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<i>Document Type:</i>	<i>Policy & Procedure</i>
<i>Department:</i>	<i>Human Resources</i>

Privacy Policy

Policy

1. Introduction

Country Home Services (CHS) is committed to protecting your privacy. As part of our commitment, this Privacy Policy outlines how CHS manages the personal information it holds about its clients, carers, independent contractors and employees.

2. Openness

When collecting personal information, CHS will indicate the purpose for the collection and use of the information, to whom it may be disclosed and how clients, carers, independent contractors and employees can request access to the information.

3. Purpose for Collecting Information

CHS only collects information that it needs in order to provide its services. CHS primarily receives commonwealth funding to provide care and services to clients. Its services include, but are not limited to the:

- provision of subsidised care and services to clients; and
- provision of non- subsidised care and services to clients.

To effectively provide such services, CHS needs to collect certain personal information to ensure the health and safety of individuals utilising its services and to assist in determining the type of services it should be providing for a particular individual.

4. Type of Information Requested

Information that CHS may request from our clients (their carers), -contractors and employees includes but is not limited to:-

- name, gender, address, phone number(s);
- date of birth;
- health information;
- billing details;
- records of our interactions such as case notes and client electronic files;
- preference for particular activities and/or events;
- feedback on services; and
- significant contact name & phone number.

CHS will endeavor to collect all information directly from our clients, carers, independent contractors and employees. However, from time to time, we may also collect information from other sources, such as from the client's family.

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Our client may choose not to provide the information that CHS requires to provide its services effectively, in this case we may not be able to provide the requested service(s).

5. Use of Personal Information

CHS uses the personal information it collects for the purposes of providing, managing and administering its service(s). This includes, but is not limited to:-

- Contact in relation to any matter relating to you or the services provided;
- scheduling and booking services;
- identifying health risk factors for individuals;
- quality assurance and client satisfaction;
- marketing, research and statistical analysis;
- practicing effective risk management;
- complying with relevant laws and regulations;
- resolving complaints; and
- fulfilling marketing promotions.

6. Disclosure of personal information

To be able to effectively provide our service(s), CHS may disclose information to others. In order to provide, manage and administer our services and to operate an efficient and sustainable business, CHS may also disclose information to third parties which may include (but are not limited to) the following:-

- contractors or service providers engaged by us;
- any persons acting on our behalf, including professional advisors;
- government and regulatory bodies (e.g. the Department of Social Services);
- where disclosure is permitted or required by law; and
- when another organisation helps us process transactions, store data, access data or provide services in order for them to perform their role.

Where we engage contractors, service providers or others to act on our behalf, CHS will take reasonable steps to protect the privacy of all information disclosed and requires such parties to comply with any relevant privacy laws. Our clients, carers, contractors and employees have the right to ask these organisations or contractors for access to information they hold about them.

7. Marketing

If our clients, carers or contractors do not wish to receive marketing material or newsletters from us, they can contact us at any time to let us know. Our contact details are at the end of this policy.

If a client, carer or contractor requests not to receive marketing material/newsletters, please note that we will still contact our client in relation to our on-going relationship. For example,

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we will still send any accounts, statements and notices that are relevant to the services purchased from us.

8. Data Quality

CHS will take reasonable steps to ensure that personal information it collects, uses and discloses is accurate, correct and up to date. It does so via its own internal quality system and auditing procedures.

If our client, carer, contractor or employee believes any personal information that we hold is incorrect, incomplete or out-of-date, please contact us. We will respond to a request within a reasonable period and will take appropriate steps to amend personal records.

9. Personal Information Storage and Security

CHS holds personal information in a combination of secure electronic and hard copy formats. The information we hold is stored within Australia. We take all reasonable steps to ensure that any personal information held by us is protected from misuse, loss and unauthorised, modification or disclosure. Such steps include, but are not limited to:-

- secure physical storage of documents;
- premises security measures;
- network and communications security measures; and
- quality system procedures.

CHS will keep information for as long as it is required to provide the intended service(s) or to meet legal and regulatory requirements. CHS will take reasonable steps to permanently de-identify or securely destroy personal information that we no longer require for any purpose except in limited permitted circumstances.

CHS will comply with Mandatory Data Breach notification requirements, meeting its obligation to notify individuals whose personal information is involved in a data breach, that is likely to result in serious harm.

10. Accessing your personal information

Our clients, carers, independent contractors and employees have a right to reasonable access to any personal information that CHS holds. To request access to personal information, please contact us (our contact details are outlined below). At the time of making such a request, we may ask that relevant forms be completed. We reserve the right to charge for providing access to certain information, as permitted by law and this information will be provided at the time of making the request. We will always endeavor to meet a request for access within a reasonable timeframe.

However, in some circumstances we may decline a request for access to information, such as, where we no longer hold the information, or where denying access is permitted or required by law. If we are unable to give access to the information requested, we will provide written

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reasons for this decision when we respond to the request. For any concerns about the refusal, please see section 13 for further information.

11. Correcting personal information

To enable us to provide the best possible service, it is important that the information we hold about our clients, carers, contractors or employees is accurate. We will take reasonable steps to ensure personal information is accurate, complete and up-to-date at the time of collecting, using or disclosing it.

If our client, carer, contractor or employee believes any personal information we hold is inaccurate, incomplete or out-of-date, this should be drawn to our attention. We will respond to a request to correct information within a reasonable period and take appropriate steps to amend the record.

12. Privacy online

12.1. Online data collection and use

When our client, carer, contractor or employee accesses our website, anonymous technical information may be collected about user activities on the website. This may include information such as the type of browser used to access the website and the pages visited.

This information is used by CHS to make decisions about maintaining and improving our websites and online services. This information remains anonymous and is not linked in any way to personal identification details.

12.2. Cookies

A “cookie” is a small text file placed on a user’s computer by a web server when accessing a website. Cookies are frequently used on websites. Cookies in themselves do not identify the individual user, just the computer used. We use cookies to collect data to help us determine which pages are most popular, peak usage times and other information that helps us make our websites easier and more efficient to use. When a client or employee visits our websites we may set a cookie on their computer so that on the next visit to our websites it links to personal information that is stored on our system.

A client, carer, contractor or employee can choose if and how a cookie will be accepted by configuring preferences and options in their browser. For example, the browser can be set to notify when a cookie is received or to reject cookies. Our clients, carers, contractor or employee should know that if they decide not to display cookies, then they may not be able to gain access to all the content and facilities of this website.

13. Contacting CHS

For any questions, feedback or concerns about this policy or how your information is handled by CHS our clients, carers, contractors or employee should contact 1300 773 202 (8.30am-4.30pm, Monday-Friday, Excluding Public Holidays).

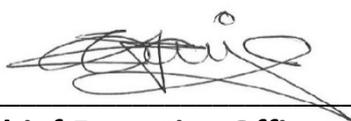
We can also be contacted by fax, mail or email:

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- Fax – (08) 7170 5893
- Mail – Level 1, 30 -38 Barossa Valley Way, Nuriootpa SA 5355
- Email – qrs@countryhomeservices.org.au

If our client, carer, contractor or employee is not happy with our response, or does not feel that the complaint has been resolved, advice can be sought from the Office of Australian Information Commissioner by calling 1300 363 992.

Signature: 
Chief Executive Officer

Date: 22 / 07 / 2020