

PRIVACY AND FREEDOM OF INFORMATION POLICY

Objective/Purpose

The purpose of this policy is to set an expected level of personal and professional behaviour for all staff, employees, volunteers or persons on work-placements with Interact Australia in the handling and transmission of sensitive (private) information.

The objective of this policy is to outline the contractual requirements set out by grant agreements, Deeds and any other such contract issued by a relevant funding entity and as required by law. This policy shall be implemented to ensure that this objective is upheld.

Scope

This policy applies to Interact Australia Personnel whether employed full-time, part-time, fixed term or on a casual basis, Board members, students, contractors and sub-contractors performing work on behalf of Interact Australia.

Policy Statement

It is the policy of Interact Australia to ensure safeguards are in place to protect the personal and confidential information obtained in the conduct of business in accordance with legislative and business requirements. This includes all written and verbal information relating to client, staff, contractors and stakeholders.

Interact Australia is committed to protecting individuals' right to privacy and complies with federal and state legislation relating to confidentiality and privacy as they apply in each jurisdiction.

Interact Australia personnel will receive training to ensure they understand their obligations under the laws and ethical codes of professional practice and codes of conduct regarding the confidentiality of personal information to ensure they maintain the highest standards of professional practice and codes of conduct regarding the confidentiality of personal information.

Principles

Interact Australia is committed to ensuring the privacy and confidentiality of personal information is upheld in accordance with the Privacy Act 1998 and the Social Security (Administration) Act 1999. It does this by ensuring procedures and practices comply with the National Privacy Principles described in the Privacy Act 1988.

Accordingly, as a minimum, the following statements are observed in the creation or implementation of any procedures (including this procedure) or practices at Interact Australia:

- Interact Australia only collects information relevant to the services it provides and only collects information in a lawful and fair way and by means which are not unreasonably intrusive
- Interact Australia informs its participants of the need to gather information, their right to access their own records and their right to request inaccuracies be corrected if they are found to exist
- Interact Australia seeks to ensure consent to the collection, use and disclosure of personal information unless disclosure is required or authorised by law.
- Interact Australia does all it can to keep personal information up to date, accurate and complete

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- Interact Australia ensures all electronic information is held on Australian-based servers
- Appropriate access restrictions are applied to electronic information across the organisation. Paper-based information is always kept secure
- Any identifiers used by Interact Australia are unique forms of identification which are not derived from any other personal identifiers such as Medicare or Tax File Numbers
- Interact Australia personnel must complete Privacy training at a minimum once every 12 months
- Interact Australia personnel must ensure that the use of personal information is for business purposes only
- Interact Australia personnel must comply with requirements under the Social Security (Administration) Act 1999, Privacy Act 1988 and any State/Territory based legislation applicable to the jurisdiction within which they work
- All actual, suspected or potential breaches of privacy must be responded to as a critical incident and must be reported to the Chief Executive Officer.

Terms and Definitions

Personal Information	Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect include names, addresses, email addresses, phone and facsimile numbers.
Sensitive Information	Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

How Interact Australia Manages Personal and Sensitive 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 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:

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- 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 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.

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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 is 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

Post Interact Australia
National Manager Quality, Compliance and Administration
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

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referred to the Interact Australia National Manager Quality, Compliance and Administration, 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 with 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.

Related Documents

- Interact Australia Employee Code of Conduct and Ethics

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- Interact Australia Privacy Statement
- Interact Australia Incident Management Policy
- IntoWork Australia Data Security Framework
- IntoWork Australia Information Security Policy
- IntoWork Australia Privacy Policy
- IntoWork Australia Risk Management Framework
- IntoWork Australia and Subcontractors Notifiable Data Breach Policy

Related Legislation and Reference Documents

- Privacy Act 1988
- Privacy Regulation 2013
- Social Security (Administration) Act 1999.
- Freedom of Information Act 1982
- Information Privacy Act 2014 (ACT)
- Privacy and Personal Information Protection Act 1998 (NSW)
- Information Act 2002 (NT)
- Information Privacy Act 2009 (QLD)
- Personal Information and Protection Act 2004 (TAS)
- Privacy and Data Protection Act 2014 (VIC)
- Freedom of Information Act 1992 (WA)
- Privacy and Information Sharing Act 2024 (WA) (effective 1 July 2026)

Amendment History

This document is released and approved as follows:

Rev.	Date	Description of Amendments	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	1/12/2022	Branding refresh new template	Chief Executive Officer
1.3	16/09/2024	Correction to how to contact us details	Chief Executive Officer
1.4	30/10/2025	Scheduled review. No changes	Chief Executive Officer
1.5	20/02/2026	Scheduled review. Rebranded. Inclusion of principles. Updated related documents	Chief Executive Officer