



Policy Privacy

Endorsed by: CEO

Document Owner: Organisational Management

Section 1: Preamble

Goulburn Options respects and protects the privacy of all people connected with Goulburn Options, including participants and caregivers, personnel, contractors, and community partners. The purpose of this policy is to ensure that people associated with Goulburn Options have confidence in the organisation's use of their personal information.

The policy affirms that The Australian Privacy Principles (APPs) provide a privacy protection framework that supports the rights and obligations of collecting, holding, using, accessing, and correcting personal information. The APPs consist of 13 principle-based laws and apply equally to paper-based and digital environments. The APPs complement the obligation to manage personal information in a regulated, open, and transparent manner.

Goulburn Options will collect and manage personal information that is required to enable service delivery and to meet financial and statutory requirements, according to these legal obligations. The purpose of any information collection, and the process of collection, storage, and use will be explained to all recipients of service, employees and any persons providing personal information to Goulburn Options, including the circumstances under which information may be disclosed to third parties. This policy is available upon request.

This policy will apply to all records, whether hard copy or electronic, containing personal information about individuals, and to interviews or discussions of a sensitive personal nature.

Section 2: Policy Statement

Goulburn Options will:

- provide a copy of this Policy upon request
- ensure personnel comply with the APPs and deal appropriately with inquiries or concerns
- take such steps as are reasonable in the circumstances to implement practices, procedures, and systems to ensure compliance with the APPs and deal with inquiries or complaints
- collect personal information for the primary purpose of managing service delivery and meeting financial and statutory requirements
- ensure that personal information collected or disclosed is accurate, complete, and up-to-date, and provide access to any individual to review information or correct wrong information about themselves
- take reasonable steps to protect all personal information from misuse and loss and from unauthorised access, modification, or disclosure
- destroy or permanently de-identify personal information no longer needed and/or after legal requirements for retaining documents have expired

- notify individuals and the Office of the Australian Information Commissioner (OAIC) when there has been a data breach (or suspected breach) of personal information, if it is likely to result in serious harm to individuals whose privacy has been breached

2.1 Personnel Responsibility

Goulburn Options personnel will take reasonable steps to ensure individuals understand:

- what information has been, and is being collected
- why the information is being collected, and whether this is due to a legal requirement
- how the information will be used or disclosed
- why and when their consent is necessary
- the organisation's procedures for access and correction of information, and responding to complaints of information breaches, including by providing this Policy

2.2 Collection of Information

Goulburn Options collects and holds information which is reasonably necessary for effective service delivery and duty of care responsibilities. The kinds of information we collect, and hold includes (but is not limited to) personal information.

Collected personal information will include:

- names, addresses, and contact details
- government identifiers
- medical information, including:
 - medical history
 - medications
 - allergies
 - adverse events
 - social history
 - family history
 - risk factors

Personal information may be held at Goulburn Options in various forms:

- as paper records
- as electronic records
- as videos and photos

The procedure for collecting personal information is set out below.

- Staff collect relevant personal and demographic information when a person first makes contact with the organisation. A collection statement is attached to/within the form and information about the management of collected information and privacy.
- Additional information may be required and collected over time.
- Personal information may also be collected from a caregiver or guardian, in the case of participants where it is practicable and necessary, or from other involved supporting services

Goulburn Options holds all personal information securely, whether in electronic format, in protected information systems, or in hard copy format in a secured environment.

2.3 Consent, Use and Disclosure of Information

Personal information will only be used for the purpose of providing services, and for claims and payments, unless otherwise consented to. Some disclosure may occur to third parties engaged by, or for the organisation for business purposes, such as accreditation, or for the provision of information technology. These third parties are required to comply with this Policy.

The organisation will only interpret and apply consent for the primary purpose for which it was provided. Goulburn Options personnel must seek additional consent from the person if the personal information collected may be used for any other purpose.

The organisation will inform the person where there is a statutory requirement to disclose certain personal information.

Exceptions to disclose without consent are where the information is:

- required by law
- necessary to lessen or prevent a serious threat to a person's life, health, or safety, or public health or safety, or it is impractical to obtain the person's consent
- to assist in locating a missing person
- to establish, exercise, or defend an equitable claim
- for the purpose of a confidential dispute resolution process

2.4 Access, Corrections and Privacy Concerns

The organisation acknowledges that individuals may request access to their records. The request can be a verbal request, or be in writing, and the organisation will respond within a reasonable time.

Goulburn Options will take reasonable steps to correct personal information where it is satisfied, they are not accurate, or up to date. Annually, Goulburn Options will ask participants and their caregivers for verification that the personal information held by the organisation is correct and up to date. Individuals may also request the organisation corrects or updates their information at any time.

Goulburn Options takes complaints and concerns about the privacy of personal information seriously. Any concerns should be expressed to staff, or management of Goulburn Options. The organisation will then attempt to resolve it in accordance with our complaint resolution procedure.

2.5 Privacy and Collection Statement

Goulburn Options is committed to protecting your privacy. To ensure Goulburn Options provides you with appropriate, quality services and support, we collect personal and sometimes sensitive information, including health information.

Goulburn Options must comply with the Privacy Act 1988, and the Australian Privacy Principles (APPs) to protect, properly use, correct, and destroy (or de-identify) personal records.

By providing your personal information to Goulburn Options, you understand and agree to the use of this information in accordance with this Privacy and Collection Statement. Our Privacy Policy is available upon request.

Reference:

[A guide to compliance with privacy laws in Australia](#)

Section 3: Roles

Role	Responsibilities and Accountabilities
Board	- Ensure the organisation’s compliance with the Privacy Act 1988 and the Australian Privacy Principles (APPs). - Provide oversight and direction to executive management on privacy and data protection strategies.
Executive Management	- Develop and implement systems and practices to ensure compliance with the APPs and privacy policies. - Address privacy breaches, ensure notification to the OAIC, and ensure that corrective measures are taken in the event of a data breach.
Team Leaders	- Ensure that their teams are aware of and comply with the privacy policy and procedures. - Support staff with privacy-related inquiries and ensure accurate and up-to-date handling of personal information within their teams.
Administration	- Safeguard personal information in both hard copy and electronic formats in line with security protocols. - Assist with collecting, storing, and maintaining accurate personal information in accordance with privacy laws and internal procedures.
Workforce (<i>DSW, Students, Volunteers</i>)	- Collect, use, and disclose personal information appropriately, ensuring consent is obtained where necessary. - Comply with privacy procedures, reporting breaches, and ensuring personal information is handled securely.

Section 4: Related Documentation

Document Name	Document Type
Complaints and Feedback Policy	Policy
Participant Intake Forms (Part A), and (Part B)	Forms
Individual Planning and Outcomes	Policy
Service Access	Policy
Organisational Communication Technology	Policy
Participant Intake and Onboarding	Procedure

Section 5: Definitions

Term	Definition
Personal Information	Information or an opinion about an identified individual, or an individual who is reasonably identifiable, regardless of its form.
Australian Privacy Principles (APPs)	13 principles that regulate how organizations must handle personal information under the Privacy Act 1988.
Data Breach	Unauthorized access, disclosure, or loss of personal information that may result in harm to individuals.