

Privacy and Dignity Policy

1.0 Purpose

Care Support Network will manage and ensure that we provide the participant access to services and supports that respect and protect their dignity and right to privacy.

2.0 Scope

This policy applies to all staff.

3.0 Policy

Care Support Network is committed to protecting and upholding all stakeholders' rights to privacy and dignity, including participants, staff, management and representatives of other service agencies.

Care Support Network is committed to protecting and upholding the participants' rights to privacy and dignity as we collect, store and handle information about them, their needs and the services provided to them.

Care Support Network requires staff and management to be considered and consistent when writing documents regarding a participant and when deciding who has access to this information.

Care Support Network is subject to NDIS Quality and Safeguards Commission rules and regulations. Care Support Network will follow the guidelines of the Australian Privacy Principles in its information management practices.

Care Support Network will ensure that each participant understands, and agrees to, the type of personal information collected and the reasons for collection. If material is to be recorded in an audio or visual format the participant must agree to their involvement, in writing, before any material can be collected. The participant must also be informed at the time material is being recorded in an audio or visual format.

Care Support Network will advise each participant of our Privacy Policy using the language, mode of communication and terms that the participant is most likely to understand (Easy Read documents are made available to all participants).

Care Support Network will ensure that:

- It meets its legal and ethical obligations as an employer and service provider, concerning protecting the privacy of participants and organisational personnel.
- Participants are provided with information about their rights regarding privacy and confidentiality.
- Participants and organisational personnel are provided with privacy, and confidentiality is assured when they're being interviewed or discussing matters of a personal or sensitive nature.
- All staff, management and volunteers understand the necessary requirements to meet their obligations.
- Participants are informed of Care Support Network's confidentiality policies using the language, mode of communications and terms they're most likely to understand.
- Care Support Network will attempt to locate interpreters and will use easy access materials.

This policy conforms to the *Federal Privacy Act (1988)* and the *Australian Privacy Principles*, which govern the collection, use and storage of personal information.

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.

4.0 Procedure

4.1 Dealing with personal information

In dealing with personal information, Care Support Network staff will:

- Ensure privacy for the participants, staff, or management when they are being interviewed or discussing matters of a personal or sensitive nature.
- Collect and store personal information that is only necessary for the functioning of the organisation and its activities.
- Use fair and lawful ways to collect personal information.
- Collect personal information only with consent from the individual.

- Ensure that people know of the type of personal information collected; the purpose of keeping the information; the method used when information is collected, used or disclosed; who'll have access to information.
- Ensure that personal information collected or disclosed is accurate, complete, and up-to-date and provide access to the individual to review information or correct wrong information about themselves.
- Take reasonable steps to protect all personal information from misuse, loss and unauthorised access, modification or disclosure.
- Destroy or permanently de-identify personal information no longer needed or after legal requirements for retaining documents have expired.
- Ensure that participants understand and agree with the type of personal information being collected and the reason/s for collection.
- Ensure participants are advised of any recordings in either audio or visual format. The participant's involvement in any recording format must be agreed to, in writing, before collection of material takes place.

4.2 Participant records

Participant records will be kept confidential and only handled by authorised Care Support Network personnel. Information about a participant may only be made available to other parties with the consent of the participant, or their advocate, guardian or legal representative. A written agreement providing permission to keep a recording must be stored in the participant's file.

All participant records will be kept in electronic format stored in secure data bases (Box, Careview, Agile CRM).

4.3 Responsibilities for managing privacy

All staff are responsible for the management of personal information to which they have access. CEO is responsible for the content appearing in Care Support Network publications, communications, and on our website, and must ensure the following:

- Appropriate consent is sought and obtained for the inclusion of any personal information about any individual, including Care Support Network personnel (see 'Consent Policy and Procedure').

- Information provided by other agencies or external individuals conforms to our privacy principles.
- Our website contains a Privacy Statement that clearly outlines the conditions regarding any collection of personal information from the general public captured via their visit to the website.

The CEO is responsible for safeguarding personal information relating to Care Support Network's staff, management and contractors. The CEO will be responsible for:

- Ensuring that all staff are familiar with the Privacy Policy and administrative procedures for handling personal information.
- Providing participants and other relevant individuals with information about their rights regarding privacy and dignity.
- Handling any queries or complaints about a privacy issue.

4.4 Privacy information for participants

During service access, participants are notified of the information being collected about them, how their privacy will be protected, and their rights concerning this data. Information sharing is part of our legislative requirements. Participants must provide consent to any information sharing between our organisation and government bodies. The participant is informed they can opt-out of any NDIS information sharing during audits.

4.5 Privacy for interviews and personal discussions

To ensure privacy for participants or Staff when discussing sensitive or personal matters, Care Support Network will only collect personal information which is necessary for the provision of supports and services and which:

- Is given voluntarily.
- Will be stored securely on the Care Support Network database.

When in possession, or control, of a record containing personal information, Care Support Network will ensure that the record shall be protected against loss, unauthorised access, modification or disclosure, by such steps as is reasonable in the circumstances. If a record must be provided to a person in connection with the provision of a service to Care Support Network, everything reasonable will be done to prevent unauthorised use or disclosure of that record.

Care Support Network will not disclose any personal information to a third party without an individual's consent, unless that disclosure is required or authorised by, or under, law.

5.0 Related documents

- Code of Conduct Agreement
- Consent Policy and Procedure
- Easy Read Privacy Document
- Privacy and Confidentiality Agreement

6.0 References

- NDIS Practice Standards and Quality Indicators 2018
- Privacy Act (1988)

Addendum to Policy – Website Privacy Statement

Care Support Network's website contains the below Privacy Statement, that clearly outlines the conditions regarding any collection of personal information from the general public captured via their visit to our website.

Information Collection and Use

While using our Site, we may ask users to provide us with certain personal information that can be used for identification and/or contact purposes, but which is only ever related directly to service provision. Personal information may include, but is not limited to: name, email address, postal address, phone number, date of birth and NDIS plan number.

Web Browser Data

Care Support Network collects information sent by the user's browser upon visiting our Site. This may include information such as the user's computer Internet Protocol (IP) address, browser type, browser version, the pages of our site that are visited, the time and date of the visit, the time spent on those pages and other statistics.

Cookies

Care Support Network uses 'cookies' to collect information. This enables our Site systems to recognise the user's browser and capture and remember certain information. We also may use trusted third-party services that track this information on our behalf. We use cookies to keep track of site traffic and site interactions, so we can make the site more user friendly, provide a better experience and work on creating useful tools. We also use them to help us understand user preferences based on the way users navigate our site, which enables us to improve our services.

The user has the choice in their internet browser settings to refuse all cookies or receive a warning each time a cookie is being sent.

Third Party Disclosure

Care Support Network does not sell, trade or undertake any other activity to transfer or share users' personal information to outside parties, unless we provide the user with advanced notice. This does not include website partners who assist us with operating our website, operating our business, or servicing users. We may also release user information if it is appropriate to comply with the law, enforce our Site policies, or protect our or others' rights, property or safety.

At times we may share non-personally identified visitor and user information for marketing, advertising or other use.

Links to other sites

Our Site may contain links to other Sites that users might click through to. If a user clicks on a third-party link that is not operated by us, it will have its own privacy policy that we recommend the user reviews. Care Support Network has no control over, and assumes no responsibility for, the content of a third-party provider.

Website Analytics and Google

Google's advertising requirements are put in place to provide a positive experience for users. We may use Google tools for advertising on our website.

Google, a third-party vendor, uses cookies to serve ads on our site. Google's use of DART cookies enables it to serve ads to our users based on their visit to our site and other sites on the internet. Users may opt out of the use of DART cookies by visiting the Google Ad and content network privacy policy