

Confidentiality and Privacy Policy

1 Purpose and Scope

1.1 Purpose

This policy provides guidance to the Tambellup CRC management committee, staff, and volunteers in dealing with privacy considerations.

1.2 Scope

Tambellup CRC is committed to protecting the confidentiality of the centre's business and personal information which the centre collects, holds, and administers. Personal information is information which directly or indirectly identifies a person.

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

2 Related Documents

The following documents either contain references to this policy or are referred to in it:

- Code of Conduct
- Decision Making Between Meetings Policy
- Records and Archives Management Policy
- Register of Members and Register of Management Committee Members Policy

3 Relevant Legislation

Privacy Act (1988)

Privacy Amendment (Enhancing Privacy Protection) Act (2012)

4 Policy

4.1 Collection of Information

- Tambellup CRC collects and administers a range of confidential information for the purposes of:
 - providing Tambellup CRC services, activities, or products; and
 - carrying out internal administrative operations.
- Tambellup CRC 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 centre in person or over the telephone;
 - Purchases a product or service from the centre e.g. joins a group;
 - Contacts the centre via e-mail or letter;
 - Subscribes to the centre newsletter or social media webpage;
 - Joins the centre's online forum;
 - Attends an event or training session held at the centre;
 - Participates in a centre promotional activity e.g. competition entry or fundraising; and
 - Contacts Tambellup CRC after being referred by other partners, such as funding bodies, local government or Linkwest.
- Tambellup CRC will collect personal information by lawful and fair means and not in an unreasonably intrusive way.

4.2 Use of Information

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- Under the Associations Incorporation Act 2015, the centre will maintain a register of members and a register of committee members. See Register of Members and Register of Management Committee Members Policy.
- Personal information provided will only be used:
 - 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.

4.3 Security of Information

- Tambellup CRC requires staff, volunteers and contractors to perform their duties in a manner that is consistent with the centre'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 centre;
 - not use any confidential information which they have acquired in relation to the activities of the centre 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 centre.
- Tambellup CRC is not responsible for the security of information that members and other users of the centre's Internet provide to external parties online.

4.4 Quality of Security

- Tambellup CRC will review, on a regular and ongoing basis, its collection and storage practices to identify how improvements to security can be made.
- Tambellup CRC 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.

4.5 Sharing of Information Overseas

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

4.6 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.

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4.7 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 coordinator. The complaint will be managed in line with the Customer Feedback Policy.

4.8 Openness

- A Privacy Statement disclosing Tambellup CRC's information gathering and dissemination practices will be maintained and made available in the public area of the Tambellup CRC website.
- All Tambellup CRC online and printable forms will contain a privacy statement.

5 Procedures

1.1. Code of Behaviour

- Tambellup CRC Code of Conduct Agreement for management committee members, staff and volunteers will include a confidentiality clause.
- All committee members, staff and volunteers are required to sign the Code of Conduct Agreement at induction.

1.2. Breach of Data

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

1.3. Correspondence in Relation to Disputes / Grievances

Refer to the Staff and Volunteers Grievances Policy.

1.4. Member Feedback Survey

- Tambellup CRC will advise users who use the centre's Internet service that personal information provided to external parties online is unsecured.
- Members and other users of the Internet will be urged to exercise caution when submitting personal information on the Internet and to be aware of the security mechanisms and privacy policies on external web sites.
- Tambellup CRC may routinely log information accessed by members and other users of the Internet.
These logs may be accessed as deemed appropriate by the coordinator or when required by law.

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

6 Document History

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Document name:			
Version number	Version date	Approved by	Description of changes
1.0	Date	Management Committee	Adopted

7 Approval

Name	
Position	
Signature	
Date	