

# Confidentiality and Privacy Policy

## 1 Purpose and Scope

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### 1.1 Purpose

This policy provides guidance to the Darling Range Hub management committee, staff and volunteers in dealing with privacy considerations.

### 1.2 Scope

The Darling Range Hub is committed to protecting the confidentiality of the Hub's business and personal information which the Hub collects, holds and administers. Personal information is information which directly or indirectly identifies a person.

The Darling Range Hub will regularly review this policy to ensure compliance with current Privacy legislation. In doing so, the Hub reduces any uncertainty regarding the sharing of personal information that it holds.

## 2 Relevant Legislation

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Privacy Act (1988)

Privacy Amendment (Enhancing Privacy Protection) Act (2012)

Privacy Amendment Act (2017)

## 3 Policy

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### 3.1 Collection of Information

- The Darling Range Hub collects and administers a range of confidential information for the purposes of:
  - providing the Darling Range Hub services, activities or products; and
  - carrying out internal administrative operations.
- The Darling Range Hub may collect personal information when an individual interacts with the centre in any of the following ways:
  - Fills in a membership application form;
  - Deals with the Hub in person or over the telephone;
  - Purchases a product or service from the Hub e.g. joins a group, is a client of the Home Made services;
  - Contacts the Hub via e-mail or letter;
  - Subscribes to the Hub newsletter or social media webpage;
  - Attends an event or training session held at the Hub;
  - Participates in a Hub promotional activity e.g. competition entry or fundraising; and
  - Contacts the Darling Range Hub after being referred by other partners, such as funding bodies, local government or Linkwest.
- The Darling Range Hub will collect personal information by lawful and fair means and not in an unreasonably intrusive way.

### 3.2 Use of Information

- Under the Associations Incorporation Act 2015, the Hub will maintain a register of members and a register of committee members.
- Personal information provided will only be used:

# Confidentiality and Privacy Policy

- For purposes consistent with the reason it was provided, or for a directly related purpose;
- Where it is required or permitted by law; or
- Where an individual has provided the centre with express or implied consent.

## 3.3 Security of Information

- The Darling Range Hub requires staff, volunteers and contractors to perform their duties in a manner that is consistent with the Hub's legal responsibilities in relation to confidentiality and privacy.
- All staff, volunteers and contractors will:
  - retain all confidential information in the strictest confidence;
  - take all reasonable steps to ensure that paper and electronic records containing personal information are stored in a way that is only accessible by people who have a genuine 'need to know' as well as a 'right to know';
  - not to disclose any confidential information to any person other than for purposes directly related to their position at the Hub;
  - not use any confidential information which they have acquired in relation to the activities of the Hub for their own interests or purposes outside of the business of the centre; and
  - upon the request, and in any event upon the end of their employment or term with the centre, return or destroy any confidential information which are in their possession, and maintain confidentiality of information learned during their time at the Hub.
- The Darling Range Hub is not responsible for the security of information that members and other users of the Hub's Internet provide to external parties online.

## 3.4 Quality of Security

- The Darling Range Hub will review, on a regular and ongoing basis, its collection and storage practices to identify how improvements to security can be made.
- The Darling Range Hub will take steps to destroy or de-identify personal information after as short a time as possible and after a maximum of seven years, unless the law requires otherwise.

## 3.5 Sharing of Information Overseas

- The Darling Range Hub generally does not send information overseas.
- If personal information must be sent overseas for sound business reasons, The Darling Range Hub will require the recipient to provide a binding undertaking that it will handle that information in line with Australian Privacy laws.

## 3.6 Access and Correction

- Members will have access to their own information, and the right to seek its correction.
- Correction to any document containing personal information will be undertaken as soon as practicably possible.

# Confidentiality and Privacy Policy

## 3.7 Complaints

- Enquiries relating to privacy issues can be made in the first instance via phone, e-mail or on the website.
- Any formal privacy related complaints should be directed in writing to the President.

## 3.8 Openness

- A Privacy Statement disclosing the Darling Range Hub's information gathering and dissemination practices will be maintained and made available in the public area of the Darling Range Hub's website.

## 4 Procedures Code of Behaviour

- The Darling Range Hub Code of Conduct Agreement for management committee members, staff and volunteers will include a confidentiality clause.

### 1.2. Breach of Data

Should the data collected by the Hub be breached, stolen, lost, or unlawfully obtained by a third party the centre will notify its members immediately.

### 1.3. Responsibilities

The management committee has the ultimate responsibility to ensure that all information that is confidential or privileged is managed in an appropriate way and according to the relevant laws and regulations.

The President will act on behalf of the committee and report to the committee at all times in regard to the implementation of this policy.

## 5 Document History

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Document name:			
Version number	Version date	Approved by	Description of changes

## 6 Approval

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Name	
Position	
Signature	
Date	