individual wherever possible.
- A contact name and telephone number for the organisation will be given to every individual who provides personal information.
- We will ensure that individuals providing personal information understand the consequences, if any, of providing incomplete or inaccurate information.

APP 4. Dealing with Unsolicited Personal Information

Unsolicited personal information is personal information received by GSLP where GSLP has taken no active steps to collect the information.

- If GSLP would not have collected the unsolicited personal information in accordance with APP 3, and the information received is not contained in a Commonwealth record, GSLP will destroy or de-identify the information as soon as practicable

APP 5. Notification of the Collection of Personal Information

GSLP will ensure that each individual providing personal information is informed about and understands the purpose for which the information has been collected, to whom or under what circumstances their personal information may be disclosed

to another party, and how they can access the information held about them by the organisation.

APP 6. Use & Disclosure of Personal Information

GSLP will ensure that personal information will only be used for the purpose it was collected, or a directly-related purpose, that would reasonably be expected by the individual providing the information.

- If the identified information is to be used for a secondary or unrelated purpose, such as data analysis or research, we will obtain informed consent from the individual.
 - Individuals will be given the opportunity to refuse such use or disclosure.
 - If an individual is physically or legally incapable of providing consent, a responsible person (as described under the Act) may do so, if this is necessary to ensure the treatment or care of the patient, or for compassionate reasons. Providing consent under this clause does not mean the responsible person is given guardianship/power of attorney privileges. Such privileges are covered by State/Territory Guardianship legislation.
- We will only disclose personal information without consent where such disclosure is required by law, or, in some circumstances, for law enforcement, or in the interests of the individual's or the public's health and safety.
 - We will keep records of any such use and disclosure.
 - Information may be disclosed to a responsible person (as described under the Act).
- Information collected may be used for the purposes of research, evaluation and quality improvement. If personal information is to be used for these purposes GSLP will:
 - Ensure information and data is collected, used or disclosed in an ethically appropriate manner and in line with APPs.
 - De-identify information wherever possible and seek specific consent where this is not possible

APP 7. Direct Marketing

GSLP will not use or disclose the personal information that it holds about an individual under any circumstances for the purpose of direct marketing

APP 8. Cross-border Disclosure of Personal Information

GSLP will only transfer personal information about an individual to someone who is in a foreign country if:

- the individual consents to the transfer; or
- the recipient is bound by legislation that is substantially similar to the APPs; or
- we have taken reasonable steps to ensure that the information will not be held, used or disclosed inconsistently with the APPs.

APP 9. Adoption, Use or Disclosure of Government Related Identifiers

Except where circumstances allow, this organisation will not use Medicare or Veterans Affairs numbers or other identifiers assigned by a Commonwealth agency (or State/Territory body where this is prohibited under State/Territory law) to identify personal information.

APP 10. Quality of Personal Information

GSLP will update our databases or records as soon as possible after being advised by an individual of changes to their personal information held by the organization.

APP 11. Security of Personal Information

GSLP will take all reasonable steps to protect the personal information it holds from misuse and loss and from unauthorised access modification or disclosure as follows:

- All personal information held by GSLP will be:
 - stored in a secure, lockable location if in paper form;
 - password and firewall protected if in electronic form;
 - only accessible by staff and only on a “need to know” basis;
 - taken from the GSLP offices only when authorised and for a specified purpose.
- We will destroy or permanently de-identify personal information that is no longer required by the organisation.

APP 12. Access to Personal Information

Under normal circumstances GSLP will provide an individual with access to their personal information within 30 days of receiving a request for access.

There will be no fee associated with lodging a request for access

- Provision of access to a person’s personal information will be undertaken in a way that is appropriate to the person’s particular circumstances, e.g. use of interpreters etc.
- Some exceptions where GSLP may refuse access include:
 - If it reasonably believes that a person’s health or life may be seriously threatened or at risk by releasing the information; or
 - If access would be unlawful or would prejudice a legal investigation; or
 - If access would have an unreasonable impact on others’ privacy.

APP 13. Correction of Personal Information

If an individual believes that information held by GSLP is inaccurate or incomplete, the organisation will take steps to amend or correct the information.

Data Management & Research

In collecting or managing data and information for the purposes of research, evaluation and quality improvement, GSLP will:

- Apply a consistent statement of ethical use of data that is evident in all reports and documents and verbalised in all narratives, presentations, public statements and meetings regarding the research.
- Ensure that data is sourced from valid and reliable sources
- Ensure that data is never misrepresented
- Ensure that data used is referenced and sited
- Ensure that where identifiable information is used appropriate consent is sought
- Ensure ethical processes are in place (such as MOUs, statements of intent) for the purposes of clear and transparent use of partner data
- Ensure that where appropriate, ethics approval is sought from an approved body (eg. University, Health Service or National Human Research Ethics Committee)

- Ensure that external contractors employed by GSLP sign an agreement regarding their agreement to operate in line with this policy and the APPs.

Complaints regarding Privacy breaches

Any complaints in relation to GSLP's handling of personal information should be directed to the Executive Officer in the first instance. In most cases the complainant will be asked to lodge their complaint in writing.

Unless a complaint can be dealt with immediately to the satisfaction of both parties, GSLP will provide a written response to the complaint within 30 days of its being received.

If an individual believes their complaint has not been appropriately handled by GSLP, the complainant should contact the Office of the Federal Privacy Commissioner, Privacy Hotline 1300 363 992 (local call charge) or via www.privacy.gov.au

Associated GSLP Procedures:

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