



DHP01 Policy on Privacy, Dignity and Confidentiality

Policy

Social Solutions Pty Ltd is committed to collecting, keeping and disposing of customer records in ways that protect our guests' privacy, ensure their confidentiality is maintained, and enable us to provide the most appropriate service to each individual.

The policy has been framed around individuals' rights as they are specified in the Privacy Act (1988), Australian Privacy Standards 2014, Freedom of Information Act (1982), and Standard 1, Rights of the National Disability Standards 2013.

This policy will apply to all Social Solutions Pty Ltd customers and guests and includes written, verbal or electronic records or information we collect in the course of delivering our services.

Purpose

Comprehensive, clear and useful records about our clients, their needs and their use of our services are essential for effective and high-quality service delivery and to maintain appropriate accountability. Our clients have legislated rights to confidentiality and privacy in relation to the records we keep and our processes for collecting, using and securely storing client data. It is essential that we protect and uphold these rights.

DATA COLLECTION AND USE

Social Solutions Pty Ltd will collect data from you when:

- a. You join our mailing list
- b. You make a travel booking or reservation
- c. You request guest support and care services

Types of personal data we may collect and how we use it includes:

- a. Your email address to join our mailing list
- b. Identification information such as your name, date of birth, address, emergency contact, passport number and other details to reserve requested travel services.
- c. Medical information and personal care plans to provide requested support services.
- d. Copies of licenses, certificates and other ID/Cards/Concessions as required for verification.
- e. Other information as agreed by you.



We will:

- a. Only collect information about the guest that can be shown to be directly relevant to effective service delivery and the company's duty of care responsibilities.
- b. Seek the written consent of the guest or family prior to obtaining information from any other source. [Form : Consent to Exchange Personal Information]
- c. If you are an NDIS Funded Agency Represented Guest we will request consent to share your personal details with the Auditor and give you the option to Opt Out of participating in the Audit process. ¹

INTERNET DATA COLLECTION AND USE

To improve online services Social Solutions Pty Ltd utilizes analytic software to collect anonymous data for website traffic including the number of visits, pages visited and how users navigate the site.

DISCLOSURE OF DATA

We will disclose your data only to:

- a. Travel service suppliers to arrange ticketing and reservations
- b. Social Solutions Staff directly involved in your service delivery
- c. Your nominated personal representative or guardian as requested
- d. Other entities authorized by you.
- e. NDIS Auditors for NDIS funded agency managed users, unless you have opted out of consent. ²

We will:

- a. Seek the written consent of the guest or family prior to releasing information to any other source. [**Form : Consent to Exchange Personal Information & Easy Read Version**]

QUALITY OF DATA

We will take all reasonable steps to ensure that the personal information we hold is Accurate, Complete, Relevant, Up-to-date, Not misleading by:

- a. Completing all service planning in direct consultation with the guest, their family, service provider, medical professional or other representative.
- b. Regularly updating customer records and service plans reviewed annually.
- c. Seeking written customer agreement with the accuracy of the personal data held for service provision.

STORAGE AND SECURITY OF DATA

¹ Addition August 2021

² Inserted to address the opt out reference in consent forms for NDIS Funded Agency Managed service users



The company maintains a guest information system that houses all personal information pertaining to an individual guest in the following secure locations:

- a. E-Newsletter Mailing List: email address, name (optional) e-newsletter mailing list.
- b. Password protected reservations system : Personal data including name, address and contact details
- c. Password Protected Cloud-based Tour Handbooks: Tour itinerary, reservations, emergency contacts and guest medical alerts.
- d. Password Protected Private Offline Hard Drive: Digital copies / scans of guest medical records, care plans and other sensitive data.
- e. Locked hard copy guest files and records cabinet.

We will take reasonable steps to ensure that the personal data we hold is protected from loss, misuse, unauthorised access by ensuring that:

- a. Staff and Employees adhere to a Code of Conduct that maintains customer confidentiality and prohibits inappropriate verbal or written disclosure to guests, other staff, suppliers or other person without consent.
- b. Staff are trained and act in accordance with the Policies and Procedures for Physical and Online Data Storage, Security and Disposal.
- c. Customer sensitive, medical and identifying data is not held or stored online
- d. Guest files are stored in lockable filing cabinets in a non-public place in the office and files are returned to their proper location as soon as they are no longer required.
- e. Guest names or other identifying information is not displayed on whiteboards or notice boards that may be open to view by other guests or the general public.
- f. Photographic, video or other identifying images are not displayed or aired publicly without the written prior permission of the guest or family.
- g. On- Service Handbooks are kept secure according to Service Handbook, Security Procedures and returned to filing promptly post service.
- h. Personal information about a guest is only held by the company as long as it remains relevant to the delivery of effective services and the company's duty of care obligations.

INTERNET AND CLOUD STORAGE OF PERSONAL DATA

- a. Service delivery information, Manifests and Itineraries shared with Social Solutions staff and employees only via cloud-based App (ISO 27001 Certified) and are password protected and accessed remotely via password protected devices.
- b. Service Itineraries are removed and stored offline promptly after tour end date
- c. Reservation information is held via (ISO 27001 Certified) customer database accessed by Social Solutions Pty Ltd staff and employees only.



ACCESS AND CORRECTION OF DATA

Customers can access the data held by Social Solutions by requesting in writing a copy of their Guest Services File. Requests from other parties must provide written consent from the customer, next of kin, guardian or nominated representative to exchange information.

OPTING OUT OF MARKETING AND PROMOTIONS

- a. Opting out of our Electronic mailing list you may follow the unsubscribe button at the bottom of your last promotional email or contact the office to update your preferences.
- b. To opt out of our postal catalogue mailing list please mark and mail your promotional catalogue "Return to Sender" or contact the office to update your preferences.

OPTING OUT OF NDIS PROVIDER AUDIT³

A guest may opt out of Audit participation for Social Solutions WA's NDIS Provider registration at any time and is required to consent to Audit participation at Service planning.

MAKING A PRIVACY COMPLAINT

Social Solutions will promptly investigate, remedy and document any consumer grievance regarding privacy, dignity or confidentiality.

Complaints and feedback may be made:

By Phone: 1800 290 966

By Email: info@socialsolutionswa.com.au

**By Mail: Guest Services
 Social Solutions
 PO Box 793
 CLOVERDALE WA 6985**

At our Website : <https://www.socialsolutionswa.com.au>

Privacy grievances and complaints will be handled according to our ***Policy on Complaints and Disputes***. Where we are unable to resolve your complaint as outlined by the process you have the right to escalate your complaint to:

Office of the Australian Information Commissioner

Phone 1300 363 992

Email: enquiries@oaic.gov.au

³ Addition for clarification of opt out procedure 10/23



Fax: +61 2 9284 9666

Post: GPO Box 5218 Sydney NSW 2001

Website: www.oaic.gov.au

RELATED POLICIES AND DOCUMENTS

Disability Services Standard One: Rights

Guest Support Manual

Policy on Information Technology

Policy on Customer Records

Employee Code of Conduct

Form: Consent to Exchange Personal Information

Form: Consent to Use Photographic Images

REVIEW OF THE POLICY

This policy will be reviewed on a two yearly basis. However, if at any time the legislative framework, policy or funding environment is so altered that the policy is no longer appropriate in its current form, the policy will be reviewed immediately and amended accordingly.

Date Adopted: August 2013

Date Reviewed: July 2024

Next Review: September 2025