

Privacy Policy

Policy number	P153	Version	3
Reviewed by	Caroline Quinn	Approved by Board on	27/6/18
Responsible person	Paul Burgess	Scheduled review date	27/6/21

Introduction

Open House is committed to protecting the privacy of any personal information which the organisation collects, holds and administers.

Personal information is information which directly or indirectly identifies a person.

Privacy is the word we use to describe a desire to keep information about us to ourselves, and to control what happens to our information.

Purpose

The purpose of this document is to provide a framework for Open House in dealing with privacy considerations.

Policy

Open House collects and administers a range of personal information for the purposes of supporting and assisting participants. We are committed to protecting the privacy of personal information it collects, holds and administers.


Open House recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – that is both protected and made accessible to them on request. These privacy values are reflected in and supported by our core values and philosophies.

Open House complies with our obligations under the Privacy Act 1988 (Cth) and the Australian Privacy Principles. We have adopted the following principles contained as minimum standards in relation to handling personal information.

Open House will:

- Collect only information which the organisation requires for its primary function;
- Ensure that participants are informed as to why we collect the information and how we administer the information gathered;
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- Store personal information securely, protecting it from unauthorised access; and
- Provide participants with access to their own information, and the right to seek its correction.

Authorisation


Signature of Board Chair
Date of approval by the Board
Open House

Privacy Procedures

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Responsibilities

The Board of Open House is responsible for developing, adopting and reviewing this policy.

The CEO of Open House is responsible for the implementation of this policy, for monitoring changes in Privacy legislation, and for advising on the need to review or revise this policy as and when the need arises.

Procedures

Open House commits to undertake the following:

Collection

- Only collect information that is necessary for the performance and primary function of Open House
- Notify participants about why we collect the information and how it is administered
Notify participants that this information is accessible to them.

Use and Disclosure

- Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose
- For other uses, Open House will obtain consent from the affected person

Data Quality

- Take reasonable steps to ensure the information the organisation collects is accurate, complete, up to date, and relevant to the functions we perform.

Data Security and Retention

- Where all personal information collected is protected from misuse or loss and from unauthorised access, modification or disclosure.
- Information stored electronically is kept on a secure server and access is restricted to authorised employees.
- Paper based documents containing personal information are stored securely. Where documents are required to be transferred to another location, personal information is transported securely in an envelope, folder or document bag.
- Reasonable steps will be taken to destroy or permanently de-identify personal information when it is no longer required for any purpose. This is in accordance with the Privacy Act of 1988

Policies can be established or altered only by the Board. **Procedures** may be altered by the CEO.
"Board" refers to the Board of Directors. "CEO" refers to the Chief Executive Officer.

Privacy Risk Management

- The organisation must not acquire or implement information systems that are not privacy compliant
- All Managers have the primary responsibility for privacy compliance in their division
- Managers must ensure that an appropriate Privacy Statement is in place where their division collects any personal information. These will be developed, where necessary, in consultation with the CEO
- Where a Manager is responsible for an information technology system, they are required to ensure that the applicable system complies with privacy legislation.

Privacy Complaints Handling

- The Privacy Act says that an individual who considers that an organisation or agency has interfered with their privacy should make their complaint to that organisation or agency first and allow an adequate opportunity for the complaint to be dealt with by the organisation or agency (generally giving 30 days for a response)
- If not satisfied with the response the individual may, if the complaint is about an organisation, take their complaint to a relevant external dispute resolution (EDR) scheme of which the organisation is a member
- The individual may then make their complaint to the Commissioner if: an EDR scheme is not an option; if the individual is not satisfied with the outcome of an EDR process; if the individual would prefer to complain directly to the regulator; or if the complaint is about an agency.

Openness

- Ensure participants are aware of Open House's Privacy Policy and its purposes,
- Make this information freely available in relevant publications and on the organisation's website.

Access and Correction

- Ensure participants have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading or not up to date.

Anonymity

- Give participants the option of not identifying themselves when completing evaluation forms or compiling government records.

Making information available to other organisations

- Only release personal information about a person with that person's express permission or where legislation, regulations or an emergency requires it. For personal information to be released, the person concerned must sign the Consent to Share Information Form (See D201)
- Only release information to third parties where it is requested by the person concerned.

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"Board" refers to the Board of Directors. "CEO" refers to the Chief Executive Officer.

Regulatory Guidelines

Guidelines to the Information Privacy Principles (issued by Privacy Victoria)

<http://www.privacy.vic.gov.au>

Guidelines to the National Privacy Principles

<http://www.privacy.gov.au/act/guidelines/index.html>

Guidelines to Handling Privacy Complaints

<https://www.oaic.gov.au/agencies-and-organisations/guides/handling-privacy-complaints>

Guidelines to Privacy in the Business, Health Sector [under s.95A of the Privacy Act 1988] and Government

<http://privacy.gov.au/health/guidelines>

Authorisation



Signature of CEO

Paul Burgess

Date 27.6.18