



Supporting our community on all sides

# P O L I C Y

## **2 Working with the Community**

*2.00 Privacy Policy*

# Manual 2 – Working with the Community

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## Policy 2.00 – Privacy Policy

Community Queensland Ltd, ABN 65 114 782 948 (“Community”, “we”, “us”, “our”), is a leading organisation that provides local community information and support services within Brisbane’s northern and southern suburbs.

### Why we do things

To ensure we maximise the support and information services we can provide, Community may collect our clients’ information. We recognise that protecting individuals’ privacy is of fundamental importance and is required by law. Community is committed to the responsible implementation and maintenance of processes and systems to ensure our clients’ personal and sensitive information is secure.

Community complies with the Australian Privacy Principles (APP), which are part of the Privacy Act 1988 (Cth) (“Privacy Act”), and its obligations under other relevant legislation as applicable, including the Aged Care Act 2024 (Cth) (“Aged Care Act”) and Aged Care Rules 2025 (Cth) (“Aged Care Rules”).

### Definitions

**Personal Information:** Under the Privacy Act, ‘personal information’ means information (including images) or an opinion about an identified individual, or an individual who is reasonably identifiable. Community collects and holds a range of personal information, including some health and other sensitive information, about clients, guardians, job applicants, volunteers, contractors, website users, and other people with whom Community ordinarily interacts.

**Sensitive Information:** Under the Privacy Act, ‘sensitive information’ means personal information relating to an individual’s racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, membership of a trade union, or other professional or trade association, philosophical beliefs, sexual orientation or practices, or criminal record. It also includes health or genetic information about an individual, or biometric information used for specific purposes.

We will only:

- Collect sensitive information where you agree and it is reasonably necessary for Community’s functions and activities;
- Use and disclose sensitive information for the purpose for which it was collected, or a directly related secondary purpose that you would reasonably expect, unless you agree otherwise, or the collection, use or disclosure of the sensitive information is otherwise authorised or required by law.

**Health information:** Any information or an opinion about an individual’s health, including an illness, disability, or injury, (at any time), an individual’s expressed wishes about the future provision of health services, and any health service provided.

## Who this policy applies to

This Privacy Policy applies to clients, guardians, job applicants, volunteers, contractors, website users, and other people with whom Communify ordinarily interacts.

This Privacy Policy is issued on behalf of Communify itself and its centres only. It contains information about how Communify collects and shares information with Communify clients, funding bodies, and government departments, but you should refer to the separate Privacy Policies of those organisations for information on how they manage your personal information.

This Privacy Policy does not apply to employees of Communify or employee records, as the handling of employee records by a private sector employer is exempt from the Privacy Act if it is directly related to the employee's current or former employment relationship. However, if you do have questions regarding the handling of your employee records, you can contact our Privacy Officer (see below) for assistance.

## Our policy

This Privacy Policy sets out in summary:

- What sorts of personal information Communify collects;
- How Communify may use that personal information and to whom it may be disclosed;
- How Communify protects the personal information we hold from unauthorised use or disclosure;
- The obligations Communify has when using, storing, and protecting personal information; and
- How you can access and correct the personal information we hold about you, and your options to complain if you believe we have breached our privacy obligations to you.

## How we do things

### Types of personal information we collect and hold

Communify collects and holds a range of personal information, including some health and other sensitive information, about clients, guardians, job applicants, volunteers, contractors, website users, and other people with whom Communify ordinarily interacts, which may include the following:

- Full name, date of birth, gender, address, email address;
- Next of kin/emergency contact;
- Language(s) spoken;
- Financial information, including income, bank account, and credit card details;
- Information about a client's income, assets, pension status, and other information used to support a claim for funded aged care services;
- Photos and/or video recordings (for example, at Communify events);
- CCTV recordings (for example, for safety purposes);
- Unique identifying numbers (including driver license number);
- Clinical notes and records that relate to interactions with Communify;
- Information on accessing Communify services, an individual's use of Communify services, including information used to support a claim for funded aged care services;
- Documentation relating to powers of attorney, guardianship orders, advance care directives, registered supports, and decision makers;
- Feedback, complaints, reports, and investigation records;
- Information about any claim(s) made for aged care services;

- Information about services we have provided to you;
- Information about how you have used Community's online services, such as online forms you have completed and pages you have visited;
- Details of the services provided;
- Publicly available information from social media;
- Usernames and passwords created on Community accounts;
- Government-issued identifiers (including Tax File Number (TFN), Medicare card number, Veteran card number, NDIS number, Customer Reference Numbers (CRNs) (which may be displayed on concession cards and health care cards), AHPRA registrations, provider numbers);
- Feedback, complaint records, and investigation reports (for example, incident records);
- Information about specialist aged care programs, such as Home Care Packages, and information relating to annual activity reports;
- Information regarding referrals to government welfare agencies;
- Records that we are required to keep to comply with the Aged Care Act and the Aged Care Rules, including records concerning the funded aged care services you access, including the costs of those services, the works and registered providers responsible for delivery of those services, provision of specialist aged care programs, and details of any requests you have made to correct your information, or complaints or reportable incidents concerning you.

Community may also collect the following types of sensitive information about clients, only where necessary or appropriate, or where the client has otherwise consented or volunteered the information:

- Race or ethnicity (including if clients identify as Aboriginal or Torres Strait Islander);
- Religious background;
- Pharmacy records;
- Diagnostic test results;
- Dietary requirements;
- Signature;
- Unique physical characteristics (including any tattoos, birthmarks, collected in the context of health or medical assessments);
- Health information, for example, when a client self-identifies as having a disability, impairment, or condition, because it is important for organisations and funding agencies to know whether clients with a disability are accessing services; and
- Sexual orientation.

### **Purpose for which we collect and use personal information**

Community's primary purpose for collecting personal information is to support its functions and activities, including:

- Establishing service requirements and determining eligibility for services provided by Community;
- Completing case notes, reports, case management, and referrals to other service providers and agencies;
- Supporting clients to access services, community programs, referrals, information, or advice they have requested from Community;
- Confirming a client's identity and manage requests for services;
- Educating clients on supports offered within the community;

- Supporting clients' social and emotional wellbeing and health;
- Contacting clients or an authorised representative in an urgent situation;
- Providing products and services, including delivery of internal and external education services;
- Updating clients on activities, including through sending out newsletters and electronic communications;
- Complying with necessary business/accounting standards and reporting obligations to government agencies, including, but not limited to, the Aged Care Quality and Safety Commission, National Disability Insurance Agency (NDIS), NDIS Quality and Safeguards Commission, and Services Australia;
- Fulfilling legal requirements, including:
  - Taking reasonable steps to reduce the risk of harm to clients and others;
  - Managing any complaints or concerns;
  - Making reasonable adjustments for clients and others; and
  - Ensuring, as far as reasonably practicable, the health and safety of people in Community workplaces;
- Maintaining good order and management of Community programs;
- Promoting accountability and continuous improvement of the aged care sector;
- Complying with the record-keeping and reporting requirements under the Aged Care Act and the Aged Care Rules, including requirements regarding records concerning:
  - The funded aged care services you access;
  - The costs of those services;
  - The workers and registered providers responsible for delivery of those services;
  - The provision of specialist aged care programs;
  - Any requests you have made to correct your information; and
  - Any complaints or reportable incidents concerning you.
- Educating employees on the collection and handling of personal information;
- Complying with our legal obligations under the Aged Care Act, the Aged Care Rules, and other laws in respect of the provision of care, services, and any accommodation offered;
- Carrying out quality assurance activities, including working with third-parties;
- Generating statistical data and reports for policy and funding purposes;
- Organising, managing, and raising funds for events/functions;
- Day-to-day administration of the Community; and
- Any other purposes that would be reasonably expected.

### **How personal information is collected by Community**

Community collects personal information about an individual directly from that individual, where reasonable and practicable to do so. We collect personal information in several ways, including:

- Face-to-face meetings and interviews, emails, and over the phone;
- By providing services to an individual or delivering programs or events;
- Over the internet (including social media platforms);
- From our website using various technologies, including 'cookies';
- Electronic or paper documents (including when submitting a request or query);
- From government agencies (either Commonwealth or State), including through the MyAgedCare online portal and the Australian Digital Health Agency;
- Community forms, surveys, and/or questionnaires;

- From other parties (such as medical professionals, other referrers); and
- From publicly available sources.

### **Informed consent in the collection of personal information:**

Communify will only collect personal information about a client with their permission, except where the law requires or allows. Information will be collected from the client and, with their consent, from other stakeholders such as family members, carers, other support services, and government agencies. Clients are informed during initial contact of the details of the Client Privacy Policy. Communify will keep the client informed about the types of information collected and how it will be used.

### **Website Users**

Communify may collect personal information by tracking use of our websites and mobile applications (in which case Communify may also collect information about an individual's IP address, location, or activity). This information helps us to stay connected with an individual by understanding their use of our website. The information collected may include data to enable us to personalise an individual's experience on our website and to allow us to statistically monitor how they are using our it.

### **Cookies and Analytics**

Communify may also collect data from its website using various technologies, including 'cookies'. A 'cookie' is a text file our website transmits to an individual's browser, which is stored on the individual's computer as an anonymous tag identifying the individual's computer (but not the individual) to us. The browser may be configured to disable cookies, but some parts of our website may not function properly (or at all) if cookies are disabled. Communify may use this information to conduct marketing and promotional efforts, to provide information to an individual's browser that we think may be of interest to them, and to determine the popularity of certain content.

### **Direct Marketing**

Marketing is an important part of ensuring that Communify continues to deliver local community information and support services. People who interact with Communify may, from time to time, receive marketing communications. If you would like to opt out of receiving marketing material, please contact us. There will also be a simple "unsubscribe" (opt-out) method in any marketing emails. If you opt out of receiving marketing material from us, we may still contact you in relation to our existing relationship with you, other than for the purposes of marketing.

### **How does Communify use and disclose personal information**

In accordance with our statutory obligations, we only use and disclose personal information for:

- The primary purpose for which the information was collected;
- A secondary purpose that is related to the primary purpose and for which you would reasonably expect us to use the collected information;
- A secondary purpose that is directly related to the primary purpose where it is sensitive information;
- or
- As otherwise required or authorised by law, including the APPs.

We will take reasonable steps to make individuals aware of the purpose for which the information collected may be used or disclosed, including by reference to this Privacy Policy.

In particular, we may disclose personal information to the following people, where appropriate:

- Our staff, contractors, and volunteers, on a 'need-to-know' basis;
- Our business partners, agents, professional advisors, and service providers (including health service providers, translators, interpreters, and other third parties we work with or engage to provide our services);
- Client representatives and advisers;
- State and Commonwealth government agencies, statutory authorities, and regulators, including Centrelink, the Department of Health and Aged Care, Services Australia, NDIA, NDIS Quality and Safeguards Commission, the Aged Care Quality and Safety Commission, AHPRA, the TAC, the Fair Work Commission, and in compliance with requests from state and Commonwealth ombudsmen;
- Universities and research organisations;
- Payment system operators and financial institutions;
- Where authorised or required by law or court order, or other governmental order or process, such as where we believe in good faith that the law compels us to disclose information in order to:
  - Lessen or prevent a serious threat to your life, health, or safety, or public health or safety, where it is impractical to obtain your consent;
  - Take appropriate action in relation to suspected unlawful activity or serious misconduct;
  - Locate an individual reported as missing;
  - Assert a legal or equitable claim; or
  - Conduct an alternative dispute resolution process;
- Where we are required to do so as a result of any obligations we owe under a contract.

### **Disclosure of personal information overseas**

Communiify will not send personal information about you outside Australia without obtaining consent from you (in some cases, this consent will be implied) or otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

Communiify may use third-party online platforms such as Better Impact and Mailchimp to store and manage personal information regarding the services and programs we provide. From time to time, we may also engage third parties to provide services to us that involve the use of personal information, such as services relating to marketing and event management. This personal information may be stored in the 'cloud,' which means that it may reside on a cloud service provider's server, which may be situated outside Australia, for example, in Canada and the United States.

We do not otherwise disclose or allow third parties outside Australia to access the personal information we hold.

### **Anonymity and Pseudonym**

Where it is lawful and practicable, individuals have the option of not identifying themselves when entering into transactions with Communiify. Clients may also request to use a pseudonym and may do so, where possible, when receiving services.

### **Right to decline to provide information**

An individual may choose not to agree to provide the personal information that Communify requests. If this choice is made, Communify may not be able to provide that person with some or all of our support, products, services, or opportunities, or Communify may not be able to engage with that person or respond to their queries or requests.

By providing personal information to Communify, the client confirms that they have agreed to Communify collecting, using, and disclosing their personal information in accordance with this Privacy Policy. Communify may collect sensitive information about a client, such as health information. When we do so, we will seek that individual's consent to the collection, use, and disclosure of that information at the time of collection.

### **Storage and security of personal information**

Communify stores the personal information that we collect in secure access-controlled client or document management software systems to comply with the retention and reporting requirements under the Aged Care Act 2024. Some of these systems may be held on our behalf by third party hosting providers such as Microsoft Azure, Microsoft 365, and Amazon AWS.

Communify takes security seriously and takes reasonable steps to protect any personal information it holds from misuse, interference, and loss. This includes:

- Physical security measures such as locking cabinets, shredding documents that are no longer required, and restricting access to employees on Communify premises;
- Technical security measures such as employing passwords and multi-factor authentication measures to protect electronic records; and
- Organisational measures such as conducting ongoing privacy and security training with staff.

### **Accessing the personal information we hold**

An individual is entitled to access the personal information we hold about them. All enquiries should be directed to Communify (see below). In particular, we note that the Statement of Rights under the Aged Care Act provides individuals with the right to seek, and be provided with, records and information about the funded aged care services accessed, including the costs of those services.

We will respond to such requests within a reasonable period of time. We are entitled under the Australian Privacy Principles to charge a reasonable fee to cover the costs we incur in providing access, but this is usually not required.

We reserve the right to refuse access where an exception applies, for example, where releasing the information would unreasonably impact the privacy of another individual. Alternatively, we reserve the right to redact the information made available to protect the privacy of other individuals. We also reserve the right to verify the identity of the person requesting the information and their entitlement to access it.

### **Integrity of personal information**

Communify takes reasonable steps to ensure that the personal information we collect, use, and disclose is accurate, complete, and up-to-date. However, the accuracy, completeness, and currency of the information we hold largely depends on the accuracy of the information supplied to us or which we collect.

If at any time you discover that any information held about you is inaccurate, out-of-date, incomplete, irrelevant, or misleading, you can request correction of the information by contacting us. Communify reserves the right to verify your identity before processing a correction request.

### **Receipt of unsolicited personal information**

Communify does not generally collect information on an unsolicited basis. From time to time, we may receive personal information about an individual without specifically asking for that personal information. For example, we may receive an email sent to us in error or an employment application sent to us on the initiative of the job applicant and not in response to an advertised vacancy.

Additionally, we may receive unsolicited personal information from an individual when we ask the individual to provide us with personal information, and the individual supplies more than what we have requested.

Where Communify receives information on an unsolicited basis, we will comply with our statutory obligations to determine whether we could have lawfully collected the information for one or more of the purposes set out in this Privacy Policy. Subject to our statutory obligations, if we determine we could not have lawfully collected such information, we will destroy or de-identify it as quickly as reasonably possible.

If Communify determines that we could have lawfully collected the personal information we received on an unsolicited basis, then we will hold, use, disclose, and dispose of that personal information in accordance with this Privacy Policy, our Record Retention Policy, and our statutory obligations.

### **Queries and complaints**

Communify aims to always meet the highest standards to safeguard privacy. An individual may wish to discuss any information contained in this Client Privacy Policy or lodge a complaint about how their personal information is collected or used, or regarding the outcome of a request to access or correct their information. If so, Communify can be contacted using the contact details below. Communify will make a record of the complaint or query and will deal with the matter as soon as we can.

### **How to contact us**

Communify Queensland Ltd  
180 Jubilee Terrace, Bardon QLD 4065  
**Phone:** (07) 3510 2700  
**Email:** [privacy@communify.org.au](mailto:privacy@communify.org.au)

If you are not satisfied with our response to your complaint, or you consider that Communify may have breached the Australian Privacy Principles or the Privacy Act, you can make a complaint to the Office of the Australian Information Commissioner ("OAIC").

### **Office of the Australian Information Commissioner**

Postal address: GPO Box 5288 Sydney NSW 2001  
Phone: 1300 363 992  
Email: [foi@oaic.gov.au](mailto:foi@oaic.gov.au)  
Website: [www.oaic.gov.au](http://www.oaic.gov.au)

## How policy change happens

This policy will be reviewed every two years, following legislative changes or when a new service is designed and delivered. Community will endeavour to notify individuals of any substantial or material change.

Information that can inform this review includes:

- Board Director feedback
- Employee feedback
- Client feedback/complaints
- Changes in legislation
- Internal audits

## Our obligations

This policy relates to the following practice standards and legislation:

- Human Services Quality Standards
- Strengthened Aged Care Quality Standards
- NDIS Practice Standards
- National Regulatory Code (Community Housing): Standard 4 Governance
- National Safety and Quality Mental Health Standards for Community Managed Organisations
- National Safety and Quality Digital Mental Health Standards
- *Aged Care Act 2024* (Cth)
- *Aged Care Rules 2025* (Cth)
- *Privacy Act 1988* (Cth)
- *Information Privacy Act 2009* (Qld)
- *Human Rights Act 2019* (Qld)
- Right to Information Act 2009 (Qld)
- *Domestic and Family Violence Act 2012* (Section 5A) – Information Sharing Guidelines
- *Child Protection Act 1999* (Qld) (Section 159C)
- *Disability Services Act 2006* (Qld)

## Relevant forms and/or documents

- Client Handbook
- Community Privacy Collection Notice
- Community Risk Management Register
- Compliment, Suggestion and Complaint Form
- Compliments, Suggestions and Complaints Register
- Easy Read Client Information – Community Privacy Collection Notice
- Folio Incident Templates
- Media Consent Form
- Service Consent Forms

## Related policies and procedures

- 2.00.1 Internal Privacy Policy
- 2.00.2 Record Retention
- 2.00.3 Data Breach Response Plan

- 2.00.4 Record Requests
- 2.12 Client and Community Complaints
- 2.13 Feedback Processes
- 3.09 Regulatory Compliance
- 3.12 Information Technology and Cyber Security
- 3.15 Responsible Use of Artificial Intelligence
- 6.02 Workplace Incidents (including Critical Incidents), Injuries and Accidents
- 6.15 Closed Circuit Television (CCTV)

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| <b>Approval date</b>              | October 2019                    |
| <b>Date last amended/reviewed</b> | May 2022, May 2024, August 2025 |
| <b>Date to be reviewed</b>        | August 2027                     |

