Privacy and Information Sharing Policy

POLICY STATEMENT

Lifestyle Assistance and Accommodation Service Inc (LAAS) will take all reasonable steps to protect the privacy of personal information and will not disclose personal or sensitive information without consent. This policy covers all privacy considerations of LAAS to employees, volunteers, clients and members of the organisation.

RESPONSIBILITIES

It is the obligation and responsibility of every employee to ensure that privacy and personal information is protected in accordance with this policy.

DEFINITIONS

Personal information is information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or is reasonably identifiable.

Sensitive information is a sub-set of personal information that is given a higher level of protection. Sensitive information means information relating to racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation or practices, criminal records, health information or biometric information.

THE INFORMATION WE COLLECT

Personal information: The types of personal information we may collect about you include:

- your name.
- your contact details, including email address, mailing address, street address and/or telephone number.
- your age and/or date of birth.
- your gender.
- your credit card or payment details (through our third-party payment processor);
- your tax file number information.
- your State or Federal Government clearances.
- your qualifications and training certificates.
- your preferences and/or opinions.
- your living arrangements including type of housing and co-inhabitants.
- your emergency contact details including their name and telephone number.
- your community support contact details including their name and telephone number.
- your medical and health practitioner's contact details including their name, address and telephone number.
- your pharmacy contact details including their name, address and telephone number.

- whether or not you have ambulance cover and if so, details of such cover.
- information you provide to us through surveys.
- images of you for the promotion of our Services to you.
- details of services we have provided to you and/or that you have enquired about, and our response to you.
- your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour.
- information about your access and use of our Services, including through the use of Internet cookies, your communications with our online Services, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider.
- additional personal information that you provide to us, directly or indirectly, through your use of our Services, associated applications, associated social media platforms and/or accounts from which you permit us to collect information; and
- any other personal information requested by us and/or provided by you or a third party.
- your sensitive information as set out below.

Sensitive information: The types of sensitive information we may collect about you include:

- your National Disability Insurance Scheme (NDIS) details including your NDIS number, your NDIS plan start and review date and a copy of your NDIS plan.
- any support plan you provide us with.
- your health information, such as:
    - your disability.
    - your health condition including your physical and mental health.
    - your medical history including illnesses and/or diseases.
    - details of your medications.
    - any aids or support you use or require.
    - allergies/reactions.
    - your support needs.
    - your access needs.
    - whether or not you smoke.
    - whether or not you have an advanced care directive.
    - whether you have any behaviours of concern.
- your cultural and religious beliefs.
- any legal orders made by a State or Federal Government body that may be relevant, such as:
    - guardianships.
    - personal financial administration.
    - firearm prohibition orders.
    - special powers orders.

Unless otherwise permitted by law, we will not collect sensitive information about you without first obtaining your consent.

HOW WE COLLECT PERSONAL INFORMATION

We will only collect information about you directly from yourself, unless:

- You have provided consent for us to collect information from other parties.
- We are required or authorised by Australian law to collect the information, or
- It is unreasonable or impracticable to do so.

We collect personal information in a variety of ways, including:

- **Directly:** We collect personal information which you directly provide to us, including when we onboard you as a client, you fill in any forms for us either online, over the telephone or in person, you submit a form through our website, through the 'contact us' form on our website or when you request our assistance via email or over the telephone.
- **Indirectly:** We may collect personal information which you indirectly provide to us while interacting with us, such as when you use our website, in emails, over the telephone and in your online enquiries.
- **From third parties:** We collect personal information from third parties, such as Support Coordinators from other agencies referring you to us, medical and health practitioners, details of your use of our website from our analytics and cookie providers and marketing providers. See the "Cookies" section below for more detail on the use of cookies.

COLLECTION AND USE OF PERSONAL INFORMATION

Personal information: We may collect, hold, use and disclose personal information for the following purposes:

- to enable you to access and use our Services, including to provide you with a login to our portal.
- to provide our Services to you, including to work with you to tailor our personal care, health and support Services to your needs and deliver our clinical training, child safe training and disability training courses to you.
- to enable you to access and use our associated applications and associated social media platforms.
- to contact and communicate with you about our Services.
- for internal record keeping, administrative, invoicing and billing purposes.
- for analytics, market research and business development, including to operate and improve our Services, associated applications and associated social media platforms.
- for quality management, investigation and auditing purposes.
- to run promotions, competitions and/or offer additional benefits to you.
- for advertising and marketing, including to send you promotional information about our services and information that we consider may be of interest to you.
- to comply with our legal obligations and resolve any disputes that we may have.

- if you have applied for employment with us; to consider your employment application; and
- if otherwise required or authorised by law.

Sensitive information: We only collect, hold, use and disclose sensitive information for the following purposes:

- any purposes you consent to.
- the primary purpose for which it is collected to work with you to tailor our Services to your needs, to enable us to provide our Services to you and to refer you to medical or health service providers.
- secondary purposes that are directly related to the primary purpose for which it was collected, including disclosure to the below listed third parties as reasonably necessary to provide our Services to you.
- for quality management, investigation and auditing purposes.
- to contact emergency services, to refer you to medical or health service providers in emergency circumstances, or to speak with your family, partner or support person where we reasonably believe there is a serious risk to the life, health or safety of you or another person and it is impracticable for us to obtain your consent; and
- if otherwise required or authorised by law.

DISCLOSURE OF PERSONAL INFORMATION TO THIRD PARTIES

We may disclose personal information to:

- the National Disability Insurance Agency (NDIA) in relation to the NDIS.
- other disability support funding bodies which you are a recipient of.
- your medical and health practitioners.
- your pharmacy.
- your legal guardian.
- your Support Coordinator.
- medical and health practitioners who we may refer you to.
- your plan manager and support workers from third party agencies.
- third party auditors as part of an audit on behalf of the NDIA or the Australian Community Industry Alliance.
- the Department of Health in relation to the Disability Services for Older Australians (DSOA) Program.
- third party service providers for the purpose of enabling them to provide their services, to us, including (without limitation) IT service providers, digital time recording platforms, data storage, webhosting and server providers, debt collectors, couriers, maintenance or problem-solving providers, professional advisors and payment systems operators.
- our employees, contractors and/or related entities.
- our existing or potential agents or business partners.
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred.

- courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you.
- courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights.
- any other third parties as required or permitted by law, such as where we receive a subpoena.

Overseas disclosure: While we currently store personal information in Australia, where we disclose your personal information to third parties listed above, these third parties may store, transfer or access personal information outside of Australia.

We will only disclose your personal information to countries with laws which protect your personal information in a way which is substantially similar to the Australian Privacy Principles, or we will take such steps as are reasonable in the circumstances to protect your personal information in accordance with the Australian Privacy Principles.

YOUR RIGHTS AND CONTROLLING YOUR PERSONAL INFORMATION

Your choice: Please read this Privacy Policy carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not, it may affect our ability to provide our Services to you and your use of our Services.

Information from third parties: If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

Anonymity: Where practicable we will give you the option of not identifying yourself or using a pseudonym in your dealings with us.

Restrict and unsubscribe: To object to processing for direct marketing/unsubscribe from our email database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

Access: You may request access to the personal information that we hold about you.

Correction: If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us via 0875479111 or admin@laas.com.au We will take reasonable steps to promptly correct any information found to be inaccurate, out of date, incomplete, irrelevant or misleading.

Complaints: It is your right to make a complaint regarding any breach or misconduct related to this policy, the Australian Privacy Principles and your personal/sensitive information. If you wish to make a complaint you can provide it by:

- Phone call to (08) 75 479 111
- Email to feedback@laas.com.au
- Online by form https://laas.com.au/contact/feedback/

All complaints will be managed according to our Feedback and Complaints Management Policy and Procedure and where possible, a response will be provided in writing and document the outcome of our investigation and the actions we will take in response to your complaint.

You also have the right to contact the relevant privacy authority.

STORAGE AND SECURITY

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

While we are committed to security, we cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

COOKIES

We may use cookies on our online services from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do recognise you when you return to our online services and allow third parties, such as Google and Facebook, to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide our online services with personal information, this information may be linked to the data stored in the cookie.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our online services.

LINKS TO OTHER WEBSITES

Our Services may contain links to other websites. We do not have any control over those websites, and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

INFORMATION SHARING GUIDELINES

Given the nature of the work we do, LAAS follow the SA Government Information Sharing Guidelines (ISG) for Promoting Safety and Wellbeing. We do this by working closely with other agencies to coordinate the most appropriate and safest support for people we may support.

Under the ISG, informed consent for the sharing of information will be requested and respected in all situations unless:

- It is unsafe or impossible to gain consent or
- Consent has been refused; and without information being shared, it is anticipated a child, young person or adult will be at risk of serious harm, abuse or neglect, or pose a risk to their own or public safety.

In the event of a threat to safety or well-being, safety will override privacy.

SECURITY OF PERSONAL INFORMATION

Personal information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure.

When personal information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify personal information. However, most of the personal information is or will be stored in client files which will be kept by us for a minimum of 7 years.

ACCESS TO PERSONAL INFORMATION

The owner of the personal information that we hold may access it to update and/or correct it, subject to certain exceptions, by contacting us in writing and providing reasonable notice. In order to protect personal information, we may require identification from parties wishing to access the information before releasing the requested information.

MAINTAINING THE QUALITY OF PERSONAL INFORMATION

It is an important to us that personal information is up to date. We will take reasonable steps to make sure that personal information is accurate, complete and up to date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

PRIVACY POLICY ENQUIRIES

If you have any queries about our Privacy Policy, please contact us at:

Lifestyle Assistance and Accommodation Service Inc.
12 Edward Street
Loxton SA 5333
Phone: (08) 75 479 111
Email: admin@laas.com.au

Record of policy development		
Version	**Date Approved**	**Date for Review**
Version 3.5	18/09/2024	18/09/2026

Responsibilities and delegations	
This policy applies to	All Employees, Clients and Board Members
Specific responsibilities	All Employees, Clients and Board Members have responsibility for understanding the policy and implementing the intent and procedures relating to the policy where applicable in their work.
Policy approval	Board

DOCUMENTATION	
Policy context – This policy relates to:	
Standards	NDIS Practice Standards and Quality Indicators Privacy Act 1988 Australian Privacy Principles Information Sharing Guidelines (SA Govt.)
Related Policies/Procedures	Q109 – Client Records Policy Q009 – ISG Policy Q104A – Mandatory Reporting Incidents Guideline P108 – Privacy Procedure

This document is readily available to employees and clients of LAAS including the Board of Management.