

# Parklands Albury Wodonga Ltd

## 3.8 Privacy Policy

<b>Policy Type:</b>	<b>People</b>
<b>Policy Type:</b>	<b>Relationships</b>
Risk Rating:	Low
Version Date:	15 March 2022
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Date Ratified:	19 June 2018
Ratified By:	Executive Officer
Standards/Legislation and Regulations :	Privacy Act 1988 (amended by the Privacy Amendment (Private Sector) Act 2000). Australian Standard AS 4269-1995 – Complaints Handling. Public Records Act 1973 AA1000 Stakeholder Engagement Standard (AA1000SES)
Other Documents and Forms	
Reference	NCOSS (2005) Stakeholder Relationships Policy
Other Related Policies and Procedures	Grievance Handling Policy Complaints Policy and Procedures

### Background

Parklands Albury Wodonga does from time to time collect personal information relating to clients or members, or in the performance of its consultation or research functions.

Personal Information is defined by the NSW Privacy and Personal Information Protection (PPIP) Act (1998) as: *“any information or opinion about an individual or which is reasonably capable of identifying an individual”*.

### Purpose

The purpose of this policy is to protect the privacy of individuals and organisations about whom Parklands Albury Wodonga collects and/or holds information.

This policy outlines the guidelines which must be observed when collecting, storing and using personal and confidential information.

### 3.8.1 Legislation

The NSW PPIP Act governs the collection, use and storage of personal information across all NSW Government agencies. The terms of Parklands Albury Wodonga funding agreement with (Funder) state that Parklands Albury Wodonga must observe the Act as if it were a government agency. This agreement entails Parklands Albury Wodonga adhering to and enacting the following principles and preparing a Privacy Management Plan detailing:

- Policies and practices to ensure compliance to the requirements of the Act;
- Dissemination of those policies and practices to persons within the agency;
- Proposed procedures in relation to internal reviews;
- Other matters considered relevant by the agency in relation to privacy and the protection of personal information held by statutory, professional or other legal obligations of privacy.

### 3.8.2 Principles

The PPIP Act sets out 12 specific Information Protection Principles to guide the collection and use of personal information. Parklands Albury Wodonga adopts these principles:

#### Collection

- **Lawful** - when an agency collects your personal information, the information must be collected for a lawful purpose. It must also be directly related to the agency's activities and necessary for that purpose.
- **Direct** - your information must be collected directly from you, unless you have given your consent otherwise. Parents and guardians can give consent for minors.
- **Open** - you must be informed that the information is being collected, why it is being collected and who will be storing and using it. The agency should also tell you how you can see and correct this information.
- **Relevant** - the agency must ensure that the information is relevant, accurate, up-to-date and not excessive. The collection should not unreasonably intrude into your personal affairs.

#### Storage

- **Secure** - your information must be stored securely, not kept any longer than necessary, and disposed of appropriately. It should be protected from unauthorised access, use or disclosure.

#### Access

- **Transparent** - the agency must provide you with enough details about what personal information they are storing, why they are storing it and what rights you have to access it.
- **Accessible** - the agency must allow you to access your personal information without unreasonable delay and expense.
- **Correct** - the agency must allow you to update, correct or amend your personal information where necessary.

## Use

- **Accurate** - agencies must make sure that your information is accurate before using it.
- **Limited** - agencies can only use your information for the purpose for which it was collected, for a directly related purpose, or for a purpose to which you have given your consent. It can also be used without your consent in order to deal with a serious and imminent threat to any person's health or safety.

## Disclosure

- **Restricted** - the agency can only disclose your information with your consent or if you were told at the time they collected it from you that they would do so. The agency can also disclose your information if it is for a related purpose and they don't think that you would object. Your information can also be used without your consent in order to deal with a serious and imminent threat to any person's health or safety.
- **Safeguarded** - the agency cannot disclose your sensitive personal information without your consent, for example information about your ethnic or racial origin, political opinions, religious or philosophical beliefs, health or sexual activities or trade union membership. It can only disclose sensitive information without your consent in order to deal with a serious and imminent threat to any person's health or safety.

### 3.8.3 Responsibilities for Managing Privacy

Responsibilities for the management of personal information are the domain of any individual within an agency with access to, or responsibilities for, such information. However Parklands Albury Wodonga promotes specific responsibilities to certain individuals / positions. Those individuals will then be in a position to ensure that all staff are suitably instructed either through training or the introduction of policies and procedures, as to their obligations in relation to the protection of personal information in their handling.

#### Privacy Contact Officer

As a matter of good practice, each agency should have a designated officer to whom members of the public can direct any queries or complaints in the first instance. Privacy Contact Officers are also the primary point of contact for liaison with Privacy NSW.

Parklands Albury Wodonga appoints this role and responsibilities to the Executive Officer.

#### Web Manager

Web managers need to recognise that consideration of privacy issues will affect web content in a number of ways:

- Personal information of staff presented to the public or other staff;
- Personal information of members of the public included in web documents;
- Obtaining personal information from the public through their visit to the website.

The agency's Privacy Management Plan should canvass the concerns associated with these issues and establish transparent procedures and standards in dealing with personal information in these situations. A Privacy Statement should also be published on the agency's web site.

### **Managerial Responsibilities**

It is the responsibility of the Executive Officer to put in place procedures to ensure that these principles are observed in the collection, use, storage, or disclosure of personal information.

Personal information also applies to information relating to staff and employees of agencies. Human resource (HR) and workplace managers are responsible for:

- Ensuring training practices are in place for employee training in privacy requirements;
- Protecting staff and employee privacy in the workplace.

### **Employee Responsibilities**

Staff members should also observe these principles when dealing with personal information in the conduct of membership information, conducting research, or undertaking consultation or advocacy work. Staff members are encouraged to raise any concerns they may have regarding privacy issues that arise in the conduct of their work, and to report any breaches of privacy that they may observe to their Supervisor.

## **3.8.4 Procedures**

**parklands** holds the following personal information on employees, volunteers, supporters and customers:

- Your name
- Date of birth (employees only)
- Address (street, postal and email)
- Contact details (phone numbers and Next of Kin contact details)
- Occupation
- Career history
- References
- Record of communications (verbal and written for licensees, complainers and supporters)
- Record of financial transactions

## Why we collect it?

**parklands** collects, uses and discloses the information for;

- to comply with our legal obligations
- occupational health and safety (contact in the event of an emergency)
- to communicate appreciation
- to ensure consistent communications from within organisation to customer
- to send out newsletters and other organisational information to raise awareness, understanding and support.

## Access to your personal information

- Hard copies stored in filing cabinets and only accessible to staff.
- Electronic copies stored on the server and only accessible to staff via logging onto the server.
- Emails sent out using “BCC” unless the specific group has requested that all contact details be included.
- Staff personnel files stored in a locked filing cabinet.
- Personnel and financial documents are to be shredded before disposal.
- Personal information is not passed onto third parties. Instead, after requesting permission from the third party, the third party’s contact details are forwarded via **parklands** staff to the **parklands** contact that the third party is wanting to contact.

## Complaints

If you have any complaints about our privacy practices or wish to make a complaint about how your personal information is managed please contact the Executive Officer. Complaints will be handled under the **parklands** Complaints Policy.

## Storage

We will take all reasonable steps to protect the security of the personal information that we hold. This includes appropriate measures to protect electronic materials and materials stored and generated in hard copy.

## Contract

We do not contract out data storage or processing functions.

## Use and disclosure

Personal information is collected for the purpose of:

- assessing your suitability for a type of job
- assessing your suitability for a position
- processing payments
- communication with customers and supporters