# Synergy West Plan Management Privacy Policy

## 1. Policy statement

Synergy West Plan Management respects each consumer's right to privacy, dignity and confidentiality. All personal information will be collected, stored and shared only with consent and in accordance with the *Privacy Act 1988* (Commonwealth) and *Information Privacy Act 2009* (Qld).

Synergy West Plan Management collects personal information from people to facilitate the safe and appropriate delivery of agreed services. Staff and volunteers should note that privacy and confidentiality apply:

- In the workplace
- At home and in the community
- When talking with other staff
- When dealing with people of other agencies
- In social environments
- When dealing with other participants

#### 2. Collection of personal information - employees

Personal information about an employee may be collected during the recruiting process and throughout your employment with Synergy West Plan Management. This personal information may be disclosed to other areas within the business for administrative purposes and for the progression of your application. All confidential information will be used for legitimate purposes in accordance with relevant legislation.

Personal information includes information relating to:

- the engagement, training, disciplining or resignation of the employee
- termination of the employment of the employee
- terms and conditions of employment of the employee
- employee's personal and emergency contact details
- employee's performance or conduct
- employee's hours of employment
- employee's salary or wages
- employee's membership of a professional or trade association
- employee's trade union membership
- employee's recreation, long service, sick, personal, maternity, paternity or other leave and
- employee's taxation, banking or superannuation affairs.

All reasonable attempts will be made to keep this information relevant, complete and current. You must ensure that any personal information provided is accurate and current.

#### 3. Collection of personal information - participants

We understand, as a service provider, we will have access to and be responsible for a significant amount of information and, therefore, in line with the *Privacy Act 1988* (Commonwealth), must have appropriate security controls in place to protect this information from unauthorised use, accidental modification, loss or release.

This Privacy Policy will be provided to all candidates/employees/contractors/participants, to ensure they understand what information will be captured about them, how it will be stored and their rights for disclosure, access and complaints.

Specific security control measures that we have in place for employees, contractors and participants include:

- This Privacy Policy outlining the responsibility of employees to maintain confidentiality of participant and employee information.
- Password protection and permission management on electronic content management systems and company files.
- Physical security of our office and equipment our office can be accessed only by our
   Senior Management team and all physical files are stored in a locked, security cabinet.
- Adherence to legal and legislative requirements regarding data usage, privacy policy and information sharing regarding

In the collection, storage and sharing of personal, participant information, we will follow these key principles:

- Consent is obtained from participants for the collection, storage and sharing of their personal information, generally this is written consent, but if verbal, this is recorded in the participant file
- Participant files, whether hard or electronic files, are kept in a secure location with authorised access only
- Participants have the right to access their information at any time
- Participants are encouraged to provide updated information if their circumstances change
- Synergy West Plan Management staff will update information when they become aware
  of changes to participant circumstances, and/or when a review is carried out, to ensure
  that the information is current and accurate
- All information relating to participants is confidential and will not be disclosed to any other person or organisation without the participant's consent
- Only information necessary for delivering effective services will be collected
- Photographs or electronic recordings will not be taken without permission
- Each participant will be offered the right to choose whether to participate in any research or auditing process
- All staff will receive training regarding confidentiality and privacy

#### 4. General files

Synergy West Plan Management maintains electronic files for secure storage and distribution of documents and correspondence which includes but is not limited to:

- Incoming and outgoing correspondence including electronic mail
- Meeting minutes
- Legal documents, Funding Agreements, acquittals and reports and funding applications
- Participant information
- Staff/personnel files.

Staff files will be retained in the organisation's electronic records system and will be accessible only to those staff who are authorised to access them or the staff member him/herself. Staff and volunteer information may include:

- Position Profile and/or Letter of Offer
- Supervision notes
- Any disciplinary letters
- Any notification of changed contracts or other materials relating to staff or volunteers
- Criminal record check Certificates.
- Consumer Files.
- Copies of staff qualifications, certificates and drivers licence

### 4.1 Participant Information

Synergy West Plan Management will utilise and access an appropriately secure platform, to manage individual participant bookings, referrals, and payments. Access will be restricted.

Additional personal information held about participants may include:

- File notes
- Assessment
- Consent information
- Emergency contacts
- Change in circumstances of the consumer
- Complaints
- Reports, referrals or information from other agencies
- Requests from the consumer for any change in service

Hardcopy files will be kept secure during travel and visits to remote communities.

Synergy West Plan Management will seek advice regarding their obligations under relevant privacy legislation when they receive a request for personal information from an external body, authority or organisation, or overseas authority, where the participant has not given consent for transfer of information.

## 5. Employee responsibilities

In light of the above, every employee is responsible for the appropriate handling of such information and to prevent unlawful disclosure.

If you have access to this information or any such personal information belonging to another employee or a participant of Synergy West Plan Management, you must ensure that you maintain the confidence of any confidential information that you have access to, or become aware of, during the course of your employment and will prevent its unauthorised disclosure or use by any other person.

You will not use the confidential information for any purpose other than for the relevant and related Employer processes during or after your employment. Any action in breach of this policy may result in disciplinary action being taken.