

# Information Management and Privacy Policy

## 1 Purpose

The purpose of this policy is to establish the principles for managing information and privacy at Greater Shepparton Lighthouse Project (GSLP) ethically and in accordance with legislative obligations. This includes describing the way and circumstances under which client's personal information is collected, stored, used and disclosed for the effective delivery of GSLP programs.

## 2 Scope

This policy applies to all GSLP employees, volunteers, Board members, interns, trainees, contractors, consultants, and other workers, both paid and unpaid (henceforth referred to as GSLP workers).

## 3 Introduction

GSLP recognises that information created and captured as part of business activities is an asset and must be managed according to its value and associated risk. Information will be open and shared as much as practicable unless constrained by legal or ethical obligations.

The primary purpose of information used by GSLP is to:

- Collect, analyse, and evaluate data regarding service access and usage
- Identify gaps
- Report on findings
- Improve the effectiveness and value of the services and programs offered

Information may be gathered from workers, clients, donors, partners and other stakeholders.

All GSLP workers are responsible for the information they create, collect, receive or have access to while working for GSLP and ensuring they manage it in accordance with this policy. All GSLP workers working with personal information must always maintain the security and confidentiality of this information.

All GSLP information must be proactively managed to support compliance with legislation.

## 4 Worker information

GSLP collects information from workers for the purposes of managing their employment. Such information may include, but is not limited to:

- Personal information e.g. name, date of birth, gender identity and pronouns, home address, contact details, emergency contact details

- Employment information e.g. resume, cover letter, interview notes, referee details, referee checks, education details or copies of qualifications, police check, visa/working rights, Working with Children check, driver's license, other copies of ID
- Health information e.g. allergies, medical conditions, injuries or illnesses that may impact on the ability to undertake programs, engage with services, or, for GSLP workers, fulfil the duties of the role, doctor's information
- Sensitive information e.g. cultural background, languages spoken at home, religion, sexual orientation

## **5 Client information**

GSLP collects information from clients for the purposes of creating and delivering valuable and effective support programs. Such information may include, but is not limited to:

- Personal information about clients e.g. names, dates of birth, gender identity and pronouns, home address, parent/guardian contact details, emergency contact details
- Health information about clients e.g. allergies, medications, preferences and permission for GSLP workers to manage a health/medical issue, doctor's information, medical conditions
- Sensitive information about clients e.g. cultural background, languages spoken at home, religion, sexual orientation

Personal, health and sensitive information about a client will only be collected by lawful means and directly from the individual or their legal guardian.

## **6 Information collection**

Information created or collected by GSLP workers will be in accordance with these principles:

- Ensuring that only information essential for GSLP's purposes is collected
- When collecting personal information, ensuring individuals are informed about the purpose of the information collection, and their consent is provided and recorded
- 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
  - Individuals will not automatically be precluded from participating in GSLP programs or services because they request anonymity, however each situation will be considered on a case by case basis to ensure the practicality and safety of participation

## **7 Information use and access**

Client information collected by GSLP workers will only be used for the purpose that it was collected for and for which consent was provided.

GSLP workers must ensure that information is not used for any other purpose other than for which it was collected. Any GSLP worker that uses information outside of the intended, communicated and consented purpose may be subject to disciplinary action.

GSLP workers may only share personal, health or sensitive information about clients with other GSLP workers when required for the effective delivery of GSLP programs and services and never to external parties. Access to such information will not be made available to any external party except with the prior written permission from the client themselves or their legal guardian.

GSLP 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. Records will be kept of any such use and disclosure.

## **8 Information storage**

Information collected from clients by GSLP workers, including personal, health and sensitive information, will be stored securely, either electronically and/or in hard-copy, with access only available to other GSLP workers relevant to its intended purpose.

Consent from clients collected at the time the information was collected will also be stored in the same secure manner.

GSLP will take all reasonable steps to protect the personal, health and sensitive information it holds from misuse, loss and from unauthorised access, modification and disclosure.

## **9 Information disposal**

If/when information is no longer required, GSLP workers must ensure it is securely destroyed such as via permanent deletion from electronic files, secure archiving of electronic or hard copy information, or secure destruction e.g. shredding.

## **10 Information or privacy breaches**

Any complaints or concerns in relation to GSLP's handling of clients' personal, health or sensitive information should be directed to a GSLP manager or the Executive Officer in the first instance. The complainant may be asked to provide 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](http://www.privacy.gov.au).

## 11 Definitions

<i>Information</i>	Information, documents, data or knowledge
<i>Personal information</i>	Information, about an individual whose identity is apparent, or can reasonable be ascertained, from the information. This includes both sensitive and health information.
<i>Sensitive information</i>	Personal information about an individual’s cultural background, gender identity and pronouns, religion, language spoken at home, sexual orientation.
<i>Health information</i>	Personal information about: <ul style="list-style-type: none"> <li>• The physical, mental or psychological health (at any time) of an individual</li> <li>• A disability (at any time) of an individual</li> <li>• An individual’s expressed wishes about the future provision of health services</li> <li>• A health service provided or not to be provided to an individual</li> </ul>

## 12 Related documents

- [Privacy Act 1988](#)
- [Privacy and Data Protection Act 2014](#)
- [Health Records Act 2001](#)

## 13 Document history

Version	Date approved	Summary of changes	Approved by	Version author	Next review date
1.0	April 2018	New policy	GSLP Board		April 2019
2.0	Feb 2024	Review of existing policy	GSLP Board	HR Consultant	Feb 2026

