




**BRIGHT LIVING SOLUTIONS**

Support for Kids &  
Young Adults

# Privacy and Confidentiality Policy & Procedure


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	<b>Privacy and Confidentiality Policy and Procedure</b>	Form Ref. No.	BLS-QRC-POL-037-SV1.0
		Issued Date:	12th Dec 2024
	Quality and Regulatory Compliance	Doc. Ref. No.	POL-037-2024

## 1. Purpose

The purpose of this Privacy and Confidentiality Policy and Procedure is to outline Bright Living Solutions' commitment to the protection of personal and sensitive information, ensuring compliance with legal obligations and industry best practices. This document provides the framework for handling personal data, including its collection, storage, access, use, disclosure, and security, in line with the organization's values of transparency, integrity, and respect for privacy.

## 2. Scope

This policy and procedure applies to:

- All employees, contractors, volunteers, and service providers who handle personal or sensitive information.
- All NDIS participants and individuals whose personal information is collected, stored, or processed by Bright Living Solutions.

## 3. References

This policy and procedure must be read in conjunction with the following relevant policies:


- **Risk Management Policy:** Ensures the protection of sensitive information through a structured risk management approach.
- **Consent Policy:** Governs the management of consent for the collection, use, and sharing of personal data.
- **Child Safety Policy:** Integrates confidentiality and privacy protocols for the safety and protection of children.
- **Safety and Security Policy:** Addresses physical and digital security measures for information protection.
- **Privacy Act 1988 (Cth):** Legislation that governs how personal information is handled in Australia.
- **NDIS Privacy and Confidentiality Guidelines:** Specific guidelines for privacy in NDIS service delivery.

## 4. Responsibilities

- **Privacy Officer:** Ensures the overall implementation and compliance with privacy policies, manages complaints, and coordinates privacy training across the organization.
- **Managers and Supervisors:** Responsible for ensuring their teams adhere to privacy and confidentiality requirements and reporting any privacy-related issues.
- **Employees, Contractors, and Volunteers:** Must comply with this policy by safeguarding confidentiality and privacy in all interactions involving personal or sensitive information.
- **Participants:** Have the right to be informed about their privacy rights and to notify Bright Living Solutions of any concerns or requests related to their personal data.

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### 5. Privacy and Confidentiality Procedure Overview

The procedure outlines the following key steps to ensure privacy and confidentiality are maintained:

1. Collection of Personal Information
2. Storage and Security of Personal Information
3. Use and Disclosure of Personal Information
4. Accessing and Correcting Personal Information
5. Confidentiality and Security Protocols
6. Responding to Privacy Complaints
7. Ongoing Privacy and Confidentiality Training
8. Review and Audit of Privacy Practices


### 6. Procedure Details

#### 6.1. Collection of Personal Information

- Step 1: Obtain Informed Consent**  
 Ensure participants are fully informed about the purpose of the data collection and how it will be used. Obtain explicit consent, recorded in writing or verbally.
- Step 2: Minimal Collection**  
 Collect only the necessary information directly related to service delivery. Avoid collecting unnecessary or excessive data.
- Step 3: Document the Collection**  
 Record all personal information accurately and ensure it is stored securely according to internal data management procedures.

#### 6.2. Storage and Security of Personal Information

- Step 1: Secure Storage**  
 Personal information must be securely stored, whether in physical files (locked cabinets) or electronic systems (password-protected files and encrypted databases).
- Step 2: Limit Access**  
 Only authorized personnel should have access to personal data. Access should be granted based on role requirements.
- Step 3: Data Encryption and Protection**  
 Implement encryption for sensitive information stored electronically, regularly back up data, and ensure disaster recovery protocols are in place.

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### 6.3. Use and Disclosure of Personal Information

- **Step 1: Use for Authorized Purposes**  
Use personal information solely for the purposes for which it was collected, such as service provision and reporting to funding bodies.
- **Step 2: Obtain Consent for Disclosure**  
Personal information will not be disclosed to third parties without informed consent, except where legally required.
- **Step 3: Document All Disclosures**  
Keep a record of all disclosures, including the date, recipient, purpose, and participant consent (if applicable).

### 6.4. Accessing and Correcting Personal Information


- **Step 1: Respond to Access Requests**  
Participants have the right to access their personal information. Provide access within 30 days in an accessible format.
- **Step 2: Correcting Inaccurate Information**  
Correct any inaccuracies identified by participants, keeping a record of the amendment.

### 6.5. Confidentiality and Security Protocols

- **Step 1: Confidentiality Agreements**  
All employees, contractors, and volunteers must sign a confidentiality agreement as part of onboarding. This agreement remains valid even after their engagement ends.
- **Step 2: Secure Handling of Documents**  
Ensure that personal information, whether physical or electronic, is securely handled and disposed of in accordance with organizational procedures (e.g., shredding paper, deleting digital records).

### 6.6. Responding to Privacy Complaints

- **Step 1: Acknowledge the Complaint**  
Acknowledge receipt of privacy complaints within 5 business days.
- **Step 2: Investigate the Complaint**  
Investigate privacy breaches thoroughly and take corrective actions to prevent recurrence.
- **Step 3: Resolution and Response**  
Provide a response to the participant outlining the investigation and actions taken. If necessary, advise the participant on escalating the matter to external authorities (e.g., NDIS Quality and Safeguards Commission).

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## 6.7. Ongoing Privacy and Confidentiality Training

- Step 1: Induction Training**  
 New employees, contractors, and volunteers will receive privacy and confidentiality training during induction.
- Step 2: Ongoing Training**  
 Annual refresher training will be provided to ensure employees remain informed of any legal, technological, or procedural changes.

## 6.8. Review and Audit of Privacy Practices

- Step 1: Annual Audits**  
 The Privacy Officer will conduct audits of personal information management practices to assess compliance and identify potential risks.
- Step 2: Policy Review**  
 This policy and procedure will be reviewed annually, and adjustments will be made as necessary to comply with evolving laws and regulations.

## 7. Conclusion

By adhering to this Privacy and Confidentiality Policy and Procedure, Bright Living Solutions ensures that personal and sensitive information is handled with care and respect, ensuring compliance with all relevant privacy laws and fostering trust with participants and stakeholders.


<b>Policy/Procedure Title:</b>	Privacy and Confidentiality Policy and Procedure
<b>Version:</b>	1.0
<b>Effective Date:</b>	12th December 2024
<b>Next Review Date:</b>	12th December 2025

This document has been reviewed and approved by the undersigned. The approval signifies that the document is complete and accurate and that the policies and procedures described herein are considered to be effective and appropriate for the intended purpose. This document is now authorised for implementation.


### Approvals:

Position	Document Status	Date
Director <i>B.L. Stehr</i>	Current	19/12/2024

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