



Policy Title	Privacy and Dignity Policy				
Policy Number	BH-P-CC-023-03				
Policy Owner	Compassionate Care WA - Clinical Process and Compliance				
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1. POLICY STATEMENT:

- 1.1. CCWA is dedicated to making certain
 - 1.1.1. Every participant upholds that dignity and defends their right to privacy.
 - 1.1.2. Information about each participant is managed to guarantee that it is current, identifiable, accurately recorded, and private.
 - 1.1.3. Information about each participant is readily available to them, and pertinent staff members use it appropriately.

2. SCOPE

- 2.1. All services and supports provided by CCWA are subject to this policy.
- 2.2. All volunteers, contractors, and employees—whether permanent, temporary, or casual—must assume full responsibility for guaranteeing that the commitments stated in this policy are fully understood.

3. PURPOSE OF THE POLICY:

- 3.1. CCWA is assisted in implementing the **Privacy and Dignity Policy BH-P-CC-023-03** and **Information Management Policy BH-P-CC-036-02** NDIS Practice Standards by this policy, as well as by the policies, procedures, and associated documentation.

4. NDIS QUALITY INDICATORS:

- 4.1. Privacy and Dignity: Every participant has access to resources that uphold and safeguard their right to privacy and dignity.
 - 4.1.1. The following signs must be shown in order to accomplish this goal:
 - 4.1.1.1. Every participant's personal privacy and dignity are respected and safeguarded by consistent procedures and practices.
 - 4.1.1.2. Confidentiality policies are explained to each participant in a language, communication style, and terminology that they are most likely to comprehend. Commission on NDIS Quality and Safeguards 6.
 - 4.1.1.3. Every participant is aware of and consents to the collection of personal data, including audio and/or video recordings, and the reasons behind it.
- 4.2. Information Management: Every participant gives their consent before any information is collected, used, retained, or disclosed to third parties, including assessments, along with information about the purpose of the collection, use, and disclosure. Every participant is made aware of the situations in which the information may be shared, including the possibility that, if necessary or permitted by law, the information may be shared without their consent. **Form for Consent Agreement Form BH-F-CC-005-04.**
 - 4.2.1. Every participant is given information about how their data is kept and used, as well as when and how they can access or update their data and revoke or modify their previous consent.
 - 4.2.2. Each participant's information is accurately and promptly recorded by an information management system that is proportionate to the organization's size and scope.



- 4.2.3. In accordance with the extent and complexity of the services provided, documents are stored using proper use, access, transfer, storage, security, retrieval, retention, destruction, and disposal procedures.

5. DEFINITION OF TERMS:

- 5.1. Bluebird Pty Ltd. is the legal name for Bluebird Homecare. Homecare by Bluebird, ABN 55 625 827 974.
- 5.2. Participant refers to a Bluebird Homecare participant, which may include an NDIS participant.
- 5.3. Important management personnel refers to Paul Lloyd Hersey, Catherine Suva, and other important managers who occasionally work at Bluebird Homecare.
- 5.4. Bluebird Homecare maintains a registry of laws, rules, regulations, and recommendations called the Legislation Registry.
- 5.5. Information or an opinion about a person who can be identified or fairly identified from the information is considered personal information, regardless of whether it is accurate or not and whether it is preserved in a material form.
- 5.6. The policy registry refers to CCWA policy registry.
- 5.7. Catherine Suva is the principal.
- 5.8. A subset of personal data known as sensitive data typically enjoys higher levels of privacy protection. Sensitive information encompasses a variety of data related to an individual's health and genetics, racial or ethnic origin, political beliefs, political association membership, religious affiliations, philosophical views, membership in professional or trade associations, sexual preferences or practices, criminal history, and certain biometric data.
- 5.9. A worker is any worker, whether they are employed by CCWA on a long-term, temporary, or casual basis; they also include the principal.

6. PROCEDURES:

- 6.1. Communication of privacy and dignity policy ensures the participants understand the subject matter of this **Privacy and Dignity Policy BH-P-CC-023-03** in a manner that is responsive to their needs and in the language, mode of communication, and terms that the participant is most likely to understand. CCWA will:
 - 6.1.1. Use respectful, open, clear, and honest communication in all professional interactions (e.g., spoken, written, social media).
 - 6.1.2. Communicate effectively with participants to promote their understanding of the subject matter of this **Privacy and Dignity Policy BH-P-CC-023-03** (e.g., active listening, use of plain language, encouraging questions).
- 6.2. The participant's personal information collected by Bluebird Homecare includes
 - 6.2.1. Name, address, telephone, and email contact details;
 - 6.2.2. Gender, date of birth, marital status, information about their disability, and support needs;
 - 6.2.3. Health and medical information;
 - 6.2.4. Medicare number and other identifiers used by government agencies or other organizations to identify individuals;
 - 6.2.5. Financial information and billing details, including information about the services individuals are funded to receive, whether under the NDIS or otherwise;
 - 6.2.6. Records of interactions with individuals, such as system notes and records of conversations individuals have had with CCWA workers; and
 - 6.2.7. Information about the services CCWA provides to individuals and the way in which Bluebird Homecare will deliver those to individuals.
 - 6.2.8. Typically, CCWA does not collect personal information in the form of recorded material in audio and/or visual format.



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- 6.3. Sensitive information and protection of dignity are collected by CCWA only when it is reasonably necessary for functions or activities and either
- 6.3.1. The individual has consented, or
 - 6.3.2. Bluebird Homecare is required or authorized by or under law (including applicable privacy legislation) to do so.
 - 6.3.2.1. For example, in order to provide CCWA services to a participant or to respond to a potential participant's inquiries about services, Bluebird Homecare may be required to collect and hold their sensitive information, including health and medical information and information relating to their disability and support requirements.
 - 6.3.3. CCWA will treat participants with dignity and respect and, as far as reasonably practicable, protect the privacy and dignity of each participant and, in particular, their sensitive information.
- 6.4. CCWA uses a variety of methods to gather personal data, such as
- 6.4.1. Via the website of Bluebird Homecare Pty. Ltd.;
 - 6.4.2. People communicate with CCWA (e.g., via phone, email, fax, or letter);
 - 6.4.3. On forms in hard copy;
 - 6.4.4. Personally,
 - 6.4.5. From third parties that provide referrals (such as a support coordinator or the National Disability Insurance Scheme);
 - 6.4.6. At gatherings and forums; and
 - 6.4.7. From government organizations and outside funding sources.
- 6.5. CCWA gathers, retains, uses, and discloses personal information primarily for the following purposes:
- 6.5.1. Educating people about the supports and services offered by Bluebird Homecare Pty. Ltd.
 - 6.5.2. Responding to their questions and providing assistance to participants.
 - 6.5.3. Processing payments and providing CCWA services and assistance.
 - 6.5.4. Carrying out tasks related to quality assurance, such as surveying, researching, analyzing, and addressing complaints.
 - 6.5.5. Obeying legal requirements and filing reports to government and funding organizations.
 - 6.5.6. Utilizing forums and events to spread the word about CCWA and its operations.
 - 6.5.7. Carrying out statistical analysis and research pertinent to CCWA operations (including extending invitations to people to take part in research activities and projects).
 - 6.5.8. Submitting reports to funding sources.
 - 6.5.9. Hiring volunteers, contractors, and employees.
 - 6.5.10. Handling financial transactions.
 - 6.5.11. Answering questions and addressing grievances.
 - 6.5.12. Assessing CCWA performance and providing external reporting.
 - 6.5.13. Performing internal tasks, such as information technology, accounting, auditing, training, and administration.
 - 6.5.14. Additional goals that are specified at the time of collection or that are mandated or permitted by law (including, but not limited to, privacy laws).
 - 6.5.15. Objectives for which a person has given their consent.
 - 6.5.16. For research, service evaluation, quality control, and instruction in a way that keeps people anonymous. People should get in touch with CCWA if they do not want their de-identified data to be used in this manner.
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- 6.5.17. To keep people updated on CCWA activities, such as modifications to the National Disability Insurance Scheme or details about disability supports, either with their express or tacit consent or in other situations where CCWA is legally allowed to do so. This information may be communicated by Bluebird Homecare via phone, email, SMS, social media, or the mail.
- 6.5.18. Until a person notifies CCWA to the contrary, their consent to receive marketing communications from CCWA will be valid. People can, however, opt out whenever they choose.
- 6.5.19. To control and enhance user experience, CCWA websites may install a cookie, which is a little text file, on their computer in order to remember their preferences. By choosing the relevant options in their browser, users can opt out of cookies.
- 6.5.20. To use cookies on their device to customize advertising based on their visits or behavior, both on Bluebird Homecare's website and through advertising networks on other websites. Through the settings on their preferred browser, users can manage the use of cookies and their purposes.
- 6.5.21. To monitor website traffic to CCWA and use this data to gauge the site's efficacy. Although the majority of this data is anonymous, CCWA occasionally links it to specific people, for example, when they pre-fill a form with their information or customize a webpage. Read Google's privacy statement to learn more about CCWA analytics tools.
- 6.5.22. To keep people updated on CCWA activities, such as modifications to the National Disability Insurance Scheme or details about disability supports, either with their express or tacit consent or in other situations where CCWA is legally allowed to do so. This information may be communicated by Bluebird Homecare via phone, email, SMS, social media, or the mail.
- 6.5.23. Until a person notifies CCWA to the contrary, their consent to receive marketing communications from CCWA will be valid. People can, however, opt out whenever they choose.
- 6.5.24. To control and enhance the CCWA website's user experience through the use of "cookies." In order to remember their preferences, CCWA website may install a cookie, which is a little text file, on their computer. By choosing the relevant options in their browser, users can opt out of cookies.
- 6.5.25. To use cookies on their device to customize advertising based on their visits or behavior, both on CCWA website and through advertising networks on other websites. Through the settings on their preferred browser, users can manage the use of cookies and their purposes.
- 6.5.26. To monitor website traffic to CCWA and use this data to gauge the site's efficacy. Although the majority of this data is anonymous, CCWA occasionally links it to specific people, for example, when they pre-fill a form with their information or customize a webpage. Read Google's privacy statement to learn more about CCWA analytics tools.
- 6.6. By giving written notice to Bluebird Homecare Pty. Ltd., a participant may change or revoke their consent at any time for CCWA to use their personal information. Due to the nature of its operations, CCWA typically cannot offer participants services or support or interact with them in any other way in the event that a participant withdraws or modifies their consent.
- 6.7. When necessary, CCWA may divulge personal data to third parties for the aforementioned purposes, such as
 - 6.7.1. Funding sources for Bluebird Homecare Pty. Ltd.;
 - 6.7.2. Department of Social Services, the Department of Health and Human Services, and the Australian Taxation Office;
 - 6.7.3. Their designated representatives, legal guardians, executors, trustees, and legal representatives, among others acting on their behalf;
 - 6.7.4. The police, the Disability Services Commissioner, or abide by mandatory notifications from government agencies, courts, or tribunals;
 - 6.7.5. Financial organizations for processing payments;
 - 6.7.6. References whose information job seekers give to Bluebird Homecare Pty. Ltd.; and



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- 6.7.7. The contracted service providers of CCWA include:
 - 6.7.7.1. Service providers of information technology
 - 6.7.7.2. Providers of invoice processing services
 - 6.7.7.3. Call centers and other marketing and communications service providers
 - 6.7.7.4. Courier and freight services
 - 6.7.7.5. External business advisors, including attorneys, auditors, and recruitment advisors.
 - 6.7.8. In the case of these contracted service providers, CCWA may give the service provider access to personal information, and the service provider may then give CCWA access to personal information gathered from people while delivering the pertinent goods or services.
 - 6.8. Personal data is stored by CCWA in a variety of formats, such as paper files stored in cabinets and drawers, electronic databases, email contact lists, and hard copy documents. Paper records can also be kept offsite in safe locations and archived in boxes.
 - 6.8.1. Bluebird Homecare is required to take appropriate action to:
 - 6.8.2. Verify that the personal data that CCWA gathers, utilizes, and shares information that is correct, current, comprehensive, and (in the case of use and disclosure) pertinent;
 - 6.8.3. Prevent unauthorized access, alteration, or disclosure of CCWA personal data, as well as misuse, interference, and loss; and
 - 6.8.4. Subject to additional legal requirements and retention guidelines that apply to Bluebird Homecare Pty. Ltd., destroy or permanently de-identify personal data that is no longer required for any purpose allowed by the Australian Privacy Principles.
 - 6.9. Employees of CCWA is only permitted to access and use personal data for legitimate work-related purposes. When working with personal data, employees should:
 - 6.9.1. Verify the recipient's information before sending emails or faxes;
 - 6.9.2. Any hard copies of private information should always be kept in a secure room or cabinet when not in use;
 - 6.9.3. Pay attention to the people and surroundings around you.
 - 6.9.4. Restrict the removal of hard copy information from secure websites;
 - 6.9.5. Safeguard data while traveling, for example. in a folder, briefcase, etc.
 - 6.9.6. Securely dispose of unnecessary copies of information; and
 - 6.9.7. Make sure those who require access to the information can get it.
 - 6.9.8. CCWA workers may only share personal information as set out under this policy and in circumstances permitted under law.
 - 6.10. CCWA takes the following actions to protect the private data it has on file:
 - 6.10.1. Safeguards for websites (like firewalls, antivirus programs, and encryption);
 - 6.10.2. Security controls on cloud-based storage (using Google Drive and OneDrive) and computer systems used by Bluebird Homecare (such as password and login protection),
 - 6.10.3. Restricted entry to CCWA location
 - 6.10.4. Personnel security (including limiting CCWA employees' access to personal data to those who have a right to know it for the aforementioned purposes); and
 - 6.10.5. Policies for the workplace and training.
 - 6.11. Retention of information



- 6.11.1. After a participant stops participating, all participant records and personal data will be kept for a minimum of seven years, unless the law specifies a different period.
- 6.12. Information disposal
 - 6.12.1. Before disposing of any personal data, employees should make sure that the requirements for record retention have been fulfilled.
 - 6.12.2. Employees should do the following when getting rid of personal data:
 - 6.12.3. Put copies of information or unnecessary working documents in safe containers or sufficient shredders.
 - 6.12.4. When not in use, make sure all electronic devices—computers, hard drives, USB keys, etc.—are cleaned.
- 6.13. Unauthorized individuals accessing, altering, or destroying personal data can lead to privacy incidents. The following are some scenarios where incidents could occur:
 - 6.13.1. The unintentional introduction of a virus into a computer used by the agency;
 - 6.13.2. Discussing or disclosing private information on Facebook or other social networking sites;
 - 6.13.3. Theft or loss of a portable storage device that holds private data;
 - 6.13.4. Putting readable paper in the recycle or hard waste bins, which is an unsafe way to dispose of hard copies of personal information;
 - 6.13.5. Documents delivered to an incorrect email address or fax number; and
 - 6.13.6. Documents delivered to a free online email account, like Yahoo!, Hotmail, Gmail, or both.
- 6.14. Incidents involving privacy can:
 - 6.14.1. Occur as a result of intentional or inadvertent actions;
 - 6.14.2. Result from technical malfunctions or human error; and
 - 6.14.3. Apply to any type of information, including hard copy and electronic.
- 6.15. All privacy incidents must be reported as soon as possible in order to reduce their impact. Employees need to be mindful of:
 - 6.15.1. How to spot possible privacy violations
 - 6.15.2. Incidents should be reported in order to lessen their impact, not to punish specific people.
 - 6.15.3. The obligation to notify their manager of any incidents as soon as they are discovered.
- 6.16. All privacy incidents involving participants must be reported by CCWA to the:
 - 6.16.1. Health Department (WA);
 - 6.16.2. Commission for the NDIS
 - 6.16.3. The Australian Information Commissioner's Office,
- 6.17. As appropriate, within a day after learning about or receiving notification of a potential privacy incident, or within a day after a potential breach is alleged.
- 6.18. A breach of participant privacy could be a near miss or incident that doesn't seem to affect a participant, or it could have a significant or minor impact. The **Incident Management and Reporting Policy BH-P-CC-008-03** must be followed in every instance for the incident to be reported and handled.
- 6.19. Correction and Access
 - 6.19.1. Participants are legally entitled to request access to or correction of any personal data that CCWA may hold about them.



6.19.2. Before completing any access or correction requests, participants may ask people to confirm their identity in order to properly protect the personal data that CCWA has on file.

6.20. Grievances

6.20.1. The CCWA **Feedback and Complaints Management Policy BH-P-CC-009-03** will be followed if a participant has a grievance regarding the way in which Bluebird Homecare has gathered or handled their personal information.

7. RELATED FORMS:

7.1. Consent Agreement Form BH-F-CC-005-04

4.1. Feedback and Complaints Form BH-F-CC-003-03

5. RELATED POLICIES:

5.1. Privacy and Dignity Policy BH-P-CC-023-03

5.2. Information Management Policy BH-P-CC-036-02

5.3. Incident Management and Reporting Policy BH-P-CC-008-03

5.4. Feedback and Complaints Management Policy BH-P-CC-009-03

6. REFERENCES:

6.1. NDIS Quality and Safeguards Commission 6