POLICY

Privacy & Confidentiality

Created: March 2019 Reviewed: January 2024 Review Date: February 2026 Version:3

At Camp Breakaway Inc. we respect confidentiality and the proper handling of personal information.

We treat our business affairs as confidential and insist that member, participant, customer, contractor, volunteer, and employee information is not disclosed to or accessed by unauthorised persons. We do not use information regarding the affairs of Camp Breakaway, our member, participant, customer, contractor, volunteer, and employee for personal gain, or for the gain of others such as friends, relatives, or business associates. We understand that improper handling of inside and/or confidential information may not only breach our Code of Conduct but also various provisions of the Corporations Law, Privacy Act 1988, and the Australian Privacy Principles (APP's amendments 2014). Any breach of these laws and acts could result in a fine and /or prosecution for both organization and individual.

Please Note: Images of individuals in photographs or film are treated as personal information under the Privacy Act where the person's identity is clear or can reasonably be worked out from that image.

Commitment

Camp Breakaway Inc. is firmly committed to the management and protection of information (personal or other) in an open and transparent way provided by staff, customers, participants, contractors, and volunteers.

Camp Breakaway Inc. views privacy as a serious matter and therefore this privacy policy applies to the management, collection, storage, use and dissemination of information collected from staff, customers, participants, contractors, and volunteers.

Camp Breakaway Inc. is required to comply with the Privacy and Personal Information Act 1998 and in addition the amendments of the Australian Privacy Principles (APP's) to this Act for the private business and health sectors. The APPs in the amendments pertain to the way organizations manage and handle information regarding:

Principle 1 – Open & transparent management of personal information

Principle 2 – Anonymity & pseudonymity

Principle 3 – Collection

Principle 4 – Dealing with unsolicited personal information.

Principle 5 – Notification of the collection of personal information

Principle 6 – Use and disclosure.

Principle 7 – Direct marketing

Principle 8 – Cross-border disclosure of personal information

Principle 9 – Government identifiers

Principle 10 – Quality

Principle 11 – Security

Principle 12 – Access

Principle 13– Correction

It is the responsibility of Camp Breakaway Inc. and all organisation staff, contractors, and volunteers to be familiar with the APPs and accordingly are required to comply with the following statement details and the policy relating to how we manage personal information.

Principle 1: Open & transparent management of personal information

We manage personal information in an open and transparent way. This includes having a clearly expressed and up to date privacy policy.

The information collected from staff, customers, contractors, and volunteers may include:

- Names, addresses, mobile numbers, email address, emergency contact details, tax file numbers, qualifications, date of birth, marital status, nationality, NDIS Worker checks, working with children checks, bank account details and information that may relate to previous employment.

The information collected from participants may include:

- Names, addresses, mobile numbers, emergency contact details, medical details including types and names of medications and previous medical history, names of plan managers and support coordinators.

Camp Breakaway **does not** collect sensitive information such as an individual's political opinion or sexual preferences etc.

Principle 2: Anonymity & pseudonymity

Camp Breakaway will give individuals the option of not identifying themselves, or of using a pseudonym. Limited exceptions apply.

Principle 3: Collection

Camp Breakaway can collect personal information that is solicited. It applies higher standards to the collection of 'sensitive' information.

- Information is collected when an application for employment is submitted and then at the point of formally establishing an employment contract under the relevant employment award.
- Information pertaining to participants is collected from the time that a participant requests Camp Breakaway services to provide a quality, safeguarding and caring environment.
- Health information is a specific type of 'personal information' which may include information about a participant's physical or mental health or disability.
- Information pertaining to volunteers is collected when an Application for Volunteering form is submitted.
- Information is collected via several standard forms including applications.

Principle 4: Dealing with unsolicited personal information.

In situations where Camp Breakaway may receive unsolicited personal information that is particularly sensitive it will never remain on our filing records. For example, in community services, an organisation may receive information relating to domestic violence or abuse. We note that such unsolicited personal information may detrimentally influence staff in their decisions about, or interactions with, that individual.

Principle 5 – Notification of the collection of personal information

Personal information is collected for the purposes of establishing and maintaining employment, staff, contractor, volunteer, and participant records. So as to provide the services and to assist in the fulfilment of duty of care obligations to staff and participants.

Principle 6 – Use and disclosure.
Details collected from employees, contractors, members, participants, and volunteers will not be forwarded to a third party unless Camp Breakaway Inc. is required to do so to comply with the law. No information about any employee, contractor, member, participant, and volunteer will be supplied to a third party without strict and implicit instruction from that individual.

Principle 7 – Direct marketing
Camp Breakaway Inc. may only use or disclose personal information for direct marketing purposes if certain conditions are met which includes written consent from individuals.

Principle 8 – Cross-border disclosure of personal information
Camp Breakaway Inc. may only use or disclose personal information for cross-border disclosure if certain conditions are met including individual written consent.

Principle 9 – Government identifiers
Camp Breakaway Inc. may only adopt a government identifier that relates to verification of an individual for the purposes of employment and provision of disability support services. For example. Tax file number or Medicare number.

Principle 10 – Quality
Camp Breakaway Inc. makes every effort to ensure that personal information details are accurate and up to date. Should your details change at any time, please contact us in order that we can update your information. Participant information (especially NDIS Support plans) is updated prior to each support program.

Principle 11 – Security
Camp Breakaway Inc. stores personal information using a combination of computer (soft) and paper (hard) based storage facilities. Paper records are stored in a fireproof strong room with security access available to authorised staff only. Access to electronic storage is also limited to authorised personnel and is password restricted.
Camp Breakaway Inc. makes every endeavour to ensure that all personal information is protected from misuse, loss, unauthorised access, modification, or disclosure.

Principle 12 – Access
Your personal information may be accessed by you at a pre-arranged time should you wish to do so, and copies of personal information documents will be supplied to you upon request.

Principle 13– Correction
Camp Breakaway Inc. makes every endeavour to correcting the personal information it holds about individuals.

Related Documentation
- Privacy Act 1988
- Australian Privacy Principles (12/03/2014)
- Fair Work Act 2009