

1.3 Privacy and Confidentiality Policy

Purpose

Gladstone Women’s Health Centre (GWHC) is committed to protecting the privacy, confidentiality, dignity and safety of all people who engage with our services. This Policy outlines GWHC’s framework for the collection, use, disclosure, storage, access, retention and management of personal and sensitive information in accordance with legislative, contractual, ethical and organisational obligations.

To protect and uphold privacy, we:

- Have processes in place, so no personal information is collected, stored, used or shared with anyone, purposefully or by omission, unless the client provides informed consent, or we are required by law to do so.
- Only collect the information needed to perform services.
- Store all data securely as per legislation.

To maintain confidentiality, we:

- Uphold all legal and ethical obligations concerning handling confidential information.
- Provide information to clients and staff about their rights regarding confidentiality and the processes used to protect these rights, and where any limits to confidentiality exist.
- Avoid inappropriate verbal and written disclosure of information about clients and staff within and outside of the organisation.
- Only share verbal and written information about a client with agencies and individuals external to Gladstone Women’s Health Centre with the written consent of the client unless the circumstances are such that limits to confidentiality apply.
- Take all reasonable steps to protect all information held (including personal information) from misuse, loss, unauthorised access, modification, or disclosure.

Scope

This Policy applies to all Board members, team members, volunteers, students, contractors, visiting practitioners and any other person who accesses or manages personal information on behalf of GWHC.

The Policy and Procedure are to be read in conjunction with our Records and Information Management Policy and Procedure.

Principles

The principles supporting high-quality privacy and confidentiality practices at GWHC are:

Confidentiality	Confidentiality practices are applied consistently across the organisation.
Privacy	Only information necessary for service delivery and organisational functions is collected and stored.

Dignity	GWHC respects and protects the dignity and privacy of clients and stakeholders.
Consent	Information is only shared externally with informed consent or where authorised or required by law.
Experienced	Team members are appropriately trained and supported to manage personal information responsibly.

Privacy

Gladstone Women's Health Centre (GWHC) collects and uses information for the purposes of providing domestic violence, sexual assault and general wellbeing counselling and support for women. This includes information about victim survivors, persons using violence and staff.

GWHC's collection, storage, use and disclosure of personal information is governed by the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth) and the *Information Privacy Act 2009* (Qld) (the Acts). You can access the *Privacy Act* [here](#).

GWHC has policies and procedures in place to ensure that the collection, storage, use and disclosure of personal information is done in a safe, secure and confidential manner to ensure your rights are protected.

GWHC is committed to complying with:

- *Privacy Act 1988* (Cth),
- *Information Privacy Act 2009* (Qld)
- *Australian Privacy Principles* (APPs)
- *Queensland Privacy Principles* (QPPs)
- *Human Rights Act 2019* (Qld)
- *Domestic and Family Violence Protection Act 2012* (Qld)
- *Child Protection Act 1999* (Qld)
- *Child Safe Organisations Act 2024* (Qld)
- and other relevant legislation governing the management of personal information.

You and your information

GWHC will only collect and use information that is necessary to its business of providing domestic violence, sexual assault and general wellbeing counselling for women (our services), or as required by law.

GWHC will take reasonable steps to ensure that the information which it holds is accurate, complete and up-to-date.

GWHC will give an individual access to all personal information it stores about the individual in a timely manner, unless an exception applies under the Acts.

Kinds of information collected

GWHC collects personal information about victim survivors, persons using violence, donors and job applicants and sometimes visitors to our website for the purposes of providing our services which may include marketing activities.

Personal information is defined in section 6 of the *Privacy Act* as "information or an opinion about an identified individual, or an individual who is reasonably identifiable whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not".

GWHC will collect and hold details of individuals which include, but are not limited to:

- full name;
- address;
- contact number;
- email address; and
- date of birth.

GWHC also collects sensitive information about victim survivors and persons using violence. Sensitive information is a subcategory of personal information which includes health information and information or opinion about an individual's racial or ethnic origin, religious beliefs or affiliations, sexual orientation or practices or criminal records etc. Because of its inherent nature, sensitive information is afforded a higher level of protection under the Acts.

GWHC will collect and hold sensitive information which includes, but is not limited to:

- medical and disability information;
- criminal convictions;
- mental health information; and
- racial or ethnic origin.

Collection and storage of personal information

GWHC will collect personal information of victim survivors, persons using violence, donors and job applicants and sometimes visitors to our website by one of the following means:

- By requesting information on an application form and other written forms including via GWHC's website;
- Through third parties where you are transferred or referred to us for the services that we provide;
- By an individual providing personal information by way of a resume;
- By an individual updating their records with GWHC.

GWHC will not collect sensitive information unless:

- you have consented to us collecting the information;
- collection is required by law; and
- collection relates to health services provision and individual or public health or safety.

GWHC will store the personal information of individuals in the following manner:

- All relevant personal information will be entered into and held on GWHC's electronic database maintained in Australia. The database is only accessible by authorised GWHC staff.

- Personal information contained in written forms and hard copy documents will be inputted into a secure system and the paper form destroyed.
- Records relating to children and young people are retained for 45 years in line with organisational policy and legislative guidance.

Purpose of collection, holding, use and disclosure of personal information

GWHC will only collect personal information when it is reasonably necessary for one of GWHC's functions or activities related to the provision of our services such as supporting the health and safety of clients.

GWHC will not use or disclose personal information for any other purpose unless:

- consent has been given by the individual; or
- the individual would reasonably expect GWHC to disclose the information for another purpose which is directly related/related to GWHC's primary purpose of providing our services; or
- GWHC is required or authorised by law and/or under the *Privacy Act*.

GWHC will only collect sensitive information when it is reasonably necessary for one of GWHC's functions or activities related to the provision of our services such as supporting the health and safety of clients and we have received your consent unless;

- collection is required by law; or
- collection relates to health services provision and individual or public health or safety.

Access to and correction of personal information

You have a right to request access to your personal information that GWHC holds about you. There is no fee involved in making such a request.

If you would like to access your personal information that GWHC holds, please contact the Chief Executive Officer (CEO) and they or their delegate will assist with your request. The CEO can be contacted by:

- Phone: 07 4979 1456
- In Person: 65 Central Lane, Gladstone Central, QLD 4680
- Email: info@gladstonewomenshealth.org.au

If any of the personal information that GWHC holds is incorrect, incomplete or out of date, please let the CEO or their delegate know and it will be corrected accordingly.

Confidentiality

GWHC is committed to protecting the confidentiality of all information entrusted to the organisation by clients, team members, volunteers, students and stakeholders. Maintaining confidentiality is essential to uphold trust, ethical obligations, safety and wellbeing.

Confidentiality Obligations

Confidential information will only be accessed, shared or discussed on a legitimate need-to-know basis.

All team members, Board members, volunteers, students and contractors are required to:

- maintain confidentiality during and after their engagement with GWHC;
- complete confidentiality agreements and relevant induction processes;
- avoid inappropriate verbal or written disclosure of information;
- securely manage records and communications; and
- immediately report suspected confidentiality breaches.

Information Security and Access Controls

GWHC maintains documented processes to ensure access to systems and databases containing personal information is restricted to authorised persons with a legitimate operational need.

GWHC will:

- implement role-based access controls;
- update access permissions immediately where a team member changes role or ceases engagement;
- conduct regular audits of system access permissions;
- maintain audit capability to identify access to information systems; and
- implement physical, electronic and administrative safeguards to protect information from misuse, loss, unauthorised access, modification or disclosure.

Training and Monitoring

All team members, volunteers, students, contractors and Board members receive privacy and confidentiality training during induction and through ongoing refresher training. Completion of mandatory training is monitored by GWHC.

Electronic Surveillance and CCTV

Where electronic surveillance technology is used, GWHC will ensure:

- surveillance is limited to appropriate operational and safety purposes;
- signage alerts individuals to the use of surveillance technology;
- surveillance does not unnecessarily intrude into areas where individuals may reasonably expect privacy;
- surveillance footage is securely stored and access restricted;
- disclosures of footage comply with legislative requirements; and
- registers and procedures are maintained regarding access, retrieval and disclosure of footage.

Domestic and Family Violence Information Sharing

GWHC complies with *Part 5A of the Domestic and Family Violence Protection Act 2012 (Qld)*.

Where safe and practical, consent should be obtained before disclosing personal information.

However, the safety and protection of people experiencing domestic violence takes precedence over consent.

GWHC may give or receive information where there is a reasonable belief that a person fears or is experiencing domestic violence and the information may assist in assessing, preventing or lessening a serious threat to life, health or safety.

Child Protection Information Sharing

GWHC may give or receive information in accordance with the Section 159c of *Child Protection Act 1999 (Qld)* where there is a reasonable belief that the information may assist in protecting a child or unborn child from harm or risk of harm.

Perpetrator Intervention Program Information Sharing

GWHC complies with the privacy and confidentiality requirements of the Professional Practice Standards for working with men who perpetrate domestic and family violence.

- We tell clients there are limits to confidentiality and where their right to confidentiality may be overridden by other considerations, such as the safety of those who have experienced domestic and family violence.
- The Program Facilitator informs all new clients of this, and they also sign a participation agreement outlining the privacy and confidentiality of their information.
- Program Facilitator provides information and ensures all new clients sign a waiver, enabling us to disclose information to relevant advocates/agencies to prioritise the safety of people who have experienced domestic and family violence.

Complaint policy

If you have a complaint about a breach of the Australian Privacy Principles by GWHC in relation to your personal information, please contact:

CEO

Phone: 07 4979 1456

In Person: 65 Central Lane, Gladstone Central, QLD 4680

Email: ceo@gladstonewomenshealth.org.au

The first step is to lodge your complaint in writing to GWHC. GWHC takes any complaint regarding the privacy of personal information seriously and will work with you to try to resolve the complaint. GWHC will consider and respond to a written complaint as soon as practicable within a 5 day period.

If your complaint remains unresolved after 30 days, you may take your complaint to the Office of the Australian Information Commissioner. The contact details for the Office of the Australian Information Commissioner can be found via its website located at www.oiac.gov.au and are also listed below:

Office of the Australian Information Commissioner

Telephone: 1300 363 992

Email: enquiries@oaic.gov.au

Facsimile: +61 2 9284 9666

Post: Sydney Office
GPO Box 5218
SYDNEY NSW 2001

Canberra Office
GPO Box 2999
CANBERRA ACT 2601

GWHC appreciates your feedback regarding our privacy and confidentiality policy. If you have any comments or queries, please contact GWHC via email at info@gladstonewomenshealth.org.au

Amendments to this policy

GWHC may change this privacy and confidentiality policy from time to time. When we do make any changes, we will notify you of the changes by posting an updated version of this policy to the website.

Information

Title	Privacy and Confidentiality Policy and Procedure
Document Number	1.3
Version Number	8
Category	Information Management
HSQF Related Standards	Human Services Quality Standards 1 and 4
Approval Date	28 May 2026
Effective Date	29 May 2028
Next Review Date	May 2028
Policy Adviser	Chief Operating Officer
Approved by	Board

Related Policies Document and Supporting Documents

Legislation	<p>Common:</p> <ul style="list-style-type: none"> • <i>Human Rights Act 2019</i> • <i>Information Privacy Act 2009 (Qld)</i> • Information Privacy Principles • <i>Right to Information Act 2009 (Qld)</i> • <i>Privacy Act 1988 (Cth)</i> • Australian Privacy Principles • <i>Privacy Amendment (Notifiable Data Breaches) Act 2017</i> • Notifiable data breaches - Home (oaic.gov.au) • Information Privacy Act 2009: Obligations of Contracted Service Providers (Office of Information Commissioner Queensland) • Information Privacy Guide (Department of Families, Seniors, Disability Services and Child Safety) • Guide to undertaking privacy impact assessments - Home (oaic.gov.au) • <i>Service Agreement - Standard Terms, Clause 27</i> <p>Domestic and Family Violence:</p> <ul style="list-style-type: none"> • Part 5A of the <i>Domestic and Family Violence Protection Act 2012</i> • <i>Domestic and Family Violence Information Sharing Guidelines (May 2017)</i> • Section 159C of the <i>Child Protection Act 1999</i> • Principle 5: Confidentiality – Practice Standards for Working with Women Affected by Domestic and Family Violence • Professional Practice Standards for Working with men who perpetrate domestic and family violence
Policy and Procedures	Records and Information Management Policy and Procedure Governance Policy and Procedure
Forms/Registers	Data Breach Response Plan Conflict of Interest Register. Conflict of Interest Record Form Conditions of Service Withdraw Consent CCTV Request Form CCTV Request Register Client Registration Form Client Consent for the Release or Obtaining of Client Information

Document History

Version #	Issue Date	Summary of Changes
8	29/05/2026	Policy and Procedure content updated including advice provided by Paxton Hall Lawyers.
7	16/09/2024	Policy and Procedure template and content updated
6	12/03/2023	Changed previous Privacy and Confidentiality policies from 1.18 and 1.20 to 1.3 as part of Policy updates New Logo Reference to Governance Policy added Link for Forms added Link for Policies added Link for Flowcharts added Procedure content updated Statement content updated Definitions content updated
5	20/10/2021	Policy Update.
4.2	12/10/2018	Added NDB scheme Formatting changes to re-brand, format and align with HSQF Standard No's.
4.1	23/11/2017	Formatting changes to document layout (i.e., no change to the content).
4	5/06/2017	Added in more robust collection procedures,
3	27/02/2017	Split from previous Confidentiality and Privacy Policy.
2	18/07/2011	Add Confidentiality Agreement.