

Policy 5.5

Privacy and Confidentiality Policy

Version History	
Document Version:	V4.0
Date of Approval:	25 November 2021
Contact Officer	CEO

1. Definitions

Refer to Standard Policy Definitions v3.0

“Confidential Information” refers to 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.

2. Overview

- 2.1. This Policy relates to the management and administrative practices of Wheatbelt NRM’s collection and use of Personal Data about Personnel, 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.
- 2.2. All Personnel are required to comply with this Policy.
- 2.3. 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.
- 2.4. Personnel 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.

3.2. Personal Data

- 3.2.1. 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.
- 3.2.2. Personal Data that is collected will be lawful and reasonable.
- 3.2.3. Permission for the collection and storage of Personal Data will be given by the individual prior to obtaining Personal Data from any other source.

- 3.2.4. The purpose for the use of personal Data will be explained when it is collected.
- 3.2.5. The option of dealing anonymously or by pseudonym with Wheatbelt NRM will be given where practicable.
- 3.2.6. Written consent of individuals will be sought prior to releasing any Personal Data to a third party, unless required by law.
- 3.2.7. Personal Data will be stored securely and protected from misuse, interference and loss as well as from unauthorised access and disclosure.
- 3.2.8. Only Personnel that require access to Personal Data will be granted access, and that right is only granted for appropriate use as required for business purposes.
- 3.2.9. Individuals have the right to view, and update or change, their Personal Data on file. Requests to be directed to the CEO.
- 3.2.10. Information on how to access this Policy will be provided to individuals.
- 3.2.11. Any data breaches will be dealt with as per the Crisis Management Policy and reported as per legislative requirement.
- 3.2.12. Wheatbelt NRM will take all reasonable steps to destroy or de-identify the Personal Data it holds once the personal information is no longer required.
- 3.2.13. All contracts where Confidential Information or Personal Data is being used or created will state the obligations on all parties regarding this information.

3.3. Confidential Information

- 3.3.1. Confidential Information will be kept confidential to Wheatbelt NRM at all times.
- 3.3.2. 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.
- 3.3.3. 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.
- 3.3.4. Confidential Information will not be used for any purpose other than for the use and benefit of Wheatbelt NRM.
- 3.3.5. Written consent from the CEO is required before Confidential Information is disclosed to any third party.

4. Responsible Officers

- 4.1. The Board, as part of its governance authority, is responsible for the approval of this Policy, including the approval of any subsequent changes.
- 4.2. The Audit and Risk Committee is responsible for reviewing this Policy prior to Board 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. Personnel will ensure they take all responsible actions to protect Confidential Information from inappropriate access or disclosure.

5. Approval

This Policy was approved by the Board on 25 November 2021.

6. Review

Policy to be reviewed in three years from date of approval, or as needed.

Name	Role	Date	Signature
Debra Rule	Chairperson	2 Dec 2001	D. Rule

