

# THE NORTHCOTT SOCIETY

## POLICY ON PRIVACY AND CONFIDENTIALITY

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<b>VOLUME:</b>	<b>2</b>	<b>Policy on Management and Organisational Issues</b>
<b>SECTION:</b>	<b>D</b>	<b>Administration</b>
<b>SUB-SECTION:</b>	<b>B</b>	<b>Records Management</b>
<b>REVIEW DATE:</b>		<b>October 2008</b>
<b>BOARD APPROVAL:</b>		<b>Not Applicable</b>

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### **Policy:**

**It is Northcott's policy in respect of all personal information it collects, stores, uses and discloses to ensure that:**

1. it meets its legislative responsibilities to protect the personal information of its clients, customers, donors and staff;
2. it is transparent about what information is collected and how it is used;
3. clients, customers, donors and staff are aware of their rights and responsibilities concerning privacy.

### **Principles:**

#### **A Collection**

1. Personal information collected must be kept to the minimum necessary for service provision and legal accountability.
2. Personal information will only be collected by fair and lawful means.

#### **B Use and Disclosure**

1. Personal information will only be used and disclosed for the primary purpose it was collected.
2. The client, customer, donor or staff's consent will be obtained before personal information is given to a third party except when other legal obligations take precedence.

#### **C Data Quality**

1. Northcott will take reasonable steps to ensure that the personal information it collects, uses or discloses is accurate, complete and up to date.

## **D Data Security**

1. Northcott will take responsibility for ensuring that personal information is protected from misuse, loss, unauthorised access, modification or inappropriate disclosure.

## **E Openness, Access and Correction**

1. Northcott's policies and procedures for the management of personal information will be openly available.
2. Clients, customers, donors and staff have a right to access personal information held about themselves.
3. If it is found that personal information is not accurate, complete or up to date, reasonable steps must be taken to correct the information.

## **F Identifiers and Anonymity**

1. Codes which identify an individual and are assigned by another agency will not be adopted for Northcott clients, customers, donors or staff.
2. Whenever it is lawful and practicable, clients, customers and donors shall have the option of operating anonymously when interacting with Northcott.

## **G Transborder data flows**

1. Personal information can only be transmitted outside of Australia when consent has been obtained from the individual and the recipient is subject to laws or binding schemes which are substantially similar to the National Privacy Principles.

### **Procedures:**

1. Staff and volunteers will be informed through induction and training programs, of clients, customers and donors' rights to privacy and confidentiality, and the measures necessary to protect them.
2. Services will ensure that all new clients, customers and donors are informed by staff in writing of their rights to privacy and confidentiality, and the measures which should be taken to protect these rights.
3. The Privacy and Confidentiality policy must be applied to all forms of information. This includes all written information in files and on computer, information obtained by word of mouth, from photographs, electronic recording etc.
4. Specific written consent must be obtained from each client before any information is released or sought from other sources.

5. Clients, customers, donors and staff must be accurately informed about who will have access to specific information and the purpose for which it is being sought/released.
6. Clients, customers, donors and staff have access to their own files and to assistance in interpreting specialist reports or other documents they may contain.
7. Staff and volunteers must ensure that there is no intrusion into areas of clients' or customers' lives which are not relevant to the services requested.
8. Specific guidelines will be followed that protect client, customer and donor privacy and confidentiality when requesting their cooperation in any fundraising or public relations activities. They will always be free to refuse if they do not want to be involved.
9. This policy will be regularly reviewed with all relevant parties. Procedures are in place to institute an earlier review if required.
10. Individual services will provide information on this policy for clients and customers in plain English and/or other accessible formats. These information resources will be regularly reviewed.

**Supporting Documents:**

Policy on Consumer Rights to Privacy, Dignity and Confidentiality – Children  
Policy on Consumer Rights to Privacy, Dignity and Confidentiality – Adults  
Policy on Writing and Management of Consumer Files  
Policy on Duty of Care  
Policy on Valued Status  
Policy on Record Management System  
Policy on Archives

**Authorised by:** .....

**Mike Fryer**  
**Director Operations**