



PRIVACY & CONFIDENTIALITY POLICY
2020

QUEENSLAND RADIO FOR THE PRINT HANDICAPPED LIMITED
SUITE 3, 17 HENRY STREET, SPRING HILL, QLD 4000

Privacy and Confidentiality Policy

1. Purpose and Scope

Queensland Radio for the Print Handicapped Limited (hereafter known as Reading Radio 4RPH) is committed to protecting the privacy and confidentiality of volunteers, external stakeholders, staff, and Board members.

This policy provides guidance on Reading Radio 4RPH's legal obligations and ethical expectations in relation to privacy and confidentiality. Reading Radio 4RPH holds two types of information which are covered by this policy, personal and organisational information. The provisions of the *Privacy Act 1988* govern the collection, protection and disclosure of personal information provided to Reading Radio 4RPH by volunteers, external stakeholders, staff, and Board members.

Definitions:

Confidentiality: ensures that information is accessible only to those authorised to have access and is protected throughout its lifecycle. Confidential information may be marked as such or deemed confidential by its nature, e.g. it is information that is not available in the public domain.

Consent: means voluntary agreement to some act, practice, or purpose. Consent has two elements: knowledge of the matter agreed to and voluntary agreement.

Individual: means any person such as volunteer, staff person/contractor, Board member, or a member of the public.

Organisational information: includes publicly available, and some confidential, information about organisations. Organisational information is not covered in the Privacy Act (1988) but some organisational information may be deemed confidential.

Personal information: means information or an opinion (including information or an opinion forming part of a database) about an individual (Office of the Federal Privacy Commissioner, 2001). It may include information such as names, addresses, bank account details and health conditions. The use of personal information is guided by the Federal Privacy Act (1988).

The public domain: in relation to confidentiality is "common knowledge," i.e. information that can be accessed by the public.

2. Principles

Reading Radio 4RPH is committed to ensuring that information is used in an ethical and responsible manner.

Reading Radio 4RPH recognises the need to be consistent, cautious, and thorough in the way that information about, volunteers, external stakeholders, staff, and Board members is recorded, stored, and managed.

All individuals including, volunteers, external stakeholders, staff, and Board members have legislated rights to privacy of personal information. In circumstances where the right to privacy may be overridden by other considerations (for example, child protection concerns), staff act in accordance with the relevant policy and/or legal framework.

All volunteers, external stakeholders, staff, and Board members are to have an appropriate level of understanding about how to meet the organisation's legal and ethical obligations to ensure privacy and confidentiality.

3. Outcomes

Reading Radio 4RPH provides quality services in which information is collected, stored, used, and disclosed in an appropriate manner complying with both legislative requirements and ethical obligations.

All staff and Board Directors understand their privacy and confidentiality responsibilities in relation to personal information and organisational information about Reading Radio 4RPH, volunteers, staff, and external stakeholders. This understanding is demonstrated in all work practices.

4. Functions and Delegations

Position	Delegation/Task
Board of Directors	<ul style="list-style-type: none"> • Endorse Privacy and Confidentiality Policy. • Be familiar with the organisation’s legislative requirements regarding privacy, collection, storage and use of personal information. • Understand the organisation’s ethical standards with regards to the treatment of other confidential information relating to Reading Radio 4RPH, its volunteers, staff, and external stakeholders. • Comply with Privacy & Confidentiality Policy and associated procedures.
Station Manager	<ul style="list-style-type: none"> • Be familiar with the legislative requirements regarding privacy and the collection, storage and use of personal information. • Understand the organisation’s ethical standards with regards to the treatment of other confidential information relating to Reading Radio 4RPH, volunteers, staff, and external stakeholders. • Ensure systems are in place across the organisation to adequately protect the privacy of personal information and confidentiality of other sensitive information. • Act in accordance with organisational systems in place to protect privacy and confidentiality. • Comply with Privacy & Confidentiality Policy and associated procedures.
Staff	<ul style="list-style-type: none"> • Be familiar with the legislative requirements regarding privacy and the collection, storage and use of personal information • Understand the organisation’s ethical standards with regards to the treatment of other confidential information relating to Reading Radio 4RPH, volunteers, staff, and external stakeholders. • Act in accordance with organisational systems in place to protect privacy and confidentiality. • Comply with Privacy & Confidentiality Policy and associated procedures.
Volunteers	<ul style="list-style-type: none"> • Comply with Privacy & Confidentiality Policy and associated procedures. • Understand the organisation’s ethical standards with regards to the treatment of other confidential information relating to Reading Radio 4RPH, volunteers, staff, and external stakeholders – where necessary • Act in accordance with organisational systems in place to protect privacy and confidentiality.

5. Risk Management

Reading Radio 4RPH ensures mechanisms are in place to demonstrate that decisions and actions relating to privacy and confidentiality comply with federal and state laws.

All volunteers, external stakeholders, staff, and Board members are made aware of this policy during orientation. All volunteers are provided with ongoing support and information to assist them to establish and maintain privacy and confidentiality.

6. Policy Implementation

This policy is developed in consultation with all staff and approved by the Board of Directors for volunteers. This policy is to be part of all Volunteer induction and orientation processes, and all are responsible for understanding and adhering to this policy.

This policy will be reviewed in line with Reading Radio 4RPH's quality improvement program and/or relevant legislative changes.

7. Policy Detail

The privacy of personal information is defined by legislation - *Privacy Act 1988*. At all times, Reading Radio 4RPH acts in accordance with these legal requirements which are underpinned by the policy statements 8.1- 8.6 outlined below. Reading Radio 4RPH also strives to respect the confidentiality of other sensitive information. However, in the spirit of partnership, we share information with other involved individuals and organisations (subject to consent), where it would be in the best interest of the, or other individual, to do so.

7.1 Collection of Information

Personal information collected by Reading Radio 4RPH is only for purposes which are directly related to the functions or activities of the organisation. These purposes include:

- Enquiry about programs.
- Referral to programs.
- Fundraising and donations.
- Administrative activities, including human resources management.
- Station membership and volunteering.
- Community development activities.
- Complaint handling.

For more detailed information about these purposes and the information handling practices that apply to them, refer to the *Human Resources Management Policy, Feedback and Complaints Policy*.

Reading Radio 4RPH provides information on personal information including:

- Purpose of collecting information.

- How information will be used.
- Transferring of personal information.
- Limits to privacy of personal information.
- How one can make a complaint about the use of their personal information.

7.2 Use and Disclosure

Reading Radio 4RPH only uses personal information for the purposes for which it was given, or for purposes which are directly related to one of the functions or activities of the organisation. It may be provided to government agencies, other organisations or individuals if:

- The individual has consented
- It is required or authorised by law
- It will prevent or lessen a serious and imminent threat to somebody's life or health.

7.3 Data Quality

Reading Radio 4RPH takes steps to ensure that the personal information collected is accurate, up-to-date, and complete. These steps include maintaining and updating personal information when we are advised by individuals that it has changed (and at other times as necessary), and checking that information provided about an individual by another person is correct.

7.4 Data Security

Reading Radio 4RPH takes steps to protect the personal information held against loss, unauthorised access, use, modification, or disclosure and against other misuse. These steps include reasonable physical, technical, and administrative security safeguards for electronic and hard copy of paper records as identified below.

Reasonable physical safeguards include:

- Locking filing cabinets and unattended storage areas.
- Physically securing the areas in which the personal information is stored.
- Not storing personal information in public areas.
- Positioning computer terminals and fax machines so that they cannot be seen or accessed by unauthorised people or members of the public.
- Shredding paper with personal information.
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Reasonable technical safeguards include:

- Using passwords to restrict computer access and requiring regular changes to passwords.

- Establishing different access levels so that not all staff can view all information.
- Ensuring information is transferred securely (for example, not transmitting health information via non-secure email).
- Using electronic audit trails.
- Installing virus protections and firewalls.

Reasonable administrative safeguards include not only the existence of policies and procedures for guidance but also training to ensure volunteers, staff, and Board members, are competent in this area.

7.5 Access and Correction

Individuals may request details of personal information held about them. The Station Manager or Secretary of the Board may assist in the updating or correction of details.

Amendments may be made to personal information to ensure it is accurate, relevant, up-to-date, complete, and not misleading, considering the purpose for which the information is collected and used. If the request to amend information does not meet these criteria, Reading Radio 4RPH may refuse the request.

The Station Manager or appropriate staff may be responsible for responding to queries and requests for details/amendment to personal information.

7.6 Anonymity

Wherever it is lawful, individuals will have the option of not identifying themselves or requesting that Reading Radio 4RPH does not store any of their personal information.

However, this may limit the activities that the individual may be able to participate in.

7.7 Collection use and disclosure of confidential information

Other information held by Reading Radio 4RPH may be regarded as confidential, pertaining either to an individual or an organisation. The most important factor to consider when determining whether information is confidential is whether the information can be accessed by the public.

All staff and Board members are to refer to the Station Manager before transferring or providing information to an external source if they are unsure if the information is sensitive or confidential to Reading Radio 4RPH or its clients, staff and stakeholders.

7.8 Organisational Information

All volunteers, staff members, Board members agree to adhere to the Reading Radio 4RPH Code of Conduct when commencing volunteering, involvement, placement, or employment. The Code of Conduct outlines the responsibilities of the organisation related to the use of information obtained through their volunteering/ involvement/ placement/ employment.

The Code of Conduct states that individuals will:

“Use information obtained through their involvement, employment or placement only for the purposes of carrying out their duties, and not for financial or other benefit, or to take advantage of another person or organisation.”

Operational Information:

The *Human Resources Management Policy* details how Reading Radio 4RPH handles volunteer, staff, members, and Board of Directors records to manage privacy and confidentiality responsibilities, including the storage and access of volunteer personnel files and the storage of unsuccessful position applicants' information.

Stakeholder Information:

Reading Radio 4RPH works with a variety of external stakeholders including private consultants. The organisation may collect confidential or sensitive information about its stakeholders as part of a working relationship. Staff at Reading Radio 4RPH will not disclose information about its stakeholders that is not already in the public domain without stakeholder consent.

The method Reading Radio 4RPH manages stakeholder information will be clearly articulated in any contractual agreements that the organisation enters into with a third party.

Volunteer information:

Detailed information regarding the collection, use and disclosure of volunteer information can be found in the *Client File Management Policy* and associated procedures.

8. Breach of Privacy or Confidentiality

If volunteers, external stakeholders are dissatisfied with regards to privacy and confidentiality of information, the matter should be raised with the Station Manager. If this is not possible or appropriate, follow delegations indicated in the *Grievance and Dispute Settling Policy*. Anyone who are deemed to have breached privacy and confidentiality standards set out in this policy may be subject to disciplinary action.

If a volunteer or external stakeholder is dissatisfied with the conduct of a Reading Radio 4RPH staff or Board member, a complaint should be raised as per the *Feedback and Complaints Policy*. Additionally, a complaint can be taken over the phone by any staff member to be documented.

9. References & Resources

9.1 Internal

- Code of Conduct
- Volunteer Policy
- Occupational Health and Safety Policy
- Privacy and Confidentiality Policy (*this document*)
- Feedback and Complaints Policy
- Grievance and Dispute Policy
- Reading Radio 4RPH Volunteer Handbook

9.2 External

Legislation

[Privacy Act 1988 \(Commonwealth\)](#)