



Privacy Policy

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1. Executive Summary

Valued Lives Foundation LTD (encompassing the Valued Lives and Empowered Connection brands) is committed to treating people with courtesy and respect and keeping an individual's information private. We recognise the importance of protecting the privacy and rights of individuals in relation to their personal information and we will always ask for their consent to collect, store and share their information.

We collect and store information in accordance with the Australian Privacy Principles and Privacy Act 1988. We comply with all of the Act's requirements in respect of the collection, management and disclosure of personal information.

This policy relates to the Valued Lives and Empowered Connection.

2. Privacy Policy – What is personal information?

When used in this privacy policy, the term “personal information” has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify an individual. This may include an individual's name, address, telephone number, email address and profession or occupation. If the information we collect personally identifies someone, or the person is reasonably identifiable from it, the information will be considered personal information.

3. What Information do we collect and store?

We may collect and store the following types of personal information:

- Name
- Mailing or street address
- Email address
- Telephone number
- Facsimile number
- Age or date of birth
- Profession, occupation or job title
- Details of the supports and services we have been engaged to provide, or which the individual/family member/authorised representative has enquired about, together with any additional information necessary to deliver those supports and services and to respond to enquiries received
- Any additional information relating to the individual which is provided to us directly through our websites or indirectly through use of our websites or online presence, through our representatives or otherwise.

We may also collect some information that is not personal information because it does not identify an individual or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users use our website.

4. How we collect personal information

We collect personal information directly from an individual unless it is unreasonable or impracticable to do so. When collecting personal information, we may collect in ways including:

- Via an individual's access and use of our website

- Conversations between an individual/family member/authorised representative and our representatives or
- When an individual completes a Service Agreement or Job Application with us or engage Support Coordination/Plan Management Services.

5. Cookies

In some cases we may also collect personal information through the use of cookies. When people access our website we may send a “cookie” (which is a small summary file containing a unique ID number) to the person’s computer. This enables us to recognise the individual’s computer and greet them each time they visit our website. It also enables us to keep track of supports and/or services viewed so that, if consent is provided by an individual, we can send them information/news about those supports and/or services. We also use cookies to measure traffic patterns, to determine which areas of our website have been visited and to measure transaction patterns in the aggregate. We use this to research our users’ habits so that we can improve our online information of our supports and services. Our cookies do not collect personal information.

If people do not wish to receive cookies they can set their browser so that their computer does not accept them.

We may log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track users’ movements, and gather broad demographic information.

6. What happens if we can’t collect personal information?

If an individual/family member/authorised representative does not provide us with the personal information described above, some or all of the following may happen:

- We may not be able to provide the requested supports and/or services, either to the same standard, or at all
- We may not be able to provide information about supports and/or services, including important information
- We may be unable to tailor the content of our websites to the user’s preferences and their experience of our website may not be as enjoyable or useful.

7. For what purposes do we collect, store, use and share personal information?

We collect personal information so that we can perform our business activities and functions and to provide the best possible quality of service.

We collect, store, use and share personal information for the following purposes:

- To provide supports and services to an individual and to send communications requested by the individual
- To answer enquiries and provide information or advice about existing and new supports and/or services
- To provide individuals with access to protected areas of our website
- To assess the performance of our website and to improve the operation of our website

- To conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties
- For the administrative, marketing (including direct marketing), planning, supports and/ or service development, quality control and research purposes of Valued Lives, its related bodies corporate, contractors or service providers
- To provide an individual's updated personal information to our related bodies corporate, contractors or service providers
- To update our records and keep individuals' contact details up to date
- To process and respond to any complaint made by individuals/families/authorised representatives
- To comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country (or political sub-division of a country).

An individual's personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

8. To whom we may share personal information

We may share an individual's personal information to:

- Our employees, related bodies corporate, contractors or service providers for the purposes of operation of our website or our business, fulfilling requests by the individual, and to otherwise provide supports and services including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountant
- Solicitors, Business Advisors and Consultants
- Suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes
- Any organisation for any authorised purpose with the individual's expressed consent.

We may combine or share any information that we collect from individuals with information collected by any of our related bodies corporate (within Australia).

9. Direct marketing materials

We may send people direct marketing communications and information about our supports and services that we consider may be of interest to them.

These communications may be sent in various forms including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the Spam Act 2003.

If an individual indicates a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at any time an individual may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications. We will then ensure the individual's details are removed from our mailing list.

We do not provide personal information to other organisations for the purposes of direct marketing.

10. How individuals can withdraw their consent, or request access or correction to their personal information

Valued Lives only collects information that relates directly to the supports and services we provide to the individual. Where consent has been provided, this will continue until we receive written or verbal notification from the individual or their family member/authorised representative that consent is withdrawn. Individuals may withdraw their consent to collect, store and share their information at any time. The notification is to be provided to the individual's Valued Lives worker, the worker's line manager or by emailing info@valuedlives.org.au . An individual note will be entered into the Valued Lives data system (i.e., Brevity) to record that consent has been withdrawn.

Where the individual or their family member/authorised representative is not able to provide written consent when entering into a Service Agreement with Valued Lives, the contents of the individual's Service Agreement will be explained to them, including that consent will continue to be in effect until we are formally notified otherwise.

Individuals or their family member/authorised representative can request access to their personal information held by Valued Lives at any time by speaking with their worker, the worker's line manager or be emailing Valued Lives, including a description of the information requested. We will make fair and appropriate decisions about permitting or refusing access to personal information, including requests from individuals who previously accessed supports and services from Valued Lives.

Where we hold information that the individual is entitled to access, we will provide suitable means for the individual to access the information (for example, by sending it electronically or via mail). We will not charge for requests for personal information. An individual note will be entered into the Valued Lives data system to record the request to access information and what information was provided.

There may be instances where Valued Lives cannot grant access to an individual's personal information that we hold. For example, we may refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. In these instances, we will provide the individual or their family member/authorised representative a written response outlining the reasons for this decision and also record this as an individual note in our data system.

Individuals or their family member/authorised representative have the right to access their records and advise Valued Lives about inaccuracies. If the individual or their family member/authorised representative believes that personal information we hold about them is incorrect, misrepresentative, incomplete, out-of-date, irrelevant or misleading they can make a request for us to amend it by contacting their worker, the worker's line manager or be emailing Valued Lives with a description of the information. We will then consider if the information requires amendment. If we do not agree that there are grounds for amendment, we will add a note to the individual's personal information in our data system stating that they disagree. Valued Lives will not charge for making any amendments to personal information.

If the individual or their family member/authorised representative is not satisfied with a decision to refuse access to personal information or to not amend their personal information, they can contact the Chief Executive Officer to discuss their concerns. The Chief Executive Officer will then review the decision and provide a written response.

11. The process for complaining about a breach of privacy

If an individual believes that their privacy has been breached we encourage them to contact us and provide details of the incident so that we can investigate it.

12. Security

We take reasonable steps to ensure personal information is protected from misuse and loss and from unauthorised access, modification or disclosure. We may hold personal information in either electronic or hard copy form. Personal information is destroyed or de-identified when no longer needed.

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information communicated to us online. We also cannot guarantee that the information supplied will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information transmitted to us online is transmitted at the individual's own risk.

Participant information stored on Brevity is not able to be locked down to particular workers or work groups. Workers will only access participant information relevant to their role and for the purpose of providing ongoing supports. This includes administration tasks such as claiming and invoicing.

13. Links

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third-party website and we are not responsible for the privacy policies or the content of any third-party website. Third party websites are responsible for informing individuals about their own privacy practices.

14. Contacting us

Individuals can contact us regarding any questions or concerns regarding this policy or regarding any breaches of the policy.

Ph: 08 9274 7760

info@valuedlives.org.au

Submit feedback on our website

[Valuedlives.org.au/contact](https://valuedlives.org.au/contact)

15. Changes to our privacy policy

We may change this privacy policy from time to time. Updated versions will be posted on our website.

This privacy policy was updated in October 2023.

16. References

- NDIS Quality & Safeguards Commission
- National Disability Insurance Scheme Act (2013)
- Privacy Act 1988

- Notifiable Data Breaches Scheme
- VL Data Breaches Management Plan and Policy
- VL Privacy Policy
- VL Code of Conduct
- VL Confidentiality Agreement