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| ORG-POL-014 | PRIVACY POLICY |
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| Applies to: All Staff |
| Specific responsibility: Managing Director/ Quality Manager |

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| Version: 4.0 |
| Date approved: 11/04/2016 |
| Next review date: 29/12/2024 |

| Policy context: This policy relates to | |
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| Standards or other external requirements | Home Care Standards - Standard 3 National Disability Standards - Standard 1 ACIS: Standard 1.4 |
| Legislation or other requirements | Privacy Act 1988 Australian Privacy Principles National Disability Insurance Scheme Act 2013 (cth) Aged Care Act 1997 |
| Contractual obligations | Employee Contract |

POLICY STATEMENT

BACKGROUND

HomeCare Australia is committed to protecting and upholding the right to privacy of clients, staff, volunteers, Management Committee members and representatives of agencies we deal with. Homecare Australia 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.

HomeCare Australia 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. All staff are required, as part of their induction, to read and acknowledge that they understand this policy.

HomeCare Australia is subject to following and adhering to the HomeCare Standards, ACIS: 2013 Standards and NDS Standards. The organisation will follow the guidelines of the *Australian Privacy Principles* in its information management practices.

HomeCare Australia 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.

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.

PROCEDURE:

Dealing with personal information

In dealing with personal information, HomeCare Australia 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 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, by archiving, 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.
- The Managing Director is responsible for content in HomeCare Australia’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 HomeCare Australia 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
 - Photos are only used with the client’s consent
- The Managing Director is responsible for safeguarding personal information relating to HomeCare Australia's staff, Management Committee members, volunteers, and contractors.
- **The Privacy Contact Officer:** The Privacy Contact Officer will be the Managing Director. The Managing Director 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 query or complaint about a privacy issue

Privacy information for clients

At sign up and during the initial assessment etc, clients 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 layout of public spaces, position of desks where phone calls may be made by staff discussing clients allows for privacy or home visits, appointments outside opening hours etc will be arranged

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 HomeCare Australia research, unless the nature of a project requires anonymity, or an organisation specifically requests it.

REFERENCES

Home Care Packages Program Guidelines

Aged Care Act 1997

National Disability Insurance Scheme Act 2013 (cth)

DOCUMENTATION

| Documents related to this policy | | |
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| Related policies | Communication Policy Code of Ethics Risk Management Access to confidential information | ORG-POL-009 ORG-POL-010 ORG-POL-017 |
| Procedures | Client sign up coordinators Client sign up Consultants Recruitment and Selection Reference Checking Client Enquiry inbound | SER-PRO-014 SER-PRO-012 HR-PRO-014 HR-PRO-012 BD-PRO-003 |
| Documents | HR and Service delivery documents, Employee Contract | |

| Reviewing and approving this policy | | |
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| Frequency | Person responsible | Approval |
| Every 3 Years | Quality Manager/Managing Director | Managing Director |

| Policy review and version tracking | | | |
|------------------------------------|---------------|-------------------|-----------------|
| Review | Date Approved | Approved by | Next Review Due |
| 1 | 11/04/2016 | Managing Director | 11/04/2017 |
| 2 | 11/04/2017 | Quality Manager | 11/04/2019 |
| 3 | 29/12/2019 | Managing Director | 29/12/2022 |

INDEXING

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| Search topic/s: | Privacy; confidentiality |
| Function/s: | HR, Service Delivery, Governance |