



PRIVACY POLICY AND PROCEDURES

Policy number	PEL002	Version	2.0
Drafted by	Teresa Russell	Approved by Board on	April 2, 2014
Responsible person	Leonie Johnson	Scheduled review date	April 2, 2017

Introduction

The Board of Primary Ethics (PEL) is committed to protecting the privacy of personal information that PEL collects, holds and administers. Personal information is information that directly or indirectly identifies a person.

Purpose

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

Policy

PEL collects and administers a range of personal information for the purposes of recruiting and vetting volunteers, communicating with stakeholders and statistical analysis. PEL is committed to protecting the privacy of personal information it collects, holds and administers.

Primary Ethics recognises the essential right of individuals to have their information administered in ways that they would reasonably expect – protected from unauthorized access but still available to themselves. These privacy values are reflected in and supported by our core values and philosophies.

PEL is bound by laws that impose specific obligations when it comes to handling information. PEL has adopted the following principles contained as minimum standards in relation to handling personal information.

PEL will

- Adhere to Primary Ethics Privacy Procedures (Policy No.PEL003)
- Collect only information which the organisation requires for its primary function;
- Ensure that stakeholders 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 stakeholders with access to their own information, and the right to seek its correction.

Responsibilities

Primary Ethics' Board is responsible for developing, adopting and reviewing this policy.

Primary Ethics' CEO 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.

Processes

Collection

Primary Ethics will:

- Only collect information that is necessary for the performance and primary function of Primary Ethics.
- Notify stakeholders about why we collect the information and how it is administered.

- Notify stakeholders that this information is accessible to them.

Use and Disclosure

Primary Ethics will:

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

Data Quality

Primary Ethics will 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

Primary Ethics will:

- Safeguard the information we collect and store against misuse, loss, unauthorised access and modification.
- Only destroy records in accordance with the organisation's Records Management Policy.

Openness

Primary Ethics will:

- Ensure stakeholders are aware of Primary Ethics' Privacy Policy and its purposes.
- Make this information freely available in relevant publications and on the organisation's website.

Access and Correction

Primary Ethics will:

- Ensure individuals 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.
- In the case of a potential volunteer having a disclosable outcome on his/her police check, Primary Ethics management will make a recommendation to the board about whether or not that volunteer should be recruited, given the nature and circumstances of the offence(s). The board may agree or disagree with the recommendation. The board's decision is final.
- Regardless of the decision, the volunteer will be offered the option of Primary Ethics keeping his/her file in our regular online system which is password protected, or of having it stored separately in a shared folder accessible only by the CEO, the General Manager and the Volunteering Manager.
- All staff, board members and volunteers with knowledge of any disclosable outcome are required to keep that information private.

Anonymity

Primary Ethics will:

- Give stakeholders the option of not identifying themselves when completing evaluation forms or opinion surveys.

Making information available to other organisations

Primary Ethics can:

- Only release personal information about a person with that person's express permission. For personal information to be released, the person concerned must sign a release form.
- Release information to third parties where it is requested by the person concerned.

Authorisation

Approved by resolution of the board of Primary Ethics Ltd on the 2nd day of April, 2014.