



nsw commission for
children & young people

Privacy Management Plan

July 2004

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FOREWORD BY THE COMMISSIONER

The Commission for Children and Young People takes the protection of individual privacy seriously and supports the standards provided in the *Privacy and Personal Information Protection Act 1998* (the *PPIP Act*) and the *Health Records and Information Privacy Act 2002* (the *HRIP Act*).

The standards and principles contained in the *PPIP Act* and the *HRIP Act* apply equally to children and young people. Children's right to privacy, and the protection of their personal and health information, is critical because of their vulnerable legal status.

This Privacy Management Plan outlines how the Commission complies with the *PPIP Act* and the *HRIP Act* and the standards outlined in the Information Protection Principles and the Health Privacy Principles. The Plan outlines the personal and health information held by the Commission and strategies to ensure the Commission effectively meets its responsibilities under the *PPIP Act* and the *HRIP Act*.

Gillian Calvert
Commissioner

1. INTRODUCTION

The *Privacy and Personal Information Protection Act 1998* (the *PPIP Act*) and the *Health Records and Information Privacy Act 2002* (the *HRIP Act*) provide the people in New South Wales with enforceable rights in the ways in which public sector agencies collect, store, use and disclose personal and health information.

The *PPIP Act* defines personal information as:

“information or an opinion (including information or an opinion forming part of a database and whether or not recorded in a material form) about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion.”

The *HRIP Act* defines health information as:

- “(a) **personal information** that is information or an opinion about:
- (i) the physical or mental health or a disability (at any time) of an individual, or
 - (ii) an individual’s express wishes about the future provision of **health services** to him or her, or
 - (iii) a **health service** provided, or to be provided, to an individual, or
- (b) other **personal information** collected to provide, or in providing, a **health service**, or
- (c) other **personal information** about an individual collected in connection with the donation, or intended donation, of an individual’s body parts, organs or body substances, or
- (d) other **personal information** that is genetic information about an individual arising from a **health service** provided to the individual in a form that is or could be predictive of the health (at any time) of the individual or of any **sibling**, **relative** or descendant of the individual,

but does not include **health information**, or a class of **health information** or **health information** contained in a class of documents, that is prescribed as exempt **health information** for the purposes of this Act generally or for the purposes of specified provisions of this Act.”

The *HRIP Act* provides that the collection, storage, use and disclosure of health information, once governed by the *PPIP Act*, is now governed by the *HRIP Act*.

Personal and health information maintained by the Commission is generally in the form of paper files or electronic records.

2. REQUIREMENTS OF THE ACTS

The *PPIP Act* and the *HRIP Act* require each public sector agency to prepare and implement a Privacy Management Plan which outlines what personal and

health information an agency collects and uses, and assess the collection, storage, use and disclosure of this information against the twelve Information Protection Principles and the fifteen Health Privacy Principles defined in the Acts. These principles establish standards for using personal and health information in the public sector.

This Plan therefore outlines how the Commission complies with the Information Protection Principles and Health Privacy Principles, identifies personal and health information held by the Commission, outlines strategies to address specific issues in respect of this information, and details the review process available to an individual (the right to make a complaint) about possible misuse of personal and/or health information.

2.1 THE INFORMATION PROTECTION PRINCIPLES

Public sector agencies must assess their holding and use of personal information against the standard outlined in the twelve Information Protection Principles of the *PPIP Act* [sections 8-19]. The Information Protection Principles cover the collection, storage, use and disclosure of personal information, and are summarised briefly as follows:

1. Personal information must be collected for a lawful purpose i.e. related to a function or activity of an agency, and where the collection is necessary for the purpose [section 8]
2. Collection must be direct from the individual to whom the information relates, unless otherwise authorised [section 9]
3. An individual must be aware that the information is being collected, the purpose for collecting it, intended recipients of the information, whether the supply is mandatory or voluntary, and the rights to access and correct the information [section 10]
4. Reasonable steps must be taken to ensure the personal information collected is relevant to the purpose, accurate, up to date, complete and not excessive [section 11]
5. Personal information must be protected by reasonable security safeguards, kept no longer than necessary, protected from unauthorised use or disclosure when made available to a third party for the provision of a service to the agency, and disposed of securely and appropriately, in accordance with requirements of the *State Records Act 1998* [section 12]
6. A person should be able to ascertain if an agency holds personal information about them and the nature of that information and entitlement of access to it [section 13]

7. An individual has a right to access to personal information held by an agency on themselves and this access should be provided without excessive delay or expense [section 14]
8. An individual can request to have personal information held by an agency amended (by correction, deletion or addition) to ensure the information is accurate, up to date, complete and not misleading. [section 15]
9. An agency must take reasonable steps to check the accuracy of personal information before its use. [section 16]
10. Personal information should only be used for the purpose for which it was collected, for a directly related purpose, or for a purpose to which the individual has consented. [section 17]
11. Disclosure of personal information should only be for a purpose directly related to a purpose of collection and where the individual is unlikely to object [section 18]
12. Special restrictions apply on disclosure: a person's ethnic or racial origin, political opinions, religious or philosophical beliefs or trade union membership should not be disclosed unless subject to an applicable exception. [section 19]

If the Information Protection Principles allow certain conduct that the Commission is otherwise prohibited from doing the Information Protection Principles do not override that prohibition.

Exceptions can affect the operation of these Principles, and are outlined in the Act, and in associated Codes of Practice. See the *Privacy and Personal Information Protection Act 1998* sections 8-19 for full details on the Information Protection Principles, *A Guide to the Information Protection Principles* published by Privacy NSW (1999) or the Privacy Commissioner's website at www.lawlink.nsw.gov.au

2.2 THE HEALTH PRIVACY PRINCIPLES

Public sector agencies must assess their holding and use of health information against the standards outlined in the fifteen Health Privacy Principles of the *HRIP Act* [Schedule 1]. The Health Privacy Principles broadly cover the collection, storage, use and disclosure of personal information, and are summarised briefly as follows:

1. Lawful – only collect health information for a lawful purpose. Only collect health information if it is directly related to the organisation’s activities and necessary for that purpose.
2. Relevant – ensure that the health information is relevant, not excessive, accurate and up to date. Ensure that the collection does not unreasonably intrude into the personal affairs of the individual.
3. Direct – only collect health information directly from the person concerned, unless it is unreasonable or impracticable to do so.
4. Open – inform the person as to why you are collecting health information about them, what you will do with the health information, and who else might see it. Tell the person how they can see and correct their health information and any consequences if they decide not to provide their information to you. If you collect health information about a person from someone else, you must still take reasonable steps to ensure that the person has been notified as above.
5. Secure – ensure that health information is stored securely, not kept any longer than necessary, and disposed of appropriately. Information should be protected from unauthorised access, use or disclosure.
6. Transparent – explain to the person what health information about them is being stored, why it is being used and any rights they have to access it.
7. Accessible – allow people to access their health information without unreasonable delay or expense.
8. Correct – allow people to update, correct or amend their health information where necessary.
9. Accurate – ensure that the health information is relevant and accurate before using it.
10. Limited – only use health information for the purpose for which it was collected, or a directly related purpose that the person would expect. Otherwise, you generally need their consent.
11. Limited - only disclose health information for the purpose for which it was collected, or a directly related purpose that the person would expect. Otherwise, you generally need their consent.
12. Not identified – only identify people by using unique identifiers if it is reasonably necessary to carry out your functions efficiently.

13. Anonymous– give people the option of receiving services from you anonymously, where this is lawful and practicable.
14. Controlled – only transfer health information outside New South Wales in accordance with HPP 14.
15. Authorised – people must expressly consent to participate in any system that links health records across more than one organisation. Only include health information about them, or disclose their identifier for the purpose of the health records linkage system, if they have expressly consented to this.

Exceptions can affect the operation of these Principles, and are outlined in the *HRIP Act* and in associated Codes of Practice.

2.3 PRIVACY CODES OF PRACTICE

Privacy Codes of Practice are statements of how agencies may depart from the Information Protection Principles, Health Privacy Principles or public register provisions of the *PIIP Act*. The Commission will consider any Codes developed to assess whether they apply to the Commission's operations.

The draft Code of Practice concerning access to records of public sector agencies for research purposes has been issued, and the Commission has provided comments to the Privacy Commissioner. It is an important Code as it addresses the issue of 'deposited records' [i.e. collections of private papers] held by state collecting institutions, including the Commission. The Commission will consider the implementation of this Code on its operations after the final version has been released by the Privacy Commissioner.

2.4 PUBLIC REGISTERS

A public register is a register of personal and/or health information that is required by law to be publicly available or open to public inspection e.g. Register of Births, Deaths and Marriages.

The Commission does not have any public registers.

2.5 OTHER LEGAL REQUIREMENTS AFFECTING PRIVACY

The duty of confidentiality applies to some records (e.g. commercial in confidence). Confidentiality is an obligation restricting use or disclosure of information in a way contrary to the interests of the person/organisation who provided it.

The Commission is subject to other legislation and government policies that involve privacy protection, primarily the *State Records Act 1998*, *Freedom of*

Information Act 1989, Independent Commission Against Corruption Act 1988 and Protected Disclosures Act 1994.

Internal policies also help the Commission comply with the *PPIP Act* and the *HRIP Act*. These policies include:

Records Management Policy and Procedures
Code of Conduct and Ethics
Local Area Network Information Security Management Policy
Internet Access and Usage Policy
Use of Communication Devices Policy
Grievance and Dispute Handling Procedures
Guidelines on Research Practice
NSW Government Personnel Handbook issued by the Premier's Department

Commission staff such as Research Officers, are also bound by codes of practice relating to specific professional practices.

3 PERSONAL AND HEALTH INFORMATION HELD BY THE COMMISSION

The Commission was established by the *Commission for Children and Young People Act 1998*. This Act outlines the powers, duties and functions of the Commission, which reports directly to the NSW Parliament. Information on the Commission and its activities can be found on the Commission's website at www.kids.nsw.gov.au

The business units of the Commission and their key functions and main dealings with personal and health information are detailed below:

Administration

Administration staff provide administrative and operational support services to assist management and staff in the provision of service to the Commission's clients.

These services include records management, mail, reception, motor vehicle management, facility management, purchasing and travel services, accounts payable and receivable and financial management. Administration also provides human resource services including recruitment, staff entitlements, workers compensation, personnel policy development and offers support and advice to staff regarding human resource issues such as training and leave entitlements.

Community education staff

Community education staff are responsible for developing and implementing various communication strategies aimed at raising awareness of the work done by the Commission and issues relating to children and young people. The unit is also responsible for designing and co-ordinating the publication of brochures, pamphlets and other publications aimed at promoting the needs, rights and issues of children and young people as well as maintaining the Commission's website.

Another key function of community education is to provide information services and advice to support the effective implementation of the Commission's functions. This is undertaken through the research, collation and disseminating information to target groups via the website, the Commission's quarterly newsletter *Exchange*, library based services and the maintenance of information databases.

Working With Children staff

Working with Children staff are responsible for the implementation and monitoring of the Working With Children Check. The Commission is also an Approved Screening Agency and staff process the Working With Children Check requests for a variety of child-related employers.

Working with Children staff also provide administrative support to the Child Sex Offender Counselors Accreditation Scheme (CSOCAS) Panel. In addition Working with Children is responsible for the provision of advice to the Crown Solicitors in relation to people seeking an exemption from the *Child Protection (Prohibited Employment) Act 1998* in either the Industrial Relations Commission or Administrative Decisions Tribunal. Working with Children staff are also responsible for advising the Commissioner on requests for exemption from the *Child Protection (Prohibited Employment) Act 1998* which may now be made to the Commission.

Policy and Research

The policy and research staff are responsible for the Commission's work in: promoting participation by children and young people; monitoring safety, welfare and well-being; conducting inquiries; making recommendations to government and non-government organisations about legislation, policies, practices and services; and training on and research into issues affecting children and young people.

The staff do this by developing, implementing and publishing learning and development curriculum and materials; developing and undertaking research and monitoring projects; working with other organisations to provide opportunities for children and young people to become more involved in community life; commenting on and developing legislation and policy proposals; organising professional development seminars and other training courses; providing forums for children and young people to voice their opinions about issues; supporting the Commission's Young People's Reference Group and Expert Advisory Committee; and providing research and administrative support to the NSW Child Death Review Team.

Classes of personal and health information held by the Commission for Children and Young People

In order to carry out its functions as described above the Commission collects the following classes of personal and health information:

3.1 Mailing and contact lists

The Commission works with many mailing and contact lists in carrying out its programs and activities. Mailing lists are maintained for the distribution of the Commission's newsletter *Exchange*, Annual Report, *Feedback*, Child Death Review Team Annual Report, Information Sheets, information on training programs and seminars and information relevant to child-related employers.

All these contact lists involve names, addresses and basic contact details of individuals and are only used for the Commission program or function involved. The information is collected from the individual concerned. Keeping contact information up to date and accurate is highly desirable. Individuals are regularly encouraged to notify the Commission of any changes to their details, or to have their details removed.

The information is only accessed by the staff involved in the activity for which the data was collected, and the information deleted when no longer relevant or up to date. The lists are maintained as databases on the network, with access protected by the network security policy.

Mailing lists are not provided to any external person or organisation.

3.2 Employment screening records

Employment screening functions are conducted under Part 7 of the *Commission for Children and Young People Act 1998*.

Working With Children Check

Information relating to both employers and child-related employment applicants are provided to the Commission in relation to the Working With Children Check. Information is entered into the Commission's Employment Screening System database. Information maintained in the database includes:

- employer details including business and trading name, contact names, address, phone and fax numbers
- applicant details including full name and aliases, date and place of birth, address, gender, position applied for, outcome of criminal record check and results from any risk assessment
- disciplinary proceedings information is collected under Section 39 of the *Commission for Children and Young People Act 1998* and includes individuals full name and aliases, date and place of birth, gender, employer details and the date the disciplinary proceeding was completed.

The Employment Screening System is maintained by Commission staff involved in the activity, and is only used for the purpose for which it was established. Information is provided to CrimTrac for the purpose of conducting a national criminal record check and is governed by strict privacy conditions as outlined in the Memorandum of Understanding between the Commission and CrimTrac. This check is undertaken from information provided by the individual to their employer for the purpose of conducting the Working With Children Check.

Individuals to be screened provide their personal information, used to conduct the Working With Children Check to the employer by completing the Working With Children Consent Form. In the case of the disciplinary proceedings database the information is collected from the employer who must notify the employee that their details are registered with the Commission. Data is stored in the databases, with access restricted to designated staff. Details contained in the database are not provided to any external party who is not legally required to have access to the information.

Hard copy records provided in relation to the Working With Children Check are subject to strict security and are accessible only to authorised staff. Files are kept in a locked storeroom within the employment screening work area and are only used for the purpose for which it was provided. Information that is provided to the Commission that is not relevant to the screening function is destroyed.

Applications for exemption from the Child Protection (Prohibited Employment) Act 1998

Individuals who are considered to be prohibited people under the *Child Protection (Prohibited Employment) Act 1998* can apply to the Industrial Relations Commission (IRC), Administrative Decisions Tribunal (ADT) or the Commission for Children and Young People for an exemption from the *Child Protection (Prohibited Employment) Act 1998* in respect of a certain offence.

The Crown Solicitor represents the Commission at the exemption hearings before the IRC and ADT. Under Section 14(A) of the *Commission for Children and Young People Act 1998* the Commission may obtain personal information from other NSW government agencies relating to the individual seeking the exemption, in order to assess applications or to provide advice to the Crown Solicitors. Personal information being sought from non-government agencies or from other States is obtained by way of subpoena/ summons issued by the Crown Solicitor.

Information being sought can include court records, employment and health records and case files maintained by other government agencies. The Commission receives a copy of the exemption application from either the Administrative Decisions Tribunal or the Industrial Relations Commission. The information contained in the applications is provided by the applicant.

Hard copy records provided in relation to the exemption application are subject to strict security and are accessible only to authorised staff. Files are kept in a locked storeroom within the employment screening work area and are only used for the purpose for which it was provided. Personal and health information that is provided to the Commission that is not relevant to the screening function is destroyed.

Child Sex Offender Counselors Accreditation Scheme

Counselors making an application for accreditation under the Child Sex Offenders Counselors Accreditation Scheme are required to provide the Commission with personal information including full name, address, date of birth, academic transcripts, work history and references.

This information is provided by the person making the application and is only used for the purpose for which is provided.

Information relating to the activities of the Working With Children Check is not disclosed for any other purpose than that for which it was provided.

3.3 Commercial activities

The only commercial activities undertaken by the Commission are the sale of publications and the payment of fees for seminars and training programs.

Information collected in relation to this activity is provided by the individual concerned and is not used for any other purpose. Information relating to the Commission's commercial activities can only be accessed by the staff involved in this activity. The data is stored in databases, stored on the network, with access protected by the network security policy.

The Commission does not currently provide electronic payment services .

3.4 Scientific research

As part of its function of supporting the work of the Child Death Review Team, the Commission collects copies of any records about children and young people who have died. These copies of records can include medical and school records, Department of Community Services, Department of Juvenile Justice and Police files, Coroner's reports and court transcripts about deceased children and their families. This function is undertaken under Part 7A of the *Commission for Children and Young People Act 1998* which requires the confidentiality of this information.

The Commission maintains databases about children and young people who have died in order to fulfill the research and reporting functions of the Child Death Review Team. Access to the databases is restricted to members of the Team and staff working on the reports. Only analytical or aggregate information is published in reports to parliament and identifying information is not included.

All hardcopy files are kept in a locked storeroom accessible only to authorised staff. All electronic databases are password protected.

From time to time, the Commission undertakes research projects, which may include the collection of personal and health information. Such projects all have ethics approval from a recognised ethics committee. Personal and health information is collected either from the person concerned or in the case of children and young people with their parents or guardian's consent.

Access to these records is by authorised personnel and the information is only used for the purpose for which it was collected. Reports generated by these research projects do not include personal or identifying health information.

Records relating to the scientific records are part of the Commission records, which are managed in accordance with the *State Records Act 1998*.

3.5 Information enquiries

The provision of information to the public is a core activity of the Commission. The Commission handles large numbers of information enquiries from the general public. Enquiries may be received either by phone, letter or by electronic mail. Information enquiries received by the Commission range from requests for publications, policy advice, information relating to the Working With Children Check or information relating to the activities and functions of the Commission.

Personal details provided in relation to information enquiries is obtained from the individual and is only used for the purpose for which it was provided.

Some details of the person enquiring are recorded for internal use and statistical purposes. Information is collected on the type of enquiry, action taken and category of enquirer which allows the planning of improved information services. Information on routine requests is destroyed under the approved disposal authority.

3.6 Personnel records

Personnel records are kept on Commission staff by the Administration staff of the Commission and by the Human Relations Branch of the Central Corporate Services Unit, in accordance with public sector policies and procedures, the *Public Sector Management Act 1988* and the NSW Personnel Handbook. Staff are aware of the purposes of personnel files. Personnel information is also kept on work experience and training placement people, consultants and contractors, and people working in the Commission on grant or other external funding. People seeking employment send in resumes that are kept on file for a short period of time. Personal details are held on members of the Commission's Expert Advisory Group, Child Death Review Team and Young People's Reference Group.

Records include personnel files, payroll and recruitment records; sick leave and other leave forms, performance management, grievance, workers compensation, OH&S and EEO related matters.

Personal information held in the CHRIS Human Resource Management System is accessible only to authorized staff on a need-to know basis. Personnel files are kept in locked cupboards within the Manager Administration's office. All electronic data is password protected.

No information is placed on an officer's personnel file or recorded in the CHRIS Human Resources Management System without the knowledge of the officer. Officers have access to their personnel file upon request and can ask to view information in the CHRIS system.

Officers are advised at their entry on duty and during their induction to the Commission of the use of their information subject to their consent such as data for the Workforce Profile conducted across all government agencies by the Premier's Department, EEO reporting and release of home telephone/mobile numbers to their immediate supervisor or manager.

Disposal is in accordance with General Disposal Schedule for Personnel Records.

3.7 Website

The Commission's website provides significant information on the work and activities of the Commission and online delivery of some Commission services.

Enquiries are managed as part of the Information Enquiries outlined above. Information on website visitors is collected for statistical purposes, but at the summary information level: users are not identified individually. Online forms only collect personal details for the purpose specified, and not used as the basis for any other mailings. Interactive forums only disclose personal details with the permission of the individual concerned. A website privacy policy has been developed and this has been published on the Commission's website.

4. COMPLIANCE WITH INFORMATION AND HEALTH PROTECTION PRINCIPLES

4.1 Collection of information

Personal and health information is collected as detailed in Section 3 of the Commission's Privacy Management Plan. The purpose is clear and evident, and only used for the purpose of collection.

Personal and health information is collected with the proper permissions and clearances. Details of people's cultural backgrounds are collected with the permission of the individual concerned (to participate or provide information/content) and/or the involvement of the cultural community concerned

4.2 Storage

Personal and health information is recorded on both paper and electronic files. The Commission's records are public records, and are managed in accordance with the provisions of the *State Records Act 1998*. State Records Authority guidelines include AS4390 the Australian Standard on Records Management, part 6 of which relates to storage, and the recently issued Standard on the Physical Storage of State Records.

The Commission's current records are managed under the Commission's Records Management Policy and Procedures that comply with the *State Records Act 1998*. Locked cabinets are used for restricted and other sensitive records storage. Disposal of records will be undertaken in accordance with the NSW General Disposal Schedules. Destruction of confidential or sensitive records will be done by secure destruction process of the Government Records Repository.

Electronic records stored on the Commission's network are stored and managed in accordance with the Commission's LAN Information Security Management policy, which outlines procedures and policies for network and data security.

Administration manages personnel files, with secure and restricted access.

4.3 Access

An individual can make enquiries to determine if personal and/or health information about them is held by the Commission, or about how to access that information to:

Privacy Contact Officer
Commission for Children and Young People
Level 2
407 Elizabeth Street
SURRY HILLS NSW 2010

Phone: 9286-7276
Fax: 9286-7267
Email: kids@kids.nsw.nsw.gov.au

The correction or amendment of contact details will be made on request. An application fee of \$30.00 will generally apply to formal applications. FOI procedures (with the associated fees and charges) will apply when dealing with complex applications e.g. when mixed information is involved. No application fees will be charged for children and young people making an FOI application. Please contact the Privacy Contact Officer for further details.

This Plan will be available to the public by being published on the Commission's website.

4.4 Use and Disclosure

The Commission is sensitive to privacy issues in dealing with personal and health information. Personal and health information provided to the Commission is only used for the purpose for which it was provided. Information is not disclosed for any other purpose than for which it was provided without the consent of the individual or for complying with legislative requirements.

Access to the Commission's records is managed in accordance with the *State Records Act 1998*. There is a general entitlement of access to state records in the open access period i.e. those at least 30 years old.

5. RIGHT OF REVIEW

If a person has a complaint about the Commission's conduct in relation to the collection, storage, use or disclosure of personal and/or health information, a written request should be forwarded to the Commission so that an internal review may be undertaken.

Children and young people can make a complaint to the Commission orally by contacting the Privacy Contact Officer on 9286-7576.

The procedures for an internal review, for complaints in relation to both personal and health information, are outlined in Part 5 of the *PPIP Act* and are briefly detailed below.

An application

- must be in writing;
- be addressed to the Commission;
- specify an address in Australia to which a notice under subsection (8) of the *PPIP Act* may be sent
- be lodged with the Commission within 6 months (or such later date as the Commission may allow) from the time the applicant first became aware of the conduct of the subject of the application; and
- comply with such other requirements as may be prescribed by the regulations.

The application will be dealt with by an individual within the Commission who is directed by the Director to deal with the application. This individual will not substantially be involved in any matter relating to the conduct, which is the subject of the application.

The review must be completed as soon as reasonably practicable in the circumstances. If not completed within 60 days from the day on which the application was received, the applicant is entitled to make an application to the NSW Administrative Decisions Tribunal.

After the completion of the review, the Commission may:

- take no further action on the matter
- make a formal apology to the applicant
- take such remedial action as it thinks appropriate
- provide undertakings that the conduct will not occur again

- implement administrative measures to ensure that the conduct will not occur again.

The Commission will write to the applicant as soon as practicable (within 14 days) of the findings of the review (and the reasons for the findings), the action proposed to be taken by the Commission and the right of the person to have those findings, and the proposed action, reviewed by the Tribunal.

When the Commission receives an application, it must notify the Privacy Commissioner, keep the Commissioner informed of the progress of the review, the findings and proposed action. The Privacy Commissioner is entitled to make submissions on the subject matter of the application and may undertake the review itself if the Commission so requests.

6. STAFF AWARENESS

Information sessions on the *Privacy and Personal Information Protection Act 1998* and the *Health Records and Information Privacy Act 2002* have been given to staff and will continue as required. Material will be prepared as part of the induction of new staff. The Privacy Management Plan will be published on the Commission's website and on the Commission's Local Area Network.

The Commission's Annual Report will include a statement of the action taken to comply with the two Acts and publish statistical details of any review carried out under Part 5. Any legislative changes, especially the development and application of Codes of Practice that may apply to the Commission will be incorporated in updates of the Plan, and staff advised of these changes.

7. SUMMARY OF ACTION

ISSUE	STRATEGY	RESPONSIBILITY	ACTION COMPLETED
Information collected on application or registration forms	Review, and amend where necessary, forms where people leave their personal details to ensure the purpose and use for collection is clearly stated and an opt-out option is available where appropriate	Managers	Feb 2002
Mailing and contact lists	Review procedures, and amend where necessary, to ensure compliance with IPPs	Manager Community Education & Manager	Dec 2001

		Administration	
Staff awareness	Publish Privacy Management Plan on the network.	Manager Administration	Feb 2002
	Prepare induction material for new staff		Feb 2002
	Provide information briefings on the Privacy Act as required		ongoing
Public awareness	Publish Privacy Management Plan on Commission website	Manager Community Education	Feb 2002
	Publish privacy statement on website		Oct 2001
Personnel Records	Review forms and procedures to ensure collection, storage, use and disclosure is within the IPPs	Manager Administration	Feb 2002
Records	Review use and disclosure of personal information collected in association with the collections to develop guidelines for the access to these records in accordance with <i>State Records Act 1998 and Privacy and Personal Information Protection Act 1998</i>	Managers and Manager Administration	May 2002
Timely and appropriate disposal	Continue to implement the Disposal Schedules	Manager Administration	Ongoing
	Issue guidelines to		April 2002

	staff on Normal Administrative Practice procedures for handling temporary records		
Internal policies and guidelines	Review internal policies and guidelines and amend to include Privacy provisions where appropriate	Director	April 2002
Holdings of personal information	Continue to identify personal information held by the Commission and ensure its management complies with the IPPs	Managers	Ongoing
Implementation of <i>Health Records and Information Privacy Act 2002</i>	Amend Commission's Privacy Management Plan and associated policies and consent forms.	Legal	June 2004

8. USEFUL REFERENCES

The following are useful for further reading and useful links:

Commission website: www.kids.gov.au

Privacy NSW website: www.lawlink.nsw.gov.au/pc.nsf/pages/index

Policy Name	Privacy Management Plan
Approved by	Commissioner
Approval Date	June 2004
Date Last Amendment	
Date Last Reviewed	
Contact Officer	Manager Administration