



# POLICY STANDARD 14

## PRIVACY

### POLICY:

**Pablos privacy of its artists and staff when managing information , written or otherwise are based on the Health Information Privacy Rules developed by the Office of the Privacy Commissioner to address the requirements of the Privacy Act 1993.**

Pablos needs to collect, hold and report certain information on people using the service for such purposes as:

- Reporting to government funding agencies
- Basic personal information for agency files, for example contact details
- Information for crisis management.

### POLICY GUIDELINES

#### **1 Collection of information**

Pablos will only collect the minimum information required for its purposes.

Information about an individual will be collected only from the persons themselves.

At the time the information is collected the person will have explained to them:

- That the information is being collected
- The purpose it is being collected for
- Who will have access to the information
- That the supply of information is voluntary but certain information is required for the person to become an artist at Pablos
- Their rights to have access to, and correct , the information if necessary
- Circumstances under which the information may be used, e.g. to contact a key worker or other contact person if the artist is unwell at Pablos

Acceptance of these rules for information is a precondition for joining Pablos.

#### **2 STORAGE AND SECURITY**

Pablos will make sure that personal information on artists is protected from loss, access for any reason by an unauthorized person, or other misuse

Information will be disposed of properly and will not be kept beyond the time it is required to offer a service to the person it refers to. It may be kept for a period ( to be determined) after a person leaves the service if it is possible they will return to the service during that period.

### **3 ACCESS AND CORRECTION**

Each artist is entitled to know what information about them is held at Pablos.

The person can have unrestricted access to the information, i.e., see any documents or records held about them, by making a request to the Privacy Officer at Pablos.

The person is entitled to point out errors or omissions in the information and have these corrected by Pablos.

### **4 USE AND DISCLOSURE OF INFORMATION**

Information will not be used for any purposes apart from that for which it was collected.

The information will not be disclosed to any person except in circumstances agreed with the person in advance, or agreed following a request for information by another party.

### **5 COMPLAINTS MANGEMENT**

Artists who have a concern that information about them held by Pablos is being used inappropriately should make the concern known to the Privacy Officer at Pablos. The Privacy Officer will investigate the issue and resolve it if appropriate/if possible.

All issues raised and addressed in this way have to be reported to management committee as part of the regular report.

If a solution cannot be reached by the Privacy Officer to the satisfaction of the artist, the issue has to be taken to the management committee for a decision. The issue can be presented by the Privacy Officer, an Artists Representative, or the person themselves, in person or in writing. The management committee will give written feedback on the outcome of their consideration of the issue.

If the person is not satisfied with the outcome of this investigation they will be supported to bring the issue to the attention of the Office of the Privacy Commissioner which has the power to implement an investigation.

## 6 **PRIVACY OFFICER**

Pablos will appoint a staff member to the position of Privacy Officer. In this role the appointee will:

- Develop practices around this policy, for example, storage of confidential documents and files, processes to ensure that staff and artists are aware of and implement this policy, and so on.
- Oversee management of information processes such as storage of files, compilation of reports to funders, and so on.
- Act as a point of contact for artists and others on privacy matters.
- Have responsibility for reporting to the management committee on any issues to do with the policy such as compliance issues, complaints, requests for information.