



PEEL HOME & COMMUNITY SUPPORTS  
*building your future together*

# Peel Home and Community Supports Inc

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**Core Human Resource Policy: PHCS-1PP.22.1**

## Privacy Policy

**Policy Effective Date: 5 December 2022**

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## Introduction

Due to the nature of Peel Home & Community Supports Inc's core business, numerous amounts of information are collected and stored relating to employees and clients. The information collected and stored often relates to intimate information about a client's personal, financial, medical, and mental health. To protect this information, Peel Home & Community Supports Inc requires all employees to abide by strict privacy principles.

## Scope

This policy covers all employees across all levels and hierarchies within Peel Home and Community Supports Inc, and includes and is not limited to the following employees:

- Permanent
- Part-time
- Contract
- Casual
- Fixed Term.

It also includes the following:

- Participants
- Visitors
- Stakeholders, and Board Members
- Vendors.

## Policy

Peel Home & Community Supports Inc is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information. As a result, the Organisation has adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act).

The APPs govern how the Organisation collects, uses, discloses, stores, secures, and disposes of personal [employee and client] information.

### **What is Personal Information and why do we collect it?**

Personal [employee and client] information is information or an opinion that has the potential to identify an individual. Examples of personal information collected may include, names, addresses, email addresses, phone numbers, medical history, and physical and mental health disabilities.

There are numerous ways in which personal information is obtained, and this may include interviews, correspondence, telephone, and email.

We collect your personal information for the primary purpose of providing our support services to participants. We may also use personal information for secondary purposes closely related to the primary purpose of support provisions. In circumstances where there would be a reasonable expectation for any such use or disclosure, informed consent will be obtained, with explanations given for the reasons for such disclosure.

When we collect the personal information we will, explain to the person or in some cases an alternate service provider, why we are collecting the information and how it is planned to be used.

### **Sensitive Information**

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record, or health information.

Sensitive information will be used by us only:

- for the primary purpose for which it was obtained
- for a secondary purpose that is directly related to the primary purpose
- with the consent of the individual, other business, vendor, stakeholder, or organisation, or
- where required or authorised by law.

### **Third Parties**

Where reasonable and practicable to do so, we will collect personal information only from employees and clients.

However, in some circumstances, we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that those to whom the information is related are made aware of the information provided to the Organisation by the third party.

### **Disclosure of Personal Information**

An individual's personal information may be disclosed under certain circumstances including the following:

- third parties where consent has been obtained to the use or disclosure, and
- where required or authorised by law.

### **Security of Personal Information**

All personal information is stored in a manner that reasonably protects it from misuse, loss, and from unauthorised access, modification, or disclosure.

When personal information is no longer needed for the purpose for which it was obtained, Peel Home & Community Supports Inc will take all reasonable steps to destroy or permanently de-identify any employee's and client's personal information.

However, most of the personal information is or will be stored in employee and client files, which will be kept by us for a minimum of seven (7) years.

## **Access to your Personal Information**

Any employee and client, or their representative [upon signed authorisation] may access personal information held about the employee or the client. Such access may be to update and/or correct it, subject to certain exceptions.

Any access to personal information must be submitted in writing.

In order to protect any employee and client personal information Peel Home & Community Supports Inc may request identification from any individual or representative of any external agency or organisation before releasing the requested information.

## **Maintaining the Quality of your Personal Information**

Any personal information relating to an employee or client must be up to date. Peel Home & Community Supports Inc will take reasonable steps to make sure that personal information is accurate, complete, and up-to-date.

If any employee or client information held on file is not up to date or is inaccurate, they have the right to advise and to provide updated information as soon as practicable so records can be updated and to ensure the Organisation continues to provide quality services to you.

## **Internal Audit**

All personal information relating to employees and clients, vendors, external agencies and support services, will be subject to periodic audits, and in all respects annually.

## **Related Documents**

- Privacy Act 1988 (*Cth*)
- Australian Privacy Principles ([Australian Privacy Principles - Home \(oaic.gov.au\)](http://oaic.gov.au))
- Peel Home & Community Supports Inc - Cyber Security Policy
- Peel Home & Community Supports Inc – Information and Technology Policy
- Peel Home & Community Supports Inc – Company Mobile Phone Policy
- Peel Home & Community Supports Inc – Code of Conduct
- National Disability Insurance Scheme – Code of Conduct