



PRIVACY & CONFIDENTIALITY POLICY

At Therapy Hive we are committed to ensuring that we protect and handle personal information in accordance with the National Disability Insurance Scheme (NDIS) and relevant privacy legislation. This policy applies to various stakeholders including our clients and team members. We acknowledge an individual's right to privacy while recognising that personal information is required to be collected, maintained and administered in order to provide a safe working environment and a high standard of quality. The information we collect is used to provide services to participants in a safe and healthy environment with individual requirements, to meet duty of care obligations, to initiate appropriate referrals, and to conduct business activities to support those services.

DEFINITIONS-

Personal information

Personal information includes (regardless of its accuracy):

- Name, address, phone number, email address and date of birth
- Recorded opinions or notes about someone
- Any other information that could be used to identify someone.

Sensitive personal information

Sensitive personal information can include personal information that is normally private such as:

- Health information
- Medicare details
- Private Health Insurance information
- Bank account details
- Superannuation fund details
- Ethnicity
- Membership of a political association, professional or trade association or trade union
- Religious beliefs or affiliations
- Philosophical beliefs
- Sexuality

Data breach

A data breach is type of security incident where personal, sensitive or confidential information normally protected, is deliberately or mistakenly copied, sent, viewed, stolen or used by an unauthorised person or parties. A data breach where people affected by the data breach are at risk of serious harm as a result, is reportable to the Office of the Australian Information Commissioner.

POLICY SCOPE

This policy applies to all representatives of Therapy Hive, including key management personnel, full-time, part-time or casual staff, as well as contractors and volunteers. This policy applies to all personal information, including sensitive personal information, used and held by the organisation for participants and employees. It also applies to all company confidential information – that is any information not publicly available.

POLICY

Privacy and confidentiality commitment

- We are fully committed to complying with the privacy requirements of the *Privacy Act 1988*, the *Australian Privacy Principles and Privacy Amendment (Notifiable Data Breaches) Act 2017* as required by organisations providing disability services.
- We are fully committed to complying with the consent requirements of the NDIS Quality and Safeguarding Framework.
- We provide all individuals with access to information about the privacy of their personal information.
- Individuals have the right to request access to their personal records by requesting this with their Therapy Hive contact person.
- Where we are required to report to government funding bodies, information provided is non-identifiable and related to services and support hours provided, age, disability, language, and nationality.
- Personal information will only be used by us and will not be shared outside the organisation without permission unless required by law (e.g. reporting assault, abuse, neglect, or where a court order is issued).

Security of information

- We take reasonable steps to protect the personal information we hold against misuse, interference, loss, unauthorised access, modification and disclosure.
- Personal information is accessible to the participant and is able for use by relevant workers.
- Security for personal information includes use of secure data centres, password protection for IT systems, locked filing cabinets and physical access restrictions with only authorised personnel permitted access.
- Personal information no longer required is securely destroyed or de-identified.

Sharing of information

In order to provide our services, we need to share your information with various third parties:

- At times it is necessary for our team members to share client information with each other to provide cover for leave, as well as to collaborate on management of clients, therefore all team members operating under the Therapy Hive banner have access to all Therapy Hive clients' personal details when deemed necessary to provide support for clients.
- Personal information is shared, with consent, with other external providers to whom referrals are made.
- The vendor of our client management system has access to personal information as there are certain technical aspects of this system that need to be outsourced. This third party provider is also bound by the Australian Privacy Principles.
- Personal information is shared with the NDIA and various plan managers in order to receive payment for provision of services. Your personal information will not be provided to any third party for the purposes of direct marketing.
- Personal information limited to name, address, contact numbers and details of outstanding debt may be shared with debt collection agencies should outstanding debts not be settled in a timely manner.

POLICY TRAINING

This policy is provided to all Therapy Hive staff and contractors through our Induction process.

CONTINUAL IMPROVEMENT AND NON CONFORMANCE

Therapy Hive policies are discussed and periodically reviewed in staff meetings.

All non-conformances and data breaches are to be reported to the Therapy Hive Director and Office Manager.

Authorised by:

Linda Wild – Director