

Privacy and Confidentiality Policy

Purpose

Safe and Well CQ is committed to protecting the privacy, confidentiality, dignity and safety of all people who engage with our services. This Policy outlines Safe and Well CQ's framework for the collection, use, disclosure, storage, access, retention and management of personal and sensitive information in accordance with legislative, contractual, ethical and organisational obligations.

To protect and uphold privacy, we:

- have processes in place, so no personal information is collected, stored, used or shared with anyone, purposefully or by omission, unless the client provides informed consent, or we are required by law to do so
- only collect the information needed to perform services
- store all data securely as per legislation

To maintain confidentiality, we:

- uphold all legal and ethical obligations concerning handling confidential information
- provide information to clients and staff about their rights regarding confidentiality and the processes used to protect these rights, and where any limits to confidentiality exist
- avoid inappropriate verbal and written disclosure of information about clients and staff within and outside of the organisation
- only share verbal and written information about a client with agencies and individuals external to Safe and Well CQ with the written consent of the client unless the circumstances are such that limits to confidentiality apply
- take all reasonable steps to protect all information held (including personal information) from misuse, loss, unauthorised access, modification, or disclosure

Scope

This Policy applies to all board members, team members, volunteers, students, contractors, visiting practitioners and any other person who accesses or manages personal information on behalf of Safe and Well CQ.

This Policy is to be read in conjunction with our Records and Information Management Policy and Procedure.

Principles

The principles supporting high-quality privacy and confidentiality practices at Safe and Well CQ are:

Confidentiality	Confidentiality practices are applied consistently across the organisation.
Privacy	Only information necessary for service delivery and organisational functions is collected and stored.
Dignity	Safe and Well CQ respects and protects the dignity and privacy of clients and stakeholders.
Consent	Information is only shared externally with informed consent or where authorised or required by law.
Experienced	Team members are appropriately trained and supported to manage personal information responsibly.

Privacy

Safe and Well CQ collects and uses information for the purposes of providing domestic violence, sexual assault and general wellbeing counselling and support for women. This includes information about victim survivors, persons using violence and staff.

Safe and Well CQ's collection, storage, use and disclosure of personal information is governed by the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth) and the *Information Privacy Act 2009* (Qld) (the Acts). You can access the *Privacy Act* [here](#).

Safe and Well CQ has policies and procedures in place to ensure that the collection, storage, use and disclosure of personal information is done in a safe, secure and confidential manner to ensure your rights are protected.

Safe and Well CQ is committed to complying with:

- *Privacy Act 1988* (Cth),
- *Information Privacy Act 2009* (Qld)
- *Australian Privacy Principles* (APPs)
- *Queensland Privacy Principles* (QPPs)
- *Human Rights Act 2019* (Qld)
- *Domestic and Family Violence Protection Act 2012* (Qld)

- *Child Protection Act 1999 (Qld)*
- *Child Safe Organisations Act 2024 (Qld)*
- and other relevant legislation governing the management of personal information.

You and your information

Safe and Well CQ will only collect and use information that is necessary to providing domestic violence, sexual assault and general wellbeing counselling for women (our services), or as required by law.

Safe and Well CQ will take reasonable steps to ensure that the information which it holds is accurate, complete and up-to-date.

Safe and Well CQ will give an individual access to all personal information it stores about the individual in a timely manner, unless an exception applies under the Acts.

Kinds of information collected

Safe and Well CQ collects personal information about victim survivors, persons using violence, donors and job applicants and sometimes visitors to our website for the purposes of providing our services which may include marketing activities.

Personal information is defined in section 6 of the *Privacy Act* as "information or an opinion about an identified individual, or an individual who is reasonably identifiable whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not".

Safe and Well CQ will collect and hold details of individuals which include, but are not limited to:

- full name;
- address;
- contact number;
- email address; and
- date of birth.

Safe and Well CQ also collects sensitive information about victim survivors and persons using violence.

Sensitive information is a subcategory of personal information which includes health information and information or opinion about an individual's racial or ethnic origin, religious

beliefs or affiliations, sexual orientation or practices or criminal records etc. Because of its inherent nature, sensitive information is afforded a higher level of protection under the Acts.

Safe and Well CQ will collect and hold sensitive information which includes, but is not limited to:

- medical and disability information
- criminal convictions
- mental health information; and
- racial or ethnic origin

Collection and storage of personal information

Safe and Well CQ will collect personal information of victim survivors, persons using violence, donors and job applicants and sometimes visitors to our website by one of the following means:

- by requesting information on an application form and other written forms including via Safe and Well CQ's website
- through third parties where you are transferred or referred to us for the services that we provide
- by an individual providing personal information by way of a resume
- by an individual updating their records with Safe and Well CQ

Safe and Well CQ will not collect sensitive information unless:

- you have consented to us collecting the information
- collection is required by law; and
- collection relates to health services provision and individual or public health or safety

Safe and Well CQ will store the personal information of individuals in the following manner:

- all relevant personal information will be entered into and held on Safe and Well CQ's electronic database maintained in Australia. The database is only accessible by authorised Safe and Well CQ staff
- personal information contained in written forms and hard copy documents will be inputted into a secure system and the paper form destroyed
- records relating to children and young people are retained for 45 years in line with organisational policy and legislative guidance

Purpose of collection, holding, use and disclosure of personal information

Safe and Well CQ will only collect personal information when it is reasonably necessary for one of Safe and Well CQ's

functions or activities related to the provision of our services such as supporting the health and safety of clients.

Safe and Well CQ will not use or disclose personal information for any other purpose unless:

- consent has been given by the individual; or
- the individual would reasonably expect Safe and Well CQ to disclose the information for another purpose which is directly related/related to Safe and Well CQ 's primary purpose of providing our services; or
- Safe and Well CQ is required or authorised by law and/or under the *Privacy Act*

Safe and Well CQ will only collect sensitive information when it is reasonably necessary for one of Safe and Well CQ's functions or activities related to the provision of our services such as supporting the health and safety of clients and we have received your consent unless;

- collection is required by law; or
- collection relates to health services provision and individual or public health or safety

Access to and correction of personal information

You have a right to request access to your personal information that Safe and Well CQ holds about you. There is no fee involved in making such a request.

If you would like to access your personal information that Safe and Well CQ holds, please contact the Chief Executive Officer (CEO) and they or their delegate will assist with your request. The CEO can be contacted by:

- Phone: 07 4979 1456
- In Person: 65 Central Lane, Gladstone Central, QLD 4680
- Email: info@safeandwellcq.org.au

If any of the personal information that GWHC holds is incorrect, incomplete or out of date, please let the CEO or their delegate know and it will be corrected accordingly.

Confidentiality

Safe and Well CQ is committed to protecting the confidentiality of all information entrusted to the organisation by clients, team members, volunteers, students and stakeholders. Maintaining confidentiality is essential to uphold trust, ethical obligations, safety and wellbeing.

Confidentiality Obligations

Confidential information will only be accessed, shared or discussed on a legitimate need-to-know basis.

All team members, board members, volunteers, students and contractors are required to:

- maintain confidentiality during and after their engagement with Safe and Well CQ
- complete confidentiality agreements and relevant induction processes
- avoid inappropriate verbal or written disclosure of information
- securely manage records and communications; and
- immediately report suspected confidentiality breaches.

Information Security and Access Controls

Safe and Well CQ maintains documented processes to ensure access to systems and databases containing personal information is restricted to authorised persons with a legitimate operational need.

Safe and Well CQ will:

- implement role-based access controls
- update access permissions immediately where a team member changes role or ceases engagement
- conduct regular audits of system access permissions
- maintain audit capability to identify access to information systems; and
- implement physical, electronic and administrative safeguards to protect information from misuse, loss, unauthorised access, modification or disclosure

Training and Monitoring

All team members, volunteers, students, contractors and board members receive privacy and confidentiality training during induction and through ongoing refresher training. Completion of mandatory training is monitored by Safe and Well CQ.

Electronic Surveillance and CCTV

Where electronic surveillance technology is used, Safe and Well CQ will ensure:

- surveillance is limited to appropriate operational and safety purposes
- signage alerts individuals to the use of surveillance technology
- surveillance does not unnecessarily intrude into areas where individuals may reasonably expect privacy

- surveillance footage is securely stored and access restricted
- disclosures of footage comply with legislative requirements; and
- registers and procedures are maintained regarding access, retrieval and disclosure of footage

Domestic and Family Violence Information Sharing

Safe and Well CQ complies with *Part 5A of the Domestic and Family Violence Protection Act 2012 (Qld)*. Where safe and practical, consent should be obtained before disclosing personal information. However, the safety and protection of people experiencing domestic violence takes precedence over consent.

Safe and Well CQ may give or receive information where there is a reasonable belief that a person fears or is experiencing domestic violence and the information may assist in assessing, preventing or lessening a serious threat to life, health or safety.

Child Protection Information Sharing

Safe and Well CQ may give or receive information in accordance with the Section 159c of *Child Protection Act 1999 (Qld)* where there is a reasonable belief that the information may assist in protecting a child or unborn child from harm or risk of harm.

Perpetrator Intervention Program Information Sharing

Safe and Well CQ complies with the privacy and confidentiality requirements of the Professional Practice Standards for working with men who perpetrate domestic and family violence.

- We tell clients there are limits to confidentiality and where their right to confidentiality may be overridden by other considerations, such as the safety of those who have experienced domestic and family violence.
- The Program Facilitator informs all new clients of this, and they also sign a participation agreement outlining the privacy and confidentiality of their information.
- Program Facilitator provides information and ensures all new clients sign a waiver, enabling us to disclose information to relevant advocates/agencies to prioritise the safety of people who have experienced domestic and family violence.

Complaint policy

If you have a complaint about a breach of the Australian Privacy Principles by Safe and Well CQ in relation to your personal information, please contact:

Chief Executive Officer
Phone: 07 4979 1456
In person: 65 Central Lane, Gladstone Central, QLD 4680
Email: ceo@safeandwellcq.org.au

The first step is to lodge your complaint in writing to Safe and Well CQ. Safe and Well CQ takes any complaint regarding the privacy of personal information seriously and will work with you to try to resolve the complaint. Safe and Well CQ will consider and respond to a written complaint as soon as practicable within a 5 day period.

If your complaint remains unresolved after 30 days, you may take your complaint to the Office of the Australian Information Commissioner. The contact details for the Office of the Australian Information Commissioner can be found via its website located at www.oiac.gov.au and are also listed below:

Office of the Australian Information Commissioner

Telephone: 1300 363 992

Email: enquiries@oiaic.gov.au

Facsimile: +61 2 9284 9666

Post: Sydney Office
GPO Box 5218
SYDNEY NSW 2001

Canberra Office
GPO Box 2999
CANBERRA ACT 2601

Safe and Well CQ appreciates your feedback regarding our privacy and confidentiality policy. If you have any comments or queries, please contact Safe and Well CQ via email at info@gladstonewomenshealth.org.au

Amendments to this policy

Safe and Well CQ may change this privacy and confidentiality policy from time to time. When we do make any changes, we will notify you of the changes by posting an updated version of this policy to the website.