

## PRIVACY POLICY

Achieving Solutions recognises an individual's right to privacy, including the right to having their personal information protected.

**Achieving Solutions protects each client's privacy in accordance with:**

- *The Privacy Act 1988* (Cth) (Privacy Act).
- The Australian Privacy Principles.
- Other Registered Privacy Codes.
- The Aged Care Charter of Rights.

This policy provides guidelines to guide how our organisation manages:

- the type of information collected;
- how information is collected;
- the use, disclosure and management of personal information.

### **RESPONSIBILITIES**

It is the responsibility of Achieving Solutions to:

- ensure that all employees have access to, and are aware of, this policy and procedure; and
- ensure client's and external stakeholders have access to this policy.

It is the responsibility of all Achieving Solutions employees to comply with this policy and procedure.

### **The purpose for which information may be collected, held, used and disclosed**

The personal information Achieving Solutions collects and holds about a client will depend on a client's interaction with Achieving Solutions. Generally, Achieving Solutions will collect, use and hold a client's personal information for the purpose of:

- assisting in the provision of quality care services for our clients;
- effectively training, managing and ensuring the safety of each employee;
- facilitating our internal business operations, including the fulfilment of any taxation, compliance or legal requirements;
- analysing our services, client and employee needs with a view to improve those services; and
- contacting the client to provide a testimonial for us.

### **Types of information collected**

Achieving Solutions can collect, hold and manage clients' personal information relating to the provision of a client's services.

Achieving Solutions can collect, hold and manage employees' personal information relating to an employee's position during their period of employment.

Sensitive information which may be collected could include, but is not limited to:

- Ethnicity;
- Cultural preferences;
- Sexual identity;
- Religion;
- Health and/or psychological information;
- Diversity.

### **How information is collected**

Achieving Solutions collects information by lawful and fair means, and we will only collect personal information that is necessary for the provision of a client's services, for employment purposes, and/or for conducting our business in general. As an example, Achieving Solutions may collect information about our clients during any client correspondence including telephone, facsimile, email, letter, subscription (electronically or otherwise) to any of our publications or when a client contacts Achieving Solutions in person.

### **How information is used and disclosed**

#### **EMPLOYEES:**

Employees personal information may be used by Achieving Solutions in connection with an employee's:

- work placement;
- performance appraisals; and
- identification of training needs.

Achieving Solutions may also use an employee's information in the management of any complaint, investigation or inquiry in which the employee is involved including, but is not limited to, insurance and/or WorkCover claims.

#### **CLIENTS:**

Client's personal information will be captured in a client's individualised care plan which supports and guides the provision of a client's care services and may be used by Achieving Solutions to share:

- With other service providers to ensure the provision of the required care and services.
- With our care givers in feedback about their care visit.

Achieving Solutions will usually use or disclose personal information relating to clients and employees:

- for the primary purpose for which it was collected;
- for related purposes which the individual would reasonably expect; or
- with client consent.

In some circumstances, we may use or disclose personal information without consent. This may include, but is not limited to:

- Enabling Achieving Solutions to match an employee’s interests with the interests of our clients;
- Reviewing and analysing our services, including client and employee needs with a view to improving those services;
- Where we reasonably believe that the use or disclosure is necessary to reduce or prevent a threat to a person’s life, health or safety or a serious threat to public health or safety;
- Where the use or disclosure is required by law; and
- Where we reasonably believe the use is necessary for law enforcement, public revenue protection, prevention and remedying of serious improper conduct, or conduct of court or tribunal proceedings, either by or on behalf of an enforcement body.

**Failure to provide Achieving Solutions with information and/or inaccurate information**

If the personal information a client provides is incomplete, not current or inaccurate, Achieving Solutions may be unable to provide the client with the care and services required.

Failure to provide complete and accurate information by an employee could also result in disciplinary actions and may result in a decision to terminate their employment contract.

**Collection of anonymous information via Achieving Solutions website**

Achieving Solutions maintains the privacy of all users and guests of our digital location.

Achieving Solutions tracks usage patterns on our website on an anonymous basis. Each time an individual accesses our website a web server makes a record of the visit.

Specifically, it records:

- The internet service provider;
- Date and time of your visit;
- Pages accessed and the documents downloaded;
- Search items entered; and
- Referring URLs (universal locators).

Our website may contain links to other websites. We are not responsible for the privacy practices of linked websites and any linked websites are not subject to our privacy policies and procedures.

Third party providers that we engage include, but are not limited to, Facebook, Instagram, Google and Adobe.

**Direct Marketing**

Achieving Solutions may from time to time use information to market services directly to a client however will not provide or disclose client information to any third party for the purposes of direct marketing. In the event we use information about you for the purpose of direct marketing, we provide the client with a mechanism to ‘opt-out’. If a client chooses

to 'opt-out' Achieving Solutions will not continue to use that client's information for direct marketing purposes.

### **How personal information is secured**

Achieving Solutions stores personal information in different ways, including in hard copy or as electronic data in our Relationship Management System (RMS) which is a core electronic business operating system. The security of personal information is important to Achieving Solutions and we take reasonable measures to ensure your personal information is stored safely to protect it from misuse, loss, unauthorised access, and modification or disclosure. These measures include electronic and physical security measures.

### **Gaining access to and correction of personal information**

A client and/or an employee may request access to any personal information held about them, by making a written request. Achieving Solutions will respond to any information request within a reasonable period.

Achieving Solutions may decline a request for access to personal information in circumstances prescribed by the Privacy Act. If access is declined, Achieving Solutions will provide you with a written notice setting out the reasons for the refusal.

If, upon receiving access to personal information, or at any time, clients and/or employees believe the personal information held is inaccurate, incomplete or out of date, Achieving Solutions is to be notified immediately. Achieving Solutions will take reasonable steps to correct the information to ensure information is always accurate, complete and current.

### **Data breach of personal information**

In the event that Achieving Solutions becomes aware of a data breach of personal information and considers the risk of the data breach is more than likely to result in serious harm to an individual/s, Achieving Solutions will notify the individual/s at risk in accordance with our obligations under the Privacy Act 1988 and the Notifiable Data Breaches Scheme.

### **Lodging a complaint and providing feedback**

If a client and/or employee wish to lodge a complaint about a breach of the Privacy Act, Australian Privacy Principles or applicable Privacy Codes they are to contact their local Achieving Solutions office where Achieving Solutions will follow the complaints management process.

A client and/or employee may also make a complaint to the Achieving Solutions Office who can be contacted at:

Achieving Solutions  
PO Box 2208  
Greenhills NSW 2323  
Telephone: 0417 022 433  
Email: [admin@achievingolutions.com.au](mailto:admin@achievingolutions.com.au)

In the event a client and/or employee is not satisfied with Achieving Solutions' response, they may lodge a complaint directly to the Office of Australian Information Commissioner who can be contacted at:

Office of Australian Information Commissioner

GPO Box 5218

Sydney NSW 2001

Telephone: 1300 363 992

Website: [www.oaic.gov.au](http://www.oaic.gov.au)