

**POLICY STATEMENT**

Katoomba Neighbourhood Centre ( KNC) is committed to protecting and upholding the right to privacy of clients, staff, volunteers, members of the KNC Board and representatives of agencies we deal with. In particular KNC 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.

KNC requires staff, volunteers and members of the KNC 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.

KNC as a provider of service under Commonwealth contract, conforms with the federal Privacy Act (1988) and endeavours to follow and comply with the *Australian Privacy Principles* which govern the collection, use and storage of personal information, in its information management practices.

Katoomba Neighbourhood Centre 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 organisational personnel are provided with privacy when they are being interviewed or discussing matters of a personal or sensitive nature.
- all staff, volunteer and members of the KNC Board understand what is required in meeting these obligations.

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.

This policy requires to be read and understood in conjunction with the following KNC documents:-

<b>POLICY/DOCUMENT NAME</b>
<b>1. Confidentiality Policy</b>
<b>2. KNC Codes of Conduct</b>
<b>3. Access to Confidential Information</b>
<b>4. Client Records</b>
<b>5. Australian Privacy Principles</b>

**WHO THE KATOOMBA NEIGHBOURHOOD PRIVACY POLICY APPLIES TO**

- Members of the KNC Board
- KNC staff
- KNC Volunteers
- Researchers, students, contractors working with KNC

## PROCEDURE

### Dealing with personal information

In dealing with personal information, Katoomba neighbourhood Centre staff will:

- ensure privacy for clients, staff, volunteers or members of the KNC Board and its sub committees, 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 it 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 KNC General Manager via the KNC Service support Coordinator are responsible for content in Katoomba Neighbourhood Centre 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 KNC 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 KNC General Manager is ultimately responsible for ensuring that the personal information of individual clients across all KNC service and programs is safeguarded appropriately, and that all client records are maintained in accordance with all relevant standards, principles and legislation.
- The KNC General Manager and the Manager Finance & Resources are responsible for safeguarding personal information relating to KNC staff, members of the KNC

Board, members of Katoomba Neighbourhood Centre Incorporated and contractors of the Organisation.

- KNC service coordinators are responsible for safeguarding any personal information held on their individual service clients, service volunteers and where relevant and appropriate service specific contractors
  - Coordinator Katoomba Volunteer Home Visitors Service is responsible for safeguarding the personal information of Volunteer Home Visitors and clients of the Katoomba volunteer Home Visitors program
  - Coordinator of Community Visitors Scheme is responsible for safeguarding the personal information of Community Visitors Scheme clients & volunteers
  - Coordinator KNC Service support is responsible for safeguarding the personal information of KNC Community Hub, Community & Cultural Development & the Vale St program volunteers
  - Builder/Coordinator of Blue Mountains Home Modification & Maintenance Service is responsible for safeguarding the personal information of the BMHMMS service clients and the contractors utilised by the BMHMM Service
  - Coordinator of the Katoomba Neighbourhood Centre KOOSH service is responsible for safeguarding the personal information of Katoomba Out of School Hours Child Care Service volunteers, and parent details
  - Coordinator of the Blue Mountains HACC Service is responsible for safeguarding the personal information of the HACC program clients and contractors utilised by the HACC program

- **The Privacy Contact Officer:**

The KNC General Manager or their delegate 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 the initial point of contact with the appropriate KNC service and or KNC Service Coordinator, prospective clients will be told what information is required to be collected, how their privacy will be protected and their rights in relation to this information. This process will routinely be attended via the initial phone contact with the client. In certain circumstance this may be attended or completed at the initial assessment.

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

Arrangements to ensure that staff and client privacy is protected when information of a sensitive or personal nature is being discussed, will differ according to where the interaction is taking place. KNC staff generally operate in open office arrangements sharing office space

with other staff. All efforts will be made to ensure that face to face interactions of a sensitive or personal nature are conducted in private, wherever possible safe and practical to do so.

- The KNC staff member undertaking the interview/interaction will seek to maintain an appropriate environment by conducting the interaction either in the allocated office space of the staff member or in an allocated KNC group or counselling room if available and safe
- Interviews may be undertaken in the staff members office, if another staff member is present the second staff member may be asked to vacate the space for a contracted period of time to enable the interview. If this cannot be facilitated then the client/volunteer/contractor/staff member will be asked if they are comfortable continuing with the staff member present, reassuring the individual that all KNC staff must abide by the KNC Code of Conduct and maintain their confidentiality.
- If this arrangement is not acceptable then an alternative time and date for interview will be negotiated, ensuring that the interview can be conducted in private in an appropriate booked KNC meeting space, if assessed by the staff member as safe to do so.
- Phone conversations with clients/volunteers/contractors/staff members are undertaken at times undertaken in the presence of the other staff sharing the office. The interviewee will be informed that their information and privacy is safeguarded as all KNC staff and volunteers are bound by the Organisational Code of Conduct governing how they must maintain privacy and confidentiality. If this arrangement is not acceptable then an alternative time and date for phone interview will be negotiated, ensuring that the interview can be conducted in private.
- Assessments and interviews are undertaken in home environments for particular services. The Service Coordinators or delegated staff members of the specific service i.e. Katoomba Volunteer Home Visitors, Community Visitors Scheme, HACC Program, Home Modification & Maintenance Service will adhere to all aspects of the KNC Privacy Policy. If other family members, friends, carers are present at the time of interview, the KNC staff member will seek the clients consent for the interview to continue in the presence of the other members. If the client does not wish to continue in the presence of others, the KNC Service Coordinator/staff member can encourage the client to ask the other members to leave. In the event that a private safe space cannot be created for the client, the KNC Coordinator/staff member will reschedule the interview at a time when privacy can be assured.
- Any advance from clients/ community users/KNC staff to discuss matters of a sensitive or personal nature outside routine operating hours will be deferred by mutual agreement to a service operating day at a mutually agreed to time.
- Community members unknown to KNC service staff accessing the community hub information and referral service on a drop in basis are initially interviewed in the public reception area in the presence of the reception volunteer. The clients consent for this process to continue is sought. If this arrangement is not acceptable then an alternative time and date for interview will be negotiated, ensuring that the

interview can be conducted in private in an appropriate booked KNC meeting space, if assessed by the staff member as safe to do so.

**Participants in research projects**

People being invited to participate in a research project will:

- be given a choice about participating or not
- consent to participating
- be given the right to withdraw at any time
- be informed about the purpose of the research project, the information to be collected, and how information they provide will be used.
- be informed on how the information they provide will be stored.
- consent to participate
- be assured that any information used in the research will be de-identified
- be given the option of receiving copies of any subsequent report/publication.

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 Katoomba Neighbourhood Centre research by position, unless the nature of a particular project requires anonymity or an organisation specifically requests it.

**Limits to confidentiality**

There are limits to confidentiality as required by law, and these are when:

- there is circumstance of immediate or grave danger to an individual - client, staff or other service user e.g. when there is reasonable belief that the individual is suicidal or homicidal
- there is reasonable suspicion of serious criminal activity
- there is recent or ongoing child abuse
- there is recent or ongoing abuse of a dependent adult
- there is reasonable suspicion of disease or conditions subject to mandatory reporting of a public health issues

Under these circumstances an individuals' right to privacy and confidentiality is replaced by requirements under the law.

**VERSION HISTORY**

Version	Approved by	Approval date	Amendment notes
Version one	KNC Board	2010	<ul style="list-style-type: none"> <li>• Privacy statements contained in the superseded</li> </ul>

			confidentiality policy
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By signing below you are indicating that you have read and understand the Katoomba Neighbourhood Privacy policy. By signing you are agreeing to abide by and be bound by this policy. Any proven breaches may result in formal action being taken against you

Staff Member Name:

  

Position:

  

Signature:

  

Date:

Version two	KNC Policy & procedure subcommittee for use in draft	March 2015	<ul style="list-style-type: none"> <li>Stand alone policy and procedures developed to sit behind the Organisational Governance policy</li> </ul>
Version two	Slated for Board ratification May 2015		<ul style="list-style-type: none"> <li></li> </ul>

