

# Privacy policy

## Purpose

RIDBC complies with Australian Privacy Principles (APP). RIDBC ensures:

- we meet legislative responsibilities to protect the personal information of our clients, employees, donors and volunteers.
- we are transparent about what information is collected and how it is used.

## Scope

This policy applies to all RIDBC, with relation to all clients, employees and donors.

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- RIDBC sometimes needs to disclose information to do our job. Sometimes this will be because the law or funding requirements requires such disclosure and sometimes it will be because the welfare of the client demands it.
- RIDBC is regulated by legislation and government-imposed rules of practice, which impacts the personal information we collect and what we do with it. We seek to protect privacy within the parameters of those laws and requirements.
- If at any time a client, donor or employee requests further information regarding our Privacy Policy, we will provide them with a copy of the Australian Privacy Principles (APPs) that form the basis of our Privacy and Confidentiality Policy.
- We provide our clients and donors with the opportunity to lodge a complaint or concern regarding privacy issues within the organisation through the feedback procedure.
- Complaints or concerns about privacy issues are addressed promptly.
- Clients may request to make changes to their privacy consent form, which is stored in their client file.
- Employees can lodge a complaint or concern that relates to another employee. Complaints or concerns should initially be addressed to their manager. If the matter is

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escalated, the People & Culture Team or the relevant Senior Leadership Team Member will investigate.

## Collection

- Personal information collected must be kept to at least the minimum period necessary for service provision and legal accountability.
- Personal information will only be collected by fair and lawful means and consent will be sought at the point of collection.
- RIDBC only collects client information that is necessary in relation to the services it provides.
- Verbal consent from clients is gained at the enquiry point of data collection.
- Written consent from clients is gained when clients come onto Services, through the 'consent to collect and use personal information' form, which is part of the RIDBC privacy notice given to clients.
- If any collection or usage practices change, RIDBC will notify clients as soon as practicable.

## Use and disclosure

- RIDBC collects client's personal information for the primary purpose of providing them with RIDBC's services.
- Personal information from clients, donors and employees will only be used and disclosed for the primary purpose it was collected. This may include improvement of services, statistics and/or reports.
- Communicating with medical practitioners and other health service providers is often essential and necessary in providing clients with RIDBC's services. These cases of disclosure are considered to be a primary purpose.
- RIDBC clients may also consent to disclosures for secondary purposes. These instances are clearly explained to clients, who may choose not to consent.
- The client, donor or employee's consent will be obtained before personal information is given to a third party, except when other legal obligations take priority.

## Data quality

- RIDBC will take reasonable steps to ensure the personal information it collects, uses or discloses is accurate, complete and up to date.
- Clients may update the information they have provided, which includes the information recorded in the 'consent to collect and use personal information' form.

## Data security

- RIDBC will ensure that personal information is protected from misuse, loss, unauthorised access, modification or inappropriate disclosure.
- Client files are stored securely. Information about a client is only accessible by relevant employees who have been trained in best practice for privacy and information handling.
- Client files are password protected.

## Openness, access and correction

- RIDBC's policies and procedures for the management of personal information will be openly available.
- Clients, donors and employees have a right to access personal information held about themselves.
- If it is found that personal information is inaccurate, incomplete or out of date, steps will be taken to correct the information. Clients may contact us at any time to make changes to the information held on file, including changes to their "consent to collect and use personal information" form.

## Identifiers and anonymity

- Codes that identify an individual and are assigned by another agency won't be adopted for our clients, donors or employees.

## Trans-border data flows

- Personal information can only be transmitted outside of Australia when consent has

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been obtained from the individual. RIDBC does not routinely provide client data outside of Australia.

- The recipient must be subject to laws or binding schemes which are similar to the Australian Privacy Principles.

## RIDBC websites

- RIDBC collects statistical information about visitors to our websites using web analytics, which use cookies to assist us in understanding how visitors' access and utilise our website and information about our services.
- Generally, this information does not contain personally identifiable information such as your name or email address and therefore cannot be used to identify you.
- In some circumstances it may include a visitor's internet protocol (IP) address, which could be linked to an individual.
- This consolidated information provides a more accurate picture of visitor journeys and use of our services and website.
- Information that can directly identify an online visitor is collected only when offered by the visitor voluntarily via our online forms.
- Further information about privacy and our website is available on our websites on the Privacy Policy page.
- Our websites may contain links to other websites of interest. We are not responsible for or liable for the protection and privacy of any information which you provide whilst visiting such websites, and such websites are not governed by this Privacy Policy.

## Key Aspects

- RIDBC employees will be told about clients' rights to privacy and confidentiality, and how to protect these, through induction and training programs.
- Services will tell all new clients about their rights to privacy and confidentiality, and how these will be protected.
- The Privacy policy must be applied to all forms of information. This includes, but is not limited to, all information in written and electronic files, information obtained by word of mouth, from photographs and from recordings.

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- Specific written consent must be obtained from each client, donor or employee before any information is released or requested from other sources. This must be maintained according to Management of Client Record Policy.
- Clients, donors and employees must be accurately informed about who will have access to the information and why it is being requested/released.
- Clients and employees have the right to access to their own files.
- Employees must not intrude into areas of clients' lives which are not relevant to the services provided.
- Consent that protects privacy and confidentiality will be obtained when requesting clients', donors' and employees' cooperation in any fundraising or public relations activities. They will always be free to refuse if they don't want to be involved.

## Breach of policy

There are a range of consequences for breaches of this policy depending on the nature and seriousness of the matter. Should any breach be identified, RIDBC complies with the requirements for data breaches as defined by the Office of the [Australian Information Commissioner](#).

- Managers have a responsibility to address alleged breaches of the policy promptly, in a fair and reasonable manner and in line with the Data Breach Procedures.
- They need to assess the seriousness of any alleged breaches, and how they should be dealt with.
- Possible outcomes for an employee who has breached the policy may include:
  - Counselling
  - Performance improvement plans
  - Formal disciplinary action
  - Referral to the relevant registration or membership board
  - Referral to the police in cases of suspected possible criminal activity
  - Termination of employment

## Responsibility

- RIDBC will be responsible for ensuring that all clients, donors and employees are aware of their rights and responsibilities about privacy.
- RIDBC employees are expected to be aware of and understand their responsibilities with regards to privacy and to act as required.

## References

- Australian Privacy Principles
- RIDBC Privacy Notice
- Event-specific consent for information, images and recordings and privacy notice
- Feedback register and policy (POL00030)
- Code of conduct and ethics (POL00009)
- Information and communication resources policy (POL00017)
- Social media policy (POL00008) and guidelines