



Ageing with Grace

Privacy & Confidentiality Policy

Purpose

Ageing with Grace is committed to protecting and maintaining the privacy of customers, members, employees, volunteers, board members, students and representatives of agencies and organisations with which we deal, and to maintain the confidentiality of the personal, health and sensitive information we hold about them.

Ageing with Grace complies with the *Privacy Amendment (Notifiable Data Breaches) Act 2017*, the *Privacy Act 1988* and the *Australian Privacy Principles*.

Scope

This policy applies to our employees (including full-time, part-time and casual), students on work experience placement, volunteers and Board Directors. (For the purposes of this policy, the above will collectively be referred to as Staff).

The Privacy and Confidentiality Policy applies to all personal, health or sensitive information about individuals, collected, used, stored, disclosed, shared and destroyed by Ageing with Grace, regardless of the format of the information.

It also applies to organisational information which is not to be used or disclosed by Board Directors, staff or volunteers.

Policy

- Ageing with Grace protects the personal information of the people we support.
- We only collect personal information for purposes directly related to Ageing with Grace services.
- We always obtain consent to collect personal information.
- Ageing with Grace obtain consent from the customer or their representative before providing services.
- We only use personal information for the purpose for which it was provided to us, for related purposes or as required or permitted by law.
- Ageing with Grace use secure IT platforms and software to store confidential information.

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| Approval Authority: Board of Directors | Next Review: November 2024 | Date Approved: November 2022 |
| Key Author: CEO | Version: 1 | Date: 30/10/2022 |



- Ageing with Grace are committed to the Information Sharing Guidelines (ISG,) these Guidelines are for use when advising customers about their limits of confidentiality, their right to privacy and explaining duty of care incumbent on Ageing with Grace staff when sharing customer information. Under the ISG framework, Ageing with Grace will seek your consent to share your information, and only whenever it is safe and possible to do so.

Types of personal information we collect and hold

For our Customers we only collect information that is necessary for our work and to help us to provide the support to our customers. Some examples of information that we may collect and hold are:

- Personal details, like name and date of birth
- Address and contact details
- Details about health relevant to the service.
- Information on whether you meet eligibility criteria for our services and prioritisation to access services
- Information to help us measure your progress
- other information to assist us in carrying out our services and activities or requested as part of funding agreements and guidelines.

We collect information on our Staff, in relation to the normal course of human resource management and the operation of a community service organisation. This information is not limited to but includes: recruitment information, address, required clearances, bank details, emergency contact and drivers licence

How we collect information

We only collect personal information by lawful and fair means. We usually collect personal information from:

- Telephone calls
- Face-to-face meetings and interviews
- Membership information;
- Application forms
- Consent forms: such as a consent form to use your name and photo in our publications;
- Fundraising events: for example, from donations and fundraising event registrations;
- Electronic communications: for example, e-mails and attachments (including CVs); forms filled out by people, including as part of acquiring a product or service from us;
- Third parties: for example, from representative or next of kin, aged care providers, recruitment agencies, referees, representatives or agents; and
- Our website: including; from the page 'contact us', engage in the discussion forum, give us feedback or to make a donation.

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Use and disclosure

We will only use your sensitive information for the purpose for which it was initially collected or for a directly related purpose, as required, or permitted by law, or where you consent to such use.

Ageing with Grace uses de-identified customer and volunteer data to provide statistics and reporting to our Grant Funding body.

Ageing with Grace may also use your de-identified information for internal research, to assess the effectiveness of our programs and to plan for future activities.

Disclosure of personal information

Staff may make referrals, for customers to access other services. For this to happen, Ageing with Grace will obtain consent.

In some cases, we may disclose your personal information to researchers, contractors or others working directly on our behalf who are also bound by privacy laws and confidentiality obligations. We will always get your consent to use and disclose your personal information for research (where your information is usually de-identified) or in any publicity or marketing activities.

Ageing with Grace will not otherwise disclose your personal information without your consent unless we are required or authorised under law to do so.

How we keep personal information secure

Ageing with Grace takes the security and confidentiality of your information very seriously. We actively ensure that all personal information we hold is protected from misuse, interference and loss, and from unauthorised access, modification or disclosure.

Where information is held and it is no longer needed or required by law to be held, we will take reasonable steps to ensure the information is destroyed or de-identified.

Notifiable Data Breaches

In the unlikely event of a data breach, Ageing with Grace will notify individuals whose personal information is involved in a data breach that is likely to result in serious harm. This notification must include recommendations about the steps individuals should take in response to the breach. The Australian Information Commissioner must also be notified of eligible data breaches via a *Notifiable Data Breach Statement – Form*.

Note: an eligible data breach is one which is *likely to result in serious harm to any individual affected*.

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Should a data breach occur, Ageing with Grace will undertake a full assessment of the incident and take steps to mitigate the risk of a data breach happening again in the future.

Access

Ageing with Grace takes special care to ensure that the personal information it holds is accurate and up to date. You can request access to the personal information Ageing with Grace holds about you, or you can request 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 1988](#), or other relevant law to withhold the information.

Personal Information can be updated by calling us on 0421 330 230 with any general queries. Personal information is also updated when conducting volunteer and customer reviews.

Links to other websites

The Ageing with Grace's privacy policy does not apply to external links, social media or non-Ageing with Grace web pages. Such third party websites may collect your personal information. We encourage you to read the privacy policies of external website. Ageing with Grace does not accept responsibility for any content contained on sites.

How to contact us

If you wish to contact us about our services, obtain access to or change your personal information, have any questions about this policy or make any other enquiries contact Ageing with Grace's at info@ageingwithgrace.org.au or call 0421 330 230.

Definitions

Customers – recipients of service, their representatives, age care providers, other agencies

Staff – employees (including full-time, part-time and casual), students on work experience placement, volunteers and Board Directors.

Privacy – Keeping certain personal information free from public knowledge and having control over its disclosure and use.

Personal information – Information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not, and whether or not recorded in a material form.

Confidential information – The names, details and information relating to customers, staff, matters of a technical nature; trade secrets; technical data; marketing procedures and information; financial information; strategic and business plans; and other information which Ageing with Grace informs a staff member or volunteer is confidential.

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Sensitive information – Type of personal information) Information or an opinion about an individual's race or ethnicity, political opinions and associations, religious beliefs or affiliations, philosophical beliefs, sexual preferences, trade or professional associations, union membership, criminal record, health or genetic information or biometric information.

Confidentiality Declaration – A separate legal concept to privacy, confidentiality applies to information given to a person or organisation under an obligation not to disclose that information to others unless there is a statutory requirement or duty of care obligation to do so. Confidentiality also applies to organisational information which is not to be used or disclosed by Board Directors, staff or volunteers.

De-identified Information – That is the processes that personal data that has been encrypted to take out/remove identify information ie name and address of the customer so that the remaining data can be used for program and performance reporting, service evaluation, strategic program development and policy planning.

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