

OVERVIEW	
Document Approver	Director of Services
Purpose	To manage the confidentiality and privacy of Client records and other information.
Risks if procedure is not followed	<ul style="list-style-type: none"> • Breach of applicable requirements – Privacy Act & Principles • Unauthorised access to personal information leading to negative personal consequences for clients, safety risks and significant reputational damage for the organisation
Legislative Obligations	<ul style="list-style-type: none"> • Privacy Act and Privacy Principles • Privacy Amendment (Notifiable Data Breaches) Act 2017 & Notifiable Data Breaches Scheme • Information security logins, password policies etc • Building and office security arrangements
What to do if procedure is not followed	<ul style="list-style-type: none"> • Follow Improvement Procedure • Provide notification and manage any data breaches per the requirements of the Data Breach Response Plan
Process Inputs	<ul style="list-style-type: none"> • Legislative Obligations • Data Breach Response Plan

POLICY
<p>WSMRC is committed to protecting and upholding the right to privacy of clients, staff, volunteers, Board Committee members and representatives of agencies we deal with. In particular WSMRC 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.</p> <p>WSMRC requires staff, volunteers and Board 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.</p> <p>WSMRC will ensure that:</p> <ul style="list-style-type: none"> • it complies the guidelines of the Australian Privacy Principles in its information management practices. • 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 staff are provided with privacy when they are being interviewed or discussing matters of a personal or sensitive nature. • all staff, Board members and volunteers understand what is required in meeting these obligations. <p>This policy conforms to the Federal Privacy Act (1988) and the Australian Privacy Principles which govern the collection, use and storage of personal information.</p> <p>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.</p>

PROCEDURE		
Step #	Responsibility	Step Details (Process Outputs)
1	All Staff	<p>Are responsible for the management of personal information to which they have access, and in the conduct of research, consultation or advocacy work. When dealing with personal information:</p> <ul style="list-style-type: none"> ensure privacy for clients, staff, volunteers or Board 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 personal information no longer needed and/or after legal requirements for retaining documents have expired.
2	Marketing and Communication Manager	<p>Is responsible for content in WSMRC publications, communications and website and must ensure the following:</p> <ul style="list-style-type: none"> appropriate consent is obtained for the inclusion of any personal information about any individual including WSMRC 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 systems are in place to safeguard personal information relating to WSMRC staff, Board members, volunteers, contractors and WSMRC members
3	Executive Assistant	<ul style="list-style-type: none"> 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 providing notification and managing any data breaches per the requirements of the Data Breach Response Plan
4	Caseworkers	<p>At each milestone stage of case management (intake, formal case plan review, exit etc) Inform clients of what information is being collected, how their privacy will be protected and their rights in relation to this.</p>

5	Operations Manager	Ensure privacy for clients or staff when discussing sensitive or personal matters, by providing soundproof meeting/consultation rooms.
6	Participants in research projects	<p>People being invited to participate in a research project must be:</p> <ul style="list-style-type: none"> • 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 as requested. <p>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.</p> <p>Organisational participants in research projects will generally be de-identified in WSMRC research, unless the nature of a particular project requires or benefits significantly from identification.</p>