



## PRIVACY POLICY

Policy number		Version	2
Drafted by	Management team	Approved by MC on	01.07.2020
Responsible person	Management team / Management Committee	Scheduled review date	June 2023
Applies to: All			
Specific responsibility: Staff, Managers & Management Committee			
Legislation / Standards and other external requirements	The Privacy Act 1988 Privacy Amendment (Enhancing Privacy Protection) Act 2012 Information Privacy Act 2000 NDIS Terms of Business for Registered Providers NDIS Quality and Safeguards Framework, 2016 Associations Incorporation Act 2009 Associations Incorporation Regulation 2016 Relevant Industrial Awards Fair Work Commission Fair Work Act 2019 National Employment Standards National Disability Insurance Scheme Act 2013 National Disability Insurance Scheme Rules and Guidelines 2018 - 2019 NDIS Terms of Business for Registered Providers NDIS Quality and Safeguarding Framework, 2018 NDIS Code of Conduct for Workers 2018 United Nations Convention on the Rights of Persons with Disabilities (CRPD) Children and Young Person (Care and Protection) Act 1998 (State)		
Contractual obligations	Employment Agreements NDIS Service Registered Service Provider obligations DoE (Sector Capacity Building project contract) Funding Terms and Conditions (Funding Agreement)		

### Introduction

*Early Connections - Coffs Coast Inc.* collects and administers a range of personal information for its designated purposes. We are committed to protecting and upholding the right to privacy of clients, staff, volunteers, Management Committee members and representatives of agencies we deal with. In particular is committed to protecting and upholding the rights of our clients to privacy in the way we collect, store and use information about them, their needs and the services we provide to them.



The [Privacy Act 1988](#) (the Privacy Act) and the [Freedom of Information Act 1982](#) (Cth) regulates how public sector agencies and certain private sector organisations can collect, hold, use and disclose personal information, and how you can access and correct that information. Personal information is information in any form that can identify a living person.

*Early Connections - Coffs Coast Inc.* must comply with the same privacy requirements applicable to the NDIS Commission for Quality and Safeguards, the Privacy Act 1988 and the Privacy Amendment (Enhancing Privacy Protection) Act 2012. The organisation will follow the guidelines of the Australian Privacy Principles in its information management practices.

*Early Connections - Coffs Coast Inc. will ensure that:*

- it meets its legal and ethical obligations as an employer and service provider in relation to protecting the privacy of clients and organisational personnel.
- clients are provided with information about their rights regarding privacy.
- clients and organisational personnel are provided with privacy when they are being interviewed or discussing matters of a personal or sensitive nature.
- all staff, Management Committee members and volunteers understand what is required in meeting these obligations.

## **Policy**

*Early Connections - Coffs Coast* is bound by the above mentioned Legislation and Principles. The organisation has adopted the National Privacy Principles as minimum standards in relation to handling personal information. This means that Early Connections - Coffs Coast will -

- Collect only information which the organisation requires for its primary function;
- Ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered;
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- Store personal information securely, protecting it from unauthorised access;
- Provide stakeholders with access to their own information, and the right to seek its correction.

This policy will apply to all records, whether hard copy or electronic, containing personal information about individuals, and to interviews or discussions of a sensitive personal nature. This includes information –

- that is collected from each client family on enrolment
- that is collected and stored whilst enrolled with the organisation
- that is stored after ceasing enrolment with the organisation
- that is collected from the Early Connections website [www.earlyconnections.org.au](http://www.earlyconnections.org.au)
- that is collected from social media
- that is collected during client surveys

## **PROCEDURES**

The Management Committees will:

- Retain overall responsibility for adopting this policy.

The Managers will:

Ensure that all team members, contractors and volunteers are aware of this policy;

Monitor changes in Privacy legislation and for reviewing this policy as and when the need arises.

All Early Connections - Coffs Coast team members, Management Committee members and volunteers at all levels will adhere to the principles outlined below:

### **Collection**

We will only collect information that is necessary for the performance and primary function of Early Connections – Coffs Coast.

- We will notify stakeholders about why we collect the information and how it is administered.
- We will notify stakeholders that this information is accessible to them.
- We will give stakeholders the option of not identifying themselves when completing evaluation forms or opinion surveys.

### **Use and Disclosure**

- We will only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose.
- For any other uses we will obtain consent from the affected person.

### **Data Quality**

- We will take reasonable steps to ensure the information we collect is accurate, complete, up-to-date, and relevant to the functions we perform.

### **Data Security and Retention**

- We will safeguard the information we collect and store against misuse, loss, unauthorised access and modification.
- We will destroy obsolete records in accordance with the designated guidelines.

### **Access and Correction**

- Ensure stakeholders are aware of the overarching – Access to Confidential Information Policy and its purposes.
- Ensure individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading or not up-to-date.
- Making information available to other service providers / a 3rd Party
- Can only release personal information about a person with that person's expressed permission. For personal information to be released, the person concerned must sign a release form.
- Can release information to third parties where it is requested by the person concerned.

### **Website Collection**



Early Connections – Coffs Coast does not collect personal information from individuals who only browse the website.

Early Connections – Coffs Coast will collect personal information from individuals that choose to complete online forms or contact us by email, for example when individuals:

- ask to be on an email list;
- make a written enquiry to us;
- send an application to us;
- complete an online survey on our website;
- Email subscriptions and Conditions of Subscription;

Your personal information is collected for the purpose of maintaining mailing lists and answering your queries. This information will not be disclosed except as authorised by law.

The following conditions apply to subscriptions to our mailing lists.

Subscribers may cancel their subscription to the mailing lists at any time.

A subscription can be cancelled by emailing [admin@earlyconnections-coffscoast.org.au](mailto:admin@earlyconnections-coffscoast.org.au) with “Unsubscribe” in the subject line of the email.

#### **Privacy Breach - Accidental or unauthorised disclosure of personal information**

As a Registered Service provider for the NDIS, Early Connections – Coffs Coast Inc. must comply with the same quality privacy standards as the NDIS Commission – Quality and Safeguards. The Organisation will take seriously and deal promptly with any accidental or unauthorised disclosure of personal information of stakeholders, client families, members and employees. Early Connections – Coffs Coast will use the same process for dealing with breaches of privacy as the NDIS Commission by following the OAIC’s [Data breach notification – A guide to handling personal information security breaches](#) when handling accidental or unauthorised disclosures of personal information. Legislative or administrative sanctions, including criminal sanctions, may apply to unauthorised disclosures of personal information.

#### **DOCUMENTATION**

Documents related to this policy	
Related policies	Case Management/Service Plan Policy Child Protection Policy and Procedure Access to Confidential Information Policy
Forms, record keeping or other organisational documents	Echidna Online – child’s file Consent Form Enrolment Form Service Agreement

Reviewing and approving this policy		
Frequency	Person responsible	Approval
3 years	Manager and Management Committee	Management Committee



Policy review and version tracking			
Review	Date Approved	Approved by	Next Review Due
1	July 2016	Management Committee	July 2020
2	June 2020	Management Team	June 2023
3			

Approved by Management Committee:

Signed:

Name: Ian Braine – President

Date: 01.07.2020