



## **EDGE Policy - Privacy Policy**

The EDGE Community Services Privacy Policy describes the information the service collects, how it is used and shared, and your choices regarding this information in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**).

At all times EDGE Community Services recognises and respects each persons right to privacy and dignity by:

- Being treated with respect and with consideration to cultural and personal beliefs; and
- Ensuring that information is protected from access and use by unauthorised persons.

### **1. Collection and Disclosure**

Information will only be collected that is reasonably necessary to perform legitimate functions or activities and will only be collected by fair and lawful measures.

The Personal Information we collect includes that information necessary to provide you with our services including: your name and contact details, your personal details (including your date of birth, gender and income), details of any personal issues relating to the services we supply, your health information including in some cases your medical history and relevant supports.

#### **Sensitive Information**

As part of delivering our services, we may collect health and other Sensitive Information about you. For example, if you are requesting our services we may collect medical history information about you, or in consultation with us you may provide us with your current health status to assist us in providing you services. In general, we attempt to limit the Sensitive Information we collect, however this may not always be possible due to the services we perform. Where we collect Sensitive Information from you we will only do so if it is considered reasonably necessary for us to collect such information for us to perform our functions or activities and you consent, or collection is required by law or another exception



under the Privacy Act applies. However, we may also collect Sensitive Information without your consent where we provide you with a health service or where it is otherwise permitted by the Privacy Act in order to carry out our services. This includes where collection is required to lessen or prevent a serious threat to your life, health or safety or to public health and safety. For more information on health services please see below.

## **2. How we collect your Personal Information**

We generally collect information directly from you when you provide it to us, such as by filling in a form, during discussions with us in person during a consultation, or when you contact us on the phone or by another method.

There may also be circumstances in which we will collect Personal Information about you from your representative or a third party, for example in the circumstances outlined above. If we collect information about you from someone else we will whenever reasonably possible (unless we are legally exempt from this obligation) make you aware that we have done this and why. If you have provided us with Personal Information in relation to another person you warrant that you have that individual's consent to the disclosure (or that you are otherwise legally entitled to do so).

All participants who access services through EDGE Community Services are requested to complete a Consent to Exchange Information form as part of the enrolment process.

1. The Consent to Exchange Information form requests signed permission for staff at EDGE Community Services to contact appropriate support workers, family members and agencies to exchange information and discuss appropriate information which may be important to your time with EDGE Community Services.
2. Participants have the right to give / or not give consent to have discussions with particular family, friends, health professionals and service providers.

## **3. Why we collect, use and disclose your Personal Information**



The primary purpose we collect, use and disclose your Personal Information is as specified in this Privacy Policy or as otherwise specified to you at the time of collection, and includes to:

- a. help us provide you with our services and to customise the support services that we provide to you;
- b. enable better co-ordination between us and other providers involved in your care and treatment;
- c. to communicate effectively with you to ensure that both parties are meeting their obligations;
- d. to document your progress with our services;
- e. to engage the services of, and document our relationship with staff, volunteers and contractors;
- f. maintain your account and contact details;
- g. send marketing communication to you;
- h. conduct our business, generate content and provide customer support and payment options;
- i. communicate with you;
- j. conduct surveys to determine use and satisfaction;
- k. detect, investigate and prevent potentially unlawful acts or omissions or acts or omissions with the potential to breach our Privacy Policy or any other policy;
- l. verify information for accuracy or completeness;
- m. comply without legal obligations;
- n. combine or aggregate your Personal Information with information we collect from third parties and use it for the purposes set out in this Privacy Policy;
- o. protect a person's rights, property or safety;
- p. advertise, promote and provide you with products or services distributed by us;
- q. any other purpose made known in this Privacy Policy or other policy.

We agree to not use or disclose this information for a secondary purpose unless you consent to us doing so, or another exception applies under the Privacy Act.



#### **4. Who we disclose your Personal Information to**

We may disclose your Personal Information to third parties for the purposes contained in this Privacy Policy, including without limitation to:

(a) Our staff members

If you are a client of ours we will disclose your Personal Information including Sensitive Information in our internal applications that our employees can access. The Personal Information that is disclosed in the internal applications include your address, so that our employees are able to attend on you, as well as a general overview of your Personal Information including health information, to assist our employees in providing our services to you. The employees use of your Personal Information is governed by this Privacy Policy and the Terms of Use.

(b) Third parties and those you ask

We may disclose your Personal Information to third parties to whom you expressly ask us to send the Personal Information to or to third parties that also provide you care and treatment. This also includes:

- a) your authorised representatives;
- b) government and regulatory authorities and other similar organisations, as required or authorised by law; and
- c) such entities that we propose to merge with or be acquired by.

#### **5. Employee obligations**

If you are an employee of EDGE Community Services you must:

- a) inform clients about their privacy rights including the right to have access to their Personal Information and correction of that Personal Information;
- b) ensure that you only collect Personal Information (other than Sensitive Information) which is reasonably necessary to perform the legitimate functions or activities of EDGE Community Services
- c) where sensitive or health information is collected from an individual, ensure that the individual consents to the collection and the information is reasonably necessary for



one or more of EDGE Community Services functions or activities or some other exception applies under the Privacy Act;

- d) ensure that collection is only done via fair and lawful measures;
- e) ensure that you only use or disclose Personal Information about an individual for the particular purpose it was collected (as contemplated by this Privacy Policy), and not use it for a secondary purpose unless the individual has consented, or another exception applies under the Privacy Act. Some examples include where disclosure is necessary to lessen or prevent a serious threat to the life, health, safety or welfare of an individual or to public health, safety or welfare or where disclosure is necessary for law enforcement;
- f) not disclose the information to any other party that is not contemplated by this Privacy Policy;
- g) not tamper with or interfere with any Personal Information in a way that is not contemplated by this Privacy Policy;
- h) not collect, store, input, upload, post, disclose or transmit Personal Information or data about others in a way that is not contemplated by this Privacy Policy;
- i) take reasonable steps to protect any Personal Information from misuse, loss, unauthorised access, modification or disclosure, including without limitation:
  - 1. keeping records in a locked, secure location;
  - 2. ensuring copies of Personal Information including in internal applications are kept out of view and not accessible by the public;
  - 3. ensuring that you keep your account details to internal applications including username and password confidential at all times;
  - 4. not allowing any other user (except those authorised) to access your account to internal applications and view client Personal Information;
- j) not collect, use, or otherwise deal with information that is inconsistent with this Privacy Policy and the Terms of Use (accessible on the website); and
- k) comply with this Privacy Policy.

## **6. Photo, Videos & Audio Recordings**

EDGE Community Services often reproduce photographs in its publications, marketing material, social media and on its web site for promotional purposes.



All participants who access services through EDGE Community Services are requested to complete a Photo, Video & Audio Consent form as part of the enrolment process.

The Photo, Video & Audio consent form provides information on the taking and use of photos, video and audio and provides a signature section and authorisation / or non authorisation to take, use or reproduce any image/recording referred to above for the purposes of publishing materials related to the activities, programs and services of EDGE Community Services. The consent acknowledges that allowing consent means the images, video and recordings may be used without acknowledgment and with no entitlement to remuneration or compensation.

The image/recording may appear in print, electronic, or video media, and may be available to a global audience through the internet.

As part of EDGE Community Services day programs, participants often access public spaces and 3<sup>rd</sup> party services. During these outings, EDGE Community Services will take all due care for participants photography consent to be followed but acknowledge that photography in public places and by other services cannot be controlled 100% of the time

If an issue arises with photos, video and audio recordings during an external program or with an outside provider, EDGE Community Services will endeavour to protect the privacy of the participant and inform the person/organisation responsible of the lack of consent.

Participants are informed that they can withdraw or change this authorisation at any time by advising the team leader in person or by emailing [hello@edgecs.com.au](mailto:hello@edgecs.com.au)

## **7. Storage and security of your Personal Information**

We take all steps reasonable under the circumstances to protect your Personal Information from misuse, interference, loss; and unauthorised access, modification or disclosure. We store your Personal Information in a secure, locked cabinet and on secure, encrypted web servers in Australia. Please be aware that we may use third-party cloud providers that provide hosting, data storage and other services.

We take the security of your Personal Information very seriously. We currently have the following in place:

- a) our online services protect your Personal Information during transit using encryption such as Transport Layer Security (TLS);



- b) hard copy confidential information is stored in key lockable filing cabinets. Filing cabinet keys are only accessible to persons with authority to access the particular information contained within each filing cabinet;
- c) electronic information is stored on a password secured computer network. Password access to EDGE Community Services network drive is provided to office-based staff only;
- d) Your Personal Information is stored in encrypted form including when we utilise third party storage providers.

Although we use reasonable security measures, no method of transmission over the internet is completely safe, therefore we are unable to guarantee the security of your Personal Information.

## **8. Access to and correction of your Personal Information**

Subject to the Privacy Act, you have a right to access and correct any personal information about you that we may hold. Should a person request access to information or correction of information, the Management Team will coordinate assessment of the requested information and determine if access or correction can be made in full, in part or if it must be denied (for example where requests are frivolous).

If we determine that Personal Information we hold on you, having regard to the purpose for which it is held, is inaccurate, out of date, incomplete, irrelevant or misleading, or you request us to correct the information, we will take all such steps as are reasonable in the circumstances to correct the information we hold, after considering the reason why we hold the information, and to make sure it is accurate, up to date, complete, relevant and not misleading.

If we receive a request from you to access or correct Personal Information we will respond to you within a reasonable time after receiving your request and in the manner requested by you, if it is reasonable and practicable for us to do so. We may charge a reasonable fee for giving access to the information.

## **9. If we can't collect your Personal Information**



If you do not provide us with the Personal Information described above, some or all of the following may happen:

- a) we may not be able to provide the requested products or services to you, either to the same standard or at all;
- b) we may not be able to provide you with information about products and services that you may want; or

### **10. Integrity and Retention of Personal Information**

We take all reasonable steps to ensure that the Personal Information we collect about you is accurate, up to date and complete. Where we collect that information from you directly, we rely on you to supply accurate information. We make it easy for you to keep your Personal Information accurate, complete, and up to date. Where we use or disclose your Personal Information we will also ensure that your Personal Information is relevant. We will retain your Personal Information for the period necessary to fulfil the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

### **11. Notifiable Data Breach**

In the event that there is a data breach and we are required to comply with the notification of eligible data breaches provisions in Part IIIC of the Privacy Act or any other subsequent sections or legislation which supersede this Part IIIC, we will follow our relevant notifiable data breach procedures in compliance with the Privacy Act and relevant laws.

### **12. Updating this Privacy Policy**

This Privacy Policy is subject to occasional revision and we reserve the right, at our sole discretion, to modify or replace any part of this Privacy Policy. It is your responsibility to check this Privacy Policy periodically for changes.

### **13. Enquiries, requests, complaints**

Enquiries regarding this Privacy Policy or the Personal Information we may hold about you, should be addressed with the Edge Community Services Management Team.





If you think your Personal Information, held by us, may have been compromised in any way or you have any other Privacy related complaints or issues, you should also raise the matter with the Management Team.

We will ensure your claims are investigated and a formal response will be provided to you, within a reasonable time, considering the circumstances of your claims. If any corrective action is determined to be required, as a result of that investigation, we will take all reasonable steps to rectify the situation and advise you of such, again within a reasonable time considering the circumstances.

If we do not resolve your enquiry, concern or complaint to your satisfaction or you require further information in relation to any privacy matters, please contact the Office of the Australian Information Commission or the NDIS Commission, whose contact details are below.

**Office of the Australian Information Commission**

1300 363 992

[enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

**NDIS Commission**

1800 035 544

[feedback@ndis.gov.au](mailto:feedback@ndis.gov.au)

<b>Document Location</b>	<ul style="list-style-type: none"><li>• File Location: Google Drive/Policies and Procedures / policies / EDGE Policy – Privacy Policy</li></ul>
<b>Corresponding Procedures</b>	<ul style="list-style-type: none"><li>• Participant Intake Procedure</li></ul>
<b>Corresponding Documents</b>	<ul style="list-style-type: none"><li>• Authority to Exchange Information</li><li>• Photo Consent Form</li><li>• Rights &amp; Responsibilities</li></ul>
<b>Referenced Documents, Legislation &amp; Acts</b>	<ul style="list-style-type: none"><li>• Commonwealth Privacy Act 1988</li><li>• Freedom of Information Act 1982</li><li>• Disability Services Act 1986</li><li>• <i>Australian Human Rights Commission Act 1986 (Commonwealth)</i></li></ul>