



Privacy and Personal Information Policy and Procedure

ABN 55 956 904 691

Policy Name:	Privacy and Personal Information		
Policy Number:	31	Version:	5.0
Board Approval Date:	November 2025	Scheduled Review Date:	November 2027

Policy Statement

This policy provides the overarching framework for upholding and ensuring privacy for all stakeholders associated with Rural Lifestyle Options Australia (RLOA) services, activities and operations. RLOA is committed to respecting and maintaining the privacy of personal and health information and the confidentiality of information pertaining to its financial and operating information. RLOA respects the privacy and confidentiality of the information provided by everyone associated with the company and is committed to ensuring that all personal information is managed in accordance with the Information Privacy Act 2009 (Qld).

RLOA is committed to protecting the privacy of all NDIS participants, Aged Care consumers, employees, volunteers, beneficiaries, donors, business partners and online users. RLOA maintains confidentiality and uses the information collected to maximise the quality of the services that are provided. All employees, carers, contractors and volunteers of RLOA have a responsibility to uphold the privacy of all personal information in complying with this policy.

RLOA acknowledges the statutory tort for serious invasions of privacy under the Privacy Act and is committed to ensuring that all organisational practices uphold individuals' rights to privacy and protection from such invasions.

RLOA uses the Office of the Australian Information Commissioner's (OAIC) Privacy Maturity Assessment Tool to self-assess and improve internal privacy governance and risk mitigation practices. This tool forms part of our regular internal audit cycle. In line with Section 13K of the Privacy Act, the Privacy Commissioner has the power to impose civil penalties for non-compliance with privacy documentation requirements, including incomplete privacy policies. RLOA reviews and updates this policy regularly to ensure full compliance with the Australian Privacy Principles.

Scope

This policy applies to all RLOA services, activities, and operations and includes all employees, carers, volunteers, NDIS participants, Aged Care consumers, recipients, donors, business partners and online users.

Principles

The principles that govern this policy are consistent with the Information Privacy Act 2009 (Qld) and include:

- Collection of Personal Information – RLOA must not collect Personal Information unless the information is necessary for (or directly related to) a lawful purpose directly related to a function or activity of the company and such information will only be collected by lawful and fair means.



Privacy and Personal Information Policy and Procedure

ABN 55 956 904 691

- Collection of Personal Information (requested from individual) – where RLOA has requested that an individual provide his or her Personal Information, RLOA will take all reasonable steps to ensure that the individual is made aware of certain matters before (or as soon as is practicable after) the time the information is collected. Such matters include the purpose of the collection and the entities to whom the information has been disclosed. A privacy collection statement will be issued to individuals as information is collected.
- Collection of Person Information (relevance etc.) – RLOA will take reasonable steps to ensure that all Personal Information collected is relevant to the purpose for which is collected; is complete and up to date and is not collected in an unreasonably intrusive manner.
- Storage and security of Personal Information – RLOA will ensure (including by implementing adequate security safeguards) that all Personal Information held by the company is protected against loss, unauthorised access, use modification or disclosure or any other misuse of that information, including ensuring that third party service providers do not misuse or disclose the Personal Information.
- Providing information about documents containing Personal Information – RLOA will take all reasonable steps to ensure that individuals can find out whether the company has control of any documents containing their personal information; the type of Personal Information contained in any such documents; the main purpose for which such Personal Information is used and how an individual can access such documents.
- Access to documents containing Personal Information – subject to certain exemptions, RLOA will provide individuals with access to the personal information the company holds about them.
- Amendment of documents containing Personal Information – Subject to certain exceptions, RLOA will take all reasonable steps to ensure that Personal Information is accurate, relevant, complete, up to date and not misleading. If an individual requests that RLOA correct information and RLOA considers that it is not required to do so, RLOA will (at the individual's request) attach to the information a statement provided by the individual.
- Checking of accuracy etc, of Personal Information before use - Before using Personal Information, RLOA will take all reasonable steps to ensure that the information is accurate, complete and up to date.
- Use of Personal Information only for relevant purpose – If RLOA proposes to use Personal Information for a particular purpose, the company will only use the parts of the information that are directly relevant to fulfilling the particular purpose.
- Limits on use of Personal Information - RLOA will not use Personal Information obtained for a particular purpose for another purpose unless an exception applies, for example, the individual has consented to the use of the information for the other purpose; or the other purpose is directly related to the purpose for which the information was obtained.
- Limits on disclosure - RLOA will not disclose Personal Information to any entity unless an exception applies, for example, the individual has consented to the disclosure. Where the disclosure is permitted

Policies can be established or altered only by the Board; Procedures may be altered by the CEO.

THIS DOCUMENT IS UNCONTROLLED WHEN PRINTED.

The electronic version of this document is the approved and most current. Any printed version is uncontrolled and may not be current.



Privacy and Personal Information Policy and Procedure

ABN 55 956 904 691

under this, RLOA will take all reasonable steps to ensure that the relevant entity will use or disclose the information only for the purpose for which it was disclosed to RLOA. Special rules apply where RLOA wishes to disclose personal information to an entity who will use the information for marketing purposes.

Definitions

Personal Information: Any information or opinion about an identified individual or an individual who is reasonably identifiable.

Health Information: A subset of personal information that includes information or opinion about the health or disability of an individual.

Roles and Responsibilities

Board of Directors:

The Board is responsible for overseeing and approving RLOA's Privacy and Personal Information Policy, ensuring it aligns with legal requirements and ethical standards. The Board ensures that governance frameworks support compliance with the Information Privacy Act 2009 (Qld), Privacy Act 1988 (Cth), and any relevant reforms including the statutory tort for serious invasions of privacy. They will periodically review and endorse this policy as part of their governance obligations.

Chief Executive Officer (CEO):

The CEO holds ultimate accountability for the implementation of this policy across RLOA. They ensure that privacy breaches are appropriately managed and that staff understand the importance of protecting personal information. The CEO approves related procedures and ensures that internal systems, audits and practices support full compliance with applicable privacy legislation.

Head of Marketing and New Business:

The Head of Marketing and New Business ensures that all external communications involving personal information comply with RLOA's privacy obligations. They ensure that marketing, media and stakeholder communications do not breach privacy guidelines and are approved where sensitive data is involved. They also liaise with the CEO on privacy risks related to promotional or digital media initiatives.

All RLOA Staff, Carers, Contractors and Volunteers:

All team members are responsible for maintaining the confidentiality of the personal and health information they access in the course of their duties. They must comply with privacy procedures when collecting, using, storing, or disclosing personal information. Staff must ensure all information is saved securely within approved systems (e.g., One Drive, Visicase, Elmo or Careview). Any suspected breach or mishandling of information must be reported immediately.



Procedures

Attachment 1 outlines the specific processes that must be followed to comply with the policy.

References

Aged Care Act 2024
Public Records Act 2002
Privacy Act 1988 (Cth)
Evidence Act 1997
Child Protection Act 1999
Child Protection Regulation 2011
Right to Information Act 2009
Information Privacy Act 2009
Information Standard 18 (Information Security)
Information Standard 40 (Recordkeeping)
National Disability Insurance Scheme Act 2013 (Cth)
Disability Services Act 2006 (Qld)
Mental Health Act 2000 (Qld)

Policy Review

This policy will be reviewed by the Board at least every two years or sooner if required by any legislative or regulatory changes, changes in RLOA's operations or other relevant factors.

ATTACHMENT 1

Procedures Name:	Privacy and Personal Information		
Related Policy Number:	31	Version:	5.0
CEO Approval Date:	November 2025	Scheduled Review Date:	November 2027

Responsibilities

Chief Executive Officer (CEO):

The CEO holds ultimate accountability for the implementation of this procedure across RLOA. They ensure that privacy breaches are appropriately managed and that staff understand the importance of protecting personal information. The CEO approves related procedures and ensures that internal systems, audits and practices support full compliance with applicable privacy legislation.

Head of Marketing and New Business:

The Head of Marketing and New Business ensures that all external communications involving personal information comply with RLOA's privacy obligations. They ensure that marketing, media, and stakeholder communications do not breach privacy guidelines and are approved where sensitive data is involved. They also liaise with the CEO on privacy risks related to promotional or digital media initiatives.

Customer Service Team:

The Customer Service Team is responsible for collecting, checking, storing and updating personal information for NDIS participants and Aged Care consumers. They ensure that all documents are securely stored in Visicase or Careview and that onboarding and renewal processes follow the appropriate checklists. They also ensure that consent forms and privacy collection notices are accurately completed.

All RLOA Staff, Carers, Contractors and Volunteers:

All team members are responsible for maintaining the confidentiality of the personal and health information they access in the course of their duties. They must comply with privacy procedures when collecting, using, storing, or disclosing personal information. Staff must ensure all information is saved securely within approved systems (e.g., One Drive, Visicase, Elmo or Careview). Any suspected breach or mishandling of information must be reported immediately.

Cyber Incident Response Team:

Responsible for implementing and maintaining security safeguards to protect personal information against unauthorised access, loss or misuse. This includes managing secure access to databases, system backups, data encryption and monitoring for cybersecurity threats. They ensure that internal systems are compliant with Information Standard 18 (Information Security).

People and Culture Team (Privacy Enquiries):

Acts as the first point of contact for individuals wishing to access their personal information or make a privacy complaint. They ensure that requests are managed in accordance with RLOA procedures and applicable privacy legislation and may liaise with the OAIC or relevant bodies if required.

Procedural Steps

RLOA is committed to ensuring that all employees and volunteers are provided with clear and concise roles associated with the implementation of the Privacy policy. All procedures associated with this Policy are specific to the responsibilities of RLOA employees to make decisions and to provide appropriate information about their delegated level of approval for the required actions.

Information contained across our various databases (Visicase, Elmo and Careview) are critical to the survival of the organisation and therefore must be accurately maintained so that information can be relied upon when business and management decisions are being made.

Privacy Statement

Rural Lifestyle Options Australia is bound by the Australian Privacy Principles and Queensland Health Privacy Principles that establish the benchmark for how personal and health information should be handled and has embraced these principles as part of its standard operating procedures. Restricted access to, and secure storage and disposal of information and records identified as confidential (including soft and hard copy files) will be maintained, with all information that enters Rural Lifestyle Options Australia handled uniformly.

Consent for NDIS Participants

Rural Lifestyle Options Australia is committed to the principles in section 4 of the NDIS Act, including that people with disability should have their privacy and dignity respected. Rural Lifestyle Options Australia may disclose information to a requesting party with the consent of the person to whom the information relates (or their authorised representative) under section 60(2)(d)(iii) of the NDIS Act.

At RLOA, we ensure that a person's express consent or the consent of their authorised representative is sought to ensure privacy and dignity is respected and to signify that we are always acting faithfully on behalf of their best interests. If consent is provided by a person who has the authority to act on a participant's behalf, whether a guardian, nominee, child representative or otherwise, we ensure this is clearly identified. This information is collected through our Service Agreement at the point of sign up to ensure the position of the individual is clear and documented from the moment services are due to commence.

Consent for Aged Care Consumers

To provide appropriate care and services, personal and health information is collected from Aged Care consumers verbally and in writing, including contact and next of kin information, date of birth, health information and financial information throughout an Aged Care consumer's time as a client with Rural Lifestyle Options Australia. The main purpose for gathering and holding this Aged Care consumer information is to process applications for care and services, to assess the level of care and service appropriate to consumers' needs, to deliver the care and services required to make decisions about the level of funding consumers will be / are entitled to receive.

To enable us to meet our obligations, information relevant to the care and services being provided may need to be disclosed to organisation personnel, consulting health professionals and other service providers.

We may from time to time, disclose some of this information to the Courts, Commonwealth Government or its agencies. This will be done for purposes that may include a legal obligation, funding, management, planning, monitoring, improvement or evaluation of the organisation's services. The Commonwealth Government is also subject to laws dealing with privacy and has its own policies that are designed to safeguard information.

Consent for Rural Lifestyle Options Australia Personnel:

We collect and hold information about personnel, including date of birth, next of kin, banking details, payroll information (superannuation, tax file number), employment history, performance history, performance management information and contact details for Human Resource Management, payroll and in the event of an emergency. This information may be disclosed to the Commonwealth Government or its agencies or other parties for the purposes of assisting in managing the business and regulatory, legislative compliance.

Disclosure of this information will be done in accordance with legislation such as the Aged Care Act 1997 (Cth), Occupational Health and Safety Act 2011 (Qld), Workplace Injury Rehabilitation and Compensation Act 2013, Privacy Amendment (Private Sector) Act 2000, Privacy Amendment (Enhancing Privacy Protection) Act 2012 and industrial relations legislation. Payroll information will be disclosed to our Customer Service and Payroll Teams for the purpose of wage payment and meeting taxation and superannuation legislation.

If you have any concerns that your personal or health information has been inappropriately handled, or if you would like to know more about our privacy practices, including your right to request access to information held by us, please contact our People and Culture Team by emailing hr@rloa.org.au

General Guidelines for saving and maintaining information

All RLOA employees are required to follow the appropriate filing requirements for the files they store on One Drive or across any of our internal systems – Visicase, Elmo or Careview. This is to ensure that files are accessible to the delegated RLOA Line Supervisors and relevant others. Where RLOA employees require electronic files to be password protected for additional security they must consult with their RLOA Line Supervisor to gain the relevant permission to do so.

Maintaining Data Integrity for Participants and Consumers

RLOA employs thorough checking measures and processes to ensure all documents and data relating to our NDIS participants and Aged Care consumers are handled in a confidential and sensitive manner. In order to ensure the integrity of all data relating to these stakeholders, RLOA employ several checklists which are completed by the Customer Service Team or relevant Division or Team representatives to ensure all relevant data is collected, accounted for and stored correctly. Compliance reports are additionally run from the CMS Visicase which is checked regularly for compliance errors.



Privacy and Personal Information Policy and Procedure

ABN 55 956 904 691

All data that is collected during the initial onboarding stage or renewal stage for NDIS participants and Aged Care consumers are filtered through our Customer Service Team who are responsible for ensuring that all documents required have been signed appropriately and or received.

On completion of an onboard or renewal process, the Customer Service Assistant saves the completed checklist to the relevant client file folder. This is checked by the Finance Team (for billing purposes) and Manager overseeing the supports to ensure all client information has been correctly loaded into the relevant system. For more information, please refer to the Commencement of Employment Procedure.

Maintaining Data Integrity for Staff

RLOA employs thorough checking measures and processes to ensure all documents and data relating to our staff are handled in a confidential and sensitive manner.

When a new staff member joins the organisation, all new employees are onboarded via the 'Elmo' platform. The People and Culture Administrator uploads the suite of documents onto Elmo (HRIS) and enters any relevant information and documentation to setup the new staff member up on Visicase (CMS). The People and Culture Administrator completes a 'New Staff File Audit Checklist' as part of this process to confirm the onboard has been correctly loaded into the relevant system. This is uploaded to the Staff Member's Elmo profile and is checked by the Finance Team (for payroll purposes) and Line Manager to ensure completion. Both systems provide reminder notifications to relevant parties to ensure key documents are reviewed regularly and checked for compliance purposes. For more information, please refer to the Commencement of Employment Procedure.

In addition to saving relevant documentation on our secure One Drive, the Customer Service Team are responsible for uploading relevant documentation as per the below table:

Stakeholder Files and Documentation	Relevant Data System
NDIS Participants accessing Direct Supports	Visicase CMS
NDIS Participants accessing Support Coordination and/or Plan Management	Careview CMS
NDIS Participants accessing Direct Supports, Support Coordination and/or Plan Management	Visicase & Careview CMS
Aged Care Home Care Consumers accessing services	Visicase CMS
Staff Members	Visicase CMS & Elmo HRIS

What type of personal information does Rural Lifestyle Options Australia collect and hold?

We collect and hold information which is reasonably necessary for us to carry out our role as a NDIS and Aged Care registered provider. The kinds of information we collect and hold includes (but is not limited to) personal information about NDIS participants, Aged Care consumers and other users of our services and about our employees, contractors and alternative providers.

Does Rural Lifestyle Options Australia disclose information to overseas recipients?

RLOA does not routinely disclose personal information to overseas recipients. If such disclosure becomes necessary, it will be carried out in accordance with the Australian Privacy Principles. Where practicable, RLOA will



Privacy and Personal Information Policy and Procedure

ABN 55 956 904 691

identify the countries to which the information is disclosed. At this time, RLOA does not actively transfer personal information overseas and no countries have been identified as regular recipients.

Examples of personal information that we may collect includes:

- Name, contact details date of birth and age;
- Gender, details about clients' physical or mental health, including disabilities;
- Information about participants' support requirements;
- Details of guardians and nominees, including names, addresses and contact details;
- Centrelink Customer Reference Number (CRN);
- Details of feedback or complaints about services provided by us;
- Bank account details;
- Employee records;
- We may also collect some 'health information' as defined under the Privacy Act, such as information about our participant's health or disability, doctors they have seen or health services they have received.

What will we do with your personal information?

Rural Lifestyle Options Australia collects, holds, uses and discloses personal information for reasons including:

- Arranging, facilitating or assisting in the provision of Services to you, including managing complaints relating to the provision of the Services (which may include, but is not limited to, privacy complaints or complaints made to the NDIS Quality and Safeguards Commission or Aged Care Quality and Safety Commission);
- Assisting Commonwealth, State or Territory health services or departments of health to provide you with services or to address issues you may raise with them;
- Service improvement;
- Compilation of data and statistical analysis for general health and safety;
- Complying with our legal obligations.

What do I do if I believe my personal information has been misused or a serious invasion of privacy has occurred?

Individuals have the right to lodge a privacy complaint with RLOA or escalate the matter to the Office of the Australian Information Commissioner (OAIC) if they believe their personal information has been misused or a serious invasion of privacy has occurred. RLOA will handle complaints promptly, fairly and in accordance with applicable legislation.



References

Aged Care Act 2024
Public Records Act 2002
Privacy Act 1988 (Cth)
Evidence Act 1997
Child Protection Act 1999
Child Protection Regulation 2011
Right to Information Act 2009
Information Privacy Act 2009
Information Standard 18 (Information Security)
Information Standard 40 (Recordkeeping)
National Disability Insurance Scheme Act 2013 (Cth)
Disability Services Act 2006 (Qld)
Mental Health Act 2000 (Qld)

Quality Standards

NDIS Quality and Safeguarding Framework
Aged Care Quality Standards