

Purpose

To provide guidelines for the protection of staff and family/participant personal information in accordance with the Privacy Act 1988 (Cth) and Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth), and the Victorian Government's Privacy and Data Protection Act 2014 and provide an overview of how CPEC handles personal information.

CPEC acknowledges an individual's right to privacy while recognising that personal information is required to be collected, maintained and administered in order to provide a safe working environment and a high standard of quality.

The information collected is used to provide services to participants in a safe and healthy environment with individual requirements, to meet duty of care obligations, to initiate appropriate referrals and to conduct business activities to support those services.

This policy applies to all personal information and sensitive personal information including the personal information of employees and participants. It also applies to all company confidential information – that is any information not publicly available.

Policy

CPEC is committed to the responsible management and protection of staff, families and participant's personal information in accordance with the Commonwealth Privacy Act 1988 and the State Government's Privacy and Data Protection Act 2014 and the ten Information Privacy Principles (and any subsequent amendments). CPEC is also committed to complying with the consent requirements of the NDIS Quality and Safeguarding Framework.

Accordingly, CPEC will not release this information to a third party without the person's consent unless there is a statutory or legal requirement, or in order for CPEC to meet its service provision responsibilities.

Collecting and holding personal information

CPEC only collects personal information for purposes that are directly related to supporting staff or its services or activities, and only when it is necessary for directly related purpose/s.

The purpose/s may include the following:

- information of participants, parents, guardians and carers is collected for the primary purposes of providing education and therapy services;
- the implementation and administration of services and support;
- staff information related to emergency contacts, payroll, taxation or other legal considerations;
- health and safety related to staff, families and participants; and
- selection, recruitment and engagement of staff and contractors.

CPEC will only use information for the purposes for which it was collected.

CPEC will collect personal information directly from the individual, either in person, in correspondence, in an application form, over the phone or over the internet. On occasion, CPEC may be required to collect personal information from a third party.

From time to time, in special and limited circumstances, CPEC may receive personal information about third parties from individuals.

Under these circumstances, CPEC will ensure that the consent of those third parties is obtained if the information is required to be disclosed, unless non-disclosure is permissible by law.

Nature of Information Collected

Parent/Family information

The nature of the personal information CPEC collects and holds may include:

Family Name	Gender	Address	Phone Numbers
Email address	Date of Birth	Centrelink CRN	NDIS Number
NDIS Plan	Medicare Number	Custody Arrangement	Cultural Beliefs
Participant Name	Gender	Address	Therapy details
Immunisation Status	Clinical Notes	Medical Details	Other relevant facts

Staff information

The nature of the personal information CPEC collects and holds may include:

Family Name	Gender	Address	Phone Numbers
Email address	Date of Birth	Driver's Licence	Cultural Beliefs
Emergency Contacts	Health Alerts	Bank Account Details	Tax File Number
Working with Children Check Number & expiry date	Working Visa or Australian Citizenship	Qualification Details	Association Membership Details
Superannuation Details	Proof of Identity Check	Employment History	NDIS Worker Screening Check Details & expiry date
National Police Check Details & expiry date	International Police Check Details	Declaration of Interest details	Other relevant facts including CV
Passport Details	Birth Certificate	Marriage Certificate	Medicare Card
Conflict of Interest declaration	Code of Conduct Agreement	Worker Orientation Certificate	

Non-disclosure of Information

A person/family, participant may choose not to disclose personal information to CPEC employees.

CPEC employees will act strictly in accordance with this Policy and will discuss the reasons for seeking to collect the personal information, including the consequences of not providing personal information, or providing incomplete or inaccurate personal information, which may affect the services CPEC can provide.

Marketing

CPEC will seek direct permission prior to using personal information for any marketing purposes. The agreement for use of photos, videos of participants or other personal information for marketing purposes can be changed at any time, depending upon the wishes of the participant/family.

Disclosure

CPEC will only disclose personal information for the purpose for which it was collected. CPEC may disclose personal information about the family or participant to child protection agencies or family support agencies when CPEC reasonably believe that a child is at risk of significant harm, as required by CPEC's PROTECT Policy, mandated reporting requirements and associated attachments.

Disclosure to a third party

CPEC will not otherwise disclose personal information to a third party for any other purpose without the staff member or family/participant consent unless it is authorised or required by law.

Access and Correction

Personal information may be requested and reviewed at any time. CPEC will work with staff, families, participants, guardians and carers to ensure that personal information is accurate, complete and up to date.

Information Storage and Security

Personal information collected by CPEC for family/participants or staff will be stored securely as follows:

- If the information is in paper from it will be stored securely in locked filing cabinets; or
- If the information is in soft copy or electronic format, this information will be stored in privileged access systems which are controlled and monitored, including password protection.

Only authorised employees and third party providers, who have signed confidentiality agreements, will have access to personal information.

CPEC is transitioning staff and family/participant information to soft copy format for security purposes and the hard copies of any personal documentation are being disposed of securely through

an external secure disposal process. Information stored on CPEC's servers or in cloud based systems are being backed up regularly.

Personal information no longer required is securely destroyed or de-identified

Data Breaches

CPEC will take reasonable steps to reduce the likelihood of a data breach occurring including storing personal information securely and accessible only by relevant staff.

If CPEC knows or suspects your personal information has been accessed by unauthorised parties, and CPEC considers this could cause you harm, CPEC will take reasonable steps to reduce the chance of harm and advise you of the breach and if necessary the Office of the Australian Information Commissioner.

Breach of Privacy and Confidentiality

A breach of privacy and confidentiality is an incident and will be investigated by the CEO and the management team.

An intentional breach of privacy and confidentiality will result in disciplinary action up to and including termination of employment.

Queries, Complaints and Feedback

For any queries regarding the collection and use of personal information, please contact the CEO.

Complaints about CPEC breaching the Privacy Acts, Australian Privacy Principles or feedback on this policy, can be referred to:

Postal Address: CPEC, PO Box 211, Glen Waverley, VIC 3150

Email: info@cpec.org.au

Telephone: +613 9560 0700

Additional Information

- Office of the Victorian Information Commissioner - Ten Information Privacy Principles
- Australian Privacy Principles – 12 March 2014