

PRIVACY POLICY - Client Personal Information	
To be reviewed by:	Date: June 2017

1. INTRODUCTION

Hepatitis SA employees and volunteers may at times be required to collect sensitive personal information about clients of the service.

Hepatitis SA is required to comply with the SA Department of Health's Code of Fair Information Practice in relation to any personal information about clients, held or acquired. Fair information practices aim to ensure that organisations which hold information about individual people handle that information responsibly. Generally this also means that wherever possible, people should be able to exercise some control over the way information about them is collected, used, stored and disclosed.

Hepatitis SA is also required to comply with the Information Sharing Guidelines for Promoting the Safety and Wellbeing of Children, Young People and their Families.

The Australian Privacy Principles (APPs) guide this policy.

<http://www.oaic.gov.au/privacy/privacy-act/australian-privacy-principles>.

These principles apply to personal information about clients, regardless of format. They do not apply to de-identified information nor to employee or volunteer records.

2. POLICY

Hepatitis SA will be transparent and accountable in the collection and the management of the personal information it holds about clients of the service, and ensure that individuals are kept informed about the kinds of personal information collected, for what purposes, how it is held, how it will be used and if it will be transferred or disclosed to a third party.

Board members, employees and volunteers are bound by a duty of confidentiality in respect to any personal information relating to clients of the service. Any unauthorised disclosure or discussion of records or information concerning clients of Hepatitis SA will be regarded as a serious breach of confidentiality and could lead to dismissal.

3. IMPLEMENTATION

Collection

Hepatitis SA will limit the collection of personal information to only that which is necessary to provide services and appropriate support to clients and members, and for statistical purposes. Information for statistical purposes is de-identified.

Where personal information is collected, it will be by lawful, fair and non-intrusive means. At or before the time personal information is collected, Hepatitis SA will take all reasonable steps to inform clients why their personal information is being collected, the use to which it will be put and their rights to access this information.

Wherever practicable, individuals will have the option of not identifying themselves, that is, be dealt with anonymously, when their personal information is collected.

Where practicable, Hepatitis SA will collect personal information directly from the individual to whom the information relates. If Hepatitis SA collects personal information about an individual from a third party, wherever possible, that individual will be informed.

Where the right to confidentiality is waived by clients, where practicable, this must be done in writing under conditions of informed consent. If only verbal consent can be gained, then a written record of this verbal consent must be kept.

The kinds of personal information collected and held by Hepatitis SA are:

- Name and address – for the purpose of sending resources, when requested, through the post to the person who has requested the resource. Hepatitis SA will not post resources to third parties. This information is only held as long as it takes to deliver the item to the post office (usually the same day), and is not kept.
- Name and address and other contact details of Hepatitis SA members - for the purpose of communicating with members – eg quarterly magazine, e-alerts, notice of Annual General Meeting etc. The membership list is only accessible by limited staff and is stored securely on a computer file that is password protected.
- In general, Hepatitis SA does not keep client records. The exception to this is when client information is collected in order to provide individual advocacy, as requested by the client e.g. such as a support letter; making a complaint. Such information is kept securely locked in a filing cabinet and / or a password protected computer file by the person providing the service.
- If a complaint is made that relates to Hepatitis SA staff, clients or visitors, then client information will also be kept that details the complaint and the complaint processes undertaken by Hepatitis SA.
- Model release forms are completed by anyone who has consented to their photograph or image being used in Hepatitis SA publications. These completed forms, which contain personal information, are kept locked in a filing cabinet.

Use and Disclosure

Hepatitis SA will only use or disclose personal information as described to individuals at the time of collection.

Hepatitis SA will take all reasonable steps to only use and disclose personal information that is accurate, complete, up-to-date and not misleading.

Hepatitis SA will not disclose any personal information:

- for any secondary purpose, unless the use or disclosure of the information is required by or under an Australian law or a court / tribunal order
- for the purpose of direct marketing

- to any overseas recipients

Security

Personal information will be protected by Hepatitis SA from misuse and/or loss from unauthorised access, modification or inappropriate disclosure by unauthorised individuals and organisations. Personal information will be destroyed or permanently de-identified in a secure manner, when no longer required.

Hepatitis SA will take all reasonable steps to maintain the security and protect the privacy of personal information if it is transferred to a third party.

Employees and volunteers must take care in maintaining the integrity and security of personal information for which they are responsible, including only making it available to authorised personnel as determined by the EO.

Information Systems

Employee passwords must be kept confidential. Disclosure of the password to other unauthorised employees or unauthorised persons is strictly prohibited. Generally, authorised employee sharing of passwords is only between employees in the same program area, the System Administrator or the EO.

Personal computers or terminals must not be left unattended when confidential details are displayed on the screen.

Access and Correction

Wherever possible, Hepatitis SA will let individuals have access to any personal information held about them, and give them the opportunity to correct any of this information if it is wrong, in accordance with the Freedom of Information Act.

Complaining about a breach of the Australian Privacy Principles by Hepatitis SA

Please refer to the Hepatitis SA Consumer Complaints Policy.

The Office of the Australian Information Commissioner (OAIC) can also investigate privacy complaints from individuals.

Before you can lodge a complaint with the OAIC, you will generally need to complain directly to the agency or organisation you are complaining about and allow 30 days for it to respond. If you do not receive a response (after 30 days), or you are dissatisfied with the response, you may then complain to the OAIC.

For further enquiries, phone 1300 363 992 or email enquiries@oaic.gov.au