



BCC PRIVACY POLICY

Applies to: All Staff, Students, Volunteers, Contractors & Board members

Specific responsibility: General Manager (Privacy Policy Officer)

Version: Nov 24

Date approved: Nov24

Next review date: Nov26

Policy context: This policy relates to

Standards or other external requirements	ASES Standard C.2.1.5 Sound Governance ASES Standard C.2.2.1 & 7 Policy and Procedures ASES Standard C.7.1.6 Outcomes Monitored Standard 1: Promoting and Upholding Rights
Legislation or other requirements	<i>Federal Privacy Act 1988</i> Australian Privacy Principles
Contractual obligations	n/a

POLICY STATEMENT

Byron Community Centre is committed to protecting and upholding the right to privacy of clients, staff, students, volunteers, contractors, Board members and representatives of agencies and organisations we deal with. In particular Byron Community 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.

Byron Community Centre requires staff, students, volunteers, contractors 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.

Byron Community Centre is subject to the *Federal Privacy Act 1988*. The organisation will follow the guidelines of the *Australian Privacy Principles* in its information management practices.

Byron Community 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, Board 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, Byron Community Centre staff will:

- Ensure privacy for clients, staff, students, volunteers, contractors, 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 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, students, volunteers and contractors are responsible for the management of personal information to which they have access, and in the conduct of research, consultation or advocacy work.

- The General Manager is responsible for content in Byron Community Centre publications, communications and website and must ensure the following:
 - Appropriate consent is obtained for the inclusion of any personal information about any individual including Byron Community 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.
- General Manager is responsible for safeguarding personal information relating to Byron Community Centre staff, Board members, volunteers, contractors and Byron Community Centre members.
- **The Privacy Contact Officer:** The Privacy Contact Officer will be the Volunteers coordinator. The Volunteers coordinator will be responsible for:
 - Ensuring that all staff, contractors and volunteers 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 client complaints about a privacy issue.

The General Manager will be responsible for handling any complaints about a privacy issue from staff, volunteers, contractors or students.

Privacy Information for Community Services Clients

At the first appointment or during the initial assessment, Community Service clients will be told

- What information is being collected;
- What purposes it is held for;
- How it is used, disclosed and who will have access to it;
- How their privacy will be protected; and,
- Their rights in relation to their information.

See the BCC Policy: Client Privacy for more information.

Privacy for Interviews and Personal Discussions

To ensure privacy for clients, staff, contractors, volunteers and students when discussing sensitive or personal matters, the organisation will ensure that all interviews take place in a private interview space. Additionally, all phone calls to clients and involving clients' personal/sensitive information will take place in a private space where confidentiality can be maintained.

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; and,
- 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 Byron Community Centre research, unless the nature of a particular project requires anonymity or an organisation specifically requests it.

DOCUMENTATION

Documents related to this policy	
Related policies	
Forms, record keeping or other organisational documents	

Reviewing and approving this policy		
Frequency	Person responsible	Approval
Every 2 years	Managers & General Manager	General Manager

Policy review and version tracking			
Review	Date Approved	Approved by	Next Review Due
1	25/10/21	Jenny Ryan	October 2022
2	12/10/22	Katie Love	Nov 24
3	29/11/24	Michelle Heuer	Nov 26
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