

## Privacy Policy

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Policy Owner: CEO  
Policy approved: 2 March 2018  
Policy last updated: 6 January 2020 (structural changes only)

### Policy objective

The objectives of this policy are to:

- Recognise the rights of individuals to privacy and Oonah's responsibility to maintain that privacy
- Ensure Oonah complies with its obligations under the Federal Privacy Act (1988) and the National Privacy Principles

### Application of Policy

This policy applies to all employees, contractors, volunteers and Board Members.

### Policy

Oonah is committed to protecting and upholding the right to privacy of clients, staff, volunteers, Board members and representatives of agencies we deal with. In particular Oonah is committed to protecting and upholding the rights of our clients to privacy in the way we collect, store and use information about them, their needs and the services we provide to them.

Oonah requires staff, volunteers and the Board to be consistent and careful in the way they manage what is written and said about individuals and how they decide who can see or hear this information.

Oonah is subject to the Corporations (Aboriginal and Torres Strait Islander) Act 2006 as it applies to its membership. The organisation will follow the guidelines of the National Privacy Principles in its information management practices.

Oonah will ensure that:

- it meets its legal and ethical obligations as an employer and service provider in relation to protecting the privacy of clients and organisational personnel.
- clients are provided with information about their rights regarding privacy.
- clients and Oonah personnel are provided with privacy when they are being interviewed or discussing matters of a personal or sensitive nature.
- all staff, Board members and volunteers understand what is required in meeting these obligations.

This policy conforms to the Federal Privacy Act (1988) and the National Privacy Principles which govern the collection, use and storage of personal information.

(Note: The Federal Privacy Act does not apply to organisations with an annual turnover under \$3m, but many funding contracts require that funded organisations comply with the Privacy Principles).

This policy will apply to all records, whether hard copy or electronic, containing personal information about individuals, and to interviews or discussions of a sensitive personal nature.

## PROCEDURES

### Dealing with personal information

In dealing with personal information, Oonah staff will:

- ensure privacy for clients, staff, volunteers or Board members when they are being interviewed or discussing matters of a personal or sensitive nature
- only collect and store personal information that is necessary for the functioning of the organisation and its activities
- use fair and lawful ways to collect personal information
- collect personal information only by consent from an individual
- ensure that people know what sort of personal information is held, what purposes it is held for and how it is collected, used, disclosed and who will have access to it
- ensure that personal information collected or disclosed is accurate, complete and up-to-date, and provide access to any individual to review information or correct wrong information about themselves
- take reasonable steps to protect all personal information from misuse and loss and from unauthorised access, modification or disclosure
- destroy or permanently de-identify personal information no longer needed and/or after legal requirements for retaining documents have expired.

### Responsibilities for managing privacy

- All staff are responsible for the management of personal information to which they have access, and in the conduct of research, consultation or advocacy work.
- The CEO is responsible for content in Oonah publications, communications and web site and must ensure the following:
  - appropriate consent is obtained for the inclusion of any personal information about any individual including Oonah personnel
  - information being provided by other agencies or external individuals conforms to privacy principles
  - that the website contains a Privacy statement that makes clear the conditions of any collection of personal information from the public through their visit to the website.

- The CEO is responsible for safeguarding personal information relating to Oonah staff, Board members, volunteers, contractors and Oonah members.
- **The Privacy Contact Officer:** The Privacy Contact Officer will be the CEO. The CEO will be responsible for:
  - ensuring that all staff are familiar with the Privacy Policy and administrative procedures for handling personal information
  - ensuring that clients and other relevant individuals are provided with information about their rights regarding privacy
  - handling any queries or complaint about a privacy issue

### **Privacy information for clients**

At intake and enrolment the enrolling staff member responsible for client intake or enrolment will be told what information is being collected, how their privacy will be protected and their rights in relation to this information.

### **Privacy for interviews and personal discussions**

To ensure privacy for clients or staff when discussing sensitive or personal matters, the organisation will:

- Ensure the intake or enrolment is undertaken in a private location
- Ensure phone with clients are not held in a public space

### **Participants in research projects**

People being invited to participate in a research project must be:

- given a choice about participating or not
- given the right to withdraw at any time
- informed about the purpose of the research project, the information to be collected, and how information they provide will be used.
- given copies of any subsequent publications.

The collection of personal information will be limited to that which is required for the conduct of the project. Individual participants will not be identified.

Organisational participants in research projects will generally be identified in Oonah research, unless the nature of a particular project requires anonymity, or an organisation specifically requests it.

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