

# PRIVACY AND FREEDOM OF INFORMATION POLICY

## Objective

This policy describes the personal information practices of Interact Australia and gives individuals an understanding of the type of personal information that Interact Australia manages.

Interact Australia is committed to protecting individuals' right to privacy. Interact Australia complies with federal and state legislation relating to confidentiality and privacy as they apply in each jurisdiction. All personnel within Interact Australia maintain the highest standards of professional practice and codes of conduct regarding the confidentiality of personal information.

Interact Australia personnel receive training and understand their obligations under the laws and ethical codes of professional practice and codes of conduct regarding the confidentiality of personal information.

## Scope

This policy applies to all Interact Australia personnel.

## Definition

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

**Interact Australia Personnel:** All employees (whether employed full-time, part-time, or on a fixed term or casual basis), Board members, students, contractors and sub-contractors performing work on behalf of Interact Australia.

## How Interact Australia manages personal information

### Consent

When we collect your personal information, our personnel will discuss the content of this policy with you and request your consent to the collection. If you do not consent to the collection of your personal information, the level or type of service that we can offer to you is limited. Our services require the collection of relevant personal information, as this enables us to provide you with the most appropriate care and support.

### Collection

Information is collected in a respectful, lawful and non-intrusive way. Where Interact Australia receives information about you from a third party, we will advise you of the information collected and confirm with you that this is correct.

The purpose for which we collect, hold, use and disclose personal information

The purpose of collection of personal information will be by lawful and fair means, and will be used and disclosed for the primary purpose for which it was collected. Typically, this will include:

- Contact and communication with our customers
- For internal record keeping and administrative purposes
- Managing and providing services to our customers
- Complying with our legislative and regulatory responsibilities

- Resolving any disputes that we may have

### Use and disclosure

We only use your personal information for the purpose for which it is given to us, or for purposes that are directly related to one of our functions or activities related to you. Interact Australia personnel that are involved in your care and support will access your personal information. Information that is essential for your continuing care and supports and Interact Australia's management, funding and quality assurance may be accessed by other appropriate personnel within Interact Australia. For example, some administrative staff may have access to personal information during the course of their duties. The extent of this access is limited to information that is relevant for them to perform their official duties.

We do not disclose personal information to other organisations or individuals unless:

- You have consented to the disclosure.
- You would reasonably expect, or have been told, that information of that kind is usually passed to those individuals, bodies or agencies.
- It is otherwise required or authorised by law.
- It will prevent or lessen a serious and imminent threat to somebody's life or health.
- It is reasonably necessary for a law enforcement function.

Some information is used to help plan our services, for reporting purposes to our funding bodies and for quality improvement. This information may also be used for research to ensure we are continually improving our services. As the information used is not personally identifiable, specific consent to this is not required.

Some of our funding agreements with the Government require transfer of personal files and information back to the funding body.

Organisations we regularly disclose information to include:

- Department of Human Services – Australian Government
- The National Disability Insurance Agency (NDIA). The National Disability Insurance Scheme Act 2013 s55 (1) gives the NDIA the power to require production of information that is, among other matters, relevant to the functions of the NDIA.
- Transport Accident Commission (TAC)

### Data Quality

We take steps to ensure that the personal information we collect is accurate, up to date and complete. This includes maintaining and updating personal information when you advise us that your personal information has changed, and at other necessary times.

### Data Security

We take reasonable steps to protect the personal information we hold against loss, unauthorised access, use, modification, disclosure and/or other misuse. These steps may include password protection and encryption of digital information, and securing paper files with physical access restrictions.

Access to personal information held on computer systems is controlled and monitored. Only personnel required by their duties to have access to customer records and information systems are authorised to access such information.

When no longer required, personal information is destroyed in a secure manner in accordance with the law and the requirements for funding agreements.

Where a data breach is likely to result in serious harm to individual/s whose information is involved in the breach, Interact Australia has an obligation to report the breach to the Office of the Australian Information Commissioner (OAIC) and affected individuals.

### Access and Correction

Access to your personal information is available to you on request. However, information relating to others or otherwise exempt from disclosure by law will not be given. Proof of identity must be presented to us before personal information will be released. A fee may be charged for this service. Requests should be in writing and addressed to the Privacy Officer. If we do not agree to provide access to personal information, we will advise you of the steps to take to seek a review of, or to appeal, our decision (as applicable).

Whilst Interact Australia is not a government agency, because we provide services under contract with the government, we do receive requests for personal information under *Freedom of Information* legislation. This would occur when an individual receiving services from Interact Australia has made a request for access to their personal information directly with the government agency responsible for administering and funding that service. Interact Australia is contractually obliged to comply with these requests.

You can take steps to request a correction of your personal information held by us. Requests should be in writing and must provide evidence to support the requested changes. If we do not agree to make the requested changes to personal information, you may make a statement about the requested changes and we will attach this to our file.

### How to contact us

Contact us to obtain further information regarding this privacy policy or to provide comments.

Telephone 1300 FUTURE (1300 388 873)  
Email [privacy@interactaustralia.com.au](mailto:privacy@interactaustralia.com.au)  
Post Interact Australia  
Privacy Officer  
267 High Street  
Preston VIC 3072

If you have any concerns about the way we handle your personal information, or you would like to make a complaint relating to privacy matters, please use the above contact details. Your concerns will be referred to the Interact Australia National Quality and Safeguards Manager, who will conduct an investigation into the matter if required.

Privacy complaints:

- Will be treated seriously
- Will be dealt with properly
- Will be dealt with in a confidential manner, and
- Will not affect the standard of services you receive from us.

## Information Collected online by Interact Australia

### Collection

We may use temporary (session) or permanent cookies when you access our website. This allows us to recognise your browser and track the webpages you have visited. You can switch off cookies by

adjusting the settings on your web browser. If you disable cookies on your web browser or device, you may not be able to fully experience all features of the website.

### Links to other websites

Our site may contain links to other websites. We do not have any control over those websites and are not responsible for the protection and privacy of any personal information which you provide whilst visiting them. Those websites are not governed by this Privacy Policy.

### Use and Disclosure

We do not give personal information collected online to other agencies, organisations or anyone else without consent, unless the individual would reasonably expect (or has been told) that information of that kind is usually passed to those agencies, organisations or individuals or the disclosure is otherwise required or authorised by law.

### Data Quality

We will correct any personal information that we hold about you on request. If you are on one of our automated email lists, you may opt out of further contact from us by clicking the 'unsubscribe' link at the bottom of the email.

### Data Security

There are inherent risks in transmitting information across the internet, and we do not have the ability to control the security of information collected and stored on third party platforms. In relation to our own servers, we take all reasonable steps to manage data stored on them to ensure security.

### Access and correction

For information about how to access or correct personal information collected on our website, see 'Access and Correction' above.

### References

- Privacy and Data Protection Act 2014 (VIC)
- Information Privacy Act 2009 (QLD)
- Personal Information Protection Act 2004 (TAS)
- Privacy Act 1988 and the Australian Privacy Principles

### Related Policies/Documents

- Customer Complaints and Feedback Policy
- Customer Complaints and Feedback Procedure

### This document is released and approved as follows:

Version	Date	Nature of Changes	Approved by
1.0	1/11/2019	Original Release	Chief Executive Officer
1.1	20/12/2021	Information Classification added to footer	Chief Executive Officer
1.2	1/11/2022	Branding refresh new template	Chief Executive Officer