

# Privacy Procedure (PRO 6.06)



**Relates to policy:** Information and Communication Policy (POL 6.0)

## OVERVIEW

Nadrasca is committed to protecting people’s privacy.

Nadrasca collects information about people who have dealings with us.

Nadrasca collects private information from participants or their representatives by lawful and fair means.

This procedure outlines how participants’ personal information is used, shared and protected from misuse.

Nadrasca will follow the guidelines of the Australian Privacy Principles in its information management practices.

## SCOPE

This procedure is applicable to Nadrasca staff, participants, employees, volunteers and students on placement.

The *Fair Work Act (2009)* applies to the collection and handling of staff records.

The *Privacy Act* applies to personal information about participants, job applicants, contractors and volunteers.

The Health Privacy Principles require Nadrasca to protect the privacy of staff and participant health information. This privacy procedure will apply in those circumstances.

## PURPOSE

Nadrasca is committed to protecting privacy in accordance with applicable privacy legislation. This privacy procedure explains how Nadrasca collects, uses, discloses and otherwise handles personal information.

## BACKGROUND

### What personal information does Nadrasca collect?

**General** The kind of personal information that Nadrasca collects about individuals depends on the type of dealings they have with Nadrasca. If a person is someone Nadrasca supports or is connected to a person Nadrasca supports (e.g. a family member, carer, advocate or nominated representative) Nadrasca may collect their:

- Name, address, telephone and email contact details
- Gender, date of birth and marital status, information about their disability and support needs
- Health and medical information
- Medicare number and other identifiers used by Government Agencies or other organisations to identify individuals
- Financial information and billing details including information about the services individuals are funded to receive, whether under the National Disability Insurance Scheme or otherwise
- Records of interactions with individuals such as system notes and records of conversations individuals have had with Nadrasca’s staff
- Information about the services Nadrasca provides to individuals and the way in which Nadrasca will deliver those to individuals.

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**The following categories dictate the type of information that may be collected:**

**Donation** – Nadrasca may collect name, organisation, contact details, the amount and frequency of donations and payment details from individuals directly or from another fundraising entity that allows Nadrasca to contact their supporters and provides Nadrasca with their contact details. Whilst Nadrasca is required to collect this information a donor has the right to remain anonymous to the broader community

**Attends a Nadrasca event** – Nadrasca may collect their name, organisation, contact details, payment details (if applicable) and any dietary and accessibility requirements.

**Nadrasca surveys** – Nadrasca may collect their name, organisation, contact details and their survey responses.

**Enquiry** – Nadrasca may collect their name, contact details and details of their query.

**Complaint/ Incidents** – Nadrasca may collect their name, contact details, the details of their complaint or the incident, information collected in any investigation of the matter and details of the resolution of the complaint/ incident.

**Applies for a job or volunteer role at Nadrasca** – Nadrasca may collect the information individuals supplied in their application, including their cover letter, resume, contact details and referee reports, their tax file number and other identifiers used by Government Agencies or other organisations to identify individuals, information from Police Checks, Working with Children Checks and information about their right to work in Australia.

**Sensitive information** – Nadrasca staff must only collect sensitive information where it is reasonably necessary for Nadrasca’s functions or activities and either:

- The individual has consented
- Nadrasca is required or authorised by or under law (including applicable privacy legislation) to do so. For example, in order to provide Nadrasca’s services to a participant or to respond to a potential participant’s inquiries about services. Nadrasca may be required to collect and hold their sensitive information including health and medical information and information relating to their disability and support requirements.

**What if a participant doesn’t provide Nadrasca with their personal information** – The nature of the business carried on by Nadrasca means generally it is not possible for Nadrasca to provide services to participants or otherwise deal with individuals in an anonymous way.

## Why does Nadrasca collect personal information?

The main purpose for which Nadrasca collects, holds, uses and discloses personal information are set out below.

**Provision of support services:**

- Providing individuals with information about Nadrasca’s services and supports
- Answering their inquiries and deliver service to participants
- Conducting quality assurance activities including conducting surveys, research and analysis and resolving complaints
- Complying with laws and regulations and to report to funding and Government Agencies.

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**General administration:**

- Recruiting, contractors and volunteers
- Processing payments
- Answering queries and resolving complaints
- Evaluating Nadrasca’s work and reporting externally
- Carrying out internal functions including administration, training, accounting, audit and information technology.

**Other purposes:**

Nadrasca may also collect, hold, use and disclose personal information for other purposes which are explained at the time of collection, purposes which are required or authorised by or under law (including, without limitation, privacy legislation) or purpose for which an individual has provided their consent.

Information collected about individuals **that does not identify individuals** may be used to report to funding bodies; and for research, evaluation of services, quality assurance activities, and education.

**What third parties does Nadrasca disclose personal information to?**

Nadrasca may disclose personal information to third parties where appropriate for the purposes set out above, including disclosure to:

- Nadrasca’s funding providers
- Government and regulatory bodies, including the National Disability Insurance Agency, Medicare, the Department of Social Services, the Department of Health & Human Services and the Australian Tax Office.
- People acting on their behalf including their nominated representatives, legal guardians, executors, trustees and legal representatives
- The police, or to the Disability Services Commissioner, or the NDIS Commission, or to comply with compulsory notices from courts of law, tribunals or Government Agencies. The person will receive written notification of any disclosure to law enforcement bodies
- Financial institutions for payment processing
- Referees whose details are provided to Nadrasca by job applicants
- Nadrasca’s contracted service providers, including
  - Information technology service providers
  - Invoice processing service providers
  - Conference, function and training organisers
  - Research Freight and courier services
  - Printers and distributors of direct marketing material including mail houses
  - External business advisers (such as recruitment advisors, auditors and lawyers).
- Emergency services (Police/ Ambulance/ Doctors/ Hospitals) in times of emergency

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In the case of these contracted service providers, Nadrasca may disclose personal information to the service provider and the service provider may in turn provide Nadrasca with personal information collected from individuals in the course of providing the relevant products or services

## Cross border disclosure of personal information

Nadrasca utilises technology infrastructure that makes use of servers based at Nadrasca sites and cloud infrastructure or services that may be located interstate. Other than this, Nadrasca does not typically transfer personal information interstate or overseas. By providing their personal information to Nadrasca or using Nadrasca services and supports, individuals are taken to have consented to this transfer.

## Data quality and security

**General** - Nadrasca holds personal information in a number of ways, including in hard copy documents, electronic databases, email contact lists and in paper files held in drawers and filing cabinets. Paper files may also be archived in boxes and stored.

Nadrasca staff will take reasonable steps to:

- Makes sure that the personal information that Nadrasca collects, uses and discloses is accurate, up to date and complete and (in the case of use and disclose) relevant
- Protect the personal information that Nadrasca holds from misuse, interference and loss and from unauthorised access, modification or disclosure; and
- Destroy or permanently de-identify personal information that is no longer needed for any purpose that is permitted by the Australian Privacy Principles, subject to other legal obligations and retention requirements applicable to Nadrasca.

**Security** – The steps Nadrasca takes to secure the personal information Nadrasca holds include website protection measures (such as firewalls and anti-virus software), security restrictions on access to Nadrasca’s computer systems (such as login and password protection), controlled access to Nadrasca’s premises, procedures on document storage and security, personnel security (including restricting the use of personal information by Nadrasca staff) and training and workplace procedures.

**Online credit card payment security** – Nadrasca processes donations and other online credit card payments using a secure payment gateway.

**Website security** – While Nadrasca strives to protect the personal information and privacy of users of Nadrasca’s website, Nadrasca cannot guarantee the security of any information that individuals disclose online and individuals disclose that information at their own risk. If individuals are concerned about sending their information over the internet, individuals can contact Nadrasca. Nadrasca has a Data Breach Reponses Plan which describes what will occur if data privacy is breached.

Individuals can also help to protect the privacy of their personal information by letting Nadrasca know as soon as possible if individuals become aware of any security breach.

**Third party websites** – Links to third party websites that are not operated or controlled by Nadrasca are provided for users’ convenience. Nadrasca is not responsible for the privacy or security practices of those websites, which are not covered by this privacy procedure. Third party websites should have their own privacy and security policies, which Nadrasca encourages individuals to read before supplying any personal information to them.

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## DEFINITIONS

**Representative-** A person appointed by the participant, by the courts, a guardian, carer or family member

## PROCEDURE

### 1 Information Collection

Procedure:	Responsibility
<p>1.1 Nadrasca staff must only collect personal information by lawful and fair means as required by the <i>Privacy Act</i>. Nadrasca staff must also only collect personal information directly from participants or their representatives where this is reasonable and practicable. Information will only be collected from individuals unless consent is given by that person to collect from other sources.</p> <p>1.2 Nadrasca collects personal information in a number of ways, including:</p> <ul style="list-style-type: none"> <li>• Through Nadrasca websites (for example, if individuals choose to donate to Nadrasca online through the secure payment gateway or an on-line enquiry)</li> <li>• When individuals correspond with Nadrasca (for example by letter, fax, email or telephone)</li> <li>• On hard copy forms</li> <li>• In person</li> <li>• From referring third parties (for example, the National Disability Insurance Scheme or a Support Coordinator)</li> <li>• At events and forums</li> <li>• From third party funding and Government Agencies such as the Department of Health and Human Services and Department of Education and Training</li> <li>• From third party fundraising entities and fundraising service providers who permit access to their donors' lists for fundraising purposes.</li> </ul> <p>NOTE: Nadrasca will not accept information from unsolicited sources unless it could have been solicited from the relevant person.</p> <p>1.3 <b>Collection Notices</b> – Where Nadrasca collects personal information about individuals, Nadrasca staff must take reasonable steps to notify them of certain matters. Staff must do this at or before the time of collection, or as soon as practicable afterwards.</p> <p>Nadrasca will not use Government identifiers for individuals, unless it is for the purpose of supplying services to that person</p> <p>1.4 <b>Consent</b> – Nadrasca will only obtain information when the person, or their representative, gives consent. The purpose of the data collected will be explained at the time that consent is sought. This process will follow the Informed Consent Procedure (PRO 11.07)</p>	<p>Nadrasca Staff</p>

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**1.5 Option of anonymity-** In some circumstances Nadrasca allows individuals the option of not identifying themselves, or of using a pseudonym, when dealing with Nadrasca (for example, when viewing Nadrasca’s website or making general phone queries).  
Donations may also be made anonymously, but in this case Nadrasca may not be able to issue a tax-deductable receipt.

## 2 How Nadrasca handles personal information

Procedure:	Responsibility
<p><b>2.1 Staff training</b> – All Nadrasca staff must complete the Sentrient training about privacy.</p> <p><b>2.2 Handling personal information</b> – Nadrasca staff must only access and use personal information for a valid work purpose. When handling personal information staff should:</p> <ul style="list-style-type: none"> <li>• Confirm recipient details before sending faxes or emails</li> <li>• Always store any hard copies of confidential information that is not being used in a secure cabinet or room</li> <li>• Be aware of the surroundings and people nearby</li> <li>• Limit taking hard copy information away from secure sites</li> <li>• Secure information when traveling e.g. in locked briefcase, folder etc.</li> <li>• Dispose unneeded copies of information securely (following the Document Data and Record Control Procedure (PRO6.01)</li> <li>• Ensure the information is available to people who need to access it.</li> <li>• Not discuss the content (information) in public</li> </ul> <p><b>2.3 Sharing personal information</b> – Nadrasca staff may only share personal information as set out under this procedure and in circumstances permitted under law.</p> <ul style="list-style-type: none"> <li>• To minimise the risk of unauthorised disclosure staff should:                             <ul style="list-style-type: none"> <li>○ Check with a manager before sharing confidential information</li> <li>○ Not use internet based file sharing software to share confidential information.</li> </ul> </li> <li>• When sharing information with authorised persons via email, staff should:                             <ul style="list-style-type: none"> <li>○ Ensure that when email address lists are distributed externally they are blind copied</li> <li>○ Not include confidential information in the subject line or body of the email</li> <li>○ Not send information to or from free web-based email accounts such as Gmail, Hotmail or Yahoo</li> </ul> </li> </ul>	<p>Nadrasca Staff</p>

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<ul style="list-style-type: none"> <li>○ Not share or discuss confidential information on social networking applications such as Facebook and Twitter.</li> </ul> <p>2.4 <b>Passwords</b> – User IDs and passwords for access to computer services are for the sole use of the person to whom they are allocated. Nadrasca staff should:</p> <ul style="list-style-type: none"> <li>● Make passwords difficult to guess</li> <li>● Keep all passwords secret and not provide them to another person</li> <li>● Change passwords regularly.</li> </ul> <p>2.5 <b>Downloading software and applications</b> – Software and applications downloaded from the Internet can contain viruses that threaten the security of information stored on users’ computers. Staff should:</p> <ul style="list-style-type: none"> <li>● Not download unauthorised software from the internet onto a Nadrasca computer</li> <li>● Lodge a formal request with a manager if software needs to be installed in order to complete work activities.</li> </ul> <p>2.6 <b>Unsolicited and suspicious emails</b> – Unsolicited emails can contain viruses that threaten the security of information stored on users’ computers. If staff receives an email from an unknown sender or an email that looks suspicious, staff should:</p> <ul style="list-style-type: none"> <li>● Not open the email or click on links contained in its subject line or body</li> <li>● Report the email to a manager and delete the email immediately.</li> </ul> <p>2.7 <b>Free web-based email accounts and file sharing software</b> – Free web-based accounts and file sharing software are often owned by international companies in foreign jurisdictions. Information is stored on systems outside of Australia with differing legislation applied to the information. Examples of free web-based email accounts include (but not limited to):</p> <ul style="list-style-type: none"> <li>● Gmail</li> <li>● Hotmail</li> <li>● Yahoo.</li> </ul> <p>Examples of file sharing programs include (but not limited to): (File sharing programs are not allowed to be used for Nadrasca purposes)</p> <ul style="list-style-type: none"> <li>● BitTorrent</li> <li>● Kazaa</li> <li>● Limewire.</li> </ul> <p>Once information has been sent to web-based email accounts or uploaded onto file sharing programs it can no longer be controlled. Personal information should not be sent:</p> <ul style="list-style-type: none"> <li>● To or from a free web-based email account</li> <li>● Via internet-based file sharing software.</li> </ul> <p>2.8 <b>Web-based applications-</b> Web-based applications are used for communication, team meetings etc. Examples of these applications are (but not limited to):</p> <ul style="list-style-type: none"> <li>● Zoom</li> </ul>	

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Procedure:	Responsibility
<ul style="list-style-type: none"> <li>• Microsoft Teams</li> <li>• Skype</li> </ul> <p>To prevent interruption, or overhearing, by unwanted people staff should only use applications which requires a password and/or has firewalls</p> <p><b>2.9 Clear desks and screens</b> – Work environments should be clear of personal information when unattended. This means staff should:</p> <ul style="list-style-type: none"> <li>• Not leave documents containing confidential information unattended on photocopiers, fax machines or printers</li> <li>• Lock a computer’s screen when leaving it unattended</li> <li>• Only print documents when absolutely necessary</li> <li>• Store portable storage devices and hard copies of confidential information in a secure drawer or cabinet, not a desk.</li> </ul> <p><b>2.10 Information disposal</b> – staff should ensure record retention requirements have been met prior to the disposal of any personal information as per Document, Data and Record Control Procedure (PRO 6.01).</p> <p>When disposing of personal information, staff should:</p> <ul style="list-style-type: none"> <li>• Place unneeded working documents or copies of information in secure bins or adequate shredders</li> <li>• Ensure any electronic media including computers, hard drives etc are deleted when no longer required.</li> </ul> <p><b>2.11 Visitors</b> – To help minimise the risks to the security of personal information staff should:</p> <ul style="list-style-type: none"> <li>• Ensure all visitors are registered and accompanied at all times</li> <li>• Be aware of unaccompanied people who are not known</li> <li>• Notify a manager if unauthorised person is present on premises.</li> </ul> <p><b>2.12 Portable storage devices</b> – Portable storage devices are usually small and capable of storing large amounts of information, and in some cases can be used to copy, transmit or share information. Examples of portable storage devices include (but not limited to):</p> <ul style="list-style-type: none"> <li>• Removable media (e.g. CD-Roms, DVDs, USB drives, portable hard drives)</li> <li>• Digital MP3 players (e.g. iPods)</li> <li>• Laptops, tablet computers and slates (e.g. iPads)</li> <li>• Smartphones</li> <li>• Mobile phones.</li> </ul> <p>Using portable storage devices that access, store or transport personal information involves considerable risk because:</p> <ul style="list-style-type: none"> <li>• They can be easily lost or stolen, and then accessed by unauthorised people</li> <li>• Using portable storage devices in public or non-work premises increases the chance of accidentally disclosing personal information to unauthorised people.</li> </ul>	

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Procedure:	Responsibility
<p>To minimise the information security risks associated with using portable storage devices, staff should:</p> <ul style="list-style-type: none"> <li>• Only use encrypted portable storage devices to store personal information</li> <li>• Avoid storing personal information on portable storage devices, where possible</li> <li>• Secure portable storage devices when unattended e.g. lock in a drawer</li> <li>• Report lost or stolen portable storage devices immediately to a manager.</li> </ul> <p><b>2.13 Privacy incidents</b> – Privacy incidents may result from unauthorised people accessing, changing or destroying personal information. Examples of situations from which incidents may arise include:</p> <ul style="list-style-type: none"> <li>• Accidental download of a virus onto a Nadrasca computer</li> <li>• Discussing or sharing of personal information on a social networking website such as Facebook</li> <li>• Loss or theft of a portable storage device containing personal information</li> <li>• Non-secure disposal of hard copies of personal information (i.e. placing readable paper in a recycle bin or hard waste bin)</li> <li>• Documents sent to the wrong fax number or email address</li> <li>• Documents sent to a free web-based email account such as (but not limited to) Yahoo, Gmail or Hotmail.</li> </ul> <p>Privacy incidents can:</p> <ul style="list-style-type: none"> <li>• Occur due to accidental or deliberate actions</li> <li>• Result from human error or technical failures</li> <li>• Apply to information in any form, whether electronic or hard copy.</li> </ul> <p><b>Incident reporting</b> – It is vital all privacy incidents are reported as soon as possible to the staff members line manager so that their impact may be minimised.</p> <p><b>2.14</b> If there is a suspected data breach <b>Nadrasca’s Data Breach Plan</b> is to be followed.</p>	

### 3 Access and Correction

Procedure:	Responsibility
<p><b>3.1</b> Individuals have a legal right to request access or correction of their personal information held by us.</p> <p><b>3.2</b> Nadrasca may ask individuals to verify their identity before processing any access or correction requests, to ensure that the personal information Nadrasca holds is properly protected.</p>	

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Procedure:	Responsibility
<p>3.3 Access, or change to information may be denied on the belief that:</p> <ul style="list-style-type: none"> <li>• Access would pose a serious threat to life, health or safety of any person</li> <li>• Access would pose a threat to the privacy of other people</li> <li>• The request is vexatious or frivolous</li> <li>• The request relates to non-discoverable information in existing or anticipated legal proceedings,</li> <li>• The request would reveal negotiation intentions</li> <li>• There is suspicion unlawful activity or misconduct is being or may be engaged in</li> <li>• The request would prejudice the activities conducted by, or for an enforcement body</li> <li>• The request would reveal information in a commercially sensitive decision making process.</li> </ul> <p>3.4 Requests for information are generally managed under the <i>Freedom of Information Act 1982 (Vic)</i>. However, some requests for personal information may be dealt with informally (outside <i>Freedom of Information Act 1982</i>). Individuals can contact Nadrasca’s Privacy Officer to discuss their requirements.</p> <p>3.5 Freedom of Information requests need to be in writing stating as precisely as possible what information is required or needs correction.</p> <p>3.6 Any Freedom of Information requests should be addressed to Nadrasca’s Privacy Officer.</p> <p>3.7 When information is disclosed to third parties any corrections will be sent to the relevant parties.</p> <p>3.8 Generally there will be no charge for people accessing information. However, depending on circumstances a nominal fee may be charged.</p>	

## 4 Complaints

Procedure:	Responsibility
<p>4.1 If individuals have a complaint about how Nadrasca has collected or handles their personal information, they may contact Nadrasca’s Privacy Officer.</p> <p>4.2 Any complaints will be dealt with in accordance Nadrasca’s Complaints, Grievances, Disputes and Harassment Procedure (PRO 2.02)</p> <p>4.3 If the individual is unhappy with Nadrasca’s response, they can refer their complaint to the <u>Office of the Australian Information Commissioner the NDIS Quality and Safeguards Commission</u> or, in some instances, other regulatory</p>	<p>Manager Quality and Compliance</p>

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Procedure:	Responsibility
bodies, such as the <u>Victorian Privacy Commissioner</u> or the <u>Victorian Health Complaints Commissioner</u> .	

## 5 Nadrasca’s contact details

Procedure:	Responsibility
<p>5.1 Participants and relevant others for whom Nadrasca holds information can contact Nadrasca if they have any queries about the personal information that Nadrasca hold about them or the way Nadrasca handles that personal information. Nadrasca’s contact details for privacy queries are set out below.</p> <p><b>Mail:</b>                      Privacy Officer                      Nadrasca                      PO Box 3874,                      Nunawading, VIC, 3131                      Ph: 03 9873 1111                      Email: <a href="mailto:privacy@nadrasca.com.au">privacy@nadrasca.com.au</a></p> <p>5.2 The Manager Quality and Compliance is responsible for fulfilling the role of Privacy Officer.</p>	<p>Manager Quality and Compliance</p>

## References

### Standards

NDIS Practice Standards  
 NDIS Code of Conduct

### Acts/Principles

Privacy act 1988  
 Fair Work act (2009)  
 Health Records Act 2001  
 Privacy and Data Protection Act 2014 (Vic)  
 Victorian Charter of Human Rights and Responsibilities Act 2006  
 Freedom of Information Act 1982 (Vic)  
 Australian Privacy Principles  
 Information Privacy Principles  
 Health Privacy Principles

### Related Policies

Information and Communication Policy (POL 6.0)

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## Related Procedures

Complaints, Grievances, Disputes and Harassment Procedure (PRO 2.02)  
Document, Data and Record Control Procedure (PRO 6.01)  
Informed Consent Procedure (PRO 11 07).

## Related Forms

## Other Documents

Data Breach Response Plan

*\*Acknowledgement- This procedure is based on Yooralla's Privacy Policy and utilised with the permission of Yooralla.*

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