



Privacy Policy

Our Purpose:

AQA exists to resource people to live well.

Our Vision:

An inclusive community where people have access to the resources they need to meet the challenges of change and live fully.

1. Summary:

AQA collects and administers a range of personal information for the purposes of delivering services to clients and members through its employees and volunteers. AQA is committed to handling personal information in accordance with the requirements of the Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles (APPs) and, where applicable, the Health Records Act 2001 (Vic) (Health Records Act) and the Health Privacy Principles (HPPs). These principles govern how we can collect, use, hold and disclose your personal information, as well as ensuring the quality and security of your personal information.

This policy sets out how AQA manages personal information (including sensitive information) collected about AQA's clients, employees or volunteers through membership, client, or employee applications; through the use of any of our services; or by any other means.

2. Scope:

This policy applies to people accessing AQA services and all AQA staff and volunteers involved in the provision of services and activities.

3. Policy:

Collection

AQA will only collect personal information necessary for the efficient delivery of services and to conduct business activities that support these functions. We collect most personal information directly from you. For example, we will collect your personal information when you apply for or use a service or talk to us in person or on the phone.

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We may directly collect personal information in the following circumstances:

- If you apply to become a member of AQA.
- If you apply to become a client of AQA
- If you apply for employment.
- If you apply to become a volunteer of AQA.
- If you agree to sponsor AQA or its members, or make a donation.
- Intermittent collection of information may occur to ensure relevant and up-to-date information records.

Means of collection

AQA uses different means of collecting information, which includes: electronic, face-to-face interaction, interaction with our website, requests for information / requests to update information, and the provision of products and services.

AQA employees must only collect personal information by lawful and fair means as required by the Privacy Act. AQA employees must also only collect personal information directly from the individual or their representatives where this is reasonable and practicable.

Sometimes we collect personal information about you from other people or organisations. This may happen without your direct involvement. For instance, we may collect personal information about you from: authorised third party representatives; funding bodies; through referral from other service providers / medical practitioners; or as a result of an informal referral made to support our community activities (i.e., candidate referrals for speakers, presenters, volunteers). We also collect information from you electronically.

AQA collects personal information in a number of ways, including:

- through AQA's websites (for example, if individuals choose to make an online enquiry or request for service)
- when individuals correspond with AQA (for example by letter, fax, email or telephone)
- electronically and digitally via digital forms
- on hard copy forms
- in person
- from referring third parties (for example, the National Disability Insurance Scheme, TAC or a Support Coordinator)
- at events and forums
- from third party funding and Government Agencies such as the Department of Health

Where AQA collects personal information about individuals, reasonable steps will be taken to notify the individual.

AQA Website

Our website uses Google Analytics to track and collect general information about visitors to our website. Google Analytics works via a "page tag". The page tag is called the "Google Analytics Tracking Code". This tag collects information from the user visiting the website and reports back aggregated data to measure website traffic data (such as the number of visits, average time spent on the site; pages reviewed

etc.). This is used by our organisation to improve our website content and make it more relevant and informative to the ongoing and future visitors.

Our website also uses cookies (a small piece of text sent to the user's internet browser by a website that is being visited). Cookies are used to enhance the website and browsing experience, allowing browsers to record and store user preferences while interacting with the website. E.g. YouTube uses the 'PREF' cookie to store information such as a user's preferred page configuration and playback preferences like autoplay, shuffle content, and player size. AQA does not use cookies to trace or record personally identifiable information about you.

Social Networking Services and Widgets

We use social networking services such as Facebook, Instagram and LinkedIn to communicate and engage with the general public, members, clients and our staff. When you interact with us using these services, we may collect your personal information based on your profile and privacy settings on the relevant social media and networking platforms. This includes clicking on the "Like" widgets in Facebook, Instagram and other widgets used by these social networks.

The social networking service will also handle your personal information for its own purposes. These services have their own privacy policies. You can access the privacy policies for these services on their websites.

Use and Disclosure

AQA uses personal information to provide products and services. Generally, personal information will only be used for the primary purpose for which it was collected and for carrying on business processes, which includes:

- Effectively running operating systems such as rostering, payroll and client management software;
- Maintaining and managing our database of volunteers, members, subscribers, their families and carers and communicating with them;
- To notify individuals of information and opportunities that might be of interest to them through newsletters or ad hoc updates;
- Setting up of legal obligations as an employer, including but not limited to payments for tax and superannuation;
- Delivery of AQA services and activities;
- Providing telephone or email support;
- Raising and administering donations, sponsorships and membership payments; and
- De-identified data may be used to meet reporting and regulatory requirements and assist with system improvements.

AQA may use or disclose your personal information for secondary purposes that relate to our functions and activities if we have your consent to do so or without your consent if the APPs or HPPs permit us to do so, for example if you would reasonably expect us to use your information for the secondary purpose. We will only use your personal information for a secondary purpose if it is related to the reason why we collected your personal information.

In some circumstances we are permitted or authorised by or under an Australian law or a court/tribunal order to use or disclose your personal and sensitive information. For example, if our disclosure of your

information will reduce or prevent a serious threat to life, health or safety or our disclosure is in response to any unlawful activity.

The types of other entities we may share your information with include:

- your authorised representatives, interpreter or legal advisors acting on your behalf;
- entities who fund and / or broker services such as the TAC, NDIS or other such body;
- entities who provide services on behalf of a funding body / health department and who will provide services to you, such as our community sector partners, community service organisations, contracted service providers or other health service providers;
- organisations that provide archival, auditing, professional advisory, banking, in-house mail, delivery, information technology, building and property maintenance services; and
- government and regulatory authorities such as Centrelink, government organisations dealing with welfare, child and family support, community support and law enforcement.

AQA may use, upon receiving explicit consent, photographs of members, clients, employees, volunteers, their families and carers for marketing, communication and community engagement purposes – such as social media, annual reports, internal and external newsletters, and websites.

Disclosure of personal information overseas will only occur where an explicit request to do so is received from the person or an authorised representative, in order for an individual to receive services in that country. AQA may outsource technological or administrative projects to overseas providers where local services are unavailable or cost prohibitive. In such cases, AQA will take reasonable steps to ensure that the overseas recipient does not breach the APPs.

AQA will not otherwise disclose any personal information about a person unless required or permitted by law.

Use and disclosure of sensitive information

AQA may collect sensitive information about the health of and any disabilities and conditions (including physical and mental disabilities) experienced by our clients, members or peer support volunteer applicants. We may also seek medical clearance from a doctor (if required) in order to evaluate a person’s application for employment or service delivery.

Where we are required to collect such information, AQA will only use that information with the person’s consent unless otherwise required or permitted by law.

We will only use your sensitive information for a secondary purpose if it is directly related to the reason we collected the sensitive information about you.

Mandatory Disclosure - The Notifiable Data Breach Scheme

AQA must comply with the Privacy Act Notifiable Data Breach (NDB) scheme and must report certain types of privacy breaches involving personal information it holds. The NDB scheme applies to entities that have an obligation under APP 11 of the Privacy Act to protect the personal information they hold. The NDB scheme does not apply to exempt records, for instance current employment records of staff.

Security of Personal Information

AQA will take reasonable steps to protect personal information from misuse, interference and loss, unauthorised access, modification or disclosure. For example:

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- access to information systems is controlled through identity and access management;
- employees are bound by internal information security policies and are required to keep information secure;
- all employees are required to complete training about information security;
- we undertake regular monitoring and review our compliance with internal policies and industry best practice; and
- We have policies and processes which govern document retention and data breach incidents.

Personal information held by AQA is stored electronically in secure databases located in Australia, or where retention of hard copy documents is required, in secure filing cabinets. Only authorised personnel are given access to an individual’s personal information. We take reasonable steps to destroy or permanently de-identify any personal information after it can no longer be used.

Cross border disclosure of personal information

AQA utilises technology infrastructure that makes use of cloud infrastructure or servers that may be located interstate or located out of Australia. Other than this, AQA does not typically transfer personal information interstate or overseas. By providing their personal information to AQA or using AQA’s services and supports, individuals are taken to have consented to this transfer.

If AQA transfers information overseas for other purposes, it will only do so with consent or otherwise in accordance with Australian law. AQA will require that the recipient of the information complies with privacy obligations to maintain the security of the information.

Access and Correction

Maintaining the Quality of Your Personal Information

It is important to us that your personal information is up to date. We will take reasonable steps to make sure that your personal information is accurate, complete and up to date. You can request access to the personal information we hold about you. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you. we will generally provide you access to your personal information free of charge.

Access to your personal information will not be granted to an unauthorised third party, without express written authority granted by you, the individual.

There are some circumstances in which we are not required to give you access to your personal information. Where access to personal information has been denied, AQA will provide reasons for the refusal.

Corrections or updates to information must be made by the individual or their authorized representative. Corrections may occur where information is inaccurate, incomplete, misleading or not up-to-date. Where updates are made by an unauthorised third party, AQA will verify the information with the individual before any amendments are made

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Anonymity

Where practical, individuals may engage with AQA anonymously or using a pseudonym. You have the option of not identifying yourself during questionnaires, opinion surveys or evaluation forms however the collection of personal information is required to enable AQA to deliver efficient goods and services or a response to a complaint or concern. If you do not wish to provide the personal or health information that we require in order to deliver a service to you, then we may not be able to provide you with that service.

Complaints about Privacy at AQA

AQA takes complaints or concerns about privacy very seriously. If you are concerned about the personal information which AQA might hold about you or wish to complain about how your personal information is handled please report to the relevant staff member, Team Leader or Manager or contact the AQA Privacy Officer either via post or email provided below.

Who else protects your privacy?

We take any privacy complaint seriously and will deal with your complaint fairly and promptly. However if you are not satisfied with our response or how we handled your complaint, you may complain to the Office of the Australian Information Commissioner (in writing) at:

Office of the Australian Information Commissioner (OAIC)
 GPO Box 5218
 Sydney NSW 1042
 Phone: 1300 363 992
 TTY: 1800 620 241
 email: privacy@privacy.gov.au

Another source of privacy information is the Office of the Health Complaints Commissioner Ph: 1300 582 113 Web: <https://hcc.vic.gov.au/contact>

More information about Privacy

AQA's approach to privacy is reviewed for improvement and amended from time to time. Any changes or updates to this policy and our procedures will be updated on the AQA website.

Individuals who would like more information about any aspects of privacy at AQA can contact the relevant Team Leader or Manager or the AQA Privacy Officer on 03 9489 0777 or via admin@aqavic.org.au.

Further information about privacy, your rights and legislation, the following may be helpful:

- Office of the Australian Information Commissioner (OAIC) <https://www.oaic.gov.au/>
- Health Complaints Commissioner: <https://hcc.vic.gov.au/>

4. Responsibilities:

AQA Victoria:

1. Actively maintain, promote and communicate this policy and related resources

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2. Support and monitor the implementation of this policy and all associated policies / procedures across all levels of the organisation.

Executive Managers, Practice Leaders & Team Leaders;

1. Model and lead practice that promotes the principles within this policy
2. Monitor staff compliance with the requirements of the policy
3. Ensure training and information is provided to staff to carry out this policy
4. Respond and report incidents that have compromised client safety and well being

All AQA staff and volunteers involved in the provision of services and activities.

1. Implement policy and related procedures when coordinating and delivering services and supports
2. Respond and report incidents that have compromised client safety and well being

5. Definitions:

What is Personal Information?

Personal information includes any information or opinion, about an identified individual or an individual who can be reasonably identified from their information. The information or opinion will still be personal information whether it is true or not and regardless of whether we have kept a record of it. The information that we seek to collect about you will depend on the services that we provide. If you do not allow us to collect all of the information we request, we may not be able to deliver all of those services effectively. This information could include your name, address, contact details and date of birth.

What is sensitive information?

Sensitive information is personal information including, but is not limited to, health information regarding disability, injury or illness, racial or ethnic origin, religious beliefs, sexual orientation or criminal record, provided the information meets the definition of personal information.

The collection of sensitive information is restricted by the Privacy Act. Collection of health records is restricted by the Health Records Act. We will only collect sensitive information if you consent to its collection and if the sensitive information is reasonably necessary for us

to carry out at least one of our functions or activities, or if the APPs or HPPs otherwise permit such collection. For example, we may collect health information in order to supply you with home-care support services or peer support and mentoring. AQA will assume consent to the collection of all sensitive information that is provided to it for use in accordance with this Privacy Policy, unless told otherwise.

6. Related Legislation:

[The Privacy Act](#)
[The Australian Privacy Principles \(APPs\)](#)
[The Health Privacy Principles \(HPPs\)](#)
[Health Records Act 2001 \(Vic\)](#)
[NDIS Practice Standards and Quality Indicators](#)
[NDIS Code of Conduct](#)
[Victorian Disability Worker Commission – Code of Conduct](#)
[Fair Work Act 2009](#)

7. References:

[Office of the Australian Information Commissioner \(OAIC\): Health Information Department of Health: Rights and privacy principles](#)

8. Internal Documents:

Credentials and Work Eligibility Policy
Credentials and Work Eligibility Procedure
Covid Vaccine Policy
Covid Vaccine Procedure
Service Agreement