

# Privacy Policy

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## 1. Purpose

The purpose of the privacy policy is to specify how Indigo Australasia Incorporated (82 056 232 143) will collect, hold, use and disclose your personal information and how you can contact us about your personal information or how you can make a complaint if you believe there has been a breach of your privacy.

Indigo Australasia Incorporated (“Indigo”) is a not-for-profit organisation that provides allied health, home modifications and assistive technology (AT) solutions to people with disability, seniors, carers, health professionals and educators. We collect, hold, use and disclose personal information that is reasonably necessary for the purposes of delivering services to our consumers.

## 2. Who this policy applies to

This policy applies to anyone who provides personal information to Indigo and anyone who has access to personal information we hold such as employees, volunteers, suppliers or contractors. In this policy, reference to “Indigo” or “we” means Indigo Australasia Incorporated.

## 3. Policy statement

Indigo is required to comply with the Privacy Act 1988 and the Australian Privacy Principles obligations. Indigo has policies and procedures in place that ensure compliance with the legislation for both personal and sensitive information including health information.

## 4. Principles

### 4.1. Collection of Information

Indigo is committed to respecting the privacy of all individuals and uses open disclosure when handling personal information (including sensitive and health information).

Indigo collects personal information relevant to the provision of our services, support, quality assurance, record keeping and accounts purposes, continuous improvement, complaints and incident management and to inform you of products and services in which you may be interested.

Wherever possible Indigo will collect your personal information directly from you. Sometimes it may be necessary for us to collect your personal information from a third party who is legally permitted to disclose it to us (for example, your carer, family member, allied health professional or general practitioner). If this occurs, we will take reasonable steps to make sure you are aware

of the purpose for which the information was obtained and how it will be used and disclosed. Other care providers may also share your personal information with us when they refer you to us for service.

We collect the following personal information:

### **Clients and Prospective Clients**

- contact details (name, address, email, phone);
- personal details (date of birth, citizenship, country of birth, residency and visa information);
- health information; and
- bank account information.

### **Employees, Volunteers and Job Applicants**

- contact details (name, address, email, phone);
- personal details (date of birth, citizenship, country of birth, residency, visa details);
- emergency contact information;
- qualifications, experience, driver's license;
- bank account information;
- Working with Children Check, Police Clearance and/or NDIS Worker Screening Check; and
- health information.

## **4.2. Health Information**

To provide a service to you, Indigo will need to collect your health information. This could include your medical history, care plans, medications and information about healthcare professionals involved in your care.

## **4.3. Consent**

Wherever possible, Indigo must gain consent from consumers to collect, store, use and disclose their information prior to recording it and details of the consent provided must be recorded against the individual consumer's file in the respective database. Consent may be given in writing, digitally or verbally and consent as noted in this procedure means either express or implied consent. That is consent that is given explicitly, or consent which can be reasonably inferred in the circumstances from the interactions between the organisation and the individual.

In certain circumstances Indigo may not be able to obtain consent before collecting personal information. These circumstances may involve customers not being able to communicate with consent to us for reasons which may include age, cognitive impairment, or other illnesses. In these circumstances, Indigo may be limited in how it can collect, use, and disclose personal information. Indigo will only do so in accordance with the Privacy Legislation. If consumers are not able to provide consent, the Privacy Legislation allows us to obtain consent from a legal guardian or attorney or someone else who is entitled to act on their behalf. Similarly, if a consumer cannot give consent for any reason, the Privacy Legislation also allows Indigo to disclose personal information in limited circumstances if the disclosure is necessary to enable the provision of appropriate care or treatment.

### 4.4. Use and Disclosure of Personal Information

Indigo will only collect and use your information for the purpose of which it was collected. Indigo will take reasonable steps to keep your personal information confidential. Indigo employees will not disclose your personal information with a third party, without your consent unless required by law or Indigo believes that you or someone else will be harmed. Indigo does not store personal information overseas. All information is stored in Australia.

Indigo may disclose personal information with other parties including:

- health professionals involved in your care;
- government departments and agencies;
- suppliers;
- regulatory bodies;
- attorneys or guardians;
- referees;
- credit agencies;
- third-party providers to facilitate a service or function (online payment facilities);
- professional advisors, lawyers, accountants, insurers and auditors.

With your consent, Indigo may use your personal information to contact you regarding services or products that may be of interest to you. If you no longer want to receive these communications, call Indigo on (08 9381 0600) or email [marketing@indigosolutions.org.au](mailto:marketing@indigosolutions.org.au).

As part of our commitment to continuous improvement, we regularly review, trial and evaluate new products, services and models of care. With your consent, Indigo may share your deidentified data with our Quality and Research partners.

### 4.5. Releasing Images or Personal Information for Publicity

Indigo publishes promotional material to raise awareness of our services and to provide information to the public. Some of the material may include photos, video recordings and sound recordings. Indigo will obtain consent before using any images or recordings of you.

### 4.6. Access to and correction of your personal information

Under the *Privacy Act 1988*, you have the right to access to and make changes to the personal information that Indigo holds. Requests should be made in writing to Indigo's Quality Team (details below). We will respond to your request within 10 business days after the request is received. Indigo will request proof of identity when any requests to access or change information is received.

Indigo does have the right under the Act to refuse requests to access or make changes to personal information. If this occurs, Indigo will advise you in writing explaining the reasons the request has been refused.

### 4.7. Security of Personal Information

Indigo stores your personal information in both electronic and physical paper form. We are committed to protecting your information from unauthorised access and/or use and take reasonable steps to protect it. Due to the nature of the internet, we cannot guarantee that electronic information stored is totally secure.

#### 4.8. How to Contact Us

If you have any questions about this policy or your personal information or require a copy of this policy in an alternate format, please contact us as per the below:

**Email:** [quality@indigosolutions.org.au](mailto:quality@indigosolutions.org.au) (Opens in new tab)

**Mail:** Indigo, The Niche, Suite A, 11 Aberdare Road, Nedlands WA 6009

**Phone:** 1300 885 886 or (08) 9381 0600

#### 4.9. Complaints

If you have a complaint about the way we have collected, used or disclosed your personal information or a potential privacy breach you have the right to make a complaint. Indigo will investigate and respond to your complaint, usually within 30 days. If you are not satisfied with our investigation and subsequent response you are entitled to refer the matter to the Office of the Australian Information Commissioner via an online form, in a letter or fax. Full contact details can be found on their website [www.oaic.gov.au](http://www.oaic.gov.au)

#### 4.10 Changes to Privacy Policy

This policy may be amended, modified or replaced from time to time. The latest version will be published on our website.

### 5. Definition

<p><b>Health information</b></p>	<p>Health Information has the meaning provided in the <i>Privacy Act</i> (Cth) and includes:</p> <ul style="list-style-type: none"> <li>• information or an opinion about the health or a disability of an individual;</li> <li>• an individual’s expressed wishes about the future provision of health services to him or her;</li> <li>• a health service provided, or to be provided, to an individual; and</li> <li>• other personal information collected to provide, or in providing a health service.</li> </ul>
<p><b>Personal information</b></p>	<p>Personal information has the meaning provided in the <i>Privacy Act 1988</i> (Cth) which is “information or an opinion (including information or an opinion forming part of a database), whether true or not and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.” Personal information includes sensitive information and health information.</p>
<p><b>Privacy Legislation</b></p>	<p>All privacy legislation that applies to Indigo and includes the <i>Privacy Act 1988</i> (Cth).</p>

<b>Privacy Principles</b>	The Australian Privacy Principles set out in Schedule 1 of the Privacy Act 1988 (Cth).
<b>Sensitive information</b>	Information or an opinion about an individual’s racial or ethnic origin; political opinions; membership of a political association; religious beliefs or affiliations; philosophical beliefs; membership of a professional or trade association; membership of a trade union; sexual preferences or practices; or criminal record.

### 6. Governance

<b>Associated procedures/ documents</b>	IDG-BRD-PRO-0106 Privacy Procedure
<b>Related legislation</b>	Privacy Act 1988
<b>Division</b>	Board
<b>Approval</b>	CEO
<b>Endorsement</b>	22/08/2018
<b>Owner</b>	Board
<b>Date effective</b>	August 2018
<b>Review date</b>	April 2025
<b>Version</b>	05/02/2020 - Policy amended to change from ILCWA to Indigo V3 29/06/2023 – Review and Update

For advice and support please contact the Quality Lead at [Quality@indigosolutions.org.au](mailto:Quality@indigosolutions.org.au)