

Client Privacy Policy

Policy number	GRS-CPP-06	Version	02-05-2024
Drafted by	Nick Jiang	Approved by Board on	02/05/2024
Responsible person	GPCC	Scheduled review date	02/05/2025

Version	Date	Author	Reason	Sections
6	01/05/2024	Nick Jiang	Update complaint contact with the new 1300 number	5.1
5	01/07/2023	Nick Jiang	Annual Review	All
4	01/07/2022	Nick Jiang	Annual Review	All
3	01/07/2021	Nick Jiang	Annual Review	All
2	01/05/2020	Nick Jiang	Updated contact details	All
1	01/07/2019	Nick Jiang	Creation of Policy	All

1. INTRODUCTION

The Global Rehabilitation Service Pty. Ltd (GRS) has responsibility to ensure all GRS clients' privacy is well protected throughout the course of receipt of our service.

Who should read this Privacy Policy?

You should read this policy if you are:

- an individual whose personal information may be given to or held by GRS;
- a GRS staff;
- a volunteer or trainee with GRS;

The Privacy Act 1988

The Privacy Act 1988 (the Privacy Act) regulates how private sector organisations can collect, hold, use and disclose personal information, and how you can access and correct that information. Personal information is information in any form that can identify a living person.

The Privacy Act applies only to information about individuals, not to information about corporate entities such as businesses, firms or trusts.

Detailed information on the Privacy Act is found on the [Office of the Australian Information Commissioner \('Oaic'\) website](#).

1.1 GRS and privacy

This Privacy Policy sets out how GRS complies with the Privacy Act. In performing its functions, GRS may collect, hold, use or disclose your personal information to a third party with your consent. GRS takes privacy seriously and will only collect, hold, use and disclose your personal information in accordance with the Privacy Act. If GRS does not receive personal information about you, the Privacy Act will not apply.

1.2 Remaining anonymous or using a pseudonym

GRS understands that anonymity is an important element of privacy and some members of the public may wish to be anonymous when interacting with GRS. GRS also understands some GRS clients may wish to use a pseudonym. Generally, GRS clients will have the right to remain anonymous or adopt a pseudonym when dealing with GRS. However, it is not always possible to remain anonymous or adopt a pseudonym and GRS will inform you when this is the case.

1.3 Information covered under this Privacy Policy

This Privacy Policy covers how GRS collects, holds, uses and discloses your personal information, including any financial information you provide to GRS. This Policy applies to all personal information collected by GRS, including personal information collected through our website and any third party service provider (e.g. your GP or support coordinator).

1.4 Information held by GRS staff

Under the Privacy Act, GRS is required to take contractual measures to ensure GRS staff (including sub-contractors) comply with the same privacy requirements applicable to GRS.

2. GRS' PERSONAL INFORMATION HANDLING PRACTICES

2.1 Collection of personal information

GRS may collect personal information about you from you, your representative or a third party. We generally use emails, our official website and our face to face assessment to collect this information and store the information securely on our cloud-based filing system electronically. GRS may also obtain personal information collected by other authorised service providers such as your GP, support coordinator and your previous therapeutic support providers. GRS collects and holds a broad range of personal information in records relating to:

- employment and personnel matters for GRS staff and contractors (including works screening assessments)
- the performance of GRS's legislative and administrative functions
- individuals participating in the NDIS
- the management of contracts and service agreements
- The management of internal audits and external audits required by the NDIS Quality and Safeguards Commission.
- correspondence from third party service providers

- complaints (including privacy complaints) made and feedback provided to GRS
- requests made to GRS under the *Freedom of Information Act 1982* (Cth)
- the provision of legal advice by internal and external lawyers.

GRS will not ask you for any personal information which we do not need. The Privacy Act requires that we collect information for a purpose that is reasonably necessary for, or directly related to, a function or activity of GRS.

When GRS collects personal information, we are required by the Privacy Act to notify you of a number of matters. These include the purposes for which we collect the information, whether the collection is required or authorised by law and any person or body to whom we usually disclose the information. GRS generally provides this notification by having Privacy Notices before our interventions.

2.2 The NDIS Act also protects personal information

The secrecy provisions in the NDIS Act also protects personal information collected by GRS. These provisions set out rules for the collection, use and disclosure of this information. These rules operate together with the rules in the Privacy Act.

2.3 Kinds of personal information collected and held

In performing its functions, GRS collects and holds the following kinds of personal information (which will vary depending on the context of the collection):

- name, address and contact details (e.g. phone, email and fax)
- photographs, video recordings and audio recordings of you with your prior verbal/written consent
- information about your personal circumstances (e.g. marital status, age, gender, occupation, accommodation and relevant information about your partner or children)
- information about your financial affairs (e.g. information about your financial intermediate and your NDIS plan details)
- information about your employment (e.g. work history)
- information about your background (e.g. educational qualifications, the languages you speak and your English proficiency)
- government identifiers (e.g. your NDIS reference number)
- information about assistance provided to you under the NDIS.

On occasions, GRS may collect or hold some sensitive information about you, including information about:

- your racial or ethnic origin;
- your health (including information about your medical history and any disability or injury you may have);
- Information about the supports or services you receive, including supports or services you receive or have received under the NDIS and information about the people who provide those supports or services to you; and
- any criminal record you may have.

2.4 How GRS collects and holds personal information

GRS collects personal information through a variety of different methods including:

- paper-based forms
- electronic forms (including online forms)

- face to face meetings
- telephone communications
- email communications
- GRS' website and GRS's social media accounts

GRS holds personal information in a range of paper-based and electronic records. Storage of personal information (and the disposal of information when no longer required) is managed in accordance with the Australian Government records management regime, including the Archives Act 1983, Records Authorities and General Disposal Authorities. This ensures that we hold your personal information securely.

2.5 Purposes for which personal information is collected, held, used and disclosed

GRS collects and holds personal information for a variety of different purposes relating to its functions and activities including:

- performing its clinical service including delivering assessment and intervention
- performing its employment and personnel functions in relation to its staff and contractors
- performing its legislative and administrative functions
- policy development, research and evaluation
- complaints handling
- service agreement management

GRS uses and discloses personal information for the primary purposes for which it is collected. We will give you information about the primary purpose of collection at the time the information is collected. GRS will only use your personal information for secondary purposes where it is able to do so in accordance with the Privacy Act.

2.6 How to seek access to and correction of personal information

You have a right under the Privacy Act to access personal information held about you. You also have a right under the Privacy Act to request corrections to any personal information that GRS holds about you if you think the information is inaccurate, out-of-date, incomplete, irrelevant, or misleading. However, the Privacy Act sets out circumstances in which GRS may decline access to or correction of personal information (e.g. where access is unlawful under a secrecy provision in portfolio legislation, or where the personal information held is an opinion and not an objective fact).

To access or seek correction of personal information we hold about you, please contact us using the contact details set out at section 5.1 of this Policy. It is also possible to access and correct documents held by GRS under the *Freedom of Information Act 1982* (the FOI Act). For information on this, please visit our FOI page.

2.7 Accidental or unauthorised disclosure of personal information

GRS will take seriously and deal promptly with any accidental or unauthorised disclosure of personal information. GRS follows the OAIC's Data breach notification — A guide to handling personal information security breaches when handling accidental or unauthorised disclosures of personal information. Legislative or administrative sanctions, including criminal sanctions, may apply to unauthorised disclosures of personal information.

2.8 Data security

Access to personal information held within GRS is restricted to authorised persons who are GRS staff or contractors. Electronic and paper records containing personal information are protected in accordance with suitable electronic medical record security policies.

GRS regularly conducts audits to ensure we adhere to our protective and computer security policies.

2.9 Our website

This website is managed internally by GRS staff. Generally, GRS only collects personal information from its website where a person chooses to provide that information. If you visit our website to read or download information, GRS records a range of technical information which does not reveal your identity. This information includes your IP or server address, your general locality and the date and time of your visit to the website. This information is used for statistical and development purposes. No attempt is made to identify you through your browsing other than in exceptional circumstances, such as an investigation into the improper use of the website.

Some functionality of the GRS website is not run by GRS and third parties may capture and store your personal information outside Australia. These third parties include (but are not limited to) Facebook, Wix, Google, Dropbox, 123 Forms, VINCI, Powerdiary and may not be subject to the Privacy Act. GRS is not responsible for the privacy practices of these third parties and encourages you to examine each website's privacy policies and make your own decisions regarding their reliability.

The GRS website might contain links to other websites. GRS is not responsible for the content and privacy practices of other websites and encourages you to examine each website's privacy policies and make your own decisions regarding the reliability of material and information found.

2.10 Cookies

Cookies are used to maintain contact with a user through a website session. A cookie is a small file supplied by GRS and stored by your web browser software on your computer when you access GRS website. Cookies allow GRS to recognise an individual web user, as they browse GRS website.

2.11 Electronic communication

There are inherent risks associated with the transmission of information over the Internet, including via email. You should be aware of this when sending personal information to us by email or by using GRS website. If this concerns you, you may prefer to use other methods of communication with GRS, such as post, fax, or phone (although these methods have associated risks). GRS only records email addresses when a person sends a message. Any personal information provided, including email addresses, will only be used or disclosed for the purpose for which it was provided.

2.12 Disclosure of personal information overseas

On occasions, GRS may disclose personal information to recipients who are overseas. The situations in which GRS may transfer personal information overseas include:

- the provision of personal information to overseas researchers or consultants (where consent has been given for this or GRS is otherwise legally able to provide this information);
- the provision of personal information to recipients using a web-based email account where data is stored on an overseas server; and
- the provision of personal information to foreign governments and law enforcement agencies (in limited circumstances and where authorised by law).

It is not practicable to list every country to which GRS may provide personal information as this will vary depending on the circumstances. However, you may contact GRS (using the contact details set out at section 5.1 of this Policy) to find out which countries, if any, your information has been given to.

3. COMPLAINTS

3.1 How to make a complaint

If you think GRS may have breached your privacy rights, you may contact us using the contact details set out at section 5.2 of this Policy.

3.2 GRS' process for handling complaints

Relevant GRS area service manager will respond to your complaint or request promptly if you provide your contact details. We are committed to the quick and fair resolution of any complaints and will ensure your complaint is taken seriously. You will not suffer negative treatment if you make a complaint. Details of our complaint policy please refer to [GRS Compliments and Complaints Policy](#).

3.3 How to complain to the Office of the Australian Information Commissioner (OAIC)

You also have the option of contacting the OAIC if you wish to make a privacy complaint against GRS, or if you are not satisfied with how we have handled a complaint made to us in the first instance. The OAIC website contains information on how to make a privacy complaint. If you make a complaint directly to the OAIC rather than to GRS, the OAIC may recommend you try to resolve the complaint directly with GRS in the first instance.

4. PRIVACY POLICY UPDATES

We will review this Privacy Policy regularly and update it as required.

5. HOW TO CONTACT US

5.1 General enquiries and requests to access or correct personal information

If you wish to:

- query how your personal information is collected, held, used or disclosed
- ask questions about this Privacy Policy
- obtain access to or seek correction of your personal information

please contact GRS administrative team using the following contact details:

- **email:** admin@grs.health
- **telephone:** 1300 066 716

5.2 Contact details for privacy complaints

If you wish to make a complaint about a breach of your privacy, please contact GRS are management team using the following contact details:

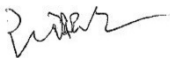
- **email:** info.nsw@grs.health (NSW), info.qld@grs.health (QLD)
- **online feedback/complaint form:** <https://www.grs.health/feedback-and-complaint>

5.3 Availability of this Policy

If you wish to access this Policy in an alternative format (e.g. hard copy), please contact GRS using the contact details set out at section 5.1 of this Policy.

AUTHORISATION

Signature of GPCC Secretary



Date of approval by the Board
01/07/2023

Global Rehabilitation Service Pty. Ltd.