

# STAFF PRIVACY AND CONFIDENTIALITY POLICY

## 1. Purpose of Policy

This Policy governs how All About Living Ltd. collects, stores, uses, discloses, and manages personal information.

This Policy also explains the types of personal information we collect, the purposes for which it is collected, how you can request access to and correct personal information that we hold about you, and how you can make a privacy complaint or contact us with your enquiries or concerns. We take your privacy seriously and are committed to open and transparent management of personal information.

Our suppliers and contractors are required to enter into written contracts ensuring their strict compliance with privacy laws.

This Policy does not apply to personal information that is exempt under the Act, including the personal information of our employees relating to their former or current employment with us.

This policy aligns to the Privacy Act 1988 (Cth), the Australian Privacy Principles (APP) and all other applicable legislation, including State and Territory health records legislation.

## 2. What kinds of personal information do we collect and why?

The personal information that we collect and hold will depend on your relationship with us, the nature of the product or service we are providing or activity you are involved in and the legal obligations we may have.

For contractors and suppliers, we collect your personal information to assess your suitability, qualifications, licences and insurance details and, if applicable, subsequently administering and managing our engagement of you. For employees, we collect your personal information to assess your suitability for the position for which you have applied.

We generally collect and hold both personal and sensitive information, including:

### a) For employees:

- i. contact details including
  - a. name,
  - b. address,
  - c. postcode,
  - d. telephone and facsimile numbers,
  - e. email addresses and

- f. family information;
- ii. demographic information
  - a. including age,
  - b. date of birth and
  - c. gender;
- iii. sensitive information such as health and psychometric information;
- iv. qualifications and experience;
- v. information contained in references obtained from third parties; and
- vi. national police certificates.

**b) For contractors and consultants:**

- i. contact details including
  - a. address,
  - b. postcode,
  - c. telephone and facsimile numbers and
  - d. email addresses;
- ii. financial details and billing information including to comply with our legal obligations;
- iii. qualifications, licences and insurance details;
- iv. information contained in references or referrals obtained from third parties; and
- v. national police certificates.

**c) For donors:**

- i. contact details including
  - a. address,
  - b. postcode,
  - c. telephone and facsimile numbers and
  - d. email addresses;
- ii. demographic information including
  - a. age,
  - b. date of birth and
  - c. gender;
- iii. financial details and billing information to comply with our legal obligations; and
- iv. testamentary intentions as they affect us (for example, details of any gifts left or intended to be left to us in the donor's Will).

If lawful and reasonable to do so, we will destroy and de-identify all unsolicited personal information we receive if we would not normally collect this information or if the information is sensitive and no consent has been given.

### **3. When do we collect Personal Information?**

We will not collect personal information unless it is reasonably necessary for one of our functions or activities. We will usually only collect sensitive information with your consent. All personal information will only be collected through lawful and fair means.

### **4. How do we collect Personal Information?**

The sources from which we collect personal information will depend on the circumstances of the collection and may include the following:

#### *4.1 From you or with your consent*

We will try to collect your personal information directly from you, or alternatively, with your consent. We will collect personal information from you:

- a. if you provide us with information about yourself.
- b. if you complete relevant agreements, applications, forms, surveys, competitions, questionnaires or you communicate with us by taking part in a discussion or forum or by email, telephone, in writing or in person.
- c. if you are providing services or goods to us or our consumers;
- d. if you apply for employment or engagement with us; or
- e. if you make a donation to us.

#### *4.2 From other people*

Where it is unreasonable or impracticable to collect information directly from you, we may obtain personal information about you from a third party. For example, we may collect personal information about you:

- a. from a member of your family, a carer, a close friend, your authorised representative or responsible person, next of kin, your nominated emergency contact person or the police;
- b. from third parties who you have asked to provide your personal information to us; or
- c. from a reference or referral identified in your application for employment or engagement with us.

#### *4.3 From our website*

When you visit our website, our web server may download a cookie to your computer. A cookie is a small piece of information sent by our server to your browser. Cookies do not contain personal information about you but can identify and capture information about a user's browser. If you do not wish to receive cookies, you may set your browser to refuse them.

### **5. Can I choose to remain anonymous?**

We automatically gather anonymous information for monitoring purposes, for example, the numbers and frequency of visitors to our website. This collective data helps us determine how our audiences use parts of our website, so we can improve our services. We may publish or provide this aggregate data to other people or organisations.

### **6. How do we use and disclose personal information?**

We may use and disclose personal information for the primary purpose for which it was collected.

We may use or disclose your personal information:

- a. to staff or other service or healthcare providers or administrative staff.

- b. in assessing whether you are eligible to provide services to our consumers.
- c. to funding bodies and government agencies.
- d. to your next of kin, your nominated emergency contact person or the police; or
- e. any third party that you request or authorise us to.

For prospective employees, this may be for assessing and processing employment applications.

We will only generally use or disclose personal information collected for a primary purpose. However, it may be necessary in some cases to disclose personal information for a secondary purpose, including:

- a. if we have your consent;
- b. if required for the management of our services. For example:
  - i. service-monitoring, funding, complaint-handling, incident reporting, developing and planning services, evaluation and improvement, quality assurance or audit activities, and accreditation activities;
  - ii. education and training of our staff where deidentified information is not sufficient for this purpose;
  - iii. disclosure to our advisors and contractors who provide services to us, for example IT and database management service providers.
- c. for research, compilation or analysis of statistics.
- d. if use or disclosure is necessary to lessen or prevent a serious or imminent threat to someone's life, health or safety or a serious threat to public health and safety.
- e. if we are required or authorised by or under an Australian law or a court or tribunal order.

We effectively and securely destroy and de-identify personal information which is no longer required to be retained by us to satisfy any legal, financial and other requirement in accordance with our information management framework.

## **7. Quality of your Personal Information**

We will take reasonable steps to ensure that the personal information we collect is accurate, complete, up to date and relevant to the purpose for which it is to be used, both at the time of collection, and use.

## **8. How do we hold and secure Personal Information?**

All personal information collected is securely stored on our electronic databases. It may also be held in hard copy files in secure and locked facilities in Australia.

We will take reasonable steps to ensure that the personal information we hold is protected from misuse, loss, interference, unauthorised access, modification or disclosure.

We will notify you, as soon as reasonably practicable, if we find that there has been any unauthorised access, disclosure or loss of your personal information that is likely to result in serious harm to you.

## **9. How can I access or correct my Personal Information?**

You can request access to your personal information held by us, upon written request to our Privacy Officer, or the People & Culture Team. If, upon receiving access to your personal information or at any other time, you believe your personal information is inaccurate, incomplete or out of date, you can notify our Privacy Officer,

or the People & Culture Team to correct your personal information. We will take reasonable steps to correct the information so that it is accurate, complete and up to date.

We may decline a request for personal information in circumstances prescribed in the Act. If so, we will give you a written notice setting out the reasons for refusal and the complaint mechanisms available to you.

#### **10. Do we use your personal information for direct marketing and can you opt out?**

There may be occasions where personal information is used for direct marketing purposes including direct contact, telephone enquiries, email, SMS, letters, internet and web interactions, surveys and other forms of communication.

Any such use will be limited to circumstances where you would reasonably expect us to use or disclose your personal information for that purpose and it has been collected from you, or if you have otherwise consented or requested this information.

You have the right:

- a. to contact us to 'opt-out' of receiving direct marketing communications; or
- b. to request that we provide the source of your personal information where reasonable and practicable.

If you have consented to us providing direct marketing to you and you wish to stop receiving such marketing, please contact us on the details set out in this Policy or provided in the marketing communication.

#### **11. How can I complain about the handling of my personal information?**

If you believe we have at any time breached this Policy, you may lodge a written complaint with our Privacy Officer or the People & Culture Team on the contact details in this Policy. We will acknowledge your complaint within 14 days of receipt, and finalise the complaint within 30 days of receipt.

If you are not happy with our response, you may lodge a written complaint with the Office of the Australian Information Commissioner using the following link:

<https://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us/>

#### **12. Contact details and further information**

Privacy Officer

- **Address:** All About Living Ltd. - 609a Robinson Road West, Aspley QLD 4034
- **Email:** [privacy@allaboutliving.com.au](mailto:privacy@allaboutliving.com.au)
- **Phone:** 1300 503 886

Our Privacy Statement is available on our website.

Further information about the Australian Privacy Principles and the application of the Act can be found at the website of the Office of the Australian Information Commissioner at <http://www.oaic.gov.au>

#### **13. Variations**

All About Living Ltd. reserves the right to vary, replace or terminate this policy from time to time.

#### **14. Associated documents**

- Privacy Statement
- Feedback and Complaints Policy

## VERSION HISTORY

VERSION	APPROVED BY	REVISION DATE	DESCRIPTION OF CHANGE	AUTHOR
V0.1		06/05/2024	New draft	Lynne Jones
V0.2		18/05/2024	Second Draft	Lynne Jones
V1.0	Executive Leadership Team	06/06/2024	Approved Document	Lynne Jones