

## **1. Aim**

Hunter Region Working Women's Group (HRWWG) has a need to collect, hold and sometimes disclose personal information relating to workers, service users and other individuals or contacts. This policy outlines how such information is collected, stored and used by HRWWG; maintaining compliance with the Australian Privacy Principles (APPs) set out in schedule 1 of the Privacy Act (Cth) 1988 (the "Act"), which regulate the handling of personal information.

## **2. Scope**

This policy applies to all Board members and workers of HRWWG. A worker is any person employed, contracted or volunteering at HRWWG, including students.

## **3. Policy**

### **3.1. Employee Records**

- 3.1.1. This policy does not apply to the collection, holding, use or disclosure of personal information that is an employee record as they are exempt from the APP's.
- 3.1.2. An employee record is a record of personal information relating to the employment an employee. Examples of personal information relating to the employment of the employee include, but are not limited to, health information and information about the engagement, training, disciplining, resignation, termination, terms and conditions of employment of the employees.
- 3.1.3. Only authorised employees will have access to employee records. Employees who have access to employee records must ensure that the information is handled confidentially and for a proper purpose only. Employee records are only permitted to be collected, used and disclosed where the act of doing so is directly related to a current or former employment relationship.

3.2. HRWWG will at all times comply with the Australian Privacy Principles set out in the Privacy Act 1988. These principles are:

- i. Open and transparent management of personal information
- ii. Anonymity and pseudonymity
- iii. Collection of solicited personal information
- iv. Dealing with unsolicited personal information
- v. Notification of the collection of personal information
- vi. Use or disclosure of personal information
- vii. Direct marketing
- viii. Cross-border disclosure of information
- ix. Adoption, use or disclosure of government related identifiers

- x. Quality of personal information
  - xi. Security of personal information
  - xii. Access to personal information
  - xiii. Correction of personal information
- 3.3. Types of information collected
- 3.3.1. Personal details such as name, contact details, Medicare details, next of kin, demographic background, photograph, health status, level of risk, care preferences, and personal goals, or bank account details may be collected by HRWWG in the course of undertaking business and providing services.
- 3.4. How this information is collected
- 3.4.1. In most circumstances information will be sought directly from the individual.
  - 3.4.2. In some circumstances HRWWG may need to contact others such as a doctor, family member, agencies that assist the individual, or referees. In these instances, permission will be sought from the individual first.
  - 3.4.3. Ways that information will be collected include in person, in writing, by telephone, by fax and by email.
- 3.5. How this information will be stored or held
- 3.5.1. Information will be stored in hard copy or electronically as appropriate. This includes paper based files, electronic files, and in electronic software systems.
  - 3.5.2. All information systems and files will be kept secured from misuse, unauthorised access, modification or disclosure.
  - 3.5.3. Should an eligible data breach occur, HRWWG will comply with the Notifiable Data Breaches Scheme as established by the Office of the Australian Information Commissioner (OAIC).
- 3.6. Purpose of collecting, holding, using and disclosing personal information
- 3.6.1. Information is collected to enable HRWWG to fulfil our responsibilities as a provider of health and support programs, as an employer, and as a registered charity.
  - 3.6.2. Information will be used for purposes such as to plan and provide the most appropriate services for service users, inform service users about other programs or service providers, conduct research on program performance, provide Government funding departments with information on program performance, and to conduct fundraising activities.
  - 3.6.3. Information collected by HRWWG will be accessible to authorised individuals employed or engaged by the Company who may be required to use the information in the course of their duties.
  - 3.6.4. There may be circumstances when HRWWG must disclose information without an individual's consent, such as when required by law or if there are serious concerns for the health or safety of a service user or another person. In such circumstances HRWWG

will make reasonable efforts to discuss the matter with the individual as soon as possible.

3.7. How an individual may access their information and seek correction

- 3.7.1. A request for information from or access to a personal information file must be made in writing. HRWWG will then provide the requested information within 30 business days
- 3.7.2. If factors prevent HRWWG from meeting the exact request, options will be discussed with the individual as soon as practicable.
- 3.7.3. If the request for information is particularly complex or requires detailed searching of records, HRWWG may charge the individual a financial fee in order for information to be provided.
- 3.7.4. Should an individual wish to seek correction to their details, a request may be submitted in writing. HRWWG will investigate and correct any inaccuracies where appropriate.

3.8. How an individual may complain if HRWWG (or a contractor) breaches the APP's

- 3.8.1. If an individual believes their privacy has been breached in accordance with the APP's or this policy, they are encouraged to contact HRWWG's Privacy Officer. They may also contact the NSW Information and Privacy Commission or the Australian Government's Office of the Australian Information Commissioner.

3.9. Steps in place to respond in a timely manner to requests for the policy to be provided in a different format

- 3.9.1. Where a request is made to provide this policy in a different format (such as in another language) HRWWG will respond to this request within 5 business days and endeavor to provide the alternate format within 30 business days.

**4. Related Documents**

Privacy Procedures

Confidentiality Policy

Code of Conduct