

Interchange Policy & Procedure Manual

Policy 2.5 Privacy, Dignity and Confidentiality

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| DATE OF BOARD ENDORSEMENT | JANUARY 2008 |
| LAST REVIEW DATE | 01 March 2014 |
| NEXT REVIEW DATE | March 2016 |
| CURRENT VERSION | V2.0 |

Reference Documents

- National Standards for Disability Services (Standard 1)
- The Privacy Act 1988
- The National Privacy Principles from the Privacy Amendment (Private Sector) Act 2000

Policy Statement

This privacy policy outlines the personal information handling practices of Interchange Incorporated. Employees and prospective employees should also refer to our Human resources privacy policy.

Interchange treats all customers with dignity and ensures that their privacy is recognised, respected and protected in all aspects of their contact with Interchange. Interchange will only collect personal information about customers and families that is necessary for us to provide a safe and responsive service. We recognise that some customer related information is of a highly sensitive nature.

We expect that information we receive from customers and families will remain confidential, however, there are occasions where confidentiality might have to be broken. These include:

(1) The exercise of duty of care

Occasionally, there might be conflicts between duty of care to the customer and the duty to maintain privacy and respect confidentiality. If there are concerns that a customer might hurt himself / herself, or pose a threat to another individual or group, or that someone else poses a threat to a customer, confidentiality might need to be broken to ensure the safety of the individuals or group concerned.

(2) Fulfilling legal obligations

Confidentiality might need to be broken in order for Interchange to comply with its regulatory and legal obligations.

Disclosure of personal information overseas

Generally we do not disclose personal information overseas.

Web traffic information is disclosed to Google Analytics when you visit our website. Google stores information across multiple countries. For further information see [Google Data Centers](#) and [Google Locations](#).

When you communicate with us through a social network service such as Facebook or Twitter, the social network provider and its partners may collect and hold your personal information overseas.

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Indirect collection

In the course of reviewing service and funding plans or handling and resolving a complaint, we may collect personal information (including sensitive information) about you indirectly from publicly available sources or from third parties such as:

- your authorised representative, if you have one
- applicants, complainants, respondents to a complaint or a third parties' employees and witnesses.

Collecting through our websites

Interchange has its own public website — www.interchangewa.org.au . Where our websites allow you to make comments or give feedback we collect your email address and sometimes other contact details. We may use your email address to respond to your feedback. We store this personal information on servers located in Australia.

Social Networking Services

We use social networking services such as Twitter, Facebook and YouTube to communicate with the public about our work. When you communicate with us using these services we may collect your personal information, but we only use it to help us to communicate with you and the public. The social networking service will also handle your personal information for its own purposes. These sites have their own privacy policies.

Disclosure

Possible situations in which we may disclose information are detailed below.

Complaints and reviews

If you make a service complaint we will usually give a copy of the complaint to the respondent and, where relevant, affected third parties.

If a complainant requests that only limited information is disclosed to the respondent, we may not have enough information to be able to fairly proceed with the matter. The respondent must have sufficient information to respond to the matter in a meaningful way.

We may disclose personal information to another review body if a complainant seeks an external review of the Interchange decision or makes a complaint to the Disability Services Commission or other regulatory body.

Disclosure of sensitive information to other service providers

We only disclose your sensitive information for the purposes for which you gave it to us or for directly related purposes you would reasonably expect or if you agree.

Quality of personal information

To ensure that the personal information we collect is accurate, up-to-date and complete we:

- record information in a consistent format
- where necessary, confirm the accuracy of information we collect from a third party or a public source
- promptly add updated or new personal information to existing records
- regularly audit our contact lists to check their accuracy.

We also review the quality of personal information before we use or disclose it.

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Procedures

- As part of their orientation to the service, all new customers will be advised of:
 - ✓ Interchange's commitment to maintaining their privacy and confidentiality and the occasions when legal requirements or our duty of care to ensure the safety and well-being of all of our customers could mean that we might not be able to keep our commitment;
 - ✓ The practices we have in place to help us to meet our commitment;
 - ✓ The reasons why we ask for the information we request from them, and what we do with that information;
 - ✓ How they can access the personal information about them that we hold, and any limitations to that access.

- Customers will be asked to give informed consent before personal information is communicated to a third party, except in situations where not informing the third party could:
 - ✓ Constitute a breach of our duty of care;
 - ✓ Place the customer or others at risk;
 - ✓ Place Interchange in breach of legal or regulatory requirements.

- As part of their induction/orientation all staff, students and volunteers will be made aware of:
 - ✓ The requirements of Standard 1 of the National Standards for Disability Services;
 - ✓ The National Privacy Principles from the Privacy Amendment (Private Sector) Act 2000; and
 - ✓ What is required of them in obtaining informed consent from a customer.
- Interviews with customers will be conducted in a room where privacy can be assured.
- Staff must ensure that Customer files are not left on desk tops, or otherwise unsecured, while the files are not in use.
- Staff must ensure that they log off their computer when they leave their desk and that they do not reveal their access password to anyone.
- Filing cabinets containing personal information of customers must be locked at all times and staff with authority to access the cabinet are issued with a numbered key for which they must sign.
- If a staff member is in a situation where they believe that they might have to divulge information about a customer that they ordinarily would not disclose, they should seek the advice of the Executive Operations Manager before making the disclosure.
- Organisational arrangements for maintaining customer privacy and confidentiality will be reviewed at least every three years as part of a privacy audit.

Accessing and correcting your personal information

Under the Privacy Act (Australian Privacy Principles 12 and 13) you have the right to ask for access to personal information that we hold about you, and ask that we correct that personal information. You can ask for access or correction by contacting us and we must respond within 30 days. If you ask, we must give you access to your personal information, and take reasonable steps to correct it if we consider it is incorrect, unless there is a law that allows or requires us not to.

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We will ask you to verify your identity before we give you access to your information or correct it, and we will try to make the process as simple as possible. If we refuse to give you access to, or correct, your personal information, we must notify you in writing setting out the reasons.

If we make a correction and we have disclosed the incorrect information to others, you can ask us to tell them about the correction. We must do so unless there is a valid reason not to.

If we refuse to correct your personal information, you can ask us to associate with it (for example, attach or link) a statement that you believe the information is incorrect and why.

You also have the right under the FOI Act to request access to documents that we hold and ask for information that we hold about you to be changed or annotated if it is incomplete, incorrect, out-of-date or misleading.

How to make a complaint

If you wish to complain to us about how we have handled your personal information you should complain in writing. If you need help lodging a complaint, you can contact us.

How to contact us

You can contact us at:

- office@interchangewa.org.au
- 08 9329 9399
- Suite 9, 32 Hulme Court, Myaree WA 6154, Australia.