



Policy Name	Privacy Policy
Related Policies & Procedures	
Version 1.1 Version 1.2	Approved Version minor changes to wording
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Policy Statement

Blue Bay Support Coordination wants anyone who comes into contact with us to have confidence that in handling personal information, we give that information an appropriate level of privacy, consistent with the National Privacy Principles.

Definitions and Procedures

What is privacy?

The word 'privacy' means different things to different people.

Types of privacy

The type of privacy covered by the legislation is the protection of people's personal information. However, this is just one aspect of privacy. Other types of privacy can include territorial privacy and physical or bodily privacy and privacy of your communications.

This policy reflects privacy issues which involve a person's personal information. This can include privacy issues associated with information about a person's location, health and communications with others.

What is Personal Information?

Personal information is information that identifies or could identify a person. There are some obvious examples of personal information, such as name or address. Personal information can also include medical records, bank account details, photos, videos, and even information about what a person is like, their opinions and where they work, basically any information that could reasonably identify an individual.

Information does not have to include a name to be personal information. For example, in some cases, a date of birth and post code may be enough to identify someone.

To be precise, the Privacy Act definition of personal information is:

"... information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion."

What privacy is not

The protection of personal information privacy is different to other related concepts such as:

- confidentiality
- secrecy
- freedom of information.

Who has responsibilities to ensure Privacy?

Blue Bay Support Coordination needs to be aware of an individual's rights under the Privacy Act, which give them greater control over the way that personal information is handled. As an individual, the Act allows individuals to:

- know **why** their personal information is being collected and **how** it will be used
- ask for **access** to their records (including health information)
- stop receiving unwanted **direct marketing** material
- **correct** inaccurate information about themselves
- ensure their information is only **used** for purposes they have been told about.

- ensure the management of each participant's information is identifiable, accurately recorded, current and confidential.
- each participant's information will be easily accessible to the participant and appropriately utilised by relevant workers.

Australian government agencies such as the Office of the Privacy Commissioner and certain private sector organisations have responsibilities under the Privacy Act.

Why information is collected by Blue Bay Support Coordination

Blue Bay Support Coordination collects the personal information we need to carry out our day-to-day operations. These operations may include provision of support, coordination of supports, information on services provided to the wider community, business transactions, purchasing of products and services, administering accounts, responding to inquiries and requests for information and in order to meet regulatory requirements of the NDIS.

How does Blue Bay Support Coordination collect information?

Where possible, Blue Bay Support Coordination will collect personal information directly from the individual it relates to (or their legal guardian or nominated representative). This may take place in a number of ways, such as at the start of the relationship e.g. when an application / referral for Coordination of Support is received, or a participant requests assistance or a service. The information may be collected in writing, over the telephone, internet or face to face.

We may also collect personal information during the course of our relationship with those we are in contact with, for example where a participant changes home address or the nominated representative changes.

Sometimes, personal information may be collected from a source other than the individual to which it relates. Some examples are:

- where we obtain work history information about an individual from a referee in the course of an individual's application for employment;
- obtaining relevant participant history from a previous support provider or specialist (such as an occupational therapist).

Regardless of who provides personal information to us, it will always be handled by Blue Bay Support Coordination in accordance with this privacy policy.

Do we disclose Personal Information to anyone else?

Examples of the types of organisations we may need to disclose information to are:

- government agencies such as the Office of the Ombudsman and the Commission for Children and Young People in Child Protection or the NDIS Quality and Safeguarding Commission;
- other parties where that party is contracted to us to provide a particular service on our behalf and is bound by the same privacy rules we follow.

Sometimes, the law requires us to disclose personal information. For example, information may be disclosed to a court in response to a subpoena or to a Government agency such as the Australian Taxation Office on receipt of a direction issued under taxation laws.

We may disclose personal information to our related entities both in and outside Australia.

We may also disclose an individual's personal information where the individual consents to us doing so. That consent may be written, verbal or implied from the individual's conduct.

Where children, young people, and participants with NDIS plans, we have additional policies and procedures around how information is exchanged.

Ensuring Personal Information is up-to-date

We rely on the personal information we hold to conduct the operations of our work. Therefore, it is very important that the information we hold is accurate, complete and up-to-date.

We take reasonable steps to ensure that the personal information we hold is accurate complete and up-to-date whenever we collect or use it. This means that from time to time, we may ask individuals to tell us if there are any changes to their personal information. If an individual finds that information we hold about them is incorrect, they should speak with one of the Blue Bay Support Coordination Directors.

Security of Personal Information

The security of information is important to and we take all reasonable precautions to protect personal information from misuse, loss, unauthorised access, modification or disclosure.

Some of the ways we protect personal information include:

- premises security;
- restricted access to personal information to staff who need it to perform their day to day functions;
- maintaining technology products to prevent unauthorised computer access including identifiers and passwords; and
- maintaining physical security over paper records.

Resolving concerns

If an individual believes that the privacy of their personal information has been compromised, they are entitled to complain. Complaints can be made by the individual contacting one of the Directors. We will respond to complaints as soon as possible.

Data Breach Response

Blue Bay Support Coordination also has a data breach policy and procedure to cover such an event.