

	Title:	
	PRIVACY POLICY	
	Version: 1	Approved: Committee of Governance
Administered: Committee of Governance	Next Review: September 2017	

Introduction

Network West Inc. is committed to meeting its legal obligations in relation to information privacy in the collection, administration, storage and disposal of information relating to identified persons.

Purpose

The purpose of this document is to:

- provide a framework for Network West Inc. in dealing with confidentiality considerations in dealings with members, funding and reporting bodies
- protect the information entrusted to the network by member organisations
- ensure compliance with the Information Privacy Act 2000, Victorian Privacy laws and the Health Records Act 2001

The Privacy Policy applies to:

Personal information: information or an opinion about an individual or member organisation whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

Sensitive information: information or an opinion about an individual's racial or ethnic origin, political opinions, trade union membership, philosophical or religious beliefs, sexual preferences or criminal record.

Health information: information about the physical, mental or psychological health, or disability of an individual.

Policy

Network West Inc. will:

- Only collect information that is necessary for the performance, primary function and reporting of core business
- Notify stakeholders and member organisations about why we collect the information and how it is administered
- Provide stakeholders and member organisations with access to information held about them on request, with the right to seek correction
- Use and disclose personal and member information only for primary functions or a directly related and relevant purpose, or with the person's consent
- Store, administer and dispose of personal and organisation information securely

Responsibilities

It is the responsibility of **The Committee of Governance** to:

- adhere to the provisions of the relevant legislation or Award/Agreement provisions for privacy by maintaining an up to date and relevant policy
- ensure the networker and committee are inducted on commencement of the policy and procedures

It is the responsibility of the **Networker** to:

- induct new staff and volunteers on commencement

It is the responsibility of all **employees, committee and volunteers** to:

- observe and follow the privacy policy and procedures

Procedure

Network West Inc. will:

- only collect information that is necessary for the performance and primary function and activities of Network West
- notify stakeholders, members and staff about why we collect information and how it is administered
- where reasonable and practicable all private information will be collected directly from the individual or member

Use and Disclosure

Network West Inc. will:

- only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose such as required reporting
- for other uses, obtain consent from the relevant person or organization
- take all reasonable steps to ensure the information it collects is accurate, complete, up to date and relevant to the functions it performs
- ensure stakeholders are aware of the Network West Inc. privacy policy and procedures by making available on the website and referenced in the annual report

Data Security and Retention

Network West Inc. will:

- maintain a secure system for storing personal and sensitive information both electronic and hard copy
- ensure electronic devices are password protected

Access and Correction

Network West Inc. will:

- ensure individuals have access to information held about them except in the circumstances outlined in the Act. For example, where the information relates to legal proceedings, where the *Freedom of Information Act* 1982 applies, (in relation to health information, granting access would pose a threat to life or health) or where the information was given in confidence by another person.
- notify all parties that this information is accessible to them and able to be corrected if it is deemed inaccurate, incomplete, misleading or out of date
- where lawful and practicable, the organisation will give an individual the option of not identifying themselves when supplying information or entering into transactions.

Making information available to others

Network West Inc. can

- only release personal information about an individual with that person's express permission at the time of information collection or at a later date
- release information to third parties where it is requested in writing by the person concerned

Identification

Any information on which restrictions have been placed shall be as far as possible clearly identified on the document or file. Where categories of information, rather than individual documents, are restricted this restriction will be conveyed to staff and volunteers dealing with this information.

Protection

Staff, committee and volunteers of the organization shall be required to sign a confidentiality agreement (see Appendix A).

APPENDIX A

Confidentiality Agreement

I agree to hold confidential all information that Network West Inc. collects, stores and disposes of in its operations, and to release it to persons outside the organisation only when authorised by the organisation and subject to any conditions set by the organisation.

I undertake to

- 1) Access information held by the organisation only when necessary in the performance of my assigned duties
- 2) Make copies of restricted information only when necessary in the performance of my assigned duties
- 3) Oversee the storage, handling and disposal of restricted information according to expected organizational processes
- 4) Take reasonable care to properly secure confidential electronic information and will take steps to ensure that unauthorized people cannot view or access such information
- 5) Not disclose my personal password(s) to anyone without the express written permission of a supervisor or record it in an easily accessible location, and will refrain from performing any tasks using another's password
- 6) Notify my supervisor if I have reason to believe that my access codes and passwords have been compromised.

Name _____

Signed _____

Date _____