

S3-SURR-P	PRIVACY POLICY
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Policy context: This policy relates to the privacy of personal and/or sensitive information	
Standards or other external requirements	Aged Care Quality Standards: <ul style="list-style-type: none"> • Standard 1 – Consumer Dignity and Choice NDIS Practice Standards: <ul style="list-style-type: none"> • Standard 1 – Rights and Responsibilities • Standard 2 – Provider Governance and Operational Management
Legislation or other requirements	Home and Community Care Act 1985 (Cth) Aged Care Act 1997 (Cth) National Disability Insurance Scheme Act 2013 (Cth) Privacy Act 1988 (Cth) Privacy and Personal Information Protection Act 1998 (NSW) Health Records and Information Privacy Act 2002 (NSW) Australian Privacy Principles Carers (Recognition) Act 2010 (NSW)
Contractual obligations	Department of Health National Disability Insurance Agency Other Contracts entered into by the Organisation

POLICY STATEMENT

The Organisation understands that it is important for clients to know how it collects, uses and safeguards personal information. This policy sets out how the Organisation manages the collection, use and storage of personal or sensitive information and protects dignity.

How Personal Information is Collected

Wherever possible, the Organisation will not collect information that can identify individuals or will de-identify the information where practicable.

The Organisation may receive personal information through:

- From other organisations via its referral pathways,
- From its client's carers or relatives, or
- Directly from its clients.

Types of Personal Information Collected

The personal information typically collected by the Organisation includes a person's:

- Name
- Address
- Phone number
- Date of Birth
- Family information
- Bank Details

Use, Storage and Access to Personal Information

Where the Organisation collects or uses personal information it is primary for the purpose of providing a service. Where necessary, the Organisation may also collect or use personal information for other associated purposes, such as informing clients about new products and changes to service provision.

Where the Organisation is required to collect personal information, that information will be kept secure (physically and electronically).

At no stage will individual personal information be disclosed for any other purpose than provision of service without seeking permission from the individual unless required or authorised by or under an Australian law or court/tribunal order.

The Organisation does not use government related identifiers and, wherever possible, personal information collected by the organisation is de-identified.

Notification of the collection of Personal Information

Upon the commencement of service provision or employment the Organisation will advise individuals:

- The purpose for which it collects personal information;
- How clients or staff can access their personal information;
- How clients or staff can correct the information; and
- Who can access that personal information.

Anonymity and Pseudonymity

Individuals have the option of not identifying themselves or of using a pseudonym when requesting general service information from the Organisation. However, if the individual has a need to discuss their individual service there is a practicable need for them to identify themselves to staff.

Gaining Access to and Updating Personal Information

The Organisation will take all reasonable steps to ensure that personal information is accurate, up to date and complete. Clients or staff may request access to their personal information at any time. All requests will be directed to the CEO who will reply to that request within thirty (7) days.

If the CEO is satisfied that the information currently held is inaccurate, out of date, incomplete, irrelevant or misleading the CEO will ensure the update of that personal information.

If the CEO refuses to update the individual information, they must advise the individual in writing:

- of the reason/s for the refusal;
- the mechanisms available to complain about that refusal; and
- the CEO must allow a statement from the individual, which outlines that they believe their information is inaccurate, out of date, incomplete, irrelevant or misleading, to be associated with their personal information so that this statement is accessed by users of their information when providing the service.

The Organisation will not apply any charges to an individual because they request access or an update to their individual information.

Law Enforcement

The Organisation reserves the right to disclose your personal information as required by law and when it believes that disclosure is necessary to protect its rights and/or comply with a judicial proceeding, court order, or legal process.

DOCUMENTATION

Documents related to this policy	
Related policies	Confidentiality Code of Ethics & Conduct Conflict of Interest
Forms, record keeping or other organisational documents	Data Breach Response Plan Cyber Security Policy Data Breach Incident Reporting Form Code of Ethics and Conduct Agreement Confidentiality Agreement

Reviewing and approving this policy		
Frequency	Person responsible	Approval
Annually	CEO	Board of Directors

Policy review and version tracking

One Connect Direct Limited

Review	Date Approved	Approved by	Next Review Due
1	26/08/2014	Board of Directors	26/08/2015
2	26/11/2015	Board of Directors	26/11/2016
3	19/08/2018	Board of Directors	19/08/2019
4	19/10/2019	Board of Directors	19/10/2020
5	24/02/2021	Board of Directors	24/02/2022