



RTO No 6507

Privacy

Policy

- 1.1 Cheltenham Community Centre (CCC) respects the privacy of all clients and is committed to protecting personal information provided to us.
- 1.2 This policy outlines how we handle personal information including -
 - a) collection and safeguarding of personal information,
 - b) use and disclosure of personal information,
 - c) client rights to access their personal information,
 - d) data breach response plan.
- 1.3 CCC complies with the Australian Privacy Principles (APPs) contained in the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*, and the *Information Privacy Principles (IPPs)* contained in the *Victorian Privacy and Data Protection Act (2014)*.
- 1.4 This policy is implemented in compliance with the requirements of the *AQTF Essentials Conditions and Standards for Continuing Registration*.
- 1.5 The CCC Manager is responsible for the implementation of this policy and procedure.

Procedure

Collection of Personal Information (IPPs 1, 7, 10)

- 2.1 For many services provided, CCC is required to collect personal information including the client's name, address, contact details and information specific to the service being delivered.
- 2.2 Personal information held by CCC can only be used and disclosed for the primary purpose for which it was collected, or for a secondary purpose that would be reasonably expected. It can also be used and disclosed in other limited circumstances, such as with the individual's consent, for a law enforcement purpose, or to protect the safety of an individual or the public.
- 2.3 CCC will only assign unique identifiers to individuals where it is necessary in order to carry out one or more of its functions or activities.
- 2.4 CCC will not make this unique identifier available to others and will not adopt, as its own, a unique identifier that has been assigned by another agency.
- 2.5 Some services require collection of sensitive information such as criminal convictions. Collection is by lawful and fair means and is not unreasonably intrusive.
- 2.6 CCC collects sensitive information only when necessary and the client has given written consent.
- 2.7 When collecting personal and sensitive information, CCC ensures that clients are made aware of:
 - a) CCC's identity and how to contact us
 - b) their right to access their personal information
 - c) the purpose for collection
 - d) the organisation/s we disclose their personal information to
 - e) any law that requires the particular information to be collected
 - f) the consequences, if any, for the client if they do not provide the information required.
- 2.8 CCC makes every effort to collect personal information directly from the individual client. Where this is not possible, such as when a client is referred by a third party or when taking group enrolments, the third party is expected (under government funding arrangements) to maintain privacy policies in compliance with the relevant privacy act/s.

Safeguarding Personal Information (IPPs 2 and 4)

- 3.1 CCC ensures information provided to us remains private and protected from misuse, loss, unauthorised access, modification or disclosure. Security measures in place include;
 - a) password access to the student management system
 - b) secure filing cabinets
 - c) clear and robust internal practices for personal information holdings (including the type of information we hold and where it is held)
 - d) computer screens out of view of others, particularly visitors to the Centre
 - e) limiting use of portable storage devices, including laptops and USB sticks
 - f) email addresses for group emails in the "bcc" field rather than the "to" field so recipients cannot see other recipient email addresses
- 3.2 Access to information is restricted to relevant, authorised staff.
- 3.3 A data breach involved the loss of, unauthorised access to, or unauthorised disclosure of, personal information. If a data breach occurs, or is suspected, the following data breach response plan will take place:
 - a) Notify the Centre Manager within 24 hours of the data breach, or suspected data breach.
 - b) Contain the data breach to prevent any further compromise of personal information.
 - c) Assess severity of breach, evaluate the risks, and take action to remediate any risk of harm.
 - d) Notify individuals and Commissioner if required.
 - e) Review the incident and consider what actions can be taken to prevent future breaches.
- 3.4 Information deemed inaccurate, irrelevant or out of date is destroyed in a way that renders it unusable, ie. Shredded.

Data Quality (IPP 3)

- 4.1 CCC will take reasonable steps to ensure that the personal information it collects uses or discloses is accurate, complete and up to date.

Openness (IPP 5)

- 5.1 CCC's practices for handling personal information is available through our *Information Collection Statement*, enrolment forms, the *Client Information Handbook* and *Student Handbook*.
- 5.2 CCC's Privacy policy is available on the CCC website and to those who request it.
- 5.3 For further information on this policy, or to request access to personal information, or make a privacy complaint, please contact the Manager, Cheltenham Community Centre, 8 Chesterville Road Cheltenham ; www.chelt.com.au ; admin@chelt.com.au ; Ph 03 9583 0095.

Access and Correction (IPP 6)

- 6.1 CCC will provide an individual with access to personal information it holds on that person upon request (at no cost). Where an individual can show that information held about them is not accurate, current or complete, CCC will take reasonable steps to correct that information.

Documents to be employed when implementing this policy and procedure:

Staff, Client and Volunteer files
Client Enrolment forms
Client Information Handbook
Information Collection Statement
Staff meeting agendas and minutes
Strategic & Business plan
Complaints and appeals policy and procedure

Revision History:

Date	Revision	Revised by
1/5/12	Created	Chris Donaghy
25/5/2013	Edited for accuracy and appropriate use of terminology	Annella Chambers
01/08/2018	Edited for 2018 Privacy Amendment (Notifiable Data Breaches Act 2017, Australian Privacy Principles (APPs), and current CCC processes and procedures	Arna O'Connell
3/05/2019	Cross-checking IPPs / APPs; and input from Sara Ganderton-Spencer *NB – IPP guidelines to be amended after May 2019	Catriona O'Neill
22/8/2020	Revised with reference to amended IPP guidelines	Catriona O'Neill