
2021 Privacy, Dignity & Confidentiality Policy

COMPLETE PLAN MANAGEMENT



COMPLETE PLAN MANAGEMENT

ABN:78 812 170 112

NDIS Provider Number: 4050002040

www.completeplanmanagement.org

TABLE OF CONTENTS

INTRODUCTION	3
DEFINITIONS	4
POLICY PRINCIPLES	
Collection	5
Use.....	5
Storage.....	6
Recording.....	6
Accuracy	6
Access.....	7
Notification	7
Disclosure	7
In-house Confidentiality.....	7
Control.....	8
REVIEW	8

INTRODUCTION

Our Privacy, Dignity and Confidentiality Policy outlines how Complete Plan Management (CPM) will handle and protect personal, private and confidential information about you, your representatives and NDIS services.

Central to our business is the commitment to uphold and respect all legal and human rights of participants and ethical compliance to all relevant privacy legislation, such as but not limited to:

- Australian Privacy Principles (APP) 2014
- Commonwealth Privacy Act 1998
- Mandatory reporting; and the identification of criminal activity.
- National Standards for Disability Services 2013
- NDIS Code of Conduct
- Privacy Principles and Privacy Amendment (Notifiable Data Breaches) Act 2017
- SA Public Health Act 2011
- State Government's Information Sharing Guidelines for Promoting the Safety and Wellbeing of Children, Young people and Their Families
- United Nations Convention on the Rights of Persons with Disabilities

This policy applies to all CPM management, full-time, part-time or casual staff as well as contractors, suppliers and volunteers. We will maintain confidentiality unless you specifically give us permission to disclose your information to your nominated parties or as required by law. We obtain consent from you via our "Consent to Share Information Form". In some situations we may also request verbal consent, in these situations it will be noted on file that consent was gained

DEFINITIONS

PRIVACY

It is your individual right to choose and control how any sensitive and personal information, that may identify you, is collected, used or stored and is protected from unauthorised disclosure.

DIGNITY

It is your individual right to be valued and respected equal to any other member of society and to be treated ethically.

CONFIDENTIALITY

It is your individual right to choose and control how and to who your information is shared. At certain times and in certain circumstances, there are people who will have access to or to disclose specified confidential information about you. Confidentiality restricts and obligates anyone disclosing any information about you to any unauthorised person, entity or process that does not have your prior consent, unless required by law.

POLICY PRINCIPLES

The following principles establish our privacy and confidentiality framework:

COLLECTION

Information that we collect from you will be strictly limited to information that is necessary for us to provide our services to you. You will always be informed as to why we need the information to use for a particular purpose and that it will not be used for any other reason.

Some of the types of personal information we may collect from you are:

- full name
- address
- contact details, such as address, phone numbers and email addresses
- date of birth
- your preferred method of communication
- NDIS plan details
- consent to obtain and share information
- relevant information from any support coordinators and service providers nominated by you
- bank account information for any applicable reimbursements (plan management services only)

This information will be collected from you by authorised staff you when you register for our services, as we provide our services, when we communicate with each other and as otherwise requested from time to time.

USE

We will use your information to provide you (and any nominated representative where applicable) with details on the services we provide, to communicate with you and to improve the quality of our services.

We will only use the information you provide for the primary purpose for which it was collected, unless disclosure is:

- required to protect an individual from harm, or
- is in the interest of public health or safety or
- required under law.

STORAGE

Your personal information is treated with upmost confidentiality and is stored in two ways.

- 1 CPM stores records of individual information electronically and is password and authentication protected
 - Management controls the appropriate level of access that each staff member has access to relevant to their role

2 Physically

- Any handwritten, printed or signed documents are stored in locked cabinets, in secure office space which is only accessible to management and staff. Your information is kept for the legislated period of time. Information or hard copy documents that are no longer required are disposed of appropriately using shredding machines into secure bins

RECORDING

We will only record personal information about a participant or representative with the individual consent of the person unless:

- The collection is required by law
- The collection is necessary to prevent or lessen a serious and anticipated threat to the life or health of any individual, where the individual whom the information concerns: 1) is physically or legally incapable of giving consent to the collection 2) physically cannot communicate consent to the collection.

ACCURACY

We will take all reasonable steps to ensure your personal information is accurate when we:

- Create your original file in our databases
- Update it as we receive new information from you or your representatives during the provision of our services.
- Record notes in relation to provision of support coordination services

ACCESS

It is your right to have access to all information about you held by us. You have the right to request access and change any information held by us unless prevented by law. You also have the right to be informed on who has access to your information and to refuse to provide personal information, in this case we will describe how this may impact on our services provided to you.

We will ensure processes are in place to protect your information from unauthorised access, improper use, alteration and unlawful or accidental destruction and / or loss.

NOTIFICATION

We will notify you either verbally or in writing at, or before, the time of collection of personal information (or, if that is not possible, as soon as practicable after). We will advise you of the nature of the contents of the information shared, who to and when.

DISCLOSURE

Before disclosing information, we will carefully consider whether the personal information needs to be disclosed and whether it can be lawfully disclosed.

We will not disclose information to a third party, or other institutions without your consent, unless lawfully or contractually allowed or required to do so.

Individuals have the right to withhold information for privacy reasons except where required by law (e.g., information pertaining to criminal histories).

Wherever it is lawful and practicable, individuals must have the option of not identifying themselves.

Although the Privacy Act only relates to individuals, we will apply the same principles to the collection of information about organisations and businesses. Where this policy refers only to individuals it applies equally to organisations/businesses.

IN-HOUSE CONFIDENTIALTY

All staff undergo an in-depth induction in their first week with the organisation. It is a requirement that all members of staff sign a Confidentiality Agreement prior to commencing with the organisation.

By signing the Confidentiality Agreement staff members consent and understand, that they are required to diligently follow the established policies, principles and relevant legislations.

Staff are obligated not to disclose any of this confidential information to any unauthorised person. The only circumstances where confidential information is allowed to be disclosed, is when an individual has given consent and the information is shared according to the Information Sharing Guidelines or as required by law.

Staff will be provided with access to your confidential information in direct relation to their role within our organisation once we have received their mandatory screenings as required under the NDIS worker screening requirements

This policy applies even after termination of their tenure at the organisation.

CONTROL

We retain a person responsible for oversight of Privacy issues for the whole of the organisation (Privacy Officer).

They will ensure legislative compliance, and that consistent processes and practices are in place that respect and protect the privacy and dignity of individuals.

REVIEW

We may modify or amend this Policy from time to time. We will display a notice on our website indicating when any such revisions have been made. Unless you notify us otherwise, we will assume that you have consented to the collection of all information which is provided to us for use in accordance with this Policy.