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| Drafted by | Kylie McGlynn | Approved by GM on | 1/04/2022 |
| Responsible person | Kylie McGlynn | Scheduled review date | 1/04/2024 |

Collective Care Supports respects the privacy of all people and is committed to safeguarding the personal information that is provided to us.

Purpose

The purpose of this privacy policy is to:

- clearly communicate the personal information handling practices of Collective Care Supports
- enhance the transparency Collective Care Supports
- operations, and
- give individuals a better and more complete understanding of the sort of personal information that Collective Care Supports holds, and the way we handle that information.

Scope

This policy and procedure will apply to all people accessing Collective Care Supports services.

The Privacy Act and this Privacy Policy do not apply to acts or practices which directly relate to employee records of Collective Care Supports current and former employees.

Definitions

Personal information as defined by the Privacy Act 1988 (as amended) is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not, and whether recorded in a material form or not.

Sensitive information as defined by the Privacy Act 1988 (as amended) is information or opinion (that is also personal information) about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices or criminal record or health, genetic, biometric information or biometric templates, that is also personal information.

Outline of this Policy

Our Information Handling Practices

This section explains our general information handling practices across Collective Care Supports including information about how we collect, use, disclose and store your information.



Our obligations under the Privacy Act

This privacy policy sets out how we comply with our obligations under the *Privacy Act 1988* (Privacy Act). We are bound by the Australian Privacy Principles (APPs) in the Privacy Act which regulate how organisations may collect, use, disclose and store personal information, and how individuals may access and correct personal information held about them.

Collection of Personal and Sensitive Information

Any person accessing Collective Care Supports

The kinds of information that may be collected include:

- contact details (name, address, email, contact details, organisation)
- personal details including: date of birth, gender, cultural background
- information on personal issues and experiences, relationships
- family background, supports clients may have in the community
- areas of interest and needs
- health information and/or medical history
- clinical assessments and progress notes
- profession / position

This information may be collected by a variety of methods including:

- Face to Face
- Telephone
- Telehealth services
- Enquiry and Registration forms (manual / electronic formats)
- Correspondence (email / fax / post / online)

Collective Care Supports uses this information for the following purposes:

- Providing Specialist Supports Services
- to meet any requirements of government funding for programs
- to monitor and evaluate existing services and plan for future services
- to obtain feedback from individuals about their experiences and outcomes
- to produce reports
- to comply with legal obligations
- to provide information about Collective Care Supports services
- to provide information about relevant industry events and activities



How We Collect Information

Where possible, we collect your personal and sensitive information directly from you. We collect information through various manual and electronic means, including telephone, face to face, telehealth, email, fax and a range of forms and surveys. If you feel that the information that we are requesting, either on our forms or in our discussions with you, is not information that you wish to provide, please feel free to raise this with us.

In some situations, we may be provided with your personal information from a third-party source. For example, we may collect information about you from a provider or health professional, we will take reasonable steps to inform you and ensure that you are aware of the purposes for which we are collecting your personal information and the organisations to which we may disclose your information, subject to any exceptions under the Act.

Health Information

As part of administering Collective Care Supports, we may collect health information. For example, Collective Care Supports collects health information (such as medical history) from some clients to provide quality services to meet your needs / goals. When collecting health information from you, Collective Care Supports will obtain your consent to such collection and explain how the information will be used and disclosed.

If health information is collected from a third party, Collective Care Supports will inform you that this information has been collected and will explain how this information will be used and disclosed.

Collective Care Supports will not use health information beyond the consent provided by you, unless your further consent is obtained or in accordance with one of the exceptions under the Privacy Act or in compliance with another law.

Use and Disclosure of Information

We only use information for the purposes for which it was given to us, or for purposes which are related to one of our functions or activities.

For the purposes referred to in this Privacy Policy (discussed above under 'Collection of Personal and Sensitive Information'), we may also disclose your personal information to other external organisations including:

- Government departments/agencies which provide funding for Collective Care Supports services.
- Service Providers, who assist us to deliver our services;

Except as set out above, Collective Care Supports will not disclose an individual's information to a third party unless one of the following applies:



- the individual has consented
- the individual would reasonably expect us to use or give that information for another purpose related to the purpose for which it was collected (or in the case of sensitive information – directly related to the purpose for which it was collected)
- it is otherwise required or authorised by law
- it will prevent or lessen a serious threat to somebody's life, health or safety or to public health or safety
- it is reasonably necessary for us to take appropriate action in relation to suspected unlawful activity, or misconduct of a serious nature that relates to our functions or activities
- it is reasonably necessary to assist in locating a missing person
- it is reasonably necessary to establish, exercise or defend a claim at law
- it is reasonably necessary for a confidential dispute resolution process
- it is necessary to provide a health service
- it is necessary for the management, funding or monitoring of a health service relevant to public health or public safety
- it is necessary for research or the compilation or analysis of statistics relevant to public health or public safety
- it is reasonably necessary for the enforcement of a law conducted by an enforcement body.

We will not send information out of Australia without additional specific consent or as required by law. If we are required to send information overseas we will seek specific consent from the individual, and take measures to protect your information such as ensuring that the country of destination has similar protections in relation to privacy or that we enter into contractual arrangements with the recipient of your information that safeguards your privacy.

Collective Care Supports may use cloud-based service providers for the purpose of storing information or utilising specific applications for service delivery and reporting. Collective Care Supports will take measures to protect your information such as ensuring that the country of destination has similar protections in relation to privacy or that we enter into contractual arrangements with the recipient of your information that safeguards your privacy.

Security of Personal and Sensitive Information

Collective Care Supports takes reasonable steps to protect the personal, sensitive and health information we hold against misuse, interference, loss, unauthorised access, modification and disclosure.

These steps include password protection for accessing our electronic IT system, securing paper files in locked cabinets and physical access restrictions. Only authorised personnel are permitted to access these details.



When the personal information is no longer required, it is destroyed in a secure manner, or deleted according to our Records Control Procedure.

Correction of Information

If an individual requests that we change that information, the staff member receiving that request will make the changes unless we consider that there is a sound reason under the Privacy Act or other relevant law to withhold the information, or not make the changes.

Requests for correction should be made to the treating therapist or staff member or can be formally requested directly to the Privacy Officer (details of which are set out below). For security reasons, you may be required to put your request in writing and provide proof of your identity. This is necessary to ensure that personal information is provided only to the correct individuals and that the privacy of others is not undermined.

Access to Information

Requests for access should be made directly to the Privacy Officer (details of which are set out below). For security reasons, you will be required to put your request in writing and provide proof of your identity. This is necessary to ensure that personal information is provided only to the correct individuals and that the privacy of others is not undermined.

Access will be provided as outlined in this policy, unless we consider that there is a sound reason under the Privacy Act or other relevant law to withhold the information.

In the first instance, Collective Care Supports will generally provide a summary of the information held about the individual. It will be assumed (unless told otherwise) that the request relates to current records. These current records will include personal information which is included in Collective Care Supports databases, and which may be used on a day to day basis.

We will provide access by allowing you to inspect, take notes or print outs of information that we hold about you.

We will take all reasonable steps to provide access or the information requested within 14 days of your request. In situations where the request is complicated or requires access to a large volume of information, we will take all reasonable steps to provide access to the information requested within 30 days.

If an individual is able to establish that information Collective Care Supports holds about her/him is not accurate, complete or up to date, Collective Care Supports will take reasonable steps to correct our records.

Access will be denied if:

- the request does not relate to the information of the person making the request;
- providing access would pose a serious threat to the life, health or safety of a person or to public health or public safety;



- providing access would create an unreasonable impact on the privacy of others;
- access discloses a 'commercially sensitive' decision making process or information; or;
- any other reason that is provided for in the APP's or in the Privacy Act.

If we deny access to information, we will set our reasons for denying access. Where there is a dispute about your right of access to information or forms of access, this will be dealt with in accordance with the complaint's procedure set out below.

Complaints Procedure

If you have provided us with personal and sensitive information, or we have collected and hold your personal and sensitive information, you have a right to make a complaint and have it investigated and dealt with under this complaint's procedure.

If you have a complaint about Collective Care Supports privacy practices or our handling of your personal and sensitive information, please contact our Privacy Officer (details of which are set out below).

A privacy complaint relates to any concern that you may have regarding Collective Care Supports privacy practices or our handling of your information. This could include matters such as how your information is collected or stored, how your information is used or disclosed or how access is provided to your information.

The goal of this policy is to achieve an effective resolution of your complaint within a reasonable timeframe, usually 30 days or as soon as practicable.

However, in some cases, particularly if the matter is complex, the resolution may take longer.

Once the complaint has been made, we will try to resolve the matter in a number of ways such as:

- Request for further information: We may request further information from you. You should be prepared to provide us with as much information as possible, including details of any relevant dates and documentation. This will enable us to investigate the complaint and determine an appropriate solution. All details provided will be kept confidential.
- Discuss options: We will discuss options for resolution with you and if you have suggestions about how the matter might be resolved you should raise these with our Privacy Officer.
- Investigation: Where necessary, the complaint will be investigated. We will try to do so within a reasonable time frame. It may be necessary to contact others in order to proceed with the investigation. This may be necessary in order to progress your complaint.
- Conduct of our employees: If your complaint involves the conduct of our employee's we will raise the matter with the employee concerned and seek their comment and input in the resolution of the complaint.



- The complaint is substantiated: If your complaint is found to be substantiated, you will be informed of this finding. We will then take appropriate agreed steps to resolve the complaint, address your concerns and prevent the problem from recurring.
- If the complaint is not substantiated, or cannot be resolved to your satisfaction, but this Privacy Policy has been followed, Collective Care Supports may decide to refer the issue to an appropriate intermediary. For example, this may mean an appropriately qualified lawyer or an agreed third party, to act as a mediator.
- At the conclusion of the complaint, if you are still not satisfied with the outcome you are free to take your complaint to the Office of the Australian Information Commissioner at www.oaic.gov.au

We will keep a record of your complaint and the outcome.

We are unable to deal with anonymous complaints. This is because we are unable to investigate and follow-up such complaints.

Privacy Officer

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Changes to this Privacy Policy

Collective Care Supports reserves the right to review, amend and/or update this policy from time to time.

We aim to comply with the APPs and other privacy requirements required to be observed under State or Commonwealth Government contracts.