

## PRIVACY POLICY

iCare connections is committed to keeping your personal information private and respecting your confidentiality. This policy outlines how we collect and manage personal and sensitive information of our participants and relevant stakeholders. It contains our privacy collection statement.

This policy document applies to all iCare Connections employees and/or contractors who may have access to private and/or confidential information.

### What is Personal Information?

Personal information is defined by the Privacy Act 1988 (Cth). Any information, or an opinion that could be used to identify you, is considered personal information. This may include your name, address, telephone number, email address, profession or occupation.

### Type of Information we collect

We collect the personal information that you share with us, such as your name, address, age or date of birth, telephone number, email address and sensitive information related to your health, including clinical documentation, records of service contracts, registration to programs, medical history, allied health services, financial situation, needs and objectives, employment details and history.

The choice and control over the level of information you provide to us remains with you. If you want to participate in our services, we require certain information from you in order to provide you with services. You have the right not to disclose personal information to us. However, this may limit our ability to provide you with the services you have requested.

In certain situations, you may have the option to interact with us anonymously. For example, if you contact us by telephone with a general question, we will not ask your full name unless we need it to answer the question.



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## Purpose of Collection

We collect, hold, use and disclose your personal information for the purposes of the implementation of your NDIS plan funds, co-ordination of your supports and liaising with your support providers and with the NDIA. This ensures quality of service in a safe environment to meet your needs, and to initiate appropriate referrals for your needs.

Sometimes we may collect sensitive personal information without your consent, such as when it is required or authorised by a law, or court or tribunal order.

## Withdrawing consent

A person may withdraw or change the consent for release of information, at any time, by emailing iCare Connections at [feedback@icareconnections.com.au](mailto:feedback@icareconnections.com.au).

## How do we collect your personal information?

Generally we collect your personal information directly from you.

We will do this:

- in person;
- over the phone; and
- via online interactions, including through our website, email, mobile and social media such as Facebook.

At other times, wherever reasonable and practicable to do so, in a lawful and fair manner, we may need to collect your personal information from third parties, with or without your direct involvement but we will obtain your prior consent if we may need to obtain your sensitive information from third parties. Depending on the products or services you request or receive, the third parties from whom we may collect personal information include your employer, market research organisations, third party brokers and agents, government agencies, your representatives and your advisers and other organisations who, jointly with us, provide products or services to you. Those that we may collect sensitive information from include medical practitioners, allied health and disability support providers. This will generally only occur with your consent.



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## How do we protect personal information?

We take steps to ensure that no-one outside iCare Connections can access information we hold about someone without that person's consent, unless that access is authorised or required under law.

We have systems and procedures in place to protect personal information from misuse and loss, as well as from unauthorised access, modification or disclosure. We may hold your information in either electronic or hard copy form. Personal and sensitive information is destroyed or de-identified when no longer needed.

We safeguard our IT systems against unauthorised access and ensure that paper-based files are secured. We also ensure that access to your personal information within our systems is only available to our staff who need to have access to do their work.

If a data breach occurs, such as if personal information that we hold is subject to unauthorised loss, use or disclosure, we will respond in line with the Office of the Australian Information Commissioner's data breach notification process (Appendix A). We will aim to provide timely advice to you to ensure you are able to manage any potential harm or loss, financial or otherwise, that could result from the breach.

When no longer required, personal information is destroyed in a secure manner, or archived or deleted in accordance with our obligations under federal law.

## Disclosing your personal and sensitive information

We will not give your personal information to government agencies, private sector organisations, or anyone else unless you consent or one of the following exceptions applies:

- you would reasonably expect us to use the information for that other purpose
- it is legally required or authorised, such as by an Australian law, or court or tribunal order;
- formally requested by regulatory bodies, government agencies and law enforcement bodies, including the Department of Health and Human Services and the NDIA;
- we reasonably believe that it is necessary to lessen or prevent a serious threat to the



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life, health or safety of any individual, or to public health or safety; and

- we have reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to our functions or activities has been, is being or may be engaged in and we reasonably believe that it is necessary for us to take appropriate action in relation to the matter.

### **What if we can't collect your information?**

If you do not provide us with the personal or sensitive information described above, some or all the following may happen:

- we may be unable to provide the requested products or services to you, either to the same standard or at all;
- we may be unable to provide you with information about products and services you may want; or
- we may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful.

### **Employees**

We collect personal information about employees and prospective employees in order to conduct employment and employment-related activities such as payroll services, recruitment and selection, performance management, reporting and work health and safety. Our collection, use and disclosure of personal information about employees and prospective employees is in accordance with Commonwealth Privacy Law.

### **Our website and social media channels**

This part of our Privacy Policy explains the kinds of information that we collect in managing and operating our website and social media channels, how such information is used and under what circumstances and to whom it may be disclosed.

We use the tools provided by Facebook and Google to capture information of our audience. See each social media platforms privacy policy for more details on how they collect your information.



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## Links to other websites

Our websites may contain hyperlinks to other sites maintained by different organisations. We do not claim any association with websites which are not clearly identified as our own and do not take any responsibility for their content. Hyperlink users should observe such websites' terms of use, privacy policies and copyright, which may or may not comply with the same privacy standards that we do.

## Use and disclosure

Personal information will only be used or disclosed by iCare Connections in compliance with relevant laws and this privacy policy. If you are a current customer, we may use your personal information to contact you, via post, SMS, email or telephone, to talk about our services and gauge your satisfaction.

Generally we will only disclose personal or sensitive information to a third party when you give permission to us to do so. Personal information is not transferred or shared with organisations outside of Australia.

Information may be disclosed as required by law, for example, reporting of assault, abuse, neglect, or where a court order is issued. Where an individual is incapable of giving or communicating consent, disclosure may occur if it is necessary for the provision of appropriate care or treatment to the individual; or for compassionate reasons. The information disclosed is limited to the information that is reasonable and necessary to achieve either of these two purposes. Disclosure would not occur if it were contrary to an individual's wishes expressed before that individual lost the capacity to give or communicate consent.

We will also disclose personal and/or sensitive information for a purpose directly related to us providing you with NDIS services, when we are required to by law or the terms of a funding agreement, to meet specific duty of care obligations, or for a law enforcement purpose, such as the Know Your Customer requirements of the AML/CTF.



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It is a requirement of the NDIS that we submit regular reports on our performance, which may include information about the characteristics of people using our services. General information is also used to help improve the overall quality of our services. Any information provided to the NDIS, or used for research and evaluation purposes, is done in a way that protects your privacy.

When you cease to be a customer of iCare Connections, any personal information which we hold about you is maintained for the relevant periods and then destroyed as required by law.

### **Accessing and correcting personal information**

You have the right to request to see all of the information that iCare Connections has relating to you and your services. You can ask for access or correction by contacting us, where we will respond as soon as possible. If we refuse to give you access to, or correct, your personal information, we will notify you in writing setting out the reasons.

It is important to iCare Connections that all personal information we hold is accurate, up-to-date, complete, relevant and not misleading. When iCare Connections becomes aware of an error, either directly from you or in some other way, we will take all reasonable steps to correct personal information we hold as soon as possible.

A review of personal information is undertaken annually, as a minimum. As information changes or becomes obsolete, it is the participant/carer/advocate/guardians responsibility to contact iCare Connections immediately. To ensure the information is communicated accurately, it is best to inform us of all changes in writing via email at [feedback@icareconnections.com.au](mailto:feedback@icareconnections.com.au).

### **Data reports**

iCare Connections is required to provide government departments such as the Victorian Department of Health and Human Services and the National Disability Insurance Agency (NDIA) information to plan and monitor how services are run. No information that will identify you as an individual is shared.



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## Data Quality and Security

iCare Connections is committed to ensuring that all personal and sensitive information is kept secure. iCare Connections ensures all information held by us is protected from misuse, loss, unauthorised access and disclosure.

Only authorised personnel are granted access to your information and additional privacy measures, such as password protection and locked cabinets, are employed to protect sensitive information.

The iCare Connections website uses cookies. When you access our website, we may send a 'cookie' (a small summary file containing a unique number) to your computer. This allows us to track site visits and website usage.

The iCare Connections website also uses Google Analytics. This service does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand website traffic and webpage usage.

The following non-personal information is automatically recorded by iCare Connections web server for statistical and system administration purposes:

- your server address;
- your top level domain name (e.g. .com, .au, .gov);
- the date and time of your visit to the site;
- the pages you accessed and downloaded;
- the address of the last site you visited;
- your operating system; and
- the type of browser you are using.



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## Accessing or correcting your information

You have a right to access personal information we hold about you. You also have a right under the Privacy Act to request corrections to any personal information that we hold about you if you think the information is inaccurate, out-of-date, incomplete, irrelevant or misleading.

It is also possible to access, and correct documents held by us under the Freedom of Information Act 1982 (the FOI Act). In some circumstances we will suggest that you make your request for personal information under the FOI Act.

This is because:

- an FOI access request can relate to any document in our possession and is not limited to personal information;
- the FOI Act contains a consultation process for dealing with requests for documents that contain personal or business information about another person; and
- you can complain to the Australian Information Commissioner about what we do under the FOI Act
- if you are refused access under the FOI Act you have a right to apply for internal review or Information Commissioner review of the access refusal decision.

Find out more information about how to make a request under the FOI Act on the Freedom of Information page (Appendix A).

You can also make a request by emailing [foi@ag.gov.au](mailto:foi@ag.gov.au).

We will not charge you to access your personal information. However, there may be a charge involved for us to process a request under the FOI Act that goes beyond a request for personal information.

To make an enquiry about our compliance with the privacy laws, our privacy policy, or to access or correct the personal information we hold about you, please contact us.



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We are entitled to refuse you access to your information in certain circumstances. For example, you may not be able to access information that would reveal information about another person, is commercially sensitive material or we are prevented by law from disclosing. If this happens, we will provide you with a reason for the refusal. If you have any questions regarding this policy or any concerns regarding our treatment of your personal information, we invite you to contact us.

### What if I have a complaint?

If you would like to leave feedback or complain about the service you have received from us, or if you think we have breached your privacy obligations, please contact us:

E: [feedback@icareconnections.com.au](mailto:feedback@icareconnections.com.au)

M: 0490 184 979

Postal: PO Box 432 Croydon VIC 3136

We will promptly investigate and resolve your complaint and respond to you as soon as possible to inform you of the progress of your complaint.

If after receiving our response, you are unsatisfied with the resolution of the matter, you can lodge a complaint with the Office of the Australian Information Commissioner (OAIC). See the OAIC website (Appendix A) for information regarding how to make a complaint.

The OAIC is independent of the NDIA and has the power to investigate complaints about possible interferences with a person's privacy. It is usually best to contact us first about any privacy concerns. This is because the OAIC will generally ask us to investigate the matter first and provide it with our findings concerning the matter.

We comply with the Privacy Act in handling privacy breaches and will notify affected individuals and the OAIC of serious data breaches where appropriate.



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## Relevant Legislation, Standards and Agreements

[Australian Privacy Principles in Privacy Act 1988 \(Cth\)](#)

[National Disability Insurance Scheme Act 2013 \(the NDIS Act\)](#)

[The NDIS Quality and Safeguard Rules 2018](#)

[The Charter of Human Rights and Responsibilities Act 2006](#)

[The Freedom of Information Act 1982 \(FOI Act\)](#)

[The Privacy and Data Protection Act 2014](#)

## Changes to this Policy

We may make changes to this Privacy Policy from time to time. The most current version will be posted on our website.

## Appendix A

Office of the Australian Information Commissioner's Data breach notification process:

<https://www.oaic.gov.au/privacy/guidance-and-advice/data-breach-preparation-and-response>

FOI Act on the Freedom of Information page:

<https://www.oaic.gov.au/freedom-of-information/the-foi-act/>

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