

PRIVACY, DIGNITY AND CONFIDENTIALITY POLICY



Purpose

In order to provide services that meet participants' needs and that comply with all relevant standards and legislation, Aurora Support Services must collect and store private information about participants and their representatives.

We also acknowledge the privileged position of confidence and trust that we hold in participants' lives. We recognise that the supports that we provide to participants are often of a very personal nature and that participants may need support to ensure that their dignity is maintained in the provision of this care.

As an employer, Aurora Support Services also collects private and confidential information about staff members.

The organisation is committed to protecting and upholding all people's inherent right to privacy, dignity and confidentiality in the way that we collect, store and use the information collected, and in the way that we deliver supports.

Scope

This policy applies to all employees, students, volunteers, contractors and members of the Committee of Management of Aurora Support Services.

This policy is relevant to all participants who attend Aurora Support Services as well as to their family members and any other supports who may interact with Aurora Support Services on their behalf.

Definitions

Privacy	The right to be free from interference and intrusion.
Dignity	The right of all people to be valued and respected, and to be treated ethically.
Confidentiality	The right for a person to have their personal information kept private.

Policy

Aurora Support Services collects personal information about participants, including but not limited to personal details of participants and their representatives (name, date of birth, address, contact information), details of participants' NDIS plan and other funding details and information about participants' support needs. These details are collected for the purpose of providing supports to participants, and/or to meet legislative compliance requirements.

Aurora Support Services collects personal information about staff members, including but not limited to their personal details (name, date of birth, address and contact information), emergency contact details, licence and 100 points of identification information, banking and payroll details, and employment information. This information is collected in order to manage essential aspects of payroll and human resources, and to maintain legislative compliance. Further confidential information is accumulated over the course of employment, such as minutes of meetings, details of changes to employment and concerns or complaints regarding or raised by a staff member.



Privacy, Dignity and Confidentiality Policy

Consent and Information Sharing

Aurora Support Services will:

- Maintain openness and transparency about why personal information is being collected and how it will be used.
- Only collect information about participants that is directly relevant to effective service delivery and to Aurora's duty of care and/or is required to meet Aurora's legislative compliance responsibilities.
- Only collect information about staff members that is directly relevant to their employment and/or is required to meet Aurora's legislative compliance responsibilities.
- Seek participants' consent to liaise with external stakeholders about their needs and supports, use of their image (photo and audio-visual), and to provide personal information to independent auditors and to other parties.
- Ensure that personal information is not used or shared for purposes other than that for which it was disclosed, and is only shared in circumstances for which the individual, or a representative on their behalf, has given their consent for us to do so.
- Only share information without consent in specifically exempted circumstances, such as when the organisation is required by law to disclose the information, or where there is a serious risk to the individual's health. If information must be disclosed without consent, we will ensure that the individual is informed of this.
- Support participants to understand that they have the right to choose not to share their personal information with us, but there are circumstances where this may affect or limit the supports that we can provide to them.
- Advise participants of their right to view the information that Aurora Support Services keeps in respect to themselves, and advise staff members of their right to view their employment records.

Storage of Information

Aurora Support Services will ensure that:

- All personal information is treated as confidential.
- Only staff who need access to a participant's or staff members' personal/confidential information will be granted access.
- Individuals' personal information is not displayed or left where unauthorised Aurora staff members, or members of the general public may view it.
- Security protocols are in place to protect personal information kept in hard-copy format, including this information being kept in locked/secure areas such as Managers' Offices or the Administration area, and/or in a locked filing cabinet or other secure storage option when not in use.
- Security protocols are in place to protect personal information stored electronically, including password protections on all Aurora computers, systems and email accounts; two-factor authentication for information access and storage systems including Outlook and SharePoint; and installation of appropriate virus protection software.
- Adequate protections are in place to protect Aurora's Information Technology systems from external threats such as hacking and data breaches, in line with the organisation's *Information Communication and Technology (ICT) Plan*.
- Information is only held by Aurora Support Services as long as it remains relevant to the delivery of effective services and as required to meet duty of care or employment obligations and/or to meet legislative compliance requirements.



Privacy, Dignity and Confidentiality Policy

Retention and Disposal of Information (formerly Archiving Procedure)

In line with relevant legislative requirements, payroll information is retained for 7 years; payroll records are to be archived at the end of each Financial Year, then disposed of 7 years after archiving.

A full file of participant and staff information is maintained for the duration of their placement/employment. Participant and staff files are archived at their exit. Records are then disposed of 7 years from the end of financial year following the individual's cessation of services or resignation.

Information/Data Breaches

A data breach happens when personal information is accessed or disclosed without permission, or is lost.

Aurora Support Services will inform individuals, and their representatives where applicable, if their privacy has, or may have been breached, and will explain what actions are being taken in response to any breach or potential breach.

Any identified breaches or grievances pertaining to privacy, dignity or confidentiality will be promptly investigated, actioned, remedied and documented, and procedures will be reviewed to prevent reoccurrence.

Office of the Australian Information Commissioner (OIA) Notifiable Data Breaches

In line with the Privacy Act (1988), Aurora Support Services must inform the individual affected by a data breach and the OAIC when there is unauthorised access to or unauthorised disclosure of personal information or a loss of personal information held by the organisation, which is likely to result in serious harm to one or more individuals, and the organisation has not been able to prevent the likely risk of serious harm through remedial action.

Examples of “*serious harm*” include identity theft, financial loss through fraud, a likely risk of physical harm (such as an abusive person gaining access to a person's address), serious psychological harm and/or serious harm to a person's reputation.

Following a data breach, Aurora has 30 days to assess whether it is likely to result in serious harm, and must try to reduce the chance that the affected individual experiences harm. If this is successful, and the person is not likely to experience serious harm, then the breach is not required to be reported.

Notifiable data breaches must be reported through the online form on the OIA's website: [oaic.gov.au](https://www.oaic.gov.au)

Dignity and Respect in Service Delivery

Aurora Support Services will ensure that:

- Participants' inherent Human Rights to freedom, respect, equality and dignity are actively promoted, and underpin our service delivery.
- Participants are involved in conversations about them and their supports, wherever practicable to do so, and have a say in how they are supported.
- Participants' personal information and details are not discussed with or in the proximity of others.
- Where participants' support needs and personal care needs are displayed for staff reference, only information necessary to provide safe supports are shared, and information of a sensitive and personal nature (such as personal care needs) are worded in a respectful and discrete manner.



Privacy, Dignity and Confidentiality Policy

- Practices are in place to protect participants' dignity. For example, personal care supports are to be conducted in a timely, discrete and respectful manner; privacy screens are to be used when supporting participants with personal care in an area that may become visible to others (eg. in a bathroom area without a locking door); participants are to be supported in a timely manner to wipe their face and hands after eating, etc.

Policy Review

Document Approver	Executive Director and/or Assistant Executive Director
Date Reviewed	02 March 2026
Timeframe For Next Review	This policy is reviewed on a two-yearly basis. The policy will, however, be reviewed before this time if it is identified that changes in the legislative, policy and/or funding environment have rendered the policy no longer appropriate in its current form.
Next Review Due	02 March 2028

Policy Context

NDIS Rules and Standards	NDIS (Code of Conduct) Rules 2018 NDIS (Provider Registration and Practice Standards) Rules 2018 NDIS Practice Standards Core Module 1, Rights and Responsibilities – Privacy and Dignity NDIS Practice Standards Core Module 2, Provider Governance and Operational Management – Information Management
Relevant Legislation	Disability Act 2006 NDIS Act 2013 Australian Human Rights Commission Act 1986 Charter of Human Rights and Responsibilities Act 2006 Equal Opportunity Act 2010 Fair Work Act 2009 Health Records Act 2001 Privacy Act 1988
Contractual Obligations	NDIS Conditions of Registration Individual Service Agreements for NDIS Participants Individual Brokerage Agreements for DSOA Participants
Related Policies and Procedures	Code of Conduct Agreement Compliments and Complaints Management Policy Conflict of Interest Policy Employee Professional Standards Policy Individual Needs Policy Participant Records Procedure Person Centred Plan (PCP) Procedure Social Media Policy Website Privacy Policy
Related Forms and Documents	Information, Communication and Technology (ICT) Plan Participants' Service Agreements



Privacy, Dignity and Confidentiality Policy – Easy Read

Your Dignity and Respect

At Aurora, we will:



- Treat you with respect and dignity
- Involve you in decisions
- Talk about your information only in private
- Support you respectfully with personal care



Your Information and Your Rights

Aurora Support Services collects your personal information so we can support you safely.

What information we collect

We collect information such as:



- Your name, birthday, address and phone number
- Your NDIS plan details
- What supports you need
- Contact details of your family or representative

We only collect what we need to support you.

Your consent (your choice)

We will:



- Tell you why we need your information
- Ask before sharing your information with others
- Ask before using your photo, video or voice
- Only share without consent if required by law or if there is serious danger

You can say yes or no, but saying no may affect the supports we can give.

You can ask to see your file at any time.



Privacy, Dignity and Confidentiality Policy – Easy Read

How we keep your information safe



We keep your information private by:

- Locking paper files away
- Using passwords and secure computer systems
- Allowing only staff who need your information to see it
- Not leaving your information where others can see it

We keep your file while you use our service.

After you leave, we keep it for **7 years**, then destroy it safely.

If your information is lost or shared by mistake



This is called a data breach.

If this happens, Aurora will:

- Tell you what happened
- Explain what we are doing to fix it
- Report it to the Office of the Australian Information Commissioner if required by law