

PRIVACY POLICY AND PROCEDURE

Policy statement

Orange Health is committed to protecting and upholding the right to privacy of clients, staff, the Management Team members and representatives of agencies we deal with. In particular Orange Health 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.

Orange Health requires staff and Managers 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.

Orange Health is subject to legislation applying to the organisation and/or its client group. The organisation will follow the guidelines of the Australian Privacy Principles in its information management practices.

Orange Health 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 and Managers understand what is required in meeting these obligations.

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

(Note: The Federal Privacy Act applies to organisations with an annual turnover over \$3m or organisations that are health service providers, operators of a residential tenancy database, a contractor that provides services under a Commonwealth contract, an organisation that is related to a larger organisation or one which trades in personal information. Many funding contracts may require that funded organisations comply with the Australian 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 Orange Health staff will:

- ensure privacy for clients and Managers 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 service provision, research, consultation or advocacy work.

The CEO and Director are responsible for the content in Orange Health 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 Orange Health 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 Director and CEO are responsible for safeguarding personal information relating to Orange Health staff and Managers, contractors and Orange Health clients.

The Privacy Contact Officer

The Privacy Contact Officer will be the CEO who 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 complaints about a privacy issue



Privacy information for clients

At specific points of contact (e.g. intake, initial assessment, reviews etc clients will be told what information is being collected, how their privacy will be protected and their rights in relation to this information.

In line with legislative requirements, Orange Health Pty Ltd undertakes a routine quality management audit. As part of the audit the auditing body are required to undertake sampling of our service delivery which includes interviewing you and reviewing your file. You have the right to "opt out" of NDIS audits.

Privacy for interviews and personal discussions

To ensure privacy for clients or staff when discussing sensitive or personal matters, the organisation will ensure suitable physical provisions such as the layout of public spaces, position of desks where phone calls may be made by staff discussing clients and private interview space for meetings and appointments outside opening hours etc.

Approvals

Date of approval: 3 March 2021

Date of review: 3 March 2021

Signature of CEO:

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