



# PRIVACY POLICY & PROCEDURE

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## INTRODUCTION

Our Rainbow House is committed to protecting the privacy of personal information which the organisation collects, holds and administers. Personal information is information which directly or indirectly identifies a person.

## PURPOSE

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

## POLICY

Our Rainbow House collects and administers a range of personal information, including photos. This information is collected to engage volunteers and employees, to communicate with members, and to administer the project and the sponsorship programs that finance it.

Our Rainbow House recognises the essential right of individuals to have their information used in ways which they would reasonably expect, and that it be both protected and made accessible to them.

Our Rainbow House shall:

Collect only the information that is needed;

Inform all stakeholders why the information is needed: how it will be stored and used; and that they have the right to see and correct their own information.

Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's written consent;

Store personal information securely, protecting it from unauthorised access. Confidential information must remain confidential.

## RESPONSIBILITIES

The Board is responsible for developing, implementing and reviewing this policy.

## **PROCEDURES**

### **Collection**

Our Rainbow House shall:

Develop or review a form for each situation where personal information is collected such as membership application, volunteer & employee application, school records, sponsorship records, interview for newsletter/ Facebook.

Ask only for information that is needed.

Notify stakeholders on the form why we need the information; how it will be stored; who will use it; and how they will use it.

Notify stakeholders on the form that they can ask to see and correct their own information.

### **Use and Disclosure**

Our Rainbow House shall:

Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose.

For other uses, Our Rainbow House must obtain written consent from the affected person. Children under 18 cannot legally give consent and need the written consent of their legal guardian. For illiterate persons, and those who do not speak fluent English, an interpreter is needed. The written consent must be signed by the named interpreter and the person's thumbprint.

### **Data Quality**

Our Rainbow House shall:

Take reasonable steps to ensure the information is accurate, complete, up to date, and relevant.

### **Data Security and Retention**

Our Rainbow House shall:

Safeguard the information we collect and store against misuse, loss, unauthorised access and modification. For example, health records – especially HIV status - are highly confidential and this confidentiality must be respected.

Only destroy records in accordance with the organisation's Records Management Policy & Procedure.

### **Openness**

Our Rainbow House shall:

Ensure stakeholders are aware of the Privacy Policy & Procedure and its purposes.

Make this information freely available in relevant publications and on the organisation's website.

### **Access and Correction**

Our Rainbow House shall: Give individuals the right to see the information held about them and to correct it if it is inaccurate, incomplete, misleading or not up to date.

### **Anonymity**

Our Rainbow House shall:

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

### **Making information available to other organisations**

Our Rainbow House may:

Release personal information about a person only with that person's express written permission. For personal information to be released, the person concerned must sign a release form.

Release information to police who have a subpoena to produce documents and / or to give evidence.

## **RELATED DOCUMENTS**

- Publications Policy

### **AUTHORISATION**

Signature of Director \_\_\_\_\_ Date \_\_\_/\_\_\_/\_\_\_\_\_