2.9 Governance & Operations

Privacy Policy and Procedure

1. Purpose

- The Housing Connection provides services to people with intellectual and other disabilities by assisting them to live fulfilling lives in the community and by providing transition to work training. The Housing Connection assists clients with activities of daily living, practical skills (e.g. cooking and managing money), finding accommodation and finding employment.
- We know that privacy is important to you. You can be confident that we will manage your personal information in accordance with Australian privacy laws.

2. Scope

This policy and procedure applies to The Housing Connection for adults with disabilities. All THC members, volunteers, workers, clients, donors, businesses and online users are required to uphold this policy and procedure.

3. Policy Statement

Our approach to privacy

- If you are our client, we collect personal information about you (including information about your health) to provide you with our services. We collect personal information from you and from your carer or guardian.
- If you choose to participate in a research project, we may also collect personal information about you (including information about your health).
- If you are a member, volunteer or worker of The Housing Connection, we collect personal information about you (including your contact details) for our list of current members and personnel files (respectively).
- If you are our client, we may share your personal information with other parties, including:
  - government departments/agencies who provide funding;
  - doctors and health care professionals, who help us to deliver our services;
  - other regulatory bodies e.g. SafeWork NSW; and
  - our professional advisors, including our accountants, auditors, lawyers and third party verifiers.
- We take steps to keep your personal information secure and we treat it with respect and care.
- We have a data Response Plan to deal with any loss or breach of personal information
- We generally do not share personal information with anyone overseas.
- You can contact us if you have questions or concerns about your privacy or to access or correct your personal information.

What information do you collect about me?

- When we provide services to you, we make an electronic and/or paper client record. The client record has information such as:
  - your name, date of birth, gender, home address and contact details;

  - your financial records if you are a direct care disability client;
  - your health information such as:
    - information about your disabilities and needs;
    - records of health services (including disability, community and welfare services) provided to you that fall within the definition of health information;
    - results of medical tests and assessments;
    - medications you are taking or treatments you are having; and
    - details about other health professionals involved in your care;
  - other information which may be relevant to providing services to you; and
  - information about your carers and guardians including:
    - details of their capacity as your carer; and
    - details of their relationship with you.
- When you choose to take part in a research project, we will collect personal information about you that is required for the project. We will not identify you unless you have consented in writing.
- We also collect information about you if you are a member, volunteer or worker of The Housing Connection.
  - If you are a member, our list of current members has information such as your address and contact details.
  - If you are a volunteer or worker, our personnel files have information such as your contact details, a copy of your employment contract and correspondence about your job description changes, salary changes and leave entitlements.
- You do not have to identify yourself when you contact us. You can also use a nickname or alias to protect your privacy. However, it is generally not possible to remain anonymous as our client. We may not be able to provide you with the services you request if you do not properly identify yourself.

4. Definitions

Specific terms used in this policy are defined within the clauses below where they first appear; there are no additional standalone definitions for this policy.

5. Procedures

5.1 How do you collect and use my personal information?

I have asked The Housing Connection to provide services to me

- If you ask us to provide services to you, we will collect information directly from you, where possible. We may also collect your personal information from your carer or guardian.
- With your consent, we may collect information from health care professionals who provide you with services or from funding bodies.
- We use your personal information to provide you with services, meeting the reporting requirements of NDIS, meeting the legal requirements of Disability Service Standards and for training and coordination. The Housing Connection workers who are providing you with services, on-call for emergencies or attending team meetings for training or coordination purposes have access to your personal information.

I have chosen to participate in a research project

- If you choose to participate in a research project, we will collect the information directly from you.
- We will use your personal information to conduct the research project. Access to your personal information for the research project will be limited to persons or organisations named in any participant information & consent form.
- You will not be identified in any publication of the research project, unless you have consented in writing. We will give you a copy of any publication(s) from the research project.

I am a member of The Housing Connection

- If you are a member of The Housing Connection, we will collect the information directly from you.
- We will use your personal information to maintain our list of current members. The list of current members is available on request to our members, Board members and staff members. Your personal information on the members list may only be accessed by our staff members on a need to know basis.

I am a volunteer or worker at The Housing Connection

- If you are a volunteer or worker at The Housing Connection, we will collect the information directly from you.
- We will use your personal information to create a personnel file for you. Only you or our Senior Management may access your personnel file.
- There will be a summary page of your name, position, phone numbers and email and emergency contact available to other staff members who are in your team and Senior Management. However, you may ask for your information to be hidden.

5.2 How do you store my personal information?

- We keep your information in electronic and/or paper records.
- If you are a client, we will archive your client record and keep it for the period we are legally required to (retention period) and is seven years after the date that we last provided a service to you. Only authorised persons may access archived material.
- When the retention period ends, we dispose of paper records by shredding, disintegrating or pulping, permanently erase electronic records and destroy any electronic medium.
- We use physical security and other measures to protect your personal information. Paper records are stored securely in locked cabinets and only authorised staff are permitted to access the locked cabinets.
- Electronic records are held on our computer system called Lumary. Our computer system is password protected.

5.3 When do you share my personal information?

I have asked The Housing Connection to provide services to me

- If you ask us to provide services to you, we will share your personal information with other organisations (to the extent necessary to provide services to you) including:
  - government departments/agencies who provide funding;
  - doctors and health care professionals, who assist The Housing Connection to deliver our services;

- We may also need to share your personal information with:
  - other regulatory bodies, such as SafeWork NSW; and
  - our professional advisors, including our accountants, auditors, lawyers and third party verifiers.
- We may also disclose your personal information to third parties if you have consented or we are legally required or entitled to do so.

I am a member of The Housing Connection

- If you are a member of The Housing Connection, we will not share your personal information with other organisations.
- However, we may disclose your personal information to third parties if you have consented or we are legally required or entitled to do so.

I am a volunteer or worker at The Housing Connection

- If you are a volunteer or worker at The Housing Connection, we will not share your personal information with other organisations.
- However, we may disclose your personal information to third parties if you have consented or we are legally required or entitled to do so.

5.4 Will you send my personal information overseas?

We do not usually send personal information out of Australia.

We are only likely to disclose personal information to anyone overseas when you are a client whose family members, friends or advocates are visiting or living abroad.

5.5 How can I access or correct my personal information?

- If you are a client and have any questions about the services you have received from us, we encourage you to first speak with The Housing Connection staff members responsible for providing you with services so that we can answer your questions in the context of the services you have received from us.
- You have a right to access your personal information at any time upon request using the contact details below. In some circumstances permitted by privacy laws, your request may be refused. In those circumstances, we may give you access in a different way, or provide access using another method e.g. by covering up or removing parts of the information.
- We will provide you with access free of charge.
- We do our best to ensure that your personal information is accurate, complete and up-to-date. You can help us by letting us know if your details change or if you notice errors in information we hold about you. If you think information we hold about you is incorrect, incomplete or out-of-date, you may ask us to amend our records. It is generally not possible to make changes to health records. However, you may be entitled to ask us to include a statement with your records.

5.6 How do I raise a concern or make a complaint about privacy?

If you wish to complain about how we have handled your personal information or privacy generally (including about any refusal of access to your client records or your personnel file) you may contact the Manager Client Services. The Manager Client Services will investigate your complaint in the context of this policy and a response will be sent to you as quickly as possible (generally within [30 days of receipt of the complaint).

If you are not satisfied with the response, you may contact the Office of the Australian Information Commissioner and if health information is involved, you may also contact the NSW Privacy Commissioner.

5.7 How to contact us

- **In writing:** Manager Client Services, 31 Albert Street, Chatswood NSW 2067
- **Telephone:** (02) 9415 2311
- **Fax:** (02) 9413 4770
- **Email:** thc@thc.org.au

5.8 How are changes to this policy and procedure made?

We may amend this policy and procedure from time to time, with or without notice to you. Visit www.thc.org.au to keep up to date with any changes.

6. Roles and Responsibilities

Role	Responsibility
CEO	• Approves this policy and holds overall accountability for THC's compliance with privacy law.
Managers / Team Leaders	• The Manager Client Services investigates and responds to privacy complaints and access/correction requests.
Workers	• Handle personal information only as set out in this policy, and refer any privacy question or complaint to the Manager Client Services.

7. Related Policy

- 2.1 Governance Oversight
- 2.2.1 Operational Risk Management Policy and Procedure
- 2.2.2 Work Health and Safety (WHS) Policy and Procedure
- 2.2.3 Staff Safety and Risk Procedures
- 2.2.4 Managing Psychosocial Hazards Policy and Procedure
- 2.2.5 Manual Handling Policy and Procedure
- 2.2.6 Participant Safeguarding Policy and Procedure
- 2.2.7 Risk Identification and Appraisal System (RIAS) Policy and Procedure
- 2.2.8 Participant Safety and Risk Procedures
- 2.3 Quality Management Policy and Procedure
- 2.4 Information Management Policy and Procedure
- 2.5 Feedback and Complaints Policy and Procedure
- 2.6 Incident Management Policy and Procedure
- 2.7 Continuity of Supports Policy and Procedure
- 2.8 Emergency & Disaster Management Policy and Procedure

- 2.10 Conflict of Interest Policy — Support Coordination, SDA, SIL and Plan Management
- 2.11 Professional Ethics, Code of Conduct & Conflict of Interest Policy
- 2.12 Client Death Policy and Procedure

Forms, record keeping or other organisational documents

- Consent for Release of Information Form

8. Legislative & Regulatory References

- Privacy Act 1988 (Cth)
- Australian Privacy Principles
- NDIS Act 2013
- NDIS Practice Standards

Version

Document Owner	Version	Next Scheduled Review
CEO	1.0	[July 2029] — no later than 3 years from issue, or on legislative change

Change History

Version	Date	Summary of Change	Author
1.0	[Insert Date]	S1.18 Privacy Policy V4.2 and S1.18P Privacy Procedure V4.0 combined into a single Privacy Policy and Procedure. Content carried over unchanged.	[Insert]