



PRIVACY STATEMENT

Version 2.0

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1. Policy

Phoenix Wings Wellness is committed to a privacy statement that safeguards the privacy of clients and employees and in accordance with the Privacy Act 1988 (Cth). Phoenix Wings Wellness will uphold the Australian Privacy Principles and handle confidential information in line with all relevant legislation and regulations

Phoenix Wings Wellness collects personal and sensitive information:

- with the prior knowledge and consent of the person (or their legal representative)
- directly from the person, where practical and appropriate, rather than a third party
- only if necessary for the function of the service or organisation
- after informing the person why the information is being collected and how it will be used; and,
- in an environment where confidentiality can be maintained.

Phoenix Wings Wellness ensures the effective storage, backup, retrieval, archiving and retention of electronic and printed data, in line with relevant privacy and record keeping regulations and legislation.

2. Definitions

Personal information refers to information or an opinion that identifies an individual. This may include a person's name, address, photograph, contact details, date of birth, employment details or any information where the person is reasonably identifiable.

Sensitive information is a subset of personal information and may include a person's cultural or ethnic origin, health information (such as disability or use of health services), religious beliefs, political opinions, sexual orientation, or criminal record.

Confidential information refers to other information that is to be kept private or could reasonably be assumed to be. This may include organisational financial and governance information, employee information and records, client information and the intellectual property of the organisation.

3. Responsibility

It is the responsibility of all workers to comply with the Phoenix Wings Wellness Privacy and Confidentiality policy

4. Collection of Information

Phoenix Wings Wellness collects and holds information which is reasonably necessary for the usual activities and operations, including developing and delivering services, evaluating outcomes and conducting research. The kind of information collected and held includes (but is not limited to) personal information about participants, service users, employees, contractors and providers.

The types of personal information that Phoenix Wings Wellness collects includes:

- name, contact details, date of birth and age
- gender, details about physical and mental health, including disabilities
- information about support requirements, including details of family and other relationships
- details of feedback or complaints about services provided by us
- bank account details
- employee records

4.1 How personal information is collected and stored

Phoenix Wings Wellness may collect information in a number of circumstances, including when a person:

- is required to provide consent to engage with a service, activity or event;
- provides feedback or requests information from Phoenix Wings Wellness;
- applies for a job, work placement or volunteer position;
- makes a donation; or
- joins a mailing or contact list.

4.2 Consent

Phoenix Wings Wellness will always try to obtain consent before disclosing information to a third party but may share information with government agencies and non-government organisations without a person's consent if:

- there are concerns about the safety, welfare and wellbeing of children and young people, for example, as mandatory reporters, Phoenix Wings Wellness is required by law to report to Child Protection in NSW and Victoria if it is suspected, on reasonable grounds, that a child or young person is at risk of significant harm
- a request for information under Chapter 16A Request or Section 248 of the Children and Young Persons (Care and Protection) Act 1998 for statutory interventions
- it is essential to lessen or prevent a serious threat to the life, health or safety of any person, or to public health or safety, or to take appropriate action in relation to suspected unlawful activity or serious misconduct.

Phoenix Wings Wellness will always gain consent before taking photographs and recordings of individuals using or participating in our services, programs or facilities and before publishing information that identifies an individual in any printed, electronic, video or audio publications.

5. Data Use

Phoenix Wings Wellness will only use the personal information collected for the purposes for which it was collected, or other purposes that are agreed to between the organisation and the client.

Personal information is held electronically and in hard copy form at Phoenix Wings Wellness. Sometimes personal information is collected from a third party if the person has consented or would reasonably expect Phoenix Wings Wellness to collect the information in this way. Examples of this include but are not limited to, collecting information from a healthcare service, such as a residential care facility. Personal information is kept in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification, or disclosure. This includes keeping hard copy information in locked cabinets with restricted access and using security controls for electronic information that include authorised access, user authentication, email filtering, encryption, firewalls, virus protection and regular data back-up.

Personal information is collected about employees and prospective employees in the course of conducting employment and employment-related activities such as payroll services, recruitment and selection, performance management, reporting and work health and safety.

Phoenix Wings Wellness uses third party systems to store some data such as client management systems. Where this occurs, Phoenix Wings Wellness has a service agreement with these third parties which incorporates our Privacy Policy and the Privacy Act

Phoenix Wings Wellness will retain personal information for as long as it is needed for the purpose for which it was obtained and in compliance with legal, regulatory, financial, and administrative requirements. Phoenix Wings Wellness will take reasonable steps to destroy or permanently de-identify personal information that is no longer in use by permanently deleting electronic information and secure shredding and disposal of hard copy information.

5.1 Accessing Personal Information

Individuals have a right under the Privacy Act to access personal information Phoenix Wings Wellness holds about them. Individuals may also request corrections of any personal

information that is held about them, where they believe the information is inaccurate, out-of-date, incomplete, irrelevant or misleading. To request access or seek correction of personal information, individuals may contact Phoenix Wings Wellness by phone, email or in person and provide identification. Phoenix Wings Wellness will respond to requests within a reasonable period of time (usually 30 days).

5.2 Data Breaches

The Notifiable Data Breach Scheme requires organisations to notify particular individuals and the Office of the Australian Information Commissioner (OAIC) if an 'eligible data breach' occurs. A data breach is eligible if it's likely to result in serious harm (psychological, emotional, physical, reputational or other forms of harm) to any of the individuals to whom the information relates.

Phoenix Wings Wellness recognises data breaches may fall into two (2) primary categories, serious (eligible) and minor. To ensure that breaches are responded to in an appropriate timely manner a Data Breach Response Plan will be implemented. Minor breaches are those that are rectified quickly and individuals are not at risk of suffering serious harm. Eligible data breaches will result in immediate notification to individuals affected and to the Officer of the Australian Information Commissioner (OAIC).

6. Complaints

If a person believes that there has been a breach in their privacy, they can contact Phoenix Wings Wellness directly. Details on how to make a complaint are set out in the Complaint Policy.

Phoenix Wings Wellness is committed to a prompt and fair resolution of complaints and will ensure that a person's complaint is taken seriously and investigated. In all cases, the person will be informed of the progress and outcome of the complaint.

If a person is not satisfied with the way a complaint has been handled, they may contact the Office of the Australian Information Commissioner (OAIC). The Information Commissioner may not investigate a person's complaint, unless it has first been brought to the attention of Phoenix Wings Wellness.

Office of the Australian Information Commissioner:

Telephone 1300 363 992

Email enquiries@oaic.gov.au

Post GPO Box 5218, Sydney NSW 2001

You can also email the commission at privacy@privacy.gov.au or access the website address at <http://www.privacy.gov.au>

7. Digital Content, Social Media & Third-party Websites

Phoenix Wings Wellness uses the tools provided by Facebook, LinkedIn, Instagram, Twitter, YouTube, and Google to tailor the Phoenix Wings Wellness website and the information delivered on social media to the preferences of Phoenix Wings Wellness' audience. Refer to

the individual privacy policy of the individual social media platform for more details on how your information is collected.

7.1 Website Cookies

Phoenix Wings Wellness collects information from users of this website through the use of 'cookies'. Cookies allow Phoenix Wings Wellness to track non-personal information about a person, such as their IP address, date and time of visit, the pages viewed, information downloaded, what browser a person is using, what search terms are used to find Phoenix Wings Wellness' site, and any information a person's browser may send. This information will only be used for the purpose of site analysis to improve online services. A person cannot be identified from this information.

8. Context	
Standards	Australian Privacy Principles Information Privacy Principles (Vic) <i>Education and Care Services National Regulations (NSW)</i>
Legislation	Privacy Act 1988 (Cth) Privacy and Data Protection Act 2014 (VIC) Freedom of Information Act 1989 (NSW) Children and Young Persons (Care and Protection) Act 1998 Chapter 16A e.g. Privacy Act 1988 (Cth) Privacy and Personal Information Protection Act 1998 (NSW)