



INFORMATION PRIVACY AND DATA PROTECTION POLICY

Version	1	Approved by Board	15 September 2017
Responsible person	Executive Officer	Scheduled review date	

VERSION CONTROL

Version No.	Date	Responsible person	Details
1	Aug 2017	K Holmes	New policy created merging a number of previous policies relating to information privacy & data protection for RFCSV-G clients, stakeholders, employees and business operations.

INTRODUCTION

The Rural Financial Counselling Service Victoria - Gippsland (RFCSV-G) is required to gather; store and use certain information about the organisation's operations as well as individuals, including clients; suppliers; business contacts and employees.

Furthermore, RFCSV-G acknowledges that to perform its service agreement with clients, both personal and sensitive information will need to be collected; managed, treated confidentially and securely stored.

This policy describes how personal and sensitive data must be collected, handled and stored to meet the RFCSV-G's data protection standards — and to comply with the law, being to use fairly; store safely and not disclose unlawfully.

SCOPE

This policy applies to:

- (a) All Members of the Board
- (b) All employees; and
- (c) Contractors, volunteers and visitors to RFCSV-G's premises, to the extent it is relevant to them.
- (d) all sources of information being electronic; printed; correspondence; notations and diary entries. It also applies to Electronic devices that are the personal property of employees.

LEGISLATION

Privacy & Data Protection Act (2014) - Victoria

Privacy Act (1988) - Federal

PURPOSE

RFCSV-G recognises its obligation to ensure the security and privacy of private and sensitive information and data, and is committed to safeguarding it in accordance with applicable legislation.



This policy is to help protect RFCSV-G from data security risks, including:

- Breaches of confidentiality.
- Failing to offer choice to stakeholders regarding their personal information.
- Reputational damage if hackers successfully gained access to sensitive data.

POLICY

RFCSV-G collects and administers a range of personal and sensitive information for the purposes of financial counselling. The organisation is committed to protecting the privacy of client's personal and sensitive information it collects, holds and administers. These obligations are governed within the Client Services Agreement.

RFCSV-G will ensure the necessary restrictions on the information it holds be observed by its employees.

RFCSV-G will ensure that electronically stored information and data is protected from unauthorised access, modification; accidental deletion or loss; corruption; theft and malicious hacking attempts. Information data stored on servers and cloud computing services is protected by suitable and approved security software and a firewall and appropriate levels of security/access is provided to users of the system.

All client and employee files, corporate data and general correspondence are and remain the property of RFCSV-G.

The organisation has adopted the following principles as minimum standards in relation to handling personal and sensitive information.

RFCSV-G will:

- Collect only information which the organisation requires for its primary purpose;
- Ensure that stakeholders are informed as to why the information is collected and how we administer the information gathered;
- Use and disclose personal or sensitive information only for its primary functions or a directly related purpose, or for another purpose with the person's consent;
- Store information securely, protecting it from unauthorised access; and
- Provide stakeholders with access to their own information, and the right to seek its correction.

RFCSV-G will provide training to all employees to help them understand their responsibilities when handling data, private and sensitive information.

Any personal information disclosed by a client, employee or contractor will be kept confidential and securely stored as required under the contractual agreement with the Commonwealth Government and in accordance with any current legislation.

Disclosure

RFCSV-G acknowledges that personal information may be disclosed to third parties where necessary for the information and management of the RFCSV-G's programme and related purposes. This disclosure is to be consistent with relevant laws, in particular the *Privacy Act* (1998). However, the Executive Officer must ensure the request is legitimate and seek assistance from the Board and legal advisers where necessary.

RFCSV-G reserves the right to disclose demographic and summarised information, when required, under the contractual agreement with the Commonwealth Government, provided that this information does not in any way disclose the identity of the client.

Employee and Contractor Obligations

All RFCSV-G employees have some responsibility for ensuring information data is collected, stored and handled appropriately.

As a condition of appointment, all personal and sensitive (including corporate) information shall not, except with the express written approval, directly or indirectly use, divulge or communicate to any person any information or other confidential information obtained or accessed while during appointment.

It is the responsibility of all RFCSV-G employees who manages information data to ensure that it is handled and processed in line with this policy and applicable procedures.

To ensure security of personal and sensitive data and information, the following guidelines apply:

- Personal data should not be disclosed to unauthorised people, either within the company or externally;
- All information and data should be kept as accurate and up to date as possible;
- Information and data stored on paper or removable media, must be kept in a secure place where unauthorised people cannot access or view it;
- Any electronic data should be synced with RFCSV-G cloud computing service frequently to ensure ongoing access to data (offline).
- Employees should not save copies of personal data to their own computers.
- Data is NOT to be saved directly to laptops or other mobile devices like tablets or smart phones.
- Passwords should be used on all electronic devices.

Client Information & Files

Before a client agrees to engage with RFCSV-G services, they are to be informed of the Information Privacy & Data Protection Policy; confidentiality; access to their files and the personal and sensitive information that will be requested by RFCSV-G, and how these will be managed, disclosed and stored.

Clients must sign the 'Client Service Agreement & Declaration' acknowledging the collection and use of the their personal and sensitive information and the manner of which it is handled.

Client's Statutory documents required to execute services, including Certificates of Title; Share Certificates and Wills, must be signed by the client acknowledging the documents have been handed over to a RFCSV-G Counsellor, and it is RFCSV-G obligation to ensure the documents are stored and managed appropriately and securely.

Data collection, type of data and record keeping and reporting method obligations are also outlined in RFCSV-G's Case Management Framework (previously included in Client Service Standards Policy).

Employee Files

The EO and HR Administration Officer has responsibility for ensuring the integrity and confidentiality of all employee records.

Employees have the right to request in writing, addressed to the EO, to view the contents of their employee file, and/or information contained be corrected and/or additional information be placed. Employees have a right to take a copy of any document in their employee file, except any confidential reference check(s) documented.

All employees, including Board members, have a responsibility to keeping their employment records up to date.

Complaints

RFCSV-G will be efficient and fair when investigating and responding to information privacy complaints and will respond to complaints in accordance with the RFCSV-G's Complaints Handling Process.

A deliberate breach of confidentiality and privacy will be a cause for instant dismissal.