



Privacy procedure

Scope

This procedure applies to personal information (including sensitive information) and health information as defined under the applicable privacy laws.

Procedure Statement

CoAbility values the privacy of every individual and strives to deliver quality services that respect the dignity of participants. We are committed to protecting participant privacy and ensuring that the collection, storage, use and disclosure of any personal information collected complies with the law.

We act in accordance with the Privacy Act 1988 (Cth) that includes Australian Privacy Principles and regulates the way we handle personal information. We also act in accordance with the Health Records Act 2001 (Vic) which creates a framework to protect the privacy of participants health information.

The Australian Privacy Principles may be obtained from the [Office of the Australian Information Commissioner](#).

1 We understand the importance of your privacy

- 1.1 At CoAbility, we ensure that our staff and contractors receive training and understand their obligations under the privacy laws and ethical codes of professional conduct. We will ensure that the privacy of your personal information is protected.

2 Remaining anonymous or using a pseudonym

- 2.1 You have the right not to identify yourself or use a pseudonym when interacting with our services. However, the nature of our services conducted by us means that generally it is not possible or practical for us to support you anonymously or when using a pseudonym.

3 What is personal information and why do we collect it

- 3.1 We require collection of relevant personal information as this enable us to provide you with the most appropriate supports. We will collect personal information in a fair and lawful way and give you information about the primary purpose of collection when you engage with our services. If you do not consent to the collection of your personal information, the level of service that we can offer you is limited.

3.2 Personal information is information or an opinion (whether true or not) in any form, (including recorded material), that reasonably identifies you. Examples of personal information we collect include: names, age, date of birth, disability information, home addresses, email addresses, phone.

3.3 We collect personal information through completion of various intake/referrals/forms and through your NDIS plan. Information may also be collected, reviewed or updated face-to-face, telephone calls or by email. We will collect personal information directly from you wherever possible.

4 Sensitive information

4.1 Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health/medical/disability information.

4.2 We also collect health information about your health or disability, doctors you have seen or health services you have received.

4.3 Generally, sensitive information has a higher level of privacy protection than other personal information.

5 How we use and disclose personal information

5.1 We collect personal information for the primary purpose for which it was given to us, or for the purpose that is necessary to fulfil the functions and activities of CoAbility as determined by the nature of your interaction with us and where we have a lawful basis to do so.

5.2 Staff and contractors who are involved with providing services, (including support coordinators, team leaders and managers) will access your personal information. Information that is essential for the commencement and continuation of your services will be accessed by appropriate staff, for example administration staff will have access to personal information in the course of their duties.

5.3 We may share your personal information with other CoAbility staff, for example a support coordinator may be required to discuss your personal details with their team leader for the purposes of supervision, determination of work, health and safety issues or to ensure the quality of the service to support you.

5.4 We do not disclose your personal information to other organisations (a third party) or anyone else unless:

- you have consented to the disclosure;
- you would reasonably expect, or have been told, that information of that kind is usually passed to those individuals, bodies or agencies (e.g a referral to a service provider where this is required for services or discussions with the NDIS);
- is otherwise required or authorised by law;
- it will prevent or lessen a serious and imminent threat to somebody's life or health, safety or welfare; or
- it is reasonably necessary for law enforcement function.

5.5 The Privacy Act does not prohibit collection and transmission of de-identified statistical data.

This is where your data is not reasonably identified.

6 How we store personal information

6.1 Your personal information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure. Personal information stored by us on databases/record management systems/cloud or personal computers are password protected. We aim to reduce the amount of paper, however any paper files are secured files with physical access restrictions and disposed of securely and in accordance with any requirements for the retention and disposal of personal information.

6.2 When your personal information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your personal information. However, most of the personal information is or will be stored in your files which will be kept by us for a minimum of 7 years.

6.3 Our additional safeguards include confidentiality requirements on staff and contractors, training on privacy laws and imposing our code of conduct expectations and requirements on staff and contractors.

7 How you can access personal information and make a correction

7.1 You should ensure your personal information is accurate, complete and up to date. You have the right to access the personal information we hold about you and to update and/or correct it, subject to certain exceptions, for example where access may present a threat to an individual or is deemed unlawful.

7.2 If you wish to access your personal information, please contact us in writing. In order to protect your personal information, we may require identification from you before releasing the requested information.

7.3 If we do not agree to provide access to personal information, we will advise you of the steps to take to seek a review of, or to appeal our decision.

8 Cookies

8.1 Cookies are used to maintain contact with a computer user through a website session. Cookies are industry standard and most major websites use them. A cookie is a small message given to your web browser by our web browser. Its purpose is to help a website keep track of your visits and activity. You will usually find information on cookies and how to manage them under options or settings on your browser. You can choose to see cookies before deleting them. Setting your browser to block all cookies however may stop you from accessing some advanced functions.

9 Electronic communication and data security

9.1 There are inherent risks in transmitting information across the internet and we do not have the ability to control the security of information collected and stored on third party platforms.

10 Cross border disclosure of personal information

- 10.1 We utilise technology infrastructure that makes use of cloud infrastructure or servers that are located interstate or located out of Australia. Other than this, we do not typically transfer personal information interstate or overseas. By providing your personal information to us or using our services and supports, you are taken to have consented to this transfer.
- 10.2 If we do transfer information overseas for other purposes, we will only do so with your consent or otherwise in accordance with Australian law. We require that the recipient of the information complies with privacy obligations to maintain the security of the information.

11 Notifiable data breach

- 11.1 A data breach happens when personal information is accessed or disclosed without authorisation or is lost. In the event we experience a data breach or suspect a data breach has occurred, we will contact affected individuals and the Office of the Australian Information Commission when a data breach involving personal information is likely to result in serious harm.

12. Confidentiality

- 12.1 In addition to privacy expectations, we also expect our staff/contractors/volunteers not to disclose any confidential or sensitive information, data or knowledge (relating to CoAbility) outside the organisation, to any third party.

13 Privacy complaints or enquires

- 13.1 You can contact us to make a privacy complaint, gain access to, or seek correction to personal information or make an enquiry. Privacy complaints will be treated seriously and confidentially. We will investigate your privacy complaint through our complaints process within a reasonable amount of time and any action taken on any findings and recommendations will be provided in writing.

Our privacy contact details are as follows:

Position: Operations Manager, CoAbility

Phone : 1300 262 245

Email: hello@coability.com.au

13 Breach of procedure

- 13.1 We treat any breach of our policies or procedures seriously. We encourage reporting of concerns about non-compliance and manage compliance in accordance our policies and procedures.

Parent Policy	Integrity and Respect
Associated procedures/statement	<ul style="list-style-type: none"> ● Staff Code of Conduct ● Advocacy ● Choice and Control ● Conflict of Interest ● Consent for service delivery ● Grievance resolution ● Privacy ● Social media

Legislation/links	<ul style="list-style-type: none"> • Privacy Act 1988 (Cth) • Health Records Act 2001 (Vic) • Office of the Australian Information Commissioner • National Disability Insurance Scheme Act • NDIS Rules
Approval	CEO
Endorsement	Operations Manager
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