



## PRIVACY POLICY

### 1. Purpose

Marymead is committed to protecting privacy of personal information that we collect, hold and administer, ensuring operational and management practices comply with the Commonwealth Privacy Act 1988 and the Australian Privacy Principles as well as any other relevant information.

For Children, Young People and Families using our services, client’s personal information will also comply with the Children and Young Peoples Act 2006 in ACT and the Children and Young Persons (Care and Protection) Act 1998 in NSW and other relevant child welfare legislation such as NSW Ombudsman, Children’s Guardian and Commissioner for Children.

Carers and volunteers rights to privacy are affected by relevant child protection legislation. NSW Carers will have their records maintained for checks on the NSW Carer Register. See Carer handbook for more information.

Employee files are not covered by the Privacy Act, however, Marymead will follow best practice as defined by Fair Work and will treat all information collected about employees with respect and diligence.

Employment candidates, donors, contractors and suppliers right to privacy will comply with the Commonwealth Privacy Act 1988.

### 2. Policy Statement

In managing information, Marymead will ensure:

- service users are made aware what personal information Marymead collects and records, and for what purposes;
- service users are made aware of who sees their personal information;
- all information in the case record clearly indicates the source it is derived from and is kept accurate and up to date;
- all service user information is stored securely;
- that permission will be sought, where applicable, before information is shared with a different Marymead program or external service; and

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- comply with the record management requirements of funding bodies (if applicable)
- all service users are made aware of their right to make complaint if they believe their privacy has been breached.

Marymead supports service users’ right to have a right to control over their personal information, and ensures service users are able to request to see their information, and seek to correct that information.

### 3. Definitions

The following definitions apply to this policy:

**Access:** giving an individual information about themselves held by the Organisation. Giving access may include allowing an individual to inspect personal information or giving a copy of it to them.

**Consent:** voluntary agreement to some act, practice or purpose. It has two elements: knowledge of the matter agreed to, and voluntary agreement. Consent can be express or implied. Express consent is given explicitly, either orally or in writing. Implied consent arises where consent may reasonably be inferred in the circumstances from the conduct of the individual and the organisation. Consent is invalid if there is extreme pressure or coercion. Only a competent individual can give consent although the Organisation can ordinarily assume capacity unless there is something to alert it otherwise. Competence means that individuals are capable of understanding issues, forming views based on reasoned judgments and communicating their decisions. The general law about competence and incapacity will apply to the issue of consent.


**Disclosure:** in general terms the Organisation discloses personal information when it releases information to others outside the Organisation or program. It does not include giving individuals information about themselves (this is ‘access’ – defined above).

**Personal information:** information or an opinion that can identify a person, such as names and addresses, birth dates and telephone numbers.

**Sensitive information:** information about an individual’s racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional trade or association, membership of a trade union, sexual preferences or practices, criminal record, or health information.

Definitions adapted from the *Guidelines to the National Privacy Principles*, Office of the Federal Privacy Commissioner, 2001

**Subpoena:** a legal document compelling the production of certain designated materials that may be relevant to pending legal proceedings.

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## 4. Procedures

### 4.1 Open and Transparent Management of Personal Information

Every person about whom information is collected should be aware of Marymead's Privacy, Confidentiality and Records Management Policy.

This information is contained in the Marymead **Information for Client Booklet**, which is given to all clients when they commence services with Marymead.

This Policy is publically accessible on the website and made available to any person who requests it.

### 4.2 Anonymity

Our clients have the right to not identify themselves or use a pseudonym when requesting services from Marymead. However this will not apply if it is impracticable for Marymead to provide services to the individual or may limit our obligation to care for and protect children's welfare and safety. Families and young people should discuss with their worker any information that they do not wish to give.

### 4.3 Collection of personal information


Marymead will only collect information that is necessary for the functions and activities of the organisation.

When collecting information, the following must be adhered to:

- only information that is necessary for the provision of service to the client will be collected. In the case of an employee, carer or worker or job applicant, information will be collected to ensure that children's safety and welfare is protected.
- Information is requested and recorded in an open and transparent manner.
- Employees will actively encourage clients to have genuine involvement in the collection and use of any information about them.
- All documentation of service user information will be written factually, and subjective conclusions by employees avoided.

When reasonable and practicable to do so, Marymead must collect personal information about an individual only from that individual. Employees may, from time-to-time, need to obtain information about an individual from another organisation or service provider. The consent of the individual must be obtained prior to obtaining information from a third party. Please see further information under 3.4 Disclosure (Sharing Information).

Information provided by a third party should only be recorded or retained if it is deemed to be purposeful to the support of the individual or imperative to the safety of Marymead employees or other service users.

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#### 4.4 Use of Personal Information

Marymead will only use or disclose personal information held by us for the purpose for which it was collected.

However, we are permitted to use or disclose personal information held by us for another purpose when:

- consent to do so has been granted;
- you would expect the disclosure to occur;
- Marymead receives information regarding an immediate threat of harm to anyone, or abuse or neglect of a child, confidentiality may be breached.
- Marymead is compelled by law to disclose;
- disclosure will prevent or lessen a serious and imminent threat to someone's life or health or a threat to public health or safety; and

where disclosure will assist a health service provider to provide you with a quality service or to address issues you may raise with them

Marymead receives funding from various government sources and some of the obligations of that funding require Marymead to provide reports to government agencies. In the majority of instances, those reports contain de-identified personal information, if data cannot be de-identified further consent will be gained.

Marymead uses de-identified client data for research and advocacy. De-identified data is personal information that has names, aliases and addresses removed and typically retains information such as age, gender, ethnicity, geographical area, services sought and other non-personal details.

Please note that volunteer files should only contain information related to that volunteer, with no specific client information included.


For service users, carers, volunteers or workers, any personal information that Marymead holds may not be used or passed on to be used by a third party for direct marketing purposes unless the individual provides consent for their information to be used in this manner.

#### 4.5 Disclosure (sharing information)

##### 4.5.1 Sharing client information internally and externally

In the course of working with children and families it may be necessary to share information with workers from other agencies or other programs within Marymead. The following applies generally for sharing information externally and internally with other Marymead programs:

- Written consent should be sought from clients prior to the release of information (see information below about the **Consent to Exchange Information Form MM SD 3001**).

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- When working with a child or young person, the parent/guardian's consent should be sought. Wherever possible and developmentally appropriate the child or young person should be involved in the process.
- Clients should be advised that they have the right to withdraw their consent to the release of personal information, preferably in writing.

Where a Marymead program becomes aware that a client is also a client of another Marymead program, program workers must observe this policy and seek client permission to share information. This will assist Marymead workers to work together effectively to provide better services to the client.

A **Marymead Consent to Exchange Information Form MM SD 3001**, or a program specific form modified to meet program needs will be used to seek consent to share information. All Marymead consent to exchange information forms must contain:

- who is giving the consent
- who the information is to be shared with
- any limitations on the information which can be shared, and
- the period for which the consent is given.

At the time of seeking consent the worker must also ensure that the client is/has been provided with the Marymead **Client Information Booklet** which includes information about their right to privacy.

Personal service user information presented in the context of internal Marymead employees meetings, supervision or employees support forums as well as external organisational meetings will be altered in such a way as to protect the identity of the service user.


#### 4.5.2 Sharing client information in Statutory Out of Home Care (OOHC)

Chapter 16A of the NSW Children and Children and Young Persons (Care and Protection) Act allows information to be exchanged between prescribed bodies in the interests of promoting the safety, welfare or wellbeing of children or young persons, and to promote collaboration and communication in the provision of services to children and young people. This means the needs and interests of children and young persons, and of their families, in receiving services relating to the care and protection of children or young people takes precedence over the protection of confidentiality or of an individual's privacy.

As a prescribed body under the Act, Marymead can request information from other prescribed bodies (i.e. Health, Education, Community Services, Corrections) in order to meet the needs of Children and Young People.

#### 4.5.3 Responding to Subpoenas

Marymead receives subpoenas requiring the timely production of files in relation to litigation. All subpoenas are to be complied with appropriately, as follows:

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- All subpoenas are to be forwarded to the CEO Office to determine whether the subpoena is valid and enforceable and to ensure the proper response.
- The CEO Office will locate the file and forward the request to the relevant Director.
- The Director will assign and inform the relevant Program Manager to comply with the subpoena.
- The Program Manager will send the completed subpoena to the CEO Office.
- The CEO will sight and approve the subpoena and arrange to submit.
- The subpoena will be logged and filed with the response.
- A file note is made on the client record.

See flowchart Subpoena Response Procedure **MMSD303**, for more details.

#### 4.6 Cross-Border Disclosure

Marymead will take reasonable steps to protect privacy if we send personal information about you to a third party in a foreign country. This means Marymead will only transfer personal information to a third party in a foreign country if we reasonably believe that the recipient is subject to a law, binding scheme, that imposes principles substantially similar to the APP's or you have expressly consented.

#### 4.7 Government Related Identifiers

Individuals must not be identified by any Government related identifier (an example being an individual's Medicare number) except where the agency is required to do so by law. Workers will routinely collect information about individuals that includes Government identifiers, for example drivers licence numbers, Medicare numbers, and health care card numbers as part of our work with children, young people and families. This information must not at any time be used as an identifier for the individual, e.g. family files must not be labeled and filed using any of these as naming conventions.


#### 4.8 Quality of Personal Information

Marymead will take reasonable steps in the circumstances to ensure that personal information is accurate, complete and up to date, both for our use and for the purpose of disclosure as relevant to the purpose. This includes maintaining and updating personal information when we are advised by you that your personal information has changed, and at other times as necessary.

Marymead has processes in place from commencement of, and throughout service provision to ensure personal information is maintained at the highest level of quality, and that information is accurate, up-to-date, complete and relevant.

#### 4.9 Security of Personal Information

Marymead takes reasonable steps to protect personal information from misuse, interference and loss as well as unauthorised access, modification, or disclosure. Personal information should be treated as confidential, and sensitive information as highly confidential.

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Personal information containing contact details of clients, clients or staff and their personal history will be stored in secure locations; where only authorised persons can access.

All Marymead employees will adhere to the following:

- When not in use, files are to be stored in lockable filing cabinets which are to be locked when the program is closed or when workers leave their office during the day. Offices should be locked after hours.
- Files should not leave the work place ('work place' includes places where a file would be required in the course of duty such as court, reviews etc.)
- Confidential information must not be left unattended at a public counter or a photocopier;
- All reports, assessments, minutes and other records relating to clients, should be securely attached within their file cover.
- All confidential waste should be shredded.
- Program procedures will specify which employees have access to which records. The guiding principle is that employees working directly with a client have access to the client's records, and other program employees/supervisors/managers as necessary. An example of this may be following up a matter when the client's usual worker is not available. Only Marymead employees working within a particular program will have access to client files in that program.
- Service user files will be modified or disclosed only with the knowledge and consent of the individual, and all reasonable steps will be taken to inform and seek consent. Any changes to personal details should only be to update information or to correct incomplete or misleading information.
- Computer access safeguards will be in place, including password protection with required regular changes to passwords;
- There must be confidential passwords to access program specific information;
- Store sensitive data on a laptop computer that is taken 'off-site' securely, with appropriate password protection.


#### 4.10 Correction

Any worker who collects personal information from an individual is required to make sure that the information remains current, accurate and complete while ever that person is using Marymead services. However all clients are able to challenge, correct or amend information perceived by them to be incorrect.

Where there is a dispute or difference of opinion about the information in a client file, the Client Service Director will be consulted.

If the program maintains that it is necessary to retain the disputed information, a written note will be added to the file clearly stating:

- that the service user has requested the information to be removed and the stated reasons, and
- the program's reasons for retaining the disputed information on the service user file.

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#### 4.11 Clients' access to their files/records

Marymead is committed to providing appropriate access to personal information and records. This will be done in a manner that:

- is timely
- ensures accessibility
- supports the client appropriately through this process, and
- observes the right of the client to access information that is held about them.

All Marymead clients will be informed about the process of accessing their file and be given a copy of the **Information for Clients Booklet**, which includes information about access to records.

See **Attachment A** for further procedures to support client's access to files.

##### 4.11.1 Request for files from Statutory Out Of Home Care Clients

When accessing files from Statutory Out of Home Care services, current and former clients will be offered support and sensitivity in recognition of the significance of these files.

##### *ACT*

For current or former children and young people who have been in the care of the Director General, ACT Community Services Directory, or equivalent status or legal orders, the Guidelines of ACT Government will be followed. Marymead will not be able to provide files or information directly. Current or former clients will be referred to the appropriate Freedom of Information Officer. If a person wishes Marymead to be involved in this process, they can request this.

##### *NSW*

For current or former children and young people who have been in the care of the Minister, NSW Department of Family and Community Services (FaCS), Community Services, requests for information relating specifically to their placement within a NSW program is to be directed to the relevant NSW OOHC Program Manager or Director. Where information is requested regarding placements other than Marymead, or in direct relation to FaCS, current or former clients will be referred to the Community Services Right to Information Unit within NSW FaCS.


#### 4.12 Retaining and archiving client records

Active files only are to be retained by workers. Client files may be kept in a program for up to one year after a case is closed, in case clients recontact the program in this period. Client files which have been closed for one year should be archived.

##### 3.11.1 Archiving Procedures

When programs have client records to be archived the following applies:

- Records for archiving are placed in an archive box provide by Administration.

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- An excel spread sheet containing the name of all files in that box is prepared for each box. The spread sheet will have the relevant client's surname and first names, the parents' names if applicable, and indicate the program.
- A copy of the spread sheet is taped inside the lid of the archive box.
- An electronic copy of the spread sheet is provided electronically to the Administration Manager.
- The Administration Manager incorporates the information into a master record of archived files, sorted into program areas.
- The Administration Manager then generates a bar code for that archive box.
- The bar code is recorded against the relevant information for the archive box in the master record of archived files.
- The bar code is placed on the box and the box is stored in a locked storage cabinet in the Administration Manager's Office.
- The storage cabinet is kept locked at all times and only approved employees may have access. The office is locked over-night.
- Boxes are sent to a secure external records management company for storage within 20 business days.

When needing to retrieve a file from an archived box employees should:

- Email a request to the Administration Manager, including the name of the client whose records need to be retrieved.
- The Administration Manager will electronically search the master record of archived files to find the bar code of the box required.
- The box is then retrieved from the external records management company. Boxes can be retrieved from the external storage by the next business day, and on the same day if the case is urgent.

#### 4.13 Employee Email

Any email correspondence using your Marymead account belongs to Marymead and is an official record of this organisation. Emails are not private and maybe reviewed by Marymead from time to time. Marymead is aware that confidential information may be sent via email and will endeavour to treat this information with respect and dignity however, it cannot guarantee complete privacy. See the IT usage policy for more information.

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## 5. References

### Related Policy

Complaints Policy MM OP 305  
Child Protection Policy and Procedures MM SD 307  
Code of Conduct MM HR 501

### Related organisational documents

Information for Clients Booklet: Privacy, Confidentiality and Access to Records, Feedback and Complaints.

### Legislation

Privacy Act 1988 (Cth)  
Privacy and Personal Information Protection Act 1998 (NSW)  
Health Records and Information Privacy Act 2002 (NSW)  
Children and Young Persons (Care and Protection) Act 1998 (NSW)  
Children & Young Persons (Care & Protection) Regulation 2012 (NSW)  
Government Information (Public Access) Act 2009 (NSW)  
Information Privacy Act 2014 (ACT)  
Territory Records Act 2002 (ACT)  
Children and Young People (Care and Protection Act) 1998 (ACT)  
Health Records (Privacy and Access) Act 1997 (ACT)

### Standards

Common Care Community Care Standards: Standard 3: Service User Rights and Responsibilities.


Family Relationships Services Guidelines (Cth): Standard 12: Client confidentiality and privacy.

National Standards for Disability Services (Cth): Standard 4: Privacy Dignity and Confidentiality.

Out of Home Care Standards, NSW, Standard 20 Record Keeping, Privacy, Confidentiality and Complaints for Carers and Staff.

Out of Home Care Standards (ACT): Standard 4.2 Confidentiality and Privacy


Raising the Standards, ACT: Standard 3.2.4 Information management, Standard 4.1.7 Client records, Standard 4.2.2 Privacy and confidentiality

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## 6. Document Control Details

Reviewing and Approving this Policy		
Frequency	Policy Owner	Approval
2 years	Senior Manager, Organisational Development	CEO

Policy Review and Version Tracking				
Review	Date Approved	Approved By	Next Review Date	Amendments Made
1	18 March 2013	Hilary Martin, CEO	18 March 2015	New
2	24 June 2015	Amanda Tobler, A/g CEO	24 June 2015	Review 1
3	06 Aug 2015	Lucy Mitchell, SM Organisational Development	24 June 2015	Administrative change
4	3 May 2016	Camilla Rowland, CEO	3 May 2018	Align with privacy principles legislation

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## Attachment A – Client Access to File

### Current clients' access to files/records

All clients have the right of access to their file. Individuals may also authorise, in writing, another person to access their file on their behalf.

Current Marymead clients may make a request to see their file directly to their direct worker or the relevant Program Manager. This access will be managed by the direct worker in consultation with their Program Manager.

Access to the file will be granted as soon as practical, but within five business days of receiving the request.

The direct worker will prepare the file, ensuring it is accurate and up to date before allowing the client to view its contents. Access by a client or authorised person to an individual's file will be in the presence of a Marymead employee, in most cases the direct worker.

On occasion there may be circumstances where a recommendation is made that certain aspects of the file be restricted. This would only be in circumstances where access would pose a serious threat to the life or health of any person.

In this case a plan would be put in place in relation to future access, and under what conditions access would be appropriate.

### Past clients access to files/records

Clients may only access information about themselves, not about other family members or employees. Clients may request copies of public documents and information written by Marymead about them. All requests for access to files by past clients will be followed up and completed within 20 business days of the request being received.


#### Making a request

Past clients who wish to access Marymead files/records concerning themselves are able to request this in writing, by phone, via email or via the Marymead website. Clients do not need to provide a reason for requesting their information, but being clear about their purpose can help to clarify what specific information is being requested. Ex-clients may request to view the entire file, be provided with a summary or specific information they believe is held on the file.

Photographic identification will be required to verify identity. This must be provided in person when viewing records, or certified by an Authorised Officer (ie: Justice of the Peace).

#### Role of the Records Officer

All requests will be directed or forwarded initially to the Records Officer. The Records Officer will assist the client to provide the appropriate identification and information in

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order to progress the request, including personal details, known dates of service and contact details, and the specific information they are seeking.

If the request is not received in writing or further information is sought, the Records Officer will file note and information received in relation to the request.

The file information will be gathered by the Records Officer and forwarded to the CEO, with the original request/file note attached.

At the end of the process the Records Officer will also ensure any file notes and identification are attached, and arrange the file to be returned to archives.

### CEO approval


The CEO will appoint a support person to coordinate and oversee the process of the client accessing the file (see 2.9.5 below). CEO approval is required before the release of the file to the client. When making decisions regarding which information can be released and to whom, the CEO will consider:

- what is allowed by Funding Body guidelines and Commonwealth and Territory legislation
- if the record is being accessed by someone other than the person to whom the file refers, the CEO will determine if the person accessing the record is an appropriately authorised representative – that is, is the legal guardian, has written evidence of power of attorney or is an advocate with written consent of the person to whom the file refers -such a person will need to show photo ID to prove identity, and
- any recommendation by the appointed support person that certain aspects of the file be restricted (See 2.9.4 below).

### Reasons to deny access to files

The following are examples of when access to sensitive information may be denied

- when providing access would pose a serious and imminent threat to the life or health of any individual
- when providing access would have an unreasonable impact upon the privacy of other individuals
- the request for access is frivolous or vexatious
- when providing access would be unlawful or when denying access is required or authorised by law
- when giving access would prejudice negotiations between Marymead and the individual, for example if Marymead negotiating a settlement with that individual
- the information requested relates to existing or anticipated legal proceedings, provided the information would not be accessible as part of the discovery process in those proceedings
- when providing access is likely to prejudice action in relation to suspected unlawful activity or serious misconduct
- when granting access is likely to prejudice an enforcement related activity brought by an enforcement body, such as the police, and

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- if giving access would reveal evaluative information in connection with a commercially sensitive decision making process. This may include assessing whether an individual is eligible for Marymead services.

Role of the appointed support person

The support person is assigned the case based on their knowledge and expertise in relation to issues that might be in the file. The support person is responsible for:


- assessment of file contents
- clarifying the clients request and expectations
- preparing and supporting the client to see the information in their file
- providing an explanation of any gaps or language concerns in the file, if necessary
- initially working through any issues, concerns or responses to what is in the file, and
- assessing the past service user’s support needs and providing referral if appropriate.

If directed by the Records Management Officer, the appointed support person must also sight and copy identification prior to allowing access to the file.

Please see Supporting Former Users Access to Files Guidelines MMSD302 for further procedures related to preparing a file for access, and supporting ex services users to access their past files.

The support person will also prepare file notes for each contact with the client in relation to accessing their file, to be attached to the original file. The file note will outline information and support provided to the client to access their file.

The file and any copies of identification will be returned to the Records Officer, who will arrange for the file to be returned to the archives.

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