

## Privacy Policy Protecting our Clients information

### Our Commitment to privacy

We are committed to managing personal information in accordance with the Australian Privacy Principles under the Privacy Act 1988 (Cth), other applicable privacy laws and related program standards.

This document sets out our policies for managing your personal information and is referred to as our Privacy Policy.

In the Privacy Policy, "we", "us" and "our company" refers to the Building Life Skills company and "you" refers to any individual about whom we collect personal information.

### What information does Building Life Skills collect about you?

When you enquire about our services or when you become a client of Building Life Skills, a record is made which includes personal information such as your name, address, date of birth, contact details and emergency contact details. Personal information collected about you to provide, or in providing, healthcare services is considered health information and is treated as sensitive information. Building Life Skills may also collect other personal information about you, which is considered sensitive information (such as information about your racial or ethnic origin) where this is relevant to the services we provide.

Generally, information we collect about you includes:

- Your previous and current medical history (including, where clinically relevant, a family medical history) and details of treatment and health services you have received
- Information about your home environment, service requirements and service preferences and other related information that is used to prepare and update your service agreement
- Medications you take; information about other healthcare professionals and health service providers who are involved in your care
- Information about your healthcare preferences and wishes
- Your attorney, guardian or other person(s) responsible for decisions about your healthcare or who are authorised to assist with decisions about the care and services you receive from us and others.

Our company will, where practicable, collect information directly from you (for example, when

## Privacy Policy Protecting our Clients information

we have contact with you in person, over the phone or via the internet). We may also collect personal information about you from third parties including:

- Other healthcare professionals and health service providers involved in your care;
- Government agencies responsible for administering relevant entitlements and benefits (such as Centrelink, Medicare, Department of Health, Department of Social Services, National Disability Insurance Agency, and other government agencies responsible for services).

We may also collect information about you from your family members, a carer, an attorney, a guardian or a person responsible for your healthcare decisions.

### Other individuals

Our company may collect information personal information about other individuals who are not clients of ours. This includes representatives and carers of our clients and care professionals who have referred clients to us or who are providing services to our clients. The kinds of personal information we collect will depend on the capacity in which you are dealing with us. Generally, it would include your name, contact details, professional details and information regarding our interactions and transactions with you.

### How do we hold and protect your personal information?

Our company primarily collects and holds your personal information in electronic form. Information held in electronic form is held securely on servers and computer systems, including the cloud. Certain information is collected and held in paper-based documents (such as administrative forms), which may be converted to electronic form and the original paper-based documents securely destroyed. Information which is retained in paper-based form is held securely at our premises.

We maintain physical security over our paper and electronic data stores, such as locks and security systems at our premises. We also maintain computer and network security; for example, we use firewalls (security measures for the Internet) and other security systems such as user identifiers, facial recognition and passwords to control access to our computer systems. Our staff can access some personal information via mobile devices to ensure they can provide services in an efficient and accurate manner. This information is limited to your service needs, contact details and information about your home. Mobile device access is restricted to those who need that information as part of our company activities and functions. All mobile devices are password and or fingerprint protected.

Due to the nature of the services we provide, documents recording your personal information may be left with you in your home (such as your support plan). We cannot ensure the security

## **Privacy Policy Protecting our Clients information**

of personal information which is left with you in your home. However, we will work with you to minimise the opportunity for other individuals to access your personal information.

### **Why do we collect your personal information?**

Our company collects personal information about clients in order to assess and manage your needs when we are providing our services to you. For example, we collect information about your health to ensure that our services respond to your healthcare needs; to ensure that our services are consistent with other healthcare services you receive.

Providing accurate and complete information is important for the safety, quality and effectiveness of the services we provide. It is also important to ensure you receive the correct entitlements to benefits and funding for the services we provide. If you provide incomplete or inaccurate information, we may not be able to provide you with the services you seek. If you have any concerns about personal information, we have asked you to provide, please let us know.

You have the option of not identifying yourself, or using a pseudonym, when dealing with us (for example, when making a general enquiry). However, it is usually not practicable for us to deal with you anonymously or pseudonymously on an ongoing basis (for example, as a client of our company).

### **How do we use and disclose your personal information?**

#### **Other healthcare professionals involved in your care**

In an emergency, we may provide personal information to other healthcare professionals, health services and emergency services without your consent.

#### **Administration and management**

Our company will also use and disclose your personal information for a range of administrative, management and operational purposes. This includes:

- Administering billing and payments and debt recovery
- Liaising with, and reporting to, government agencies in the administration of particular funding programs
- Planning, managing, monitoring and evaluating our services
- Safety and quality assurance and improvement activities
- Statistical analysis and reporting

## **Privacy Policy**

### **Protecting our Clients information**

- Training staff, contractors and other workers
- Risk management and management of legal liabilities and claims (for example, liaising with insurers and legal representatives)
- Obtaining advice from consultants and other professional advisers
- Responding to subpoenas and other legal orders and obligations

#### **Do we use or disclose your personal information for direct marketing?**

We will only use or disclose your personal information for direct marketing purposes with your consent. If you do provide your consent to receive direct marketing communications, you can opt-out at any time by contacting us using the contact details below.

#### **Do we disclose your personal information overseas?**

Our company may store information on a secure, cloud-based system that is hosted overseas but Australia do not typically or routinely disclose personal information to overseas recipients.

Unless we have your consent, or an exception under the Australian Privacy Principles applies, we will only disclose your personal information to overseas recipients where we have taken reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to your personal information.

#### **How can you access or seek correction of your personal information?**

Generally, if you would like further information about the care or services you have received from us you may simply ask The Manager.

When a person calls to requesting information regarding day-to-day services, we will only provide the information to a listed representative of the client or to third parties detailed above. We will generally request that the caller identifies themselves by name and address/phone number to ensure that they are authorised to receive the information.

You have the right to request access to personal information our Company holds about you at any time. To request access to your personal information, please contact us using the contact details below.

Where the person requesting access is an authorised representative of the person about whom the information relates (such as an attorney or guardian) we will ask the representative to provide evidence of their authority (such as a copy of an Enduring Power of Attorney) where we do not already hold that information.

## **Privacy Policy**

### **Protecting our Clients information**

In certain circumstances, your request to access your personal information may be declined in accordance with privacy laws (for example, where giving access would put you or another person at risk of harm).

We will respond to your request to access within a reasonable period. If we decline your request for access, we will tell you the reasons for declining your request and inform you of your right to make a complaint.

We take reasonable steps to ensure that your personal information is accurate, up-to-date and complete. You can help us do this by letting us know if you notice errors or discrepancies in information we hold about you and also letting us know if any of your personal details change.

If you consider personal information we hold about you is inaccurate, out-of-date, incomplete or irrelevant, you have a right to request we correct the information. It is sometimes not possible for us to make changes to personal information we hold about you (such as your healthcare records). In that circumstance, you may be entitled to request that we associate a statement with your information and you may have a right to make a complaint.

### **How can you make a complaint about the handling of your personal information?**

You may contact us at any time if you have any questions or concerns about this Privacy Policy or about the way in which your personal information has been handled.

You may make a complaint about privacy to The Director at the contact details set out below.

The Director will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint. We will generally respond to your complaint within one week.

If your complaint requires more detailed consideration or investigation, we will acknowledge receipt of your complaint within one week of receipt and endeavor to complete our investigation into your complaint promptly. We may ask you to provide further information about your complaint and the outcome you are seeking. We will then typically gather relevant facts, locate and review relevant documents and speak with individuals involved.

In most cases, we will investigate and respond to a complaint within 30 days. If the matter is more complex or our investigation may take longer, we will let you know.

## Privacy Policy Protecting our Clients information

If you are not satisfied with our response to your complaint, you are entitled to make a complaint to the Following departments

- Australian Information Commissioner: Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au) Phone: 1300 363 992 Post: Office of the Australian Information Commissioner GPO Box 5218, Sydney NSW 2001
- *National Disability Insurance Agency – GPO box 700, Canberra ACT 2601 or email [feedback@ndis.gov.au](mailto:feedback@ndis.gov.au)*

### **How are changes to this Privacy Policy made?**

This Privacy Policy may be reviewed or amended from time to time. You can access the most up to date copy of this policy by visiting our website ([www.buildinglifeskills.org](http://www.buildinglifeskills.org)).

### **How can you contact us with privacy questions, comments and complaints?**

Email: [admin@buildinglifeskills.org](mailto:admin@buildinglifeskills.org)