



2.4.8	PRIVACY Policy
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Applies to: Centre Manager and all Staff	Version: 1
Specific responsibility: Centre Manager	Date approved: feb 2015
	Next review date: feb 2018

Policy context: This policy relates to	
Standards or other external requirements	Health and Community Standards
Legislation or other requirements	NSW privacy and personal Information Act Federal Privacy Act Community Services (Complaints, Reviews and Monitoring) Act 1993 National Statement on Ethical Conduct in Human Research (2007)
Contractual obligations	

POLICY STATEMENT

Bankstown Women’s Health Centre is committed to protecting and upholding the right to privacy of clients, staff, volunteers, Board/Management Committee members and representatives of agencies we deal with. In particular Bankstown Women’s Health Centre 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.

Bankstown Women’s Health Centre 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.

Bankstown Women’s Health Centre is subject to the NSW Privacy and Information Act . The organisation will follow the guidelines of the *Australian Privacy Principles* in its information management practices.

Bankstown Women’s Health Centre 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.

PROCEDURES

Dealing with personal information

In dealing with personal information, Bankstown Women's Health Centre 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.

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.
- Centre Manager and all staff members are responsible for content in Bankstown Womens Health Centre 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 Bankstown Womens Health Centre 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 Centre Manager and all staff are responsible for safeguarding personal information relating to Bankstown Women's Health Centre staff, Management Committee members, volunteers, contractors and BWHC members.
- **The Privacy Contact Officer:** The Privacy Contact Officer will be the Centre Manager. The Centre 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

At the initial assessment all 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: provide a private room where phone calls can be made by staff discussing clients, a private interview space, client will have access to GP's, Psychologists , Counsellors, Case Managers in a separate and private room away from any waiting clients or other staff.

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

DOCUMENTATION

Documents related to this policy	
Related policies	File Keeping Policy Clients rights policy Clients complaints policy
Forms, record keeping or other organisational documents	Client Records Complaints forms Clients rights and responsibilities brochure Procedures for culling Request to access file Confidentiality

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Reviewing and approving this policy		
Frequency	Person responsible	Approval
Every 3 years	Centre Manager or delegated staff	CM

Policy review and version tracking			
Review	Date Approved	Approved by	Next Review Due
1	January 2015	MC	January 2018
2			
3			

INDEXING

Search topic/s:	
Function/s:	

Reviewed and approved Aug 2015
Next review August 2018