



HCC Privacy & Confidentiality Policy

Definition:

Healthy Change Challengers (HCC) is committed to safeguarding the privacy and confidentiality of any personal or health information of individuals by:

Creating procedures that protect privacy with regard to the collection, storage and disclosure of personal and health information; and,

Complying with the Australian Privacy Principles and the Privacy Act 1988 (Cth) (the Privacy Act).

Respect the privacy of people with a disability

People with a disability have the right not to have their personal information disclosed to others without their informed consent - unless mandatory reporting is required.

To ensure that all individuals are aware of their rights in regards to privacy and confidentiality and are aware of the means to access or amend private information held about them; and,

To ensure that any information collected is directly related to Healthy Change Challenge's service functions or activities.

Guiding Principles

HCC believes that individuals and communities have a right to privacy, dignity and confidentiality. This right will be upheld at all times through practices of sharing and providing information in a discreet manner and on a need-to-know basis;

HCC will be guided by the Australian Privacy Principles at all times;

HCC aims to create a workplace which is respectful, ethical and professional in all matters pertaining to confidential or private information held about an individual.

How we collect information

Where possible, we collect your Personal Information and Sensitive Information directly from you. We collect information through various means. We will not collect information unless it is necessary for the functions or activities of HCC.



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If you do not want to disclose information that we have requested, please raise this with us.

There are situations where we may also obtain Personal Information about you from a third party source. If we collect information about you in this way, we will take reasonable steps to contact you and ensure that you are aware of the purpose for which we are collecting your personal information and the organisations to which we may disclose your information, subject to any exceptions under the Privacy Act.

Personal and Health information

HCC may collect Personal and Health Information relating solely to the challengers, staff and volunteers of the organisation or to individuals who have regular contact with the organisation in connection with its activities. When collecting Personal and/or Health Information from you, as this is Sensitive Information, HCC will obtain your consent to such collection and explain how this information will be used and disclosed.

If Personal and/or Health Information is collected from a third party, HCC will inform you that this information has been collected and will explain how this information will be used and disclosed.

HCC will not use Personal and/or Health Information beyond the consent provided by you, unless your further consent is obtained or in accordance with one of the exceptions under the Privacy Act or in compliance with another law. If HCC uses your Information for research or statistical purposes, it will be de-identified if practicable to do so.

Security of Personal & Information

HCC takes reasonable steps to protect the Personal and Health Information we hold against misuse, interference, loss, unauthorised access, modification and disclosure.

These steps include:

Access to electronic information is via a secured google drive. Staff can only access this with a current password protected email address, that is issued to the staff member and is used whilst the staff member is employed.

Documents of a sensitive nature are not accessible to all staff. These are linked only to the people concerned on a "need to know basis" with those particular persons.



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Paper files are secured in a locked cabinet in a locked storage shed (coded lock) applying physical access restrictions. Only authorised personnel are permitted to access our systems and controlled premises.

Records will be kept for 7 years from the date the record was made in accordance with the guidelines outlined by NDIS Quality and Safeguard commission. When personal information is no longer required, it is destroyed in a secure manner, or will be de-identified.

Access to and correction of personal information

If an individual requests access to the personal information we hold about them, or seeks to change that personal information, upon this request we will give the individual access, unless:

- the request does not relate to the personal information of the person making the request;
- the request would have an unreasonable impact on the privacy of other individuals;
- the request relates to existing or anticipated legal proceedings;
- providing access would prejudice negotiations with the individual making the request;
- denial of access is authorised or required by law;
- access would prejudice an action in relation to suspected unlawful activity, or misconduct of a serious

Requests for access and/or correction should be made to the Privacy Officer. For security reasons, any request must be made in writing with proof of identity. We will take all reasonable steps to provide access to the information requested within 14 days of your request. In situations where the request is complicated or requires access to a large volume of information, we will take all reasonable steps to provide access to the information requested within 30 days.

We will provide access by allowing you to inspect, take notes or print outs of personal information that we hold about you.

If we deny access to information, we will set out our reasons for denying access in writing. Where there is a dispute about the right to access information or forms of access, this will be dealt with in accordance with the HCC complaints procedure. More information about this process can be obtained from the Privacy Officer.



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Complaints Procedure

If you have a complaint about HCC's privacy practices or our handling of your Personal Information or Sensitive Information, you may notify our Privacy Officer.

All efforts will be made to address complaints and achieve an effective resolution of your complaint within a reasonable timeframe. In most cases this will be 30 days or as soon as practicable. However, if the matter is complex, the resolution of the complaint may take longer. All complaints and outcomes will be recorded. In the event that an anonymous complaint is received we will note the issues raised and where appropriate, investigate and resolve them appropriately.

Changes to this Privacy Policy

HCC will review, amend and/or update this policy from time to time as appropriate.

How to contact us:

Individuals can obtain further information in relation to this Privacy Policy, or provide any comments, by contacting:

The Privacy Officer, Lloyd Valentine

Email: healthychangechallenge@gmail.com Subject: Attention Privacy Officer

By signing this document I acknowledge I have read and understood the content of the Privacy & Confidentiality Policy.

Name and Date

Australian Privacy Principles and the Privacy Act 1988 (Cth) (the Privacy Act)

NDIS Quality and Safeguards Commission