

Meals on Wheels Central Coast Limited

S3-SURR-P	PRIVACY POLICY
------------------	-----------------------

Authorized by: Board of Directors	Version: 1.2
Date of Issue: 26/11/2015	Date approved: 26/11/2015
	Next review date: 26/11/2016

Policy context: This policy relates to privacy of individual personal and/or sensitive information	
Standards or other external requirements	Community Care Common Standards Standard 3 - Service User Rights and Responsibilities
Legislation or other requirements	Home & Community Care Act 1985 Corporations Act 2001 Corporations(Change of Incorporation)Regulation 2002 Privacy Act 1988 Freedom of Information Act 1982 The Protected Disclosures Act 1994 Privacy and Personal Information Protection Act 1998 (NSW) (PIIP Act) The Health Records and Information Privacy Act 2002 (NSW) (HRIP Act) Australian Privacy Principles
Contractual obligations	Department of Health Department of Family & Community Services All Contracts entered into by MOWCC

POLICY STATEMENT

Meals on Wheels Central Coast Limited (MOWCC) understand that it is important for clients to know how we collect, use and safeguard personal information. This policy sets out how MOWCC manage the collection, use and storage of personal information.

Collection of Personal Information

MOWCC receive personal client information through our referral pathways and personal staff information through job applications and the creation of staff records. The personal information contains:

- Name
- Address
- Phone number
- Date of Birth
- Minimum Data Set (MDS) (refer - Attachment 1)
- Family information
- Bank Details

In some cases MOWCC may need to seek information directly from a client if it is not provided through the referral pathways.

Meals on Wheels Central Coast Limited

Use, Storage and Access of Personal Information

MOWCC will use personal information only to provide service and to fulfil our Minimum Data Set requirements for the funding bodies. (Refer – Attachment 1).

MOWCC stores personal information on the Client Management System and in personnel files, this system is backed up daily. Any hard copy files are secured on our premises, with records held for legislated periods of time. MOWCC will take all reasonable steps to ensure that personal information is accurate, up to date and complete, this is to ensure the quality of the information held and quality of service provision.

At no stage will individual personal information be disclosed for any other purpose than provision of service without seeking permission from the individual unless required or authorized by or under an Australian law or court/tribunal order.

MOWCC will not use government related identifiers, MOWCC uses individual organizational specific identifiers for each individual. All information included in our MDS transmission is de-identified.

Notification of the collection of Personal Information

On commencement of service provision or employment MOWCC will advise individuals:

- Purpose of the collection of information
- How clients or staff can access their information
- How clients or staff can correct the information
- Who can access the information

Dealing with unsolicited personal information

In the course of service delivery a client may provide unsolicited personal information and if:

- the information does not place the client or others in harm, staff will advise the client that they do not have to provide us with sensitive personal information.
- the information places the client or others in direct harm the staff will debrief to the Manager who will advise what further steps are to be taken.

Anonymity and Pseudonymity

Individuals have the option of not identifying themselves or of using a pseudonym when requesting general service information. However, if the individual has a need to discuss their individual service there is a practicable need for them to identify themselves to staff.

Direct Marketing

MOWCC will use individual information to provide service and to inform clients of new products and changes to service provision. MOWCC will not disclose to any other party personal individual information for the purpose of direct marketing.

Gaining Access and Updating Personal Information

MOWCC clients or staff may request access to their personal information at any time. All requests will be directed to the Manager who will reply to the request within thirty (30) days.

Meals on Wheels Central Coast Limited

If a client or staff member seeks to update their information the request will be directed to the Manager, if the Manager is satisfied that the information currently held is inaccurate, out of date, incomplete, irrelevant or misleading the Manager will ensure the update of individual information.

If the Manager refuses to update the individual information, they must advise the individual in writing:

- of the reason/s of the refusal
- the mechanisms available to complain about the refusal
- the Manager must allow a statement from the individual, which outlines that they believe their information is inaccurate, out of date, incomplete, irrelevant or misleading, to be associated with their personal information so that it is accessed by users of their information when providing service.

MOWCC will not apply any charges to an individual because they request access or an update to their individual information.

Complaints about supposed breaches of the Australian Privacy Principles

Individuals may:

- Contact the Manager via a letter, email or if the client or staff member has a specific difficulty with that they may contact the Manager directly via telephone. The complaint will be resolved within 10 business days.
- If the complaint is not resolved within the specified time, the individual may contact the Office of the Australian Information Commission – www.oaic.gov.au to take further steps in resolving the matter.

DOCUMENTATION

Documents related to this policy	
Related policies	Confidentiality Code of Ethics & Conduct Conflict of Interest
Forms, record keeping or other organisational documents	Code of Ethics and Conduct Agreement Board Meeting Minutes

Reviewing and approving this policy		
Frequency	Person responsible	Approval
Annually	Manager	Board of Directors

Policy review and version tracking			
Review	Date Approved	Approved by	Next Review Due
1	26/08/2014	Board of Directors	26/08/2015
2	26/11/2015	Board of Directors	26/11/2016
3			