

Privacy Policy

APP PRIVACY POLICY

Overview

Shepparton Access (referred to as “SA”, “we”, “our”, “us”) collects, stores, uses and discloses personal information, sensitive information and health information to conduct its business and provide its services.

This policy explains how we collect, store, use and disclose your personal information, how you can access and correct that information if necessary and complain if you believe it has been wrongly collected or inappropriately handled.

Your privacy is important

We recognise the importance of respecting and protecting the privacy of individuals and will handle your information in a lawful way that respects your right to privacy in accordance with the *Privacy Act 1988* (Cth), *National Disability Insurance Scheme Act 2013* (Cth), *Privacy and Data Protection Act 2014* (Vic) and *Health Records Act 2001* (Vic) (as applicable).

We may change or update our Privacy Policy from time to time to make sure it remains appropriate and will post the amended or updated version on our website.

Information covered under this privacy policy

This policy applies to anyone who provides us with personal information, including our clients and their families, prospective clients, supporters and workers (subject to any exemptions under relevant laws).

This privacy policy has been developed in accordance with Australian Privacy Principle 1 and embodies our commitment to protecting your personal information, including sensitive information and health information, we collect, hold, use and disclose.

This privacy policy is not intended to cover our handling of commercially sensitive information, personal information relating to employees and contractors or other information that is not defined in the Privacy Act as personal information.

Definitions

Health information is any personal information about individual’s health or disability. It includes information or opinion about their illness, injury or disability.

Personal information means information or opinion about an identified individual (or an individual who is reasonably identifiable) whether the information or opinion is true or not and whether the information or opinion is recorded in material form or not.

Sensitive information is personal information that includes information or an opinion about an individual’s racial or ethnic origin, political opinions or associations, religious or philosophical beliefs, trade union membership or associations, sexual orientation or practices, criminal record, health or genetic information and some aspects of biometric information. Generally, sensitive information has a higher level of privacy protection than other personal information.

Privacy Policy

1. Collection of personal information

We collect, hold, use and disclose personal information for a variety of purposes, including information about:

- clients and their family members, including health or sensitive information,
- employers,
- employees, including prospective employees,
- contractors, vendors and service providers,
- government departments and their representatives,
- other government and non-government organisations and their representatives that SA have dealings with.

We only collect, hold, use and disclose personal information for a lawful purpose that is reasonably necessary or directly related to one or more of our functions or activities or where otherwise required or authorised by law.

We will only use your personal information for secondary purposes where we are able to do so in accordance with the Privacy Act.

Types of personal information we collect and hold

The amount and type of personal information we collect from you and hold about you depends on your relationship with us.

If you send us an enquiry, we may collect information including:

- name, telephone and email contact details,
- details of the enquiry.

If you are a client that we support, have registered your interest in becoming a client or are connected to a person we support or may support in the future (e.g. a family member, carer, advocate or nominated representative), the personal information we may collect and hold may include:

- name, address, telephone and email contact details,
- gender, date of birth and marital status,
- information about a clients' disability and support needs,
- health and medical information required to support service delivery,
- things that are important to a client, e.g. likes and dislikes,
- living and accommodation arrangements,
- learning and educational needs,
- details concerning a clients' daily life and routine,
- details concerning a clients' employment goals and other life goals,
- details concerning a clients' social and community activities,
- a clients' visual image, via photograph or otherwise,

Privacy Policy

- any other information obtained from a client and/or their support network through the National Disability Insurance Scheme,
- NDIS reference number or other identifiers used by Government agencies or other organisations,
- financial information including plan management and billing details,
- records of our interactions with you such as system notes and records of conversations you have had with our employees,
- information about the services a client is funded to receive under the National Disability Insurance Scheme and the current supports being used,
- information about the services we provide to a client including details of the outcomes or goals we are working with the client to achieve, and other plans relating to the services asked for and the way in which we will deliver those services.

If you provide services to SA we may collect and hold information including:

- name, address, telephone and email contact details,
- information about services provided,
- financial information including billing and bank account details to make payments.

If you are an employee, job applicant or volunteer, we may collect and hold information including:

- name, address, telephone and email contact details,
- gender and date of birth,
- referee details,
- information about qualifications, training and work history and secondary employment,
- health and medical information,
- information from NDIS worker screening, working with children checks (or similar), drivers licence details and information about right to work in Australia,
- information for payroll purposes, if successful, including tax file number and other identifiers used by Government agencies or other organisations, bank account and superannuation details.

If you are a supporter, donor, corporate partner or are otherwise connected with SA through fundraising, marketing, training or community access activities, we may collect and hold information including:

- name, address, telephone and email contact details,
- details of the donations, bequests and contributions you have made,
- events and activities you have participated in,
- renewal and billing information,
- other information that you provide to us when interacting with us.

Privacy Policy

If you are a visitor to our website, we may collect and hold information including:

- any details you provide to us when sending us an enquiry, expressions of interest or making a donation,
- 'cookies' and other technical information through your use of our website.

If a person does not fall into one of the above categories, we generally do not collect or hold any of their personal information.

Individuals have the option to interact with us anonymously where reasonably possible. For example, if a person contacts us with a general question, they will not be required to provide their name unless it is required to adequately handle the enquiry.

However, if you do not provide us with the personal information we reasonably request, we may be unable to provide you with the information, services or supports that you are requesting.

Sensitive information

To provide our services or to respond to inquiries about our services, we may be required to collect and hold your sensitive information including health and medical information and information relating to your disability and support requirements where you have consented to provide such information.

We understand that protecting your privacy in relation to sensitive information is particularly important. We will limit the collection of sensitive information to the minimum amount required in the circumstances to provide you with, or a person with whom you are connected with, our services.

You can ask us to withdraw or amend your prior consent at any time by contacting us to make your request.

Health information

The privacy and security of your health information is a key priority for us.

When we collect and store your health information, we will ensure:

- that you are aware that we have this information, the full scope of the information we have, and the purpose for which we hold it,
- that you are aware that you can access the information and correct errors in it at any time,
- that you have the opportunity to require us to provide this information to another health provider upon your instruction to do so.

How we collect personal information

We may collect personal information from you or about you in a range of ways.

Personal information may be collected directly by us, or by people or organisations acting on our behalf (e.g. contracted service providers). It may be collected directly from you, or on your behalf from a representative you have authorised.

Where possible, we will collect your personal information directly from you or your nominated representatives. We may ask you for certain information, including personal information, when you interact with us, including:

- when you enquire about services or supports,
- when you apply to receive services or supports from us,

Privacy Policy

- when you apply for or are successful in obtaining employment or a volunteer role with us,
- when you become a supporter or community partner,
- when you contact us in person, by phone, via mail, email or online (or any means),
- when you use our website,
- when you receive services and supports from us (this may include images of you, such as those taken on a mobile phone camera),
- when you donate to us or participate in any of our fundraising activities,
- through our direct marketing activities,
- through our contracted service providers.

However, there may be circumstances in which we collect your personal information from other people or organisations such as a client's support network, representative, other service providers or from third party government agencies such as the National Disability Insurance Agency.

If we collect personal information about you from a third party and it is unclear that you have consented to the disclosure of your personal information to us, we will take reasonable steps to contact you and ensure that you are aware of the circumstances surrounding the collection and purposes for which we have collected your personal information.

If you have provided us with information about another person, then you need to tell that other person that you have done so, that they have a right to access their information and that they can refer to the Privacy Policy for information on how SA will handle their personal information.

Online data collection and use

When you access our website, technical information may be collected about user activities on the website, including via Google Analytics. This may include information such as the type of browser used to access the website, the pages visited, and geographical location. We use this information to make decisions about maintaining and improving our website and online services.

Our website may also use 'cookies' to manage and improve your experience on our website. A cookie is a small text file that our website may place on your computer as a tool to remember your preferences. Most browsers allow an individual to choose whether to accept cookies or not. The information collected using cookies is not ordinarily personal information.

Unsolicited personal information

Sometimes we receive personal information that we did not request or that is additional to the information that we have requested. This is known as unsolicited personal information.

If the information is such that we could have lawfully collected it for an allowed purpose, then we will handle the information in the same way as other personal information.

If the information is such that we could not have lawfully collected it, we will destroy, return or de-identify the information as soon as reasonably practicable, provided it is lawful and reasonable to do so.

Privacy Policy

2. Use of personal information

The purposes for which we collect, hold, use, or disclose your personal information depends on your relationship with us and the type of information being handled.

The main purposes for which we may collect, hold, use and disclose personal information are set out below. If we collect your personal information for one of the purposes below, we may use or disclose that personal information for any of the other purposes set out below. By providing us with your information, you are taken to consent to our use and disclosure of your personal information for the below purposes.

If you are a person we support or are connected to a person we support (e.g. family member, advocate or nominated representative), an employee, job applicant or volunteer, a supporter, donor, corporate partner or are otherwise connected with SA through fundraising, marketing, training or community access activities, we may collect, hold, use, or disclose your personal information to:

- provide you with information about our organisation, services and supports,
- manage our relationship with you including to answer your enquiries, receive feedback and resolve complaints,
- deliver services and supports to you (if applicable) including providing information, advice and assistance to you, your nominated decision-makers and others, including third party service providers involved in your support, care or treatment,
- provide education, training and employment opportunities including adult education services (e.g. Adult, Community and Further Education (ACFE) pre-accredited training and other programs), work experience, and supported employment.
- research projects and activities to learn new skills and broaden employment options,
- send you information about our organisation, services and supports, events, community activities, fundraising appeals and donor activities,
- administer our services and supports including processing invoices and payments, salaries or wages, and to seek and process donations,
- conduct quality assurance activities including investigations, surveys, research and analysis,
- manage our workforce, including recruitment and employee records,
- carry out internal functions including administration, training, accounting, audit and information technology,
- comply with laws and regulations and to report to applicable government agencies,
- enable third parties, such as the National Disability Insurance Agency, to conduct audits,
- encourage further involvement with SA and for direct marketing and telemarketing,
- promote and advertise our services, events, community activities, fundraising appeals and donor activities and measure the effectiveness of our marketing and fundraising activities,
- meet our corporate governance requirements.

We may also collect, hold, use and disclose personal information for other purposes not in the list above which are explained to you at the time of collection, purposes which are required or authorised by or under law or purposes for which you have provided your consent.

Privacy Policy

Use of de-identified information

We may aggregate or otherwise de-identify data we have collected about you of all personally identifying information. We may use and share that aggregated or anonymised data for quality assurance activities, education, marketing and fundraising activities and to evaluate our services.

Direct marketing

Where you have consented or we are otherwise permitted by law to do so, we may use your personal information (other than sensitive information) to keep you informed and up to date about our work and to send you marketing material, supporter / donor communications, and invitations to participate in events and activities ("marketing communications").

Where you have consented to receive these marketing communications from us, that consent will remain current until you advise us otherwise. Each use of personal information for these purposes will include a clear and easy to use 'opt-out' option should you wish to opt-out of receiving marketing communications in the future.

In addition to using the opt-out function, if you no longer want to receive marketing communications from us, you can also contact us directly.

3. Disclosure of personal information

We may disclose your personal information to third parties for the purposes listed in the section above. This includes disclosure to:

- related and affiliated companies and organisations including joint venture partners and industry affiliate organisations,
- service providers and suppliers engaged by us or acting on our behalf in relation to our business, including information technology service providers, research agencies, invoice processing service providers, fundraising and marketing agencies, communications service providers and external business advisers (such as recruitment advisers, auditors and lawyers),
- Government and regulatory bodies, including the National Disability Insurance Agency, NDIS Quality and Safeguards Commission, Medicare, the Department of Social Services, the Department of Families, Fairness and Housing and the Australian Taxation Office,
- people acting on your behalf including your nominated representatives, legal guardians, executors, trustees and legal representatives,
- clinicians and other service providers where you have given your consent,
- financial institutions for payment processing, and
- where disclosure is required by law, including to the police, or to the Disability Services Commissioner, or to comply with compulsory notices from courts of law, tribunals or government agencies.

We take reasonable steps to make sure that third parties will protect the privacy of your personal information, in accordance with this Privacy Policy. We will not sell your personal information to any third party.

Privacy Policy

Disclosure of personal information overseas

Our technology infrastructure primarily uses cloud infrastructure or servers located within Australia, but we may on occasion use a platform or service located overseas. Other than our use of these platforms and services, we do not typically transfer personal information overseas. By providing your personal information to us or using our services and supports, you are taken to have consented to the transfer of your personal information to platforms and services located overseas.

We may transfer your personal information to platforms and services located in a country and jurisdiction that does not have the same data protection laws as Australia. However, we always take steps to ensure that an overseas recipient of your personal information complies with the Australian Privacy Principles or is bound by a substantially similar privacy scheme.

4. Storage of personal information

We take all reasonable steps to ensure that your personal information is securely stored and protected. These steps include password protection for accessing our electronic IT systems, securing paper files in locked cabinets and physical access restrictions to buildings where information is held. In addition, access to your personal information is restricted to those properly authorised to have access. SA workers must only access and use personal information for a valid work purpose.

We store your personal information for as long as it is needed for the purposes for which it was collected and to comply with our legal requirements.

We take reasonable steps to:

- ensure that the personal information we collect, use and disclose is accurate, up to date, complete and (in the case of use and disclosure) relevant,
- protect the personal information we hold from misuse, interference and loss and from unauthorised access, modification or disclosure, and
- destroy or permanently de-identify personal information that is no longer needed for any purpose permitted by the Australian Privacy Principles, subject to other legal obligations and retention requirements applicable to us.

Unfortunately, there are inherent risks in the management of personal information, and we cannot and do not guarantee that unauthorised access to your personal information will not occur. We have a Data Breach Response Procedure that we follow in the event of a data breach affecting the data we hold. If a data breach meets the Privacy Act definition of an “eligible data breach”, we will contact you to let you know what has happened and try to minimise the impact on you.

5. Accessing and correcting your personal information

You can request access to and correction of the personal information we hold about you by contacting us.

We may ask an individual to verify their identity before giving access to the personal information or correcting it.

We do not typically charge you for access to your personal information.

Generally (but subject to our legal obligations), we will provide you with access to your personal information, or take reasonable steps to correct the information, within a reasonable time and in the manner requested by you. However, there may be some circumstances when this is not possible, including where:

Privacy Policy

- we no longer hold or use the information,
- providing access would have an unreasonable impact on the privacy of others,
- the request is frivolous or vexatious,
- providing access would be unlawful, or
- for any other permitted reason set out in Australian legislation that is applicable to us.

If we do not provide you with access to all of your personal information, we will tell you the reason why we have not done so.

6. Contact us

Requests for access or correction of your personal information and any other queries relating to privacy can be made to our Privacy Officer:

- via telephone on 03 5831 6180, or
- email admin@sheppaccess.com.au or
- by post to 227 Wyndham Street, Shepparton VIC 3630.

7. Privacy Complaints

If you have a complaint about how we have collected or handled your personal information, please contact our Privacy Officer. We will ask you to explain the circumstances of the matter you are complaining about and how you believe your privacy has been interfered with.

We will investigate your complaint in accordance with our Feedback and Complaints Management Policy. You will be informed of the outcome of your complaint following completion of the investigation.

At all times, privacy complaints:

- will be treated seriously,
- will be dealt with promptly,
- will be dealt with in a confidential manner, and
- will not affect your existing obligations or affect the commercial arrangements between you and SA.

If you are dissatisfied with our response, you can refer your complaint to the NDIS Quality and Safeguards Commission, the Office of the Australian Information Commissioner or in some cases the Victorian Health Complaints Commissioner.

You can also seek further information and advice from the Office of the Australian Information Commissioner (OAIC) by:

- mail: GPO Box 5288, Sydney NSW 2001
- phone: 1300 363 992
- email: enquiries@oaic.gov.au
- online: www.oaic.gov.au