



PRIVACY POLICY

Statement

At Griffith Post School Options Limited ABN 42 871 827 492 (**GPSO**) we have legal and ethical responsibilities that we must follow in relation to the management of Personal Information provided to us or otherwise generated through the provision of services by us.

GPSO is committed to complying with all laws and regulations that apply to the collection, handling and storage of your Personal Information, including the Privacy Act 1988 (Cth) (**Privacy Act**) and the Australian Privacy Principles contained therein.

Purpose & Application

The Purpose of this Privacy Policy is to provide you with an understanding of how and why GPSO collects, stores, uses, discloses and protects your Personal Information.

This Privacy Policy applies to all GPSO stakeholders, including but not limited to GPSO, participants, carers, attorney's or legal guardians of Participants (**Stakeholders**).

What is Personal Information?

The Privacy Act defines Personal Information as "*Information or an opinion about an identified individual, or an individual who is reasonably identifiable:*

- a. *whether the information or opinion is true or not; and*
- b. *whether the information or opinion is recorded in a material form or not".*

What if I want to remain anonymous or use a pseudonym?

GPSO understands that when dealing with GPSO some members of the public may wish to remain anonymous or use a pseudonym. Although anonymity is an important element of privacy, there are limited circumstances where GPSO allows this. Unless impracticable or required by law, such circumstances might include but are not limited to when you might wish to make a donation or complaint to GPSO or submit a general enquiry with GPSO.

What Personal Information do we collect?

Depending on how you are interacting with us and what services we are providing you as a Stakeholder, the Personal Information we collect about you or you can at times include:

- Your contact details, number, postal/residential address and email;
- Identifiable information such as your name, date of birth, age, gender, photographs and other client identification numbers (including card numbers) in relation to the following organisations or organisation types: GPSO, NDIS, Centrelink, DVA, DSS, companions, pensions, seniors, healthcare, proof of age, public guardian and trust, private health insurance, healthcare and tax file numbers;

- Health information such as your health history, diagnosis, personal care routine, goals, training and educational needs, capabilities, medication, behavioral support requirements;
- Information relating to your NDIS plan, including your participant number, start and finish dates and the funding allocated for each support category;
- Information collected by other third party service providers that you have given GPSO permission to receive and release Personal Information such as the providers listed in your "My Support Team" in your personal profile with us, or third party providers listed in the "Participant Consent" form (**Authorised Providers**);
- Information relating to your current or prospective employment or work history; or
- other information relevant to your situation;

At times, the Personal Information you provide to GPSO will include information that is defined as "Sensitive Information" in the Privacy Act, such as your health information (listed above), or other information about your: racial or ethnic origin; religious beliefs; affiliations; or criminal record.

We will only collect Sensitive Information if you have given us your consent to do so and we do not collect any Personal Information that is not necessary for the provision of services.

What happens if you don't provide the Personal Information we have requested?

It is entirely your choice as to whether you provide us with your Personal Information. However, if you do not provide the Personal Information we have requested, we might not be able to:

- provide some of the services which you require;
- properly investigate or resolve any complaints made by you; or
- processes applications for employment or other assistance.

How do we collect your Personal Information?

GPSO will collect Personal Information in a number of ways, including:

- directly from you or when relevant a Stakeholder (i.e. carer), for example when you complete forms provided to you by GPSO including, GPSO intake forms or when you provide us with information by phone, email or in agreements;
- from our own records of how you use our services; and/or
- from an Authorised Provider.

How we store your Personal Information?

When you engage with GPSO and become a Participant or other Stakeholder, a record is made which includes your Personal Information. We hold your Personal Information in both paper-based files, and other electronic record keeping methods in secured databases.

The security of your Personal Information is important to GPSO and GPSO takes reasonable steps to protect your Personal Information from misuse, interference and loss and from unauthorised

access, modification or disclosure. Such steps include:

- requiring our GPSO team members to maintain confidentiality;
- document storage security measures including password protection, locked cabinets, key security;
- providing discrete environments for confidential discussions; and
- only allowing access to records when the individual seeking access to their own information has satisfied our identification requirements.

Paper & electronic records

Personal Information may be collected in paper-based documents and converted to electronic form for use or storage (with the original paper-based documents either archived or securely destroyed).

GPSO maintains physical security over paper-based documents onsite at its offices, including through locks and electronic data is securely stored on GPSO server(s) through the use of firewalls (security measures for the internet) and other security systems at our premises, such as, user identifiers, two-factor authentication and passwords to control access to our computer systems.

Third party providers

We may store electronic records of your Personal Information with other third parties such as third party database storage providers, which may be based in Australia and/or overseas. GPSO takes all reasonable measures to ensure that third party providers store any Personal Information in a safe and secure place.

How long do we retain your Personal Information?

We will only keep your Personal Information we hold for as long as is necessary for the purposes set out in this Privacy Policy or as required to comply with any applicable legal obligations. The retention periods we apply to Personal Information take account of:

- legal and regulatory requirements and guidance;
- limitation periods that apply in respect of taking legal action;
- our ability to defend ourselves against legal claims and complaints;
- good practice; and
- the operational requirements of GPSO's business.

Personal Information that is collected by mistake and is not required for the purpose of carrying on GPSO will be destroyed as soon as it is identified as information that is deemed to be sourced incorrectly.

If GPSO does receive unsolicited Personal Information that is deemed to be necessary for the purpose of carrying on the business, GPSO will contact the Stakeholder and seek the consent of the Stakeholder's to retain the information.

Why do we collect your Personal Information?

GPSO functions and activities

GPSO collects Your Personal Information (including Sensitive Information) for a range of purposes relating to our functions and activities, including to:

- provide and improve optimal support and services;
- deliver a more personalised experience and service offering;
- assist with personal care, feeding routines, changing procedures and achievement of goals;
- assist Participant's with preparing, looking for and ascertaining employment;
- provide appropriate advice and information in relation to any matters associated with a Participant's disability;
- internal administration, including investigating and handling complaints, administering billing services and comply with legal requirements.

GPSO will only use and disclose your Personal Information in relation to the purpose for which it was collected ("**Primary Purpose**").

Any disclosure of Your Personal Information for a purpose other than the Primary Purpose or in relation to the Primary Purpose will be in accordance with requirements under Privacy Act or other applicable laws or with your consent ("**Secondary Purpose**").

Pursuant to the Privacy Act, Disclosure for a Secondary Purpose is generally not allowed unless an exception applies. Some exceptions include where:

- you would reasonably expect GPSO to use or disclose Your Personal Information for the Secondary Purpose;
- the secondary use or disclosure is required or authorised by law or court or tribunal order;
- a permitted general situation or health situation exists in relation to the secondary use or disclosure; and/or
- GPSO reasonably believes that the secondary use or disclosure is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body e.g. ASIC.

Direct Marketing

GPSO will at times use or disclose your Personal Information, excluding information that is considered to be Sensitive Information for the purposes of sending you direct marketing communications and information about GPSO services that we consider may be of interest to you, or as otherwise permitted under applicable privacy laws.

These communications may be sent in various forms, including mail, SMS and email, in accordance with the applicable laws from time to time.

In addition, at any time you may opt-out of receiving marketing communications from us by contacting us, or by using opt-out functionalities provided in the marketing communications, and we will then ensure that your name is removed from our mailing list. If you opt-out of receiving marketing material from us, we may still contact you in relation to our ongoing relationship with you.

How can you access your Personal Information?

Records relating to the Personal Information held by GPSO in relation to you, is at all time the property of GPSO. However, you have the right to access records relating to your Personal Information, or the Personal Information of a Participant if you are a carer, attorney or legal guardian of that Participant, on request and to be provided with copies of documents.

In order to access the Personal Information:

- GPSO will need to identify the person requesting the information. This is usually done by asking the Stakeholder to confirm their identity by providing a copy of a valid method of identification or attendance at GPSO in person;
- You are required to be listed as either the Legal Guardian or primary or secondary contact on the Participant's Personal Profile, or an authorised personnel listed on the Participant's consent form.
- Viewing of records will occur under the supervision of a GPSO administration member. Under no circumstances is information allowed to be removed from a Participant's file without the consent of the participant or their nominated representative.

How do we keep your Personal Information Accurate?

We take all reasonable steps to ensure that all records and Stakeholder Personal Information we collect, use and disclose is accurate, complete and up to date. If you consider that any Personal Information that we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, you are entitled to request correction of the Personal Information. After receiving a request from you, we will take reasonable steps to correct your Personal Information.

You can amend any information in your records that you consider to be incorrect, incomplete or misleading and we request that you ensure that all information you provide to GPSO is current.

GPSO endeavors to update all participant information annually. This ensures GPSO is up to date with your support needs and can provide the best possible services. We suggest you let us know if there are any errors in the information, any changes to personal details e.g. name or address or if you receive an updated NDIS plan or recent allied health report or other relevant assessments that can assist GPSO in the delivery of services.

Disclosing Personal Information

Participant Consent

In order for GPSO to provide a comprehensive and effective service it may be helpful to share a Participants Personal Information (including Sensitive Information) with an Authorised Provider e.g. a Participant's GP or other service provider. We will ask Participant's to give us consent to disclose any information from your records to the Authorised Provider. GPSO gathers a Participant's consent to disclose Personal Information via the "Participant Consent" form which is provided on or around

the time a Participant's Personal Profile is made with us, which is required to be completed and signed ("**Consent Form**").

In the Consent Form you can stipulate whether you will allow or deny permission for Authorised Providers to receive from and release to us, your Personal Information. Copies of all paperwork related to the release of the information will be placed in your file (paper and/or electronic version).

If you, as a Participant, are unable to give consent about the release of your information due to your age, physical or cognitive limitations, a decision will be sought from your authorised personnel, attorney or legal guardian. You are able to withdraw your consent to release Information at any stage.

How does GPSO interact with you via the internet?

You may visit our website, www.gpsso.com.au (**Website**) without identifying yourself. If you identify yourself (for example, by submitting an inquiry or filling out a form), any Personal Information you provide to us will be managed in accordance with this Privacy Policy.

Our websites do not necessarily use encryption or other technologies to ensure the secure transmission of information via the internet. Users of our websites are encouraged to exercise care in sending Personal Information via the internet.

Cookies

The Website may set and access cookies on your computers in order to collect non-personal information including type of operating system, domain name and IP address. A 'cookie' is a small file stored on your computer's browser, which assists in managing customised settings of the website and delivering content. The information collected is anonymous and is used for the purpose of understanding member behaviour when accessing our products and service.

You can change the settings in your browser to control how your browser deals with cookies. However, in doing so, you may be unable to access certain pages or content.

Links to third party sites

The Website may contain links to third party websites that are not run or controlled by GPSO. GPSO is not responsible and will not take any accountability for any information, whether Personal Information or not, provided to such third party websites by you through accessing those third-party sites.

How to contact us or make a complaint?

Complaints to GPSO

If you would like to contact us in relation to any of the matters set out in the statement regarding GPSO's handling of your Personal Information, or make a complaint about the way GPSO handles, stores or processes your Personal Information please contact GPSO as follows:

Post: Attention: Roy Catanzariti, General Manager

 Address: 8-18 Hebden Street, Yoogail, NSW, 2680

Ph: (02) 6964 3199

Email: roy@gpsso.com.au

Complaints to the OAIC

If you are not satisfied with our response or we fail to provide a response to your complaint within 30 days of receipt, you can lodge a privacy complaint with the *Office of the Australian Information Commissioner (OAIC)*. The contact details for the OAIC are set out below:

Post: GPO Box 5288
Sydney NSW 2001

Ph: 1300 363 992

Fax: (02) 9284 9666

Website: <https://www.oaic.gov.au/>

Application and update of Privacy Policy

This Privacy Policy will commence from February 2023. It replaces all other Privacy Policies of GPSO and may be amended from time to time, without any further notice to you. Where there is a material change to this Privacy Policy, we will provide you with the updated version.