

Approval Authority	Executive Leadership Team
Policy Owner	Chief Executive Officer
Policy Author	Manger, Quality and Assurance
Approval Date	17 December 2020
Next Review Date	17 December 2022

1. Governing Frameworks

This policy supports the Compliance and Risk Management Frameworks.

2. Background/Context and Purpose

Carers Queensland recognises the importance of privacy, security and confidentiality of information held about its clients, employees, volunteers, business partners and other individuals.

This policy outlines a framework for Carers Queensland to manage the information provided to Carers Queensland by individuals in accordance with the 13 Australian Privacy Principles contained in the *Privacy Act 1988*.

3. Policy Statement

Carers Queensland is committed to managing personal information in an open and transparent way, protecting individuals' rights to privacy. Personal information about clients, former clients, care recipients, employees and volunteers is considered confidential and subject to privacy restrictions under current federal and state legislation.

4. Policy Objectives

- a. To ensure carers Queensland meets its legal and ethical obligations as an employer and service provider in relation to protecting the privacy of individuals through its systems, practices and procedures.
- b. To ensure individuals are provided with information about their rights regarding privacy, including their right to access and correct their information, lodge a privacy complaint and have that complaint dealt with fairly and promptly.
- c. To ensure individuals are provided with privacy when they are being interviewed or discussing matters of a personal or sensitive nature.
- d. To ensure all employees, board members, consultants, contractors, students and volunteers understand what is required in meeting privacy obligations.

5. Scope

This policy applies to all Carers Queensland employees and volunteers and to all areas of the business where personal, sensitive or health information about individuals is collected, used, stored or disclosed. This includes all records, both hard and electronic, as well as interviews or discussions of a sensitive and personal nature.

6. Australian Privacy Principles

All Carers employees, volunteers and contractors are responsible for observing privacy and confidentiality requirements in accordance with the Australian Privacy Principles (APP). The table below specifies the type of information we must provide to you.

Australian Privacy Principles	
The kinds of personal information we collect and hold;	<p>Your personal information is only collected if you give us consent to do so. Consent can be either in writing or verbally. If consent is given verbally, a note will be made on your file that you have given verbal consent.</p> <p>Carers Queensland will only collect information that is necessary to provide services to you. This information may include the following:</p> <p>“your name, address, contact details, health information, gender, cultural identity, health status, special care needs, Aboriginal or Torres Strait Islander status, communication needs (e.g. interpreter or translator), Centrelink number, bank details (for loan applications), criminal history, superannuation and tax file numbers (for employees), emergency contact information, drivers licence or other forms of identification or other information deemed necessary to provide you with the service you are seeking”.</p>
How we collect and hold your personal information;	<p>How your personal information is collected depends on how you make contact with us? For example, some information is collected via the Carers Queensland intake form that you will be encouraged to fill out when you apply for a program. Some information may be collected over the phone, such as when a client calls our offices to seek assistance. In some instances, information is collected in person at our local offices. Your personal information is stored in our secure database or in hard copy client/staff files in a secure location.</p>
The purposes for which we collect, hold, use and disclose personal information;	<p>We collect personal information that is reasonably necessary for us to carry out our activities i.e. to provide services to you, to communicate with you about our services, to improve our services, and to comply with our legal and reporting obligations. We do not disclose your personal information to overseas recipients.</p> <p>Your information will not be disclosed to third parties unless you or your legal representative gives consent. Written consent must specify the information to be released and to whom (refer Appendix A - Consent to Disclose to Third Party). This policy excludes the collection and transmission of non-identifying statistical data to the funding agency or for purposes of research.</p>
How you may access	<p>If you would like access to your personal information for any reason, you can contact the Privacy Officer by completing Appendix B - Request to</p>

<p>personal information about yourself that is held and seek the correction of such information;</p>	<p><u>Access or Amend Information</u> and returning it as per contact details below. Alternatively, you can write to the Privacy officer at:</p> <p>Privacy Officer, P.O. Box 179 Holland Park, QLD 4121</p> <p>Email: mehmann@carersqld.com.au</p> <p>Individuals may have supervised access to their own records following a written request to the Privacy Officer. Access may include viewing the information, receiving a summary of information held, or having information explained. Access to some records may be limited if providing access potentially breaches another individual's privacy.</p> <p>The Privacy Officer will collate all electronic and paper files held on the individual making the request, review and make a recommendation for access to the Chief Executive Officer. Upon approval, the Privacy Officer will liaise with the individual and the relevant Manager to arrange supervised access at a time and location suitable to both parties.</p> <p>Employees will obtain photographic proof of identity, including proof of current residential address prior to providing access to files. A copy of the documents sighted is forwarded to the Privacy Officer.</p>
<p>How you may complain about a breach of the Australian Privacy Principles;</p>	<p>You can make a complaint anytime if you believe Carers Queensland has breached the Australian Privacy Principles. You can make a complaint to us:</p> <ul style="list-style-type: none"> • by phone: 07 3900 8100 • by completing a complaint form on the Carers Queensland's website • by post to: The Chief Executive Officer, P.O. Box 179 Holland Park, QLD 4121
<p>How we will deal with such a complaint;</p>	<p>The Feedback and Complaints policy and form outlines how we will respond to your complaint and the timelines within which we will provide a response.</p>
<p>Whether we are likely to disclose personal information to overseas residents.</p>	<p>Carers Queensland does not disclose personal information to overseas residents.</p>

7. Anonymity and Pseudonymity

You have the option of dealing with us anonymously however, this only applies where it is practicable for us to deal with you acting anonymously or under a pseudonym. Examples of when you may prefer to remain anonymous or use a pseudonym could include your preference to not be identified; to keep your whereabouts secret for safety purposes; to access services (such as some of our carer support services) without being identified; and/or to express your views without being personally identified.

In some instances, it may be impractical for us to provide assistance if you are anonymous or utilising a pseudonym. For example, if you make a complaint under a pseudonym we may be unable to investigate your complaint.

8. Passive Information Collection

As you navigate through our website, certain information can be passively collected (that is, gathered without you actively providing the information) using various technologies, such as cookies, Internet tags or web beacons, and navigational data collection (log files, server logs, and clickstream data). For example, we may collect information about matters including but not limited to the date, time and duration of visits and which pages of a website are most commonly accessed. This information is generally not linked to your identity, except where our website is accessed via links in your email.

9. Minors

Personal information will not be collected by any person who is known to be under the age of eighteen (18) without the consent of a parent or legal guardian. Persons under age of 18 may only provide personal information with the involvement and consent of a parent or legal guardian.

10. Roles and Responsibilities

Role	Responsibility
Executive Leadership Team	To approve the Policy To comply with the policy
Chief Executive Officer	To comply with and to oversee the implementation of the policy. To receive internal audit reports. To oversee the implementation of audit treatment plans.
General Manager	To comply with and ensure all employees and volunteers are familiar with the policy
Managers, Regional Managers, Area Managers and Team Leaders	To ensure all employees and volunteers are aware of and understand the policy
Quality and Assurance	To review the policy by the scheduled date. To publish and promote the policy and procedure
Internal Audit and Evaluation Officer	To audit compliance with the Policy and monitor implementation of any audit treatment plans
Employees and Volunteers	To be familiar with and to comply with this policy

11. Mandate

Privacy Act 1988

The Office of the Australian Information Commissioner

12. Appendices

Appendix A: 8.10.03d1 Consent to Disclose to Third Party

Appendix B: 8.10.03d2 Request to Access or Amend Information

13. Related Documents

1.15.01a Code of Conduct

6.10.02a Communications Policy

7.15.01a External Feedback and Complaints

1.25.01a Risk Management Policy

6.10.01a Social Media Policy

14. Document Control

DOCUMENT REVISION HISTORY				
Version	Approved by	Approval date	Effective Date	Amendments
V.1.0	SMG	Feb 2018	Feb 2018	Review MGT.9 Update policy to reflect current regulations.
V.2.0	ELT	17/12/2020	17/12/2020	