

Different Journeys Privacy and Confidentiality Policy

Introduction

Different Journeys is committed to protecting and upholding the rights of our clients to privacy and confidentiality and will apply the *Australian Privacy Principles (APPs)*, *The Privacy Act*, *The Health Privacy Principles*, and *The Health Records Act of Victoria* in the way we collect, store and use information about clients, their needs and the services we provide to them.

Application

This Privacy and Confidentiality Policy applies to all paid staff, volunteers, job candidates, contractors, visitors, children, families, carers, students, management and Board members.

Personal Information

The type of personal information *Different Journeys* collect may include but is not limited to:

- Names, contact and address details including email address
- Date of birth and gender
- Educational qualifications, employment history, volunteer information
- Medical information
- Likes and Interests
- Referees
- Government-issued payment or card information (for example Medicare, Centrelink)
- Permission to release information
- Photos and Videos

If it is necessary for *Different Journeys* to collect sensitive information to provide specific services *Different Journeys* will request the persons consent to record this information on our client database. *Different Journeys* will advise what information we collect, why, and the circumstances in which we need to share it with others.

Different Journeys is committed to protecting the confidentiality of all records, to treating information in the strictest confidence and to storing information securely.

Purpose for collecting, holding, using and disclosing personal information

Different Journeys collects, stores and uses personal information for purposes including but not limited to:

- Providing services
- To engage service providers
- To report to funding bodies to meet our contractual obligations
- To respond to feedback or complaints, and
- To conduct surveys and seek feedback

Informed consent for the sharing of information is sought in all situations unless:

- We are obliged by law to disclose information
- It is unsafe or impossible to gain consent or consent has been refused and without information being shared, it is anticipated a child, young person or adult will be at risk of serious harm, abuse or neglect, or pose a risk to their own or public health or safety.

Collection of personal information

Different Journeys collects personal information:

- Directly – for example: through a registration form or over the phone,
- From correspondence (including email or text message), or
- Via forms and surveys.

Different Journeys may also be provided with personal information from government departments or services that work with us in order to provide services.

Storing personal information

Different Journeys stores client information in electronic format. Hard copy files are scanned, uploaded and securely stored; as required by law or funding contract agreements.

Different Journeys take security measures to protect electronic client information including restriction of access, firewalls, and the use of encryption, passwords and digital certificates. Where hard copy information must be retained, it is stored in lockable cabinets.

Direct marketing

Different Journeys do not disclose personal information to third parties for marketing purposes.

Gaining access to personal information

Clients can request access to their personal information, subject to some limited exceptions permitted or required by law. Such request must be made in writing to *Different Journeys* Executive Officer. Request will be actioned within 20 working days. If access is unable to be given, *Different Journeys* will explain the reasons why.

Different Journeys will provide clients with approved access to their personal information at no cost.

Keeping personal information current

Clients may request correction of any personal information that *Different Journeys* has collected about them if they believe it to be inaccurate, not up-to-date, incomplete, irrelevant or misleading. Requests for correction must be forwarded to the Executive Officer.

Complaints

Complaint regarding the handling of your personal information should be directed to the Executive Officer. The Executive Officer may ask the complainant to set out the details of their complaint in writing in a form provided. Receipt of the complaint should be provided within 5 working days. Outcomes and/or progress report should be provided within 20 working days.

Unsatisfied complaints should be advised of the option to take their concerns to the Office of the Australian Information Commissioner Enquiries line via 1300 363 992 or enquiries@oaic.gov.au.

Notifiable Data Breaches

The Notifiable Data Breaches scheme applies to all organisations with personal information security obligations under the Australia Privacy Act 1988. If a breach of personal information occurs, *Different Journeys* will notify the Office of the Australian Information Commissioner.

Contact information

All queries or complaints regarding this Privacy Policy, or requests for access to, or correction of, personal information should be directed to the *Different Journeys* Executive Officer.

Review

This policy was endorsed in September 2020 and will be reviewed annually.