

## PRIVACY POLICY

### 1.0 Statement of Intent

ALARA QLD Limited respects the privacy of all individuals associated with the organisation including members, employees, volunteers, our clients/beneficiaries, donors, business partners and online users, and is committed to safeguarding the personal information that is provided to us.

We will use all reasonable efforts to protect the privacy of individuals' personal information and to comply with the obligations imposed by the *Privacy Act 1988* (Cth) (**Privacy Act**), the Australian Privacy Principles (**APPs**), the Aged Care Act and the Aged Care Principles as well as relevant State legislation and regulation – Information Privacy Act 2009 (Qld) and Disability Services Regulation 2017 (State), Human Rights Act 2019 (Qld).

We will only collect personal information by lawful and fair means and will only collect personal information that is necessary for one or more of our organisation's functions or activities.

If it is reasonable and practicable to do so, we will collect personal information about an individual only from that individual.

In meeting our obligations with respect to the privacy of our clients we acknowledge that people with vision or hearing impairments and those of culturally and linguistically diverse people may require special consideration.

### 2.0 Purpose

The purpose of this privacy policy is to:

- clearly communicate the personal information handling practices of ALARA QLD Limited
- ensure personal information is managed in an open and transparent way
- give individuals a better and more complete understanding of the sort of personal information that ALARA QLD Limited holds, and the way we handle that information
- protect the privacy of personal information including health information of clients and workers
- provide for the fair collection and handling of personal information

- regulate the access to and correction of personal information; and
- ensure that personal information we collect is used and disclosed for relevant purposes only
- ensure the confidentiality of personal information through appropriate storage and security

### 3.0 Scope

This policy applies to all ALARA QLD Limited members, volunteers, employees, clients/carers, donors, business partners and online users.

### 4.0 Definitions

#### *Personal Information*

Personal Information is information or an opinion, 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.

#### *Sensitive Information*

Sensitive Information includes information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record, biometric information, biometric templates, health information about an individual and genetic information.

#### *Health Information*

Health Information is:

- (i) information or an opinion about:
  - the health or a disability (at any time) of an individual;
  - an individual's expressed wishes about the future provision of health services to him/her; or
  - a health service provided, or to be provided, to an individual that is also personal information; or
- (ii) other personal information collected to provide, or in providing, a health service;
- (iii) other personal information about an individual collected in connection with the donation, or intended donation, by the individual of his or her body parts, organs or body substances; or
- (iv) genetic information about an individual in a form that is, or could be, predictive of the health of the individual or a genetic relative of the individual.

### *Unsolicited Information*

Unsolicited Information is all personal information received from an individual that we did not actively seek to collect.

### *Employee Record*

An Employee Record is a record of personal information relating to the employment of the employee. Examples of personal information relating to the employment of the employee are health Information about the employee and personal information about all or any of the following:

- the engagement, training, disciplining or resignation of the employee;
- the termination of the employment of the employee;
- the terms and conditions of employment of the employee;
- the employee's personal and emergency contact details;
- the employee's performance or conduct;
- the employee's hours of employment;
- the employee's salary or wages;
- the employee's membership of a professional or trade association;
- the employee's trade union membership;
- the employee's recreation, long service, sick, personal, maternity, paternity or other leave; and
- the employee's taxation, banking or superannuation affairs.

### *On-Line Users*

Online Users refers to anyone that accesses the ALARA QLD Limited website [www.alaragld.org.au](http://www.alaragld.org.au)

## **5.0 Overview of ALARA QLD Limited Programs and Services**

ALARA QLD Limited provides a range of services for people with a disability, older Australians and their carers at home and in their community.

In order to provide these services ALARA QLD Limited engages volunteers and employees, and receives donations, funding and support from members of the community, corporations, groups and governments.

In addition to the services which we provide from funds donated by the public, ALARA QLD Limited also holds contracts to deliver State and Commonwealth government programs, contracts with other organisations to deliver services on their behalf and provides services on a fee for service basis and through the National Disability Insurance Scheme. In providing such services, we comply with the relevant state or national privacy principles and any additional obligations under the relevant contract or agreement.

## 6.0 Outline of this Policy

**Part A — Personal Information Handling Practices'** explains our general information handling practices across ALARA QLD Limited including information about how we collect, use, disclose and store your personal information.

**Part B — Contact Lists** offers further detail by explaining our personal information handling practices in relation to specific ALARA QLD Limited functions or activities. Here you can find out what sort of records we keep and why.

## 7.0 Effective date:

Created: June 2006

Revised: July 2012

Revised: March 2014

Last reviewed: March 2018

Revised: August 2018

Revised: February 2020

## Part A — Our Personal Information Handling Practices

### Our obligations under the Privacy Act

This privacy policy sets out how we comply with our obligations under the *Privacy Act 1988* (Privacy Act) and the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* (Cth). We are bound by the *Australian Privacy Principles* (APPs) in the Privacy Act which regulate how organisations may collect, use, disclose and store personal information, and how individuals may access and correct personal information held about them. In relation to Aged Care Home Care Services we comply with the Aged Care Act and the Aged Care Principles.

### Collection of Personal and Sensitive Information

If you would like to access any ALARA QLD Limited Services on an anonymous basis or using a pseudonym, please tell us. If this is possible and lawful, we will take all reasonable steps to comply with your request. However, we may not be able to provide the services in question if we are not provided with the personal information requested.

The nature and extent of personal and sensitive information collected by ALARA QLD Limited varies depending on your particular interaction with ALARA QLD Limited.

ALARA QLD Limited collects personal and sensitive information from clients/carers, donors, business partners, ALARA QLD Limited people and online users. We only collect Personal Information by fair and lawful means. Further information about the kind of information collected from each of these groups and the usage of such information is detailed below.

### ALARA QLD Limited Clients and Carers

Kind of information collected:

- contact details (name, address, telephone, email etc.)
- NDIS number (where applicable for booking and claiming)
- emergency contact details
- personal details including: date of birth, gender, income
- country of birth, citizenship or residency details
- ethnic and racial origin
- preferred language/communication requirements
- information on personal issues and experiences, relationships,

- family background, supports clients may have in the community
- court orders/tribunal decisions/guardianship details
- areas of interest
- health information and/or medical history (primary disability, secondary disability, medical conditions, support requirements, medication plan etc.)
- bank account details (for individuals receiving direct payments or reimbursements)
- income information (where funded services have a co-contribution requirement)

How the information is collected:

- membership applications
- referrals and reports from government or other agencies
- online registration
- telephone or in person
- completion of the ONI, support plans and reviews

Primary purpose for which ALARA QLD Limited uses the information:

- to plan and provide ALARA QLD Limited services for the individual, carer or family
- to enable communication with emergency contacts, advocates, treating professionals, govt. departments
- to determine eligibility for funded services or entitlements provided under any state or commonwealth law.
- to provide clients/carers with the most appropriate services for their needs
- to produce invoices for fee for service or co-contributions where applicable and service statements
- to meet any reporting requirements of government funding or compliance with any state or commonwealth law
- enable contact with a nominated person regarding a client's health status
- to monitor and evaluate existing services and plan for future services

Secondary Purposes for which the information may be used:

- to apply for funding for support or equipment
- to determine appropriate referrals to other services both inside and outside of ALARA QLD limited
- to determine billing and invoice requirements
- to develop a service and track progress and outcomes
- to measure the quality of service provision
- to comply with legal obligations

We will not collect your Sensitive Information (including Health Information) unless the collection of the information is reasonably necessary for or directly related to one or more of our functions and:

- (a) you have consented to the collection of this information; or
- (b) the collection of the information is required or authorised by or under an Australian law or a court/tribunal order; or
- (c) a permitted general situation exists to the collection of the information; or a permitted health situation exists in relation to the collection of the information

#### **ALARA QLD Limited Donors**

Kind of information collected:

- contact details (name, address, telephone numbers, email etc.)
- credit card numbers or bank account details (if ALARA QLD Limited is processing a donation via this means)
- expiration date of credit card

(Credit card information is destroyed after the transaction is made)

How the information is collected:

- online registration
- telephone
- in person

Primary purpose for which ALARA QLD Limited uses the information:

- to process donations and provide accurate receipts

Secondary Purpose for which ALARA QLD Limited uses the information:

- to facilitate on-going fundraising and marketing activities
- to comply with legal obligations
- to provide transparency relating to donated funds, particularly for Appeals for public donations
- to acknowledge the donation

### **ALARA QLD Limited Business Partners**

Type of information collected:

- contact person's name, the name of the organisation which employs the person, telephone numbers, fax number, street and postal address, email address, position title
- areas of interest by category and industry
- insurance details, and details of professional licenses and registrations
- bank details (if ALARA QLD Limited is to receive payment or make payment for services received)
- Australian Business Number (ABN)
- type of support or service

How the information is collected:

- telephone
- in person
- request made in writing as part of contract negotiations

Primary Purpose for which the information is collected:

- to provide services
- to process donations and provide accurate receipts



- to pay for services
- to verify insurances, licenses and registrations required in relation to a service
- to receive services from you or the organisation that employs you
- to recognise your support of ALARA QLD Limited

**ALARA QLD Limited People** (volunteers, employees, delegates) and candidates for volunteer work, work experience placement and prospective employees

Type of information collected:

- contact details (name, address, telephone numbers, email etc.)
- personal details including personal details of emergency contact person(s)
- date of birth
- country of birth, citizenship, residency and/or visa details (proof of ability to legally work in Australia)
- gender
- details of current/previous employment or volunteer involvement
- skills, qualifications and experience and copies of this documentation
- languages spoken and written
- driver's license details
- registration details, vehicle insurance details (where transporting client's in own vehicle)
- driving record -Department of Transport Driver history (for specific positions only)
- information and opinions from referees for prospective employees and candidates for volunteer work
- Police Checks are required for all roles in ALARA QLD Limited because of our work with vulnerable people and in some cases young children. The Police Check will be for the purpose of obtaining a Disability Services Positive Notice card or Exemption (Yellow Card) Blue Card for Child Related Employment or National Police Check for federally funded programs. Individuals will be required to provide certain information for a Police Check.

- in some situations it is necessary for ALARA QLD Limited to collect or receive information about an individual's health. In this circumstance, ALARA QLD Limited will advise why the information is being collected and whether and to whom it will be released
- Bank account details for payments and reimbursements (employees and volunteers only)

Primary Purpose for which the information is collected:

- to provide ALARA QLD Limited services
- to process an application to become a volunteer or employee of our organisation
- to facilitate a placement in an appropriate service or position
- to assist with services whilst an individual is employed or engaged as a volunteer with ALARA QLD Limited
- to provide feedback on performance as a volunteer or employee
- to meet legislative responsibilities to all volunteers and employees
- to obtain feedback from individuals about their experiences and suggestions

Secondary Purpose for which the information is collected:

- to assist ALARA QLD Limited to review and improve its programs and services to keep individuals informed about ALARA QLD Limited developments, policy and procedural changes and opportunities
- to provide information about ALARA QLD Limited services and employee benefits
- to facilitate further involvements with ALARA QLD Limited (eg. events, training, membership, donor)
- to recognise your support of ALARA QLD Limited
- to meet any government reporting requirements

## ALARA QLD Limited Members

Type of information collected:

- contact details (name, address, telephone numbers, email etc.)
- date of birth
- requested category of membership and interest in the organisation
- credit card details and expiration date of credit card (where applicable)

Primary purpose for which the information is collected:

- to determine the correct category of membership
- to meet the requirements of ASIC to hold a register of members
- to process membership fees and provide accurate receipts
- to provide communication updates and formal company correspondence such as Notice of Meetings and the Annual Report

Secondary Purpose for which the information is collected:

- to facilitate ongoing fundraising and marketing activities
- to provide information about the organisation
- to provide invitations to upcoming events and activities
- to recognise your support of the organisation

## Online Users

To the extent that this Privacy Policy applies to online privacy issues, it is to be read as forming part of the terms and conditions of use for the ALARA QLD Limited website.

Type of information collected:

- contact details (name, address, telephone numbers, email etc.) where an on-line facility is used
- non-personal information e.g. visitor navigation and statistics
- server address, browser type, date and time of visit

- personal information (where provided)

Primary Purpose for which the information is collected:

- online bookings and initial contact (referrals)
- to facilitate queries, feedback, comments, complaints
- to analyse website usage and make improvements to the website

Please note: ALARA QLD Limited does not match the personal information collected with the non-personal information

#### *Additional Information*

The website may from time to time contain links to other websites. ALARA QLD Limited stresses that when an online user accesses a website that is not the ALARA QLD Limited website, it may have a different privacy policy. To verify how that website collects and uses information, the user should check that particular website's policy.

#### **How We Collect Information**

Where possible, we collect your personal and sensitive information directly from you (or your representative/nominee). We collect information through various means, including telephone and in-person interviews, appointments, forms and questionnaires. If you feel that the information that we are requesting, either on our forms or in our discussions with you, is not information that you wish to provide, please feel free to raise this with us.

In some situations we may also obtain personal information about you from a third party source. If we collect information about you in this way, we will take reasonable steps to contact you and ensure that you are aware of the purposes for which we are collecting your personal information and the organisations to which we may disclose your information, subject to any exceptions under the Act. For example, we may collect information about you from a health care professional, such as your doctor or a referring body.

If we receive unsolicited information and could not have obtained that information by lawful means we will destroy or de-identify the information as soon as practicable and in accordance with the law.

## Health Information

As part of providing and administering services, ALARA QLD Limited may collect health information. For example, ALARA QLD Limited collects health information (such as medical history) from some clients participating in ALARA QLD Limited programs. When collecting health information from you, ALARA QLD Limited will obtain your consent to such collection and explain how the information will be used and disclosed.

If health information is collected from a third party (such as your doctor), ALARA QLD Limited will inform you that this information has been collected and will explain how this information will be used and disclosed.

ALARA QLD Limited will not use health information beyond the consent provided by you, unless your further consent is obtained or in accordance with one of the exceptions under the Privacy Act or in compliance with another law. If ALARA QLD Limited uses your health information for statistical purposes, it will be de-identified if practicable to do so.

## Use and disclosure of Personal Information

We only use personal information for the purposes for which it was given to us, or for purposes which are related to one of our functions or activities.

We may share your personal information with our associated operational divisions, such as the Finance and Administration Department. This is on a need to know basis in order that they can perform functions related to managing your relationship with us e.g. government reporting, invoicing, mailing information.

For the purposes referred to in this Privacy Policy (discussed above under '*Collection of Personal and Sensitive Information*'), we may also disclose your personal information to other external organisations including:

- Government departments/agencies or other service organisations who provide funding or contract support on behalf of you for ALARA QLD Limited services
- Contractors undertaking a role around maintaining or supporting or information and finance systems. In any such instance contractual arrangements will be in place to ensure they comply with the APPs when they handle personal information and are authorised only to access personal information in order to provide the services or to perform the functions required by ALARA QLD Limited.
- Contractors providing services on a subcontracted or brokered basis where this has been approved by you or your decision maker. In any such instance contractual arrangements will be in place to ensure they comply with the APPs when they handle personal information and are authorized only to access personal information in order to provide the services or to perform the functions required by ALARA QLD Limited.

- Doctors and health care professionals, who assist us to deliver our services;
- Other regulatory bodies, such as WorkCover Queensland;
- Referees and former employers of ALARA QLD Limited employees and volunteers, and candidates for ALARA QLD Limited employee and volunteer positions; and
- Our professional advisors, including our accountants, auditors and lawyers.

Except as set out above, ALARA QLD Limited will not disclose an individual's personal information to a third party unless one of the following applies:

- the individual has consented
- the individual would reasonably expect us to use or give that information for another purpose related to the purpose for which it was collected (or in the case of sensitive information – directly related to the purpose for which it was collected)
- it is otherwise required or authorised by law
- it will prevent or lessen a serious threat to somebody's life, health or safety or to public health or safety
- it is reasonably necessary for us to take appropriate action in relation to suspected unlawful activity, or misconduct of a serious nature that relates to our functions or activities
- it is reasonably necessary to assist in locating a missing person
- it is reasonably necessary to establish, exercise or defend a claim at law
- it is reasonably necessary for a confidential dispute resolution process
- it is necessary to provide a health service
- it is necessary for the management, funding or monitoring of a health service relevant to public health or public safety
- it is necessary for research or the compilation or analysis of statistics relevant to public health or public safety
- it is reasonably necessary for the enforcement of a law conducted by an enforcement body.

*We do not send personal information out of Australia. If we are required to send information overseas we will take measures to protect your personal information. We will protect your*

*personal information either by ensuring that the country of destination has similar protections in relation to privacy or that we enter into contractual arrangements with the recipient of your personal information that safeguards your privacy.*

### **Security of Personal and Sensitive Information**

ALARA QLD Limited takes reasonable steps to protect the personal and sensitive information we hold against misuse, interference, loss, unauthorised access, modification and disclosure.

These steps include:

Our security measures include, but are not limited to:

- training our Workers on their obligations with respect to your personal information;
- securing paper files in locked cabinets and physical access restrictions;
- use of passwords when accessing our data storage system; and
- the use of firewalls and virus scanning tools to protect against unauthorised interference and access.

Workers will have up-to-date virus protection software and firewalls installed on any device used to access documents containing Personal Information.

Contractors working on our behalf are required to:

- comply with the Australian Privacy Principles;
- have up-to-date virus protection software and firewalls installed on any device used to access documents containing Personal Information;
- notify us of any actual or potential breaches of security;
- indemnify us in relation to any loss suffered by a breach.

We will, as soon as practicable and in accordance with the law, destroy or de-identify any personal information that is no longer required for our functions.

When the personal information is no longer required, it is destroyed in a secure manner, or deleted according to our *Procedure – Archiving and Destruction of Paper Records*

### **Response to a data breach**

A data breach occurs when personal information is lost or subjected to unauthorised access, modification, use or disclosure, or other misuse or interference. All Workers are responsible for reporting any actual or suspected data breach to their Supervisor/Manager

Detail about how we manage any actual or suspected data breach is set out in our Policy -Data Breach Response which includes our Data Breach Response Plan.

The relevant funding body will also be advised in accordance with any requirements under the funding program.

## Access to and correction of personal information

If an individual requests access to the personal information we hold about them, or requests that we change that personal information, we will allow access or make the changes unless we consider that there is a sound reason under the Privacy Act or other relevant law to withhold the information, or not make the changes.

General requests for access and/or correction should be made to the Privacy Officer (details of which are set out below). For security reasons, you will be required to put your request in writing and provide proof of your identity. This is necessary to ensure that personal information is provided only to the correct individuals and that the privacy of others is not undermined. In the case of Clients and Carers please refer to the Procedure outlined in the Client information Manual. Further detail is available in the *Procedure – Privacy (Clients)* which is available on request from your Coordinator or Service Manager.

In the first instance, ALARA QLD Limited will generally provide a summary of the information held about the individual. It will be assumed (unless told otherwise) that the request relates to current records. These current records will include personal information which is included in ALARA QLD Limited databases and in paper files, and which may be used on a day to day basis.

We will provide access by allowing you to inspect, take notes or print outs of personal information that we hold about you. If personal information (for example, your name and address details) is duplicated across different databases, ALARA QLD Limited will generally provide one printout of this information, rather than multiple printouts.

We will take all reasonable steps to provide access or the information requested within 14 days of your request. In situations where the request is complicated or requires access to a large volume of information, we will take all reasonable steps to provide access to the information requested within 30 days.

ALARA QLD Limited may charge you reasonable fees to reimburse us for the cost we incur relating to your request for copies of information such as for photocopying and delivery cost of information stored off site. For current fees, please contact the Privacy Officer.

If an individual is able to establish that personal information ALARA QLD Limited holds about her/him is not accurate, complete or up to date, ALARA QLD Limited will take reasonable steps to correct our records.

Access will be denied if:

- the request does not relate to the personal information of the person making the request (or their authorised person e.g. guardian)
- providing access would pose a serious threat to the life, health or safety of a person or



- to public health or public safety;
- providing access would create an unreasonable impact on the privacy of others;
  - the request is frivolous and vexatious;
  - the request relates to existing or anticipated legal proceedings;
  - providing access would prejudice negotiations with the individual making the request;
  - access would be unlawful;
  - denial of access is authorised or required by law;
  - access would prejudice law enforcement activities;
  - access would prejudice an action in relation to suspected unlawful activity, or misconduct of a serious nature relating to the functions or activities of ALARA QLD Limited
  - access discloses a 'commercially sensitive' decision making process or information; or
  - any other reason that is provided for in the APP's or in the Privacy Act.

If we deny access to information we will set our reasons for denying access. Where there is a dispute about your right of access to information or forms of access, this will be dealt with in accordance with the complaints procedure set out below.

### **Complaints Procedure**

If you have provided us with personal and sensitive information, or we have collected and hold your personal and sensitive information, you have a right to make a complaint and have it investigated and dealt with under this complaints procedure.

If you have a complaint about ALARA QLD Limited privacy practices or our handling of your personal and sensitive information please contact our Privacy Officer (details of which are set out below).

All complaints will be logged on our database.

A privacy complaint relates to any concern that you may have regarding ALARA QLD Limited privacy practices or our handling of your personal and sensitive information. This could include matters such as how your information is collected or stored, how your information is used or disclosed or how access is provided to your personal and sensitive information.

The goal of this policy is to achieve an effective resolution of your complaint within a reasonable timeframe, usually 30 days or as soon as practicable.

However, in some cases, particularly if the matter is complex, the resolution may take longer.

Once the complaint has been made, we will try to resolve the matter in a number of ways such as:

- *Request for further information:* We may request further information from you. You should be prepared to provide us with as much information as possible, including details of any relevant dates and documentation. This will enable us to investigate the complaint and determine an appropriate solution. All details provided will be kept confidential.
- *Discuss options:* We will discuss options for resolution with you and if you have suggestions about how the matter might be resolved you should raise these with our Privacy Officer.
- *Investigation:* Where necessary, the complaint will be investigated. We will try to do so within a reasonable time frame. It may be necessary to contact others in order to proceed with the investigation. This may be necessary in order to progress your complaint.
- *Conduct of our employees:* If your complaint involves the conduct of our employees we will raise the matter with the employee concerned and seek their comment and input in the resolution of the complaint.
- *The complaint is substantiated:* If your complaint is found to be substantiated, you will be informed of this finding. We will then take appropriate agreed steps to resolve the complaint, address your concerns and prevent the problem from recurring.
- If the complaint is not substantiated, or cannot be resolved to your satisfaction, but this Privacy Policy has been followed, ALARA QLD Limited may decide to refer the issue to an appropriate intermediary. For example, this may mean an appropriately qualified lawyer or an agreed third party, to act as a mediator.
- We will keep a record of your complaint and the outcome.
- We are unable to deal with anonymous complaints in relation to privacy matters. This is because we are unable to investigate and follow-up such complaints. However, in the event that an anonymous complaint is received we will note the issues raised and, where appropriate, try and investigate and resolve them appropriately.
- If you are still not satisfied with the outcome you are free to take your complaint to the Office of the Australian Information Commissioner at [www.oaic.gov.au/privacy/making-a-privacy-complaint](http://www.oaic.gov.au/privacy/making-a-privacy-complaint)

By phone: 1300363992  
By fax: on +61 2 9284 9666  
By email: enquiries @oaic.gov.au

In writing, by addressing your letter to the Australian Information Commissioner at the:

Office of the Australian Information Commissioner  
GPO Box 5218  
Sydney NSW 2001

Depending on the nature of funding used to access ALARA programs you may also wish to take your complaint to:

### **Aged Care Quality and Safety Commission**

The Aged Care Complaints Commissioner receives complaints about aged care services under the Act. Complaints can be made:

Online: <https://www.agedcarequality.gov.au/making-complaint/lodge-complaint>

By phone: on 1800 951 822.

Or if you need an interpreter you can phone the Translating and Interpretation Service on 131 450 and ask them to put you through to the Aged Care Complaints Commissioner on 1800 951 822.

For Aboriginal Interpreter Services (AIS) phone 1800 334 944

### **Department of Communities, Disability Services and Seniors Complaints Unit**

Write to: GPO Box 806, Brisbane Qld 4001

Freecall: 1800 491 467

Email: [feedback@communities.qld.gov.au](mailto:feedback@communities.qld.gov.au)

### **NDIS Quality and Safeguards Commission**

Phone: 1800 035 544

TTY: 133677 and ask for 1800 035 544

Online: <https://www.ndiscommission.gov.au/about/complaints>

### **Human Rights Complaints**

Complaints under the Human Rights Act 2019 (Qld) can be made in relation to alleged breaches which have occurred from 1 January 2020. The Human Rights Act requires public entities which includes funded entities such as ALARA to act in a way that is compatible with human rights obligations when delivering services and interacting with the community. This includes the right to privacy and reputation.

A human rights complaint about ALARA must first be made to the organisation, which has 45 days to respond. If you're unhappy with the response provided by ALARA, or if we don't respond, you can lodge a complaint with the Queensland Human Rights Commission (QHRC).

The legislation states that complaints must be made in writing (including email).

The Queensland Human Rights Commission operates a statewide telephone information and enquiry service.

Phone: 1300 130 670 toll free

Email: [enquiries@qhrc.qld.gov.au](mailto:enquiries@qhrc.qld.gov.au)

### **Changes to this Privacy Policy**

ALARA QLD Limited reserves the right to review, amend and/or update this policy from time to time.

We aim to comply with the APPs and other privacy requirements required to be observed under State or Commonwealth Government contracts.

### **How to contact us**

Individuals can obtain further information in relation to this privacy policy, or provide any comments, by contacting us:

#### **Telephone**

Privacy Officer: (07) 38170600

#### **Assisted Contact**

##### **National Relay Service**

A phone solution for people who are deaf or hearing impaired.

TTY: 133 677 (24hr relay service)

Speak and Listen: 1300 555727

##### **Interpreters**

ALARA QLD Limited will arrange Interpreter services on request

**Post**

Privacy Officer, ALARA QLD Limited, 8 Warwick Rd, Ipswich 4305

**Email**

[privacy@alaraqld.org.au](mailto:privacy@alaraqld.org.au)

**Note:** These calls can be made for a local call cost from fixed residential landlines anywhere in Australia, but calls from mobile and pay phones may incur higher charges. Check with the service provider for costings from mobile and pay phones.

**Part B — How ALARA handles Contact Lists****Contacts Lists****Purpose**

We generate and maintain contacts lists which include contact information about individuals who may have an interest in disability services. We use these contacts lists to distribute information about our services, activities, events and publications (e.g. newsletters, annual report) undertake surveys (e.g. for quality audits or to determine unmet need) and to provide other information that has been requested.

**Collection**

It is our usual practice to collect personal information in contacts lists directly from individuals, for example, where they have asked to be added to a contact list.

Sometimes we collect personal information from a third party or from a publicly available source such as a website or telephone directory. We usually only collect personal information in this way if the individual would reasonably expect us to, or has given their consent. For instance, we might collect this information if we thought that the individual (or the organisation they work for) would like to receive information about services we are carrying out, or that they might be likely to consider information about disability care useful in the work they do. We would only contact this individual in their work capacity.

**Use and disclosure**

We only use personal information in contacts lists for the purpose of managing stakeholder relations.

We do not give personal information about an individual to other organisations or anyone else without consent unless the individual would reasonably expect, or has been told, that

information of that kind is usually passed to those organisations or individuals, or the disclosure is otherwise required or authorised by law.

### **Data quality**

We maintain and update personal information in our contacts lists when we are advised by individuals that their personal information has changed. We also regularly audit contacts lists to check the currency of the contact information. We will remove contact information of individuals who advise us that they no longer wish to be contacted.

### **Data security**

The personal information in the contacts lists is stored in either password protected electronic media or in locked cabinets in paper form. When no longer required, personal information in contacts lists is destroyed in a secure manner or deleted in accordance with Records Disposal Policy.

Routine access to contacts lists is limited to the database operators who have responsibility for maintaining the contacts lists. Other staff members have access to the personal information in contacts lists on a need to know basis.

### **Access and correction**

For information about how to access or correct personal information in our contacts lists see 'Access and Correction' in Part A of this document.

### **Quality Standards:**

#### *Human Services Quality System:*

- Standard 1 – Governance and Management
- Standard 4 – Safety, Well Being and Rights
- Standard 5 – Feedback Complaints and Appeals

#### *Aged Care Standards*

- Standard 5 – Organisation's Service Environment
- Standard 6 – Feedback and Complaints
- Standard 8 – Organisational Governance

*NDIS Practice Standards*

## Core

## Rights and Responsibilities

- Privacy and Dignity

## Provider Governance and Operational Management

- Feedback and Complaints Management
- Information Management

**References:**

Disability Services Regulation 2017 (State)

Disability Services Act 2006

Information Privacy Act 2009 (Qld)

Information Privacy Act 2009 – Obligations of Contracted Service Providers – Information Sheet  
Privacy Act 1988

Privacy Amendment Act (Enhancing Privacy Protection) Act 2012

Privacy Amendment (Notifiable Data Breaches) Act 2017

Aged Care Act 1997

Human Rights Act 2019 (Qld)

Record Keeping for Non-Government Service Providers

**Related Documents:**

Statement - ALARA QLD Limited Privacy Statement

Policy - Confidentiality

Policy - Complaints Management and Resolutions

Policy – Data Breach Response and Data Breach Plan

Policy - Technology Resource Management

Procedure - Privacy (Clients)

Procedure - Archiving and Destruction of Paper Records

Flowchart – Data Breach Response Plan

Form - Client Consent

Form - Client Consent – Case Management

Form - Register of Confidential Information

Form – Client Service Agreement

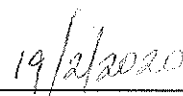
Form – Referral/Enquiry

**Attachments:**

Statement of Understanding and Compliance – Privacy (to be signed by staff and volunteers)



Executive Manager  
ALARA QLD Limited



Date



**Policy – Privacy - Attachment  
(for Staff and Volunteers)**

***Statement of Understanding and Compliance***

This Statement will be signed on appointment and may be periodically renewed, e.g. after a change in status of the employee or volunteer or revision of the Policy.

I have received a current copy of the ALARA QLD Limited Privacy Policy.

I understand the Privacy Policy and agree to abide by the conditions therein.

Employee/Volunteer Name: \_\_\_\_\_

Employee/Volunteer Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Witness: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_