

Wheatbelt Natural Resource Management Incorporated

Privacy and Confidentiality Policy

Policy Name:	Privacy and Confidentiality Policy
Policy Number:	5.5
Policy Version Number:	V2.00
Policy Category:	Records Management
Contact Officer:	Chief Executive Officer
Date Approved by the Board of Management:	8 November 2016
Date of Last Review:	4 th November 2016
Period Until Next Review:	36 months from the approved date or as required
Related Legislation:	Associations Incorporation Act 2015(Western Australia) Privacy Act 1988 (Commonwealth)
Related WNRM Policies or Procedures:	1. 4.1 Grievance Resolution Policy 2. 5.6 Records Management Policy

1. Definitions

“**Associates**” means individuals that are registered as Associates of Wheatbelt NRM and are listed on the Associate Register.

“**Confidential Information**” means Wheatbelt NRM information that is not approved for public disclosure, that may include, but is not restricted to, propriety data, reports, plans, results, research, trade secrets, policies, procedures, processes, intellectual and industrial property, documented expertise, market information, financial information, and staff and client details, whether stored in hard copy or electronically.

“**Members**” means organisations or groups that are registered as Members of Wheatbelt NRM and are listed on the Member Register.

“**Personal Data**” means any information of a personal nature that relates to a current or previous Representatives, Members, Associates, suppliers or clients of Wheatbelt NRM.

“**Representatives**” means Board Directors, employees, contractors or volunteers of Wheatbelt Natural Resource Management Incorporated.

“**Wheatbelt NRM**” means Wheatbelt Natural Resource Management Incorporated.

2. Overview

This Policy relates to the management and administrative practices of Wheatbelt NRM's collection and use of Personal Data about Representatives, Members, Associates, suppliers or clients and information that would be considered Confidential Information. Wheatbelt NRM is committed to ensuring restricted access, privacy and security of Personal Data and the protection and use of Confidential Information.

All Representatives are required to comply with this Policy

For clarification purposes, the Freedom of Information Act 1992 (Western Australia) only applies to Government entities, and therefore it is not applicable to Wheatbelt NRM.

Representatives who breach this Policy may be subject to disciplinary action.

3. Policy Statements

3.1 In the case of reporting a suspected inappropriate privacy or confidentiality disclosure matter, the Grievance Resolution Policy will be followed.

Personal Data

3.2 Only Personal Data that can be shown to be directly relevant to Wheatbelt NRM's effective service delivery and appropriate for retention will be collected.

3.3 Personal Data that is collected will be lawful and reasonable.

3.4 Permission for the collection and storage of Personal Data will be given by the individual prior to obtaining Personal Data from any other source.

3.5 The purpose for the use of personal Data will be explained when it is collected.

3.6 Written consent of individuals will be sought prior to releasing any Personal Data to a third party.

3.7 Personal Data will be stored securely and protected from misuse, interference and loss as well as from unauthorised access and disclosure.

3.8 Only Representatives that require access to Personal Data will be granted access, and that right is only granted for appropriate use as required for business purposes.

3.9 Individuals have the right to view their Personal Data on file.

3.10 All contracts where Confidential Information or Personal Data is being used or created will state the obligations on all parties regarding this information.

Confidential Information

3.11 Confidential Information will be kept confidential to Wheatbelt NRM at all times.

3.12 During employment and after the termination of employment, an employee will hold all Confidential Information in trust and confidence, and will only use, access, store, or disclose Confidential Information, directly or indirectly, as appropriate in the performance of the employee's duties or as required by law.

- 3.13 An employee will not remove materials or property containing Confidential Information from the organisation unless it is necessary in the performance of the person's job duties.
- 3.14 Confidential Information will not be used for any purpose other than for the use and benefit of Wheatbelt NRM
- 3.15 Written consent of Wheatbelt NRM will be sought before Confidential Information is disclosed to any third party, or otherwise in accordance with the authority of the role of the individual.

4. Responsible Officers

- 4.1 The Board of Management, as part of its governance authority, is responsible for the approval and publication of this Policy, including the approval of any subsequent changes.
- 4.2 The Audit Committee is responsible for reviewing this Policy prior to Board of Management approval, and ensuring the scheduled review of this Policy.
- 4.3 The Chief Executive Officer is responsible for the operational compliance of the organisation to this Policy.
- 4.4 Representatives will ensure they take all responsible actions to protect Confidential Information from inappropriate access or disclosure. This includes their personal view of the appropriateness of Personal Data being collected.

5. Approval

This Policy was approved by the Board of Management on the 8th November 2016.

Jim Sullivan
Chairperson
Board of Management
Wheatbelt Natural Resource Management Incorporated