

# Harm Reduction Australia (HRA) Privacy and Confidentiality Policy and Procedure

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| <b>Document Name</b>                | Privacy and Confidentiality Policy and Procedure |
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## 1. Purpose

This policy outlines how Harm Reduction Australia (HRA) and Pill Testing Australia (PTA) collect, handle, store, and protect personal and sensitive data in compliance with Australian privacy laws, particularly the Privacy Act 1988 and the Australian Privacy Principles (APPs). It ensures service users, volunteers, contractors, and partners' privacy is respected while maintaining transparency in data collection and processing.

## 2. Scope

This policy applies to all personal information collected by PTA, including from service users, volunteers, and training participants. It outlines data collection methods, retention periods, and destruction procedures to comply with Australian privacy laws.

## Related & Supporting Documents

|                                                      |                                                                                                                                                                                        |
|------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Legislation</b>                                   | Privacy Act 1988, Australian Privacy Principles (APPs)                                                                                                                                 |
| <b>Policy</b>                                        | <ul style="list-style-type: none"> <li>● Social Media and Digital Education Policy</li> <li>● Communications Policy</li> </ul>                                                         |
| <b>Procedures</b>                                    |                                                                                                                                                                                        |
| <b>Supporting documents, standard and guidelines</b> | <ul style="list-style-type: none"> <li>● Code of Conduct</li> <li>● Consent to Share Information Form (Service Users)</li> <li>● Confidentiality Agreements (Third Parties)</li> </ul> |

## 3. Data Collection

- **Service Users:** Personal information is not collected. Only de-identified, anonymous data is gathered (e.g., gender, age, sample results) during brief interventions. Participation is voluntary, and users can opt out of providing information.
- **Volunteers and Contractors:** Basic personal information (e.g., name, suburb, contact details) is collected for administrative purposes, volunteer management, and quality improvement feedback.

- **Training Participants:** Feedback surveys are anonymous and used to improve the quality of PTA's training programs.

#### 4. Data Storage and Protection

- **Physical Data:** Paper forms are stored securely in a locked safe on-site during service delivery. Access is restricted to authorized personnel (e.g., PTA Event Manager and Executive Officer).
- **Digital Data:** De-identified information is stored on a secure, cloud-based system. Only designated PTA personnel, such as Executive Officers, have access to this data.

#### 5. Data Sharing and Third Parties

- **Data Sharing:** PTA only shares anonymised, de-identified data with third parties when required by contractual obligations or for research and evaluation purposes. No personal information will be shared without consent.
- **Third-Party Agreements:** External parties (e.g., researchers, government agencies) receiving data must sign confidentiality agreements to ensure compliance with privacy laws.
- **Legal Compliance:** All data sharing complies with the *Privacy Act 1988* and the Australian Privacy Principles (APPs), ensuring data security.
  - **Consent:** Any data shared will be in accordance with the consent provided by service users and volunteers. As all service user data is anonymised at the point of collection, no identifying details will be shared with third parties.
  - **Confidentiality Agreements:** Any external party receiving anonymized data from PTA must sign confidentiality agreements and commit to maintaining data security. They will not be authorized to use or disclose the data for any purpose outside the agreed scope of work.
  - **Compliance with Privacy Laws:** All third-party data sharing will comply with Australian privacy laws, including the *Privacy Act 1988* (Cth) and Australian Privacy Principles (APPs), ensuring that data security measures are in place to protect the information shared (see OAIC)

#### 6. Data Retention and Destruction

**Service User Data:** Anonymous data will be retained for up to 7 years for evaluation and compliance purposes. After 7 years, it will be securely destroyed.

**Volunteer Data:** Volunteer personal information will be retained for up to 7 years after engagement with PTA, unless early destruction is requested or legally required for longer retention.

**Training Data:** Anonymous training feedback will be retained for 5 years for quality improvement purposes.

**Data Destruction:** Physical records will be shredded, and digital data will be irreversibly deleted from cloud storage once retention periods have expired.

## **8. Privacy Rights of Clients**

- **Access to Data:** Individuals may request access to their personal data or request corrections by contacting PTA staff. Requests will be processed within 30 days.
- **Consent Withdrawal:** Service users can withdraw consent during their participation. However, as data is anonymized at collection, withdrawal cannot be processed after the service has been completed.

## **9. Review and Compliance**

This policy will be reviewed every two years to ensure ongoing compliance with privacy laws and to adapt to any changes in data management practices. Updates will be communicated to all relevant stakeholders.