



PROCEDURES 4.0 - PRIVACY, DIGNITY & CONFIDENTIALITY

Number	Procedure	Related National Disability Insurance Scheme Quality Practice Standards
4.0 (A)	Principle 1. Collection	1
4.0 (B)	Principle 2. Use and disclosure	
4.0 (C)	Principle 3. Data quality	
4.0 (D)	Principle 4. Data security	
4.0 (E)	Principle 5. Openness	
4.0 (F)	Principle 6. Access	
4.0 (G)	Principle 7. Identifiers	
4.0 (H)	Principle 8. Anonymity	
4.0 (I)	Principle 9. Trans border data flows	
4.0 (J)	Principle 10. Sensitive information	

Procedures

4.0 (A) Principle 1. Collection

- Better Together will only collect personal information which is necessary for one or more of its functions.
- Data will be collected in order to appropriately analyse service delivery and assess outcomes.
- Better Together will support the stakeholder to access a family member or independent advocate to assist them with all matters concerning the collection, storage and use of their personal information.

4.0 (B) Principle 2. Use and disclosure

- Better Together or its employees must not use or disclose personal information about a stakeholder other than for the primary purpose of collection unless;
 - the stakeholder has consented to the use or disclosure in writing
 - the use or disclosure is necessary to lessen or prevent a serious threat to the health and safety of the stakeholder or any other person
 - the use or disclosure is required or authorized by law
 - or, any other relevant reason as detailed in the *National Privacy Principles*



2. Better Together's stakeholders will not use information collected for any personal reason, to promote their cause or advance their personal agenda.
3. Better Together employees who have access to the personal information of all stakeholders, may only access the information for the specific purpose of providing a quality service or for administration purposes as authorised by the Manager or the President.

4.0(C) Principle 3. Data quality

Better Together will review the individual's personal information annually or as required to ensure it is accurate, complete and up to date.

4.0(D) Principle 4. Data security

Better Together will take steps to protect the information it holds from misuse, unauthorised access, modification or disclosure;

Hard copy data

1. Hard copies of personal information will be stored in a locked filing cabinet only accessible by the manager or authorised employees
 - an authorised employee is someone who has responsibility for the service provision of the stakeholders as outlined in their position description
 - only the specific information requested by the manager will be accessed from the stakeholders file
2. If personal information about a service user is no longer required, then, depending on its nature, and legislative requirements regarding its storage, it will be archived or destroyed
3. Files will only be archived when authorised by the manager
4. Archived files will be stored in a secure location for at least seven (7) years
5. Unwanted documents containing personal details will be shredded
6. Personal information is not left in view of unauthorised people
7. An authorised employee will only take a service user's file out of the office to visit with them, their family or their advocate
8. Office whiteboards, charts etc. will display initials only of service users and or lifestyle coaches

Electronic data

9. Information stored on the computer system will be protected by passwords
10. All employees will have their own password and will only have access to relevant files as delegated by the manager to assist in effective service delivery
11. Security based changes to the password will be made as deemed appropriate by the manager
12. CRM system has record access permission function to limit file access to increase unnecessary access to a file
13. Electronic information will only be updated, altered or archived but not deleted
14. Computer data will be remotely backed up and scanned for viruses



15. Contracted IT companies will be required to sign a Confidentiality Agreement
16. No personal records will be copied onto or stored on an external memory device

Information kept off-site

17. Where appropriate, a service user's communication diary or folder will be kept in their home to provide a single access point for lifestyle coaches
18. Lifestyle coaches will store their devices securely and log out of the Better Together client management system when not in use
19. Documents with personal information generated from an employee's personal electronic device, or emailed to an employee's personal electronic device, will be stored securely throughout the duration of their employment and deleted when their employment with Better Together discontinues or they are no longer a part of the service user's team

Information sharing within the Better Together team

1. Employees of Better Together will only share relevant information regarding the support of a service user with their team leader or other authorised team members for the purpose of improving or supporting quality service delivery
2. Information shared may be in a team meeting or a private space at the Better Together office and never in a public space where there could be a risk of being overheard
3. In a training or learning environment, non-identifying examples may be used only for the purpose of professional development and continuous improvement

Sharing information with other agencies

1. Better Together will seek the written consent of the service user prior to obtaining information from any other source or releasing information to any other source
2. At the commencement of service provision the service user will complete the Information Permission Form which includes instructions to Better Together about sharing personal information with:
 - individuals other than themselves
 - community organisations
 - health professionals
 - government agencies
 - authorised individuals who may view the Individuals File for Quality Assurance purposes
3. Whenever information is requested from Better Together, inform the service user and document on the Individuals file:
 - when and what information was shared, and
 - to whom
4. The service user will complete a Media Release Form regarding the future publication of the individual's photo and/or name in the Better Together newsletter, website or promotional material;
5. Advise the service user of their right to withdraw or modify their consent to share information with any person or organisation at any time ([see procedure 3.0 \(B\) Seeking Consent](#)) ;
6. Review and update the relevant consent forms annually;



4.0(E) Principle 5. Openness

Better Together will clearly express its' management of personal information in this policy 4.0 Privacy, Dignity and Confidentiality.

At the time information is collected, reasonable steps will be taken to ensure the stakeholder or their advocate is aware of;

- Better Together's contact details
- what sort of information it holds
- the purposes for which the information is collected
- how it stores, uses and discloses that information
- the stakeholder's rights to gain access to their information

4.0(F) Principle 6. Access

Under the right to information Act 2009 a stakeholder who requests it will be given access to their information within 10 working days from the written receipt of the request, unless;

- providing access would pose a threat to the life or health of any individual
- providing access would impact upon the privacy of other individuals
- or, for any other relevant reason as detailed in the *National Privacy Principles*

If you believe that any information that we hold about you is inaccurate or out of date, please contact us and we will review and update the relevant information. We encourage our members and Individuals to access and update personal membership information should they believe it to be incorrect.

4.0(G) Principle 7. Identifiers

Better Together will not use an identifying number allocated to a service user by another organisation or agency. At Better Together, the service user will always and only be identified by their name or their initials.

4.0(H) Principle 8. Anonymity

Anonymity is an option for service users when providing feedback or completing surveys.

Better Together will respect a service user's right to not disclose their personal details. However, if this interrupts or breaches service delivery a decision will need to be made by the management committee regarding the anonymity.

4.0(I) Principle 9. Transborder data flows



Better Together will only transfer information to someone in a foreign country if the service user consents to the transfer in writing.

4.0(J) *Principle 10. Sensitive information*

Better Together will not collect sensitive information unless the individual has consented or the collection is necessary to prevent threat to life or health.