

KOONUNG COTTAGE COMMUNITY HOUSE INC A. 9540

PRIVACY POLICY AND PROCEDURES

Introduction:

Koonung Cottage Community House is committed to protecting the privacy of personal information which the organisation collects, holds and administers.

Personal information is information which directly or indirectly identifies a person.

Purpose:

The purpose of this document is to provide a framework for Koonung Cottage Community House in dealing with privacy considerations.

Policy:

Koonung Cottage Community House recognises the essential right of individuals to have their information administered in a way that protects their privacy. While also making them available to the individual on request. These privacy values are reflected in and supported by our core values and philosophies and also reflected in our Privacy Policy, which is compliant with the Privacy Act 1988.

Koonung Cottage Community House is bound by laws which impose specific obligations when it comes to handling information. The organisation has adopted the following principles contained as minimum standards in relation to handling personal information.

Koonung Cottage Community House will:

- Collect only information which the organisation requires for its primary function;
- Ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered;
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- Store personal information securely, protecting it from unauthorised access; and
- Provide stakeholders with access to their own information, and the right to seek its correction.

Procedures:

Collection

Koonung Cottage Community House will:

- Only collect information that is necessary for the performance and primary function of Koonung Cottage Community House.
- Notify stakeholders about why we collect the information and how it is administered.

- Notify stakeholders that this information is accessible to them.
- Collect personal information from the person themselves wherever possible.
- If collecting personal information from a third party, be able to advise the person whom the information concerns, from whom their personal information has been collected.
- Determine, where unsolicited information is received, whether the personal information could have collected it in the usual way, and then if it could have, it will be treated normally. (If it could not have been, it must be destroyed, and the person whose personal information has been destroyed will be notified about the receipt and destruction of their personal information).

Use and Disclosure

Koonung Cottage Community House will

- Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose,
- For other uses, Koonung Cottage Community House will obtain consent from the affected person.
- Information which is collected for statistical purposes to comply with reporting requirements for funding bodies will not contain any identifying information.
- In relation to a secondary purpose, use or disclose the personal information only where:
 - a secondary purpose is related to the primary purpose and the individual would reasonably have expected us to use it for purposes; or
 - the person has consented; or
 - certain other legal reasons exist, or disclosure is required to prevent serious and imminent threat to life, health or safety.
- In relation to personal information which has been collected from a person, use the personal information for direct marketing, where that person would reasonably expect it to be used for this purpose, and Koonung Cottage Community House has provided an opt out and the opt out has not been taken up.
- No information will be sent overseas or sold to a third party.
- Provide all individuals access to personal information except where it is a threat to life or health or it is authorized by law to refuse and, if a person is able to establish that the personal information is not accurate, then Koonung Cottage Community House must take steps to correct it. Koonung Cottage Community House may allow a person to attach a statement to their information if Koonung Cottage Community House disagrees it is inaccurate.
- Where for a legal or other reason we are not required to provide a person with access to the information, consider whether a mutually agreed intermediary would allow sufficient access to meet the needs of both parties.

- Make no charge for making a request for personal information, correcting the information or associating a statement regarding accuracy with the personal information.

Storage

- Implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorized access, interference, unauthorized modification or disclosure.
- Ensure that Koonung Cottage Community House's data is up to date, accurate and complete.

Destruction and de-identification

- Destroy personal information once is not required to be kept for the purpose for which it was collected, including from electronic devices.

Data Quality

Koonung Cottage Community House will:

- Take reasonable steps to ensure the information collected is accurate, complete, up to date, and relevant to the functions we perform.

Data Security and Retention

Koonung Cottage Community House will:

- Safeguard the information we collect and store against misuse, loss, unauthorized access and modification.
- Records containing personal information will be kept as required by law and practice as follows:
 - Childcare enrolment forms, Sign In/Sign Out (attendance), medication, accidents, injury and illness, behaviour and development, complaints and time sheets and rosters for 25 years from last contact
 - Health Forms- for as long as a participant is enrolled in an exercise class and each year as new forms are given to participants to complete
 - Class Booking Sheets will be kept for 2 years
 - Class Rolls will be kept for 1 year
 - Financial records and staff records for staff other than childcare staff 7 years
 - Membership register – is kept in accordance with the Association Rules, in line with the Association Incorporation Reform Act 2012. Information is retained for 2 years after membership has lapsed.

Openness

Koonung Cottage Community House will:

- Ensure stakeholders are aware of Koonung Cottage Community House's Privacy Policy and its purposes.
- Make this information freely available in relevant publications and on the organisation's website.

Access and Correction

Koonung Cottage Community House will:

- Ensure individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading or not up to date.

Anonymity

- Allow people from whom the personal information is being collected to not identify themselves or use a pseudonym unless it is impracticable to deal with them on this basis.

Making information available to other organisations

Koonung Cottage Community House can:

- Release information to third parties where it is requested by the person concerned.

Confidentiality Statement

Staff and volunteers are required to maintain confidentiality regarding information involving the organisation, staff, volunteers and participants (this includes child care participants and their families) of the Cottage. Breaches of confidentiality will result in disciplinary action or termination of the staff or volunteer's engagement with the Cottage.

Enquiries and Privacy complaints

If you would like further information about the way Koonung Cottage Community House manages the personal information it holds, please contact the Manager. If you have any concerns, complaints or you think there has been a breach of privacy, then also please contact the Privacy Officer who will first deal with you usually over the phone. If we then have not dealt satisfactorily with your concerns we will meet with you to discuss further. If you are not satisfied with our response to your complaint within 30 days from this meeting then you can refer your complaint to the Office of the Australian Information Commission – 1300 363 992

Privacy incidents must be reported to the DHHS via the Funded Agency Channel. The form asks for details about the privacy incident, clients involved, immediate risks, and how the incident is being managed.