Privacy Policy

1. INTRODUCTION

Life Skills & Adventures respects the privacy of our clients, members, participants, staff, volunteers and visitors. This Policy meets the requirements of the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* (Privacy Amendment Act) which made many significant changes to the *Privacy Act 1988* (Privacy Act). These changes commenced on 12 March 2014.
The Privacy Regulation 2013, made under the Privacy Act, also relates to Victorian Government legislation (Health Records Act 2001 and the Information Privacy Act 2000).

2. POLICY

Life Skills & Adventues reserves the right to make changes or amendments to the **LSA Privacy Policy** as required by law.

Collection, use and disclosure of information

a. Collection of personal or health information

Life Skills & Adventures collects personal information directly from our clients, members, Third party agencies, referral agencies, participant representatives/guardians/carers/support agencies, staff,volunteers and visitors through electronic, verbal, and written correspondence by means of email, phone, online, in person, via competitions, enrolments, social media.

Data collected includes but is not limited to;
Phone numbers, emails, addresses, date of birth, gender, medical conditions, medication plans, risk and behaviour management plans, payment details, bank account details, concession card details, Family Assistance Officer CRN, NDIS Plan, Court Order information and emergency contact details.

b. Use of personal or health information

Life Skills & Adventures may use personal/health information for:

- programs and service provision
- administration
- training
- payroll
- research and development purposes

c. Collection of personal or health information relating to children

Life Skills & Adventues does not collect, use or disclose personal information about anyone under the age of 18 unless we have the consent of a parent or legal guardian.

The Privacy Act extends rights to individuals of any age and does not specify an age at which an individual is capable of giving consent. Under common law, considerations of what an appropriate age is, take into account factors like the maturity of the child and the child's ability.

d. Disclosure of personal or health information

Life Skills & Adventures may disclose personal & health information to organisations/individuals outside LSA in order to provide the range of services and programs offered. The consent of the individual will be sought prior to any disclosure of personal or health information.

Disclosure of personal and health information will be in accordance with the National Privacy Principles.

Data Quality

Life Skills & Adventures takes reasonable steps to ensure that personal information is accurate, complete and up to date whenever it is collected, used or disclosed. We require customers to regularly update their enrolment information.

Data Security, Storage & Retention

Life Skills & Adventures takes reasonable steps to protect personal information from loss, misuse, unauthorised disclosure or destruction.

Only authorised LSA staff have access to information for approved purposes.

Data is stored on local secure servers as well as third party secure hosted data centres and comply with data security standards. Annually these suppliers are asked to provide a compliance report and to validateour audit requirements.

Health information will be retained for a minimum of 7 years following the last occasion on which service was provided. Where information was collected while the individual was a child it shall be retained until the individual is 25 years old, or for 7 years whichever is the greater.

Openness

The LSA Privacy Policy is available to:

- The community, members and clients through external promotional material brochures and websites.
- staff and volunteers via the internet and through induction processes.

Access and Correction

Access to personal information collected and stored by Life Skills & Adventures will be administered according to the provisions of the Commonwealth Privacy Legislation.

Life Skills & Adventures requires any person requesting access to their individual's personal information put their request in writing/email and attention to the Company Director and forward to Fun@LSAdventures.com.au. All requests are processed within 30 days of receipt of

application at no charge. Access to personal/health information for the purposes of viewing or correction will only be available to people requesting changes to their specific information or authorised carers/guardians with the consent of the person requesting the information.

In accordance with the Health Records Act, all Health information collected by the LSA will not be deleted. Amendments or alterations to the health information will be recorded on a separate form and attached to the original file.

Unique Identifiers

Life Skills & Adventures may be required to collect an individual's identifier such as Tax File number, NDIS number, Medicare number or Social Security number for the provision of services. These identifiers will only be disclosed to agencies as required by law.

Anonymity

Wherever it is lawful and reasonable to do so, LSA provides an opportunity to remain anonymous.

Transferred data flows

Life Skills & Adventures does not transfer any personal/ health information overseas without the consent of the individual.

Sensitive information

Life Skills & Adventures collects sensitive information such as religion, gender, disability, custody records, concession card details and criminal records where:

- the individual has consented; or
- the collection is required by law;

LSA does not disclose this information without consent or as required by law.This information is recorded in secure, password protected and lockable facilities.

Info to another Health Service Provider

If requested by an individual, LSA shall transfer their health information to a designated/ recognised health provider (i.e. medical suite, massage service, physiotherapy service, sports medicine service, health and fitness club, recreation centre, medical practitioners) free of charge on the completion of a "Personal Health Information Transfer Form".

Consent

By acquiring, booking or using the LSA services, products or facilities, individuals consent to the reasonable collection, use and disclosure of personal information.
Consent may be directly implied in the completion of an application or registration form or indirectly implied. e.g. LSA requests personal details to forward program information and the customer supplies their name and address for this purpose, social media, online competitions etc.

Complaints Procedure

Formal complaints regarding the manner in which personal information is collected, used, or disclosed are to be handled in accordance to the "LSA Complaints Handling Procedures".

Life Skills & Adventures websites

Life Skills & Adventures collects personal or sensitive information through websites, e-commerce systems, etc.
Life Skills & Adventures protects websites through the use of encryption technology.

Credit Card Processing

LSA collects credit card details for the purpose of processing payments.
Data is immediately entered into the EFTPOS terminal at the time of payment and not recorded, or it is provided with on a booking form, processed and shredded.

Direct debit Processing

Life Skills & Adventures processes customers direct debit payments with the written authorisation of the customer on a Direct Debit Authorisation Form. Personal and sensitive information is collected, input in to Point of Sale system and payment is processed by a third payment identified on the DDR Form.
Forms are retained in a secure location for the duration of the customer's relationship with LSA.

Access to the Policy

This Privacy Policy is available on the Life Skills & Adventures website and may be updated at anytime without notice. A copy of the Policy or alternate formats of the policy can be made available on request to fun@lsadventures.com.au

Notification of Data Breaches

Notifications to the Office of Australian Information Commission (OAIC) is required for incidents of unauthorised access to, or disclosure or personal information; breaches of a secure storage and handling of information; or accidental loss of data such as personal details and credit information.
Refer to the following documents on the OAIC website.

- *Data breach notification — a guide to handling personal information security*
- *Guide to developing a data breach response plan*
- *Guide to securing personal information*

3 DEFINITIONS

'Privacy' means many different things to people.

It can mean protecting your personal space by not having others observe you when you are at home or in your backyard. It may be expecting not to be subject to video surveillance when you are at work. Central to all ideas of 'privacy' is keeping your own actions, conversations, information and movements free from public knowledge and attention.

What privacy means as a general concept is often different to what privacy means under law. Only certain types of information and activities are protected by privacy legislation.

Data protection laws

Most privacy laws are more correctly described as data protection laws, as they are limited to regulating the handling of personal information by organisations

4 SCOPE

This policy applies to all customers, potential customers, employees, volunteers and contractors of Life Skills & Adventures.

5 ROLES AND RESPONSIBILITIES

Department/Area	**Role/Responsibility**
Operations	All Carers/Camp Leaders will be provided with this policy annually and are responsible for the daily implementation of the policy.
Company Director	Is responsible for ensuring suitable resources and support systems to enable compliance with this policy. Drive the consultation process and provide leadership and advice on the continuous improvement of the policy. Responsible for the development, monitoring and review of the Policy and related systems, ensuring all content meets all legislated requirements.
Company Director	Approve the Policy and Provide official sign off on the Policy

6 MONITORING, EVALUATION AND REVIEW

The ongoing monitoring and compliance of this policy will be overseen by the LSA Director. Each program will complete an annual self-assessment against this procedure, associated policy and the legislated standards from which it was drawn.

The evaluation of the policy will be facilitated by the LSA Director using stakeholder feedback to drive continuous improvement and reflect service users' comments where practical.

7 SUPPORTING DOCUMENTS

Privacy rights in Victoria are established in four pieces of privacy and privacy related legislation:
The Information Privacy Act 2000 (Vic)
The Health Records Act 2001 (Vic)
The Charter of Human Rights and Responsibilities Act 2006 (Vic).
http://www.privacy.vic.gov.au
http://www.privacy.gov.au
Office of the Australian Information Commissioner: www.oaic.gov.au
Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Privacy Amendment Act)
Privacy Amendment (Notifiable Data Breaches) Bill 2016 (pending Gazette 2017)