

SAO PL022 - Privacy and Dignity Policy

1. Principles

Step As One Disability Services (Step As One) will:

- Maintain the privacy of personal information of its participants, and the confidentiality arising from any agreement or administrative or service supports provided by Step As One.
- Maintain the personal privacy of participants in the provision of service delivery.
- Abide by legislative requirements surrounding privacy, confidentiality, and dignity of participants.

2. Definitions

Personal information (as defined by the Privacy Act 1988): information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.

Sensitive information (as defined by the Privacy Act 1988): information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record, or health, genetic or biometric templates, that is also personal information.

Confidentiality: implies the relationship of confidence between the organisation and individuals.

Consent: Written and/or verbal permission obtained from the participant and/or their legal representative for the provision of information, the showing of any images, disclosure of any personal details in private and public spaces, medical and service details about and/or involving the participant, information from third parties about the participant.

Australian Privacy Principles: deal with all stages of the processing of personal information, setting out standards for the collection, use disclosure, quality, and security of personal information; and provide obligations on agencies and organisations subject to the Privacy Act (1988) concerning access to, and correction of, an individuals' own personal information.

3. Purpose

The purpose of this Privacy and Confidentiality Policy is to outline Step As One expectation for ensuring the privacy, confidentiality and dignity of participants being provided with disability supports by Step As One.

4. Scope

This policy applies to all Step As One employee including volunteers and contractors.

5. Roles and Responsibilities

5.1 Managing Directors

- Oversees the governance and strategic oversight of the implementation of this policy and related procedures including ongoing changes, legislation updates, review, and approval.



- Oversight of the implementation of this policy and related procedures including ongoing changes, legislative updates, review, and approval.
- Ensuring that relevant authorities including state-based government agencies are notified about any privacy breaches.
- Ensuring legislative requirements both Federal and State are adhered to.

5.2 Managers

- Responsible for incident and investigations practices, as well as, reporting to statutory authorities.
- Ensuring that all staff are informed and trained in the application of this policy and its procedures.
- Oversight over the operational implementation of this policy and related procedures in relation to the intake and engagement process.
- Oversight of service delivery components of this policy and related procedures.

5.3 Staff and volunteers

Ensure they know and understand their responsibilities and follow the intentions of the policy and comply with the instructions in any related procedures. Responsible to report any breaches to this policy or related procedures to a supervisor or Manager.

5.4 Committees

Step As One will implement a Quality and Continuous Improvement Committee responsible for the governance and strategic oversight of the implementation of this policy and related procedures to consider financial, legal, quality of service delivery, safety, and strategic direction of the organisation.

5.5 Participants

Engage in the development and provision of the support they receive by providing feedback, ideas and personal experience that inform the policy and associated procedures. Report any concerns relating to the use of personal information to the organisation as soon as practicably possible.

6. Policy

Step As One Disability Services is committed to implementing a system to ensure each participant will receive quality services and supports that respect and protect their dignity and right to privacy.

Step As One ensures:

- Consistent processes and practices are in place that respects and protect the personal privacy and dignity of each participant.
- Each participant is advised of privacy and confidentiality policies and procedures using the language, mode of communication and terms that the participant is most likely to understand.
- Each participant understands and agrees to what personal information will be collected and the reason, including recorded material in audio and/or visual format and how it will be used, as well as for what purposes.

- Ensuring all information collected from any party included in the above is treated in accordance with the Commonwealth Privacy Amendment (Enhancing Privacy Protection) Act 2012, and in line with the National Privacy Principles.
- Ensuring that all information regarding Step As One staff members, staff, volunteers, participants, and students is maintained in the strictest confidence and is passed on to third parties only with the signed written consent of people concerned.

7. Legislation

- Administrative Appeals Tribunal Act 1975
- Australian Human Rights Commission Act 1986 Cth
- Privacy Act 1988 Cth
- National Disability Insurance Scheme Act 2013 Cth
- National Disability Insurance Scheme Rules 2018 Cth
- National Disability Insurance Scheme (Provider Registration and Practice Standards) Rules 2018.
- National Disability Insurance Scheme (Incident Management and Reportable Incidents) Rules 2018
- NDIS Practice Standards and Quality Indicators July 2018 Cth
- Corporations Act 2001 Cth
- Disability Discrimination Act 1992 Cth
- Disability Services Act 1986 Cth
- National Standards for Disability Services 2013 Cth
- Various State and Territory legislation including but not limited to:
 - disability, mental health, guardianship and administration, enduring power of attorney and medical directive/advance care planning legislation
- State and Territory privacy and health records legislation
 - Health Records and Information Privacy Act 2002 NSW
 - Health Records Act 2001 Vic
- State and Territory work health and safety legislation

8. Document Control

Policy ID: SAO-PL022	Policy title: Privacy and Confidentiality Policy
Reviewed by: Cheryl Hodgson – Managing Director	Approver: Greg Robertson - Managing Director
Version: 1	Effective date: 24 June 2022
Next review date: 24 June 2023	