



# **Policy Manual - HOGF**

## **Information Collection and Confidentiality Policy**

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**2021**

**Welcome to our Policy Manual**

Please take the time to familiarize yourself with these policies. Hopefully you will find them fair, easy to read, and understandable. Should you have any questions please ask.

You will always find the most recent version of this Policy Manual on the website.

Please complete the acknowledgement and return to me.

Many thanks.

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McClean Nortey  
Executive Officer

## Receipt and Acknowledgment of Policy Manual

I confirm that I have received and read a copy of our Policy Manual.

I understand that the policies described in it are subject to change from time to time.

I also understand that I will be consulted before significant changes are made and that I will have an opportunity to review and comment on these changes.

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\_\_\_\_\_  
Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

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## Information Collection and Confidentiality Policy

Instructions on how sensitive information will be collected, stored and shared

### Information collection and storage

The Administrator will:

- Ensure that any personal information collected from workers is necessary for recruitment, and relevant to organizational functions;
- Take reasonable steps to ensure that the information collected about workers is accurate, complete, up-to-date and relevant, and safeguarded against misuse, loss, unauthorized access and modification;
- Ensure that workers are notified about what information is collected, why it is collected and how it is administered;
- Ensure workers know they have a right to access their file and make corrections if they feel the information is inaccurate; and
- Ensure workers are aware of this Privacy Policy and Procedures and its purposes.

### Personal information

Personal information is any information held by us about a worker and could include:

- name, address, email and phone number
- tax file number
- medical or health status
- other employment activities
- hobbies, clubs or other activities
- image/s
- likes and opinions

### Sensitive Information

We will not collect sensitive information unless it:

- Has the individual's consent
- Is required by law

Sensitive information includes but is not limited to:

- Racial or ethnic origin
- Political opinions

- Membership of a political association
- Religious belief or affiliation
- Philosophical beliefs
- Membership of a professional or trade association
- Membership of a trade union
- Sexual preference or practice
- Health information

### **Sharing confidential information about contacts and stakeholders**

Workers will ensure that the information given in confidence is shared only with those who are authorized to receive it (the ‘confidentiality bubble’).

In gauging if information on an individual should be shared the Administrator should consider whether:

- The individual has expressly consented to the sharing of the information; or
- Sharing of the information would benefit the individual, and do them no harm; or
- The individual would likely give consent to the sharing of the information

Examples of those who may be authorized to receive information includes law enforcement agencies, child protection agencies, border control and anti-terrorism agencies, health complaints and anti-discrimination commissions.

In general terms a staff member should avoid any undertaking to ‘keep information confidential’ as the person might mistake this for meaning that the information so given will not be shared.

A worker who is required by law to divulge information and does not do so is committing a serious breach of this policy.

### **Sharing information about workers**

We will not use a worker’s information for a secondary purpose without the express permission of the person unless:

- Obligated by Ghanaian Law or a court/tribunal order;
- A health situation arises (see below); or
- We reasonably believe that the information is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body (if so then a written note will be made of such use or disclosure)

A health situation is a situation in which medical assistance is required for a worker whilst reasonably under the employer's duty of care which requires the sharing of personal information with a third party. This might include for example a situation in which the worker may not be conscious, or have capacity to share information with the treatment personnel.

In gauging whether or not to share personal information if a health situation arises the Administrator should consider whether:

- The individual has expressly consented to the sharing of the information; or
- Sharing of the information would benefit the individual, and do them no harm; or
- The individual would likely give consent to the sharing of the information

If one of these 3 conditions applies, then the Executive Officer may reasonably assume the tacit consent of the worker to share their information.

### **Disciplinary provisions**

Staff members who don't follow this policy may be disciplined under the Staff Disciplinary Policy.