

Privacy & Dignity Policies and Procedures

DECEMBER 2019



Table of Contents

Glossary of terms	2
Introduction	3
A Person Centred Approach at My Plan Manager	4
Collection of personal information	4
Use of your personal information	5
Sharing your personal information	5
Storing your personal information	6
Access to your personal information	6
Complaints	7

Glossary of terms

Term	Definition
Australian Privacy Principles (APPs)	These outline how all private sector and not-for-profit organisations with an annual turnover of more than \$3 million, all private health service providers and some small businesses (collectively called 'APP entities') must handle, use and manage personal information. The APPs are included in the Australian Privacy Act (1988) (Cth) .
Participant	A person who meets the NDIS access requirements.
Confidential information	Any information made available to or generated by My Plan Manager which is not already publicly available or about to become publicly available. All <i>personal information</i> is strictly confidential.
Information	Includes information forming part of a database, and information recorded in a material form or not.
Personal information (includes <i>sensitive information</i>)	Information or an opinion about an identified individual, or an individual who is reasonably identifiable: <ul style="list-style-type: none"> • whether the information or opinion is true or not • whether the information or opinion is recorded in a material form or not.
Personnel	Anyone, paid or unpaid, who works for or with My Plan Manager. It includes members of the governing body or any other similarly-empowered committee constituted by My Plan Manager.
Policy	A statement of intent that sets out how an organisation should fulfil their vision, mission and goals
Procedure	A statement or instruction that sets out how a policy will be implemented and by whom

Introduction

This **Privacy and Dignity Policy** sets out how My Plan Manager.com.au Holdings Pty Ltd and My Plan Manager.com.au Pty Ltd (together, **My Plan Manager**, or **we, our** or **us**) handle information about you, and ensures that supports accessed by participants through My Plan Manager promote, uphold and respect the legal and human rights of participants. This includes the rights of participants to access supports that respect and protect their dignity and privacy.

This means we will:

- Respect the privacy and dignity of participants in their interactions with us, and in the delivery of the supports they receive.
- Notify via this policy the collection of personal information from participants.
- Comply with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles in collecting, storing, and sharing the personal information of participants.
- Ensure participants understand what personal information we collect about them, and for what purpose.
- Ensure participants understand how we manage personal information collected by our organisation to assist us in the provision of their supports.
- Understand that personal information we collect about a participant belongs to a participant.
- Some participants may, in some limited circumstances, have a nominee/parent/child representative or legal guardian to make decisions for them, including in relation to the sharing of their personal information. Such authorised persons must consider the dignity of the participant and make decisions to share information based upon opportunities to best maximise the participant's wellbeing in all aspects of their life. My Plan Manager will work with the authorised person as required to achieve this end.

We may modify or amend this Policy from time to time. We will display a notice on our website indicating when any such revisions have been made. Unless you notify us otherwise, we will assume that you have consented to the collection of all information which is provided to us for use in accordance with this Policy.

Last Reviewed: December 2019

Last Updated: December 2019

Signed: (by CEO/Head of Organisation)

A Person Centred Approach at My Plan Manager

My Plan Manager is committed to a Person-Centred Approach in delivering supports to participants. Person Centred Supports are central to our philosophy, our mission, and our business model.

Please refer our Person-Centred Supports policy & procedure for more information on person-centred approaches

Collection of personal information

The types of personal information we collect from you may include:

- name, date of birth and contact details, including address, phone number, email address;
- information about preferred modes of communication;
- your NDIS plan details;
- information relating to your “consent to obtain and release” information
- information relating to bank accounts if you chose “reimbursements” as a payment option.
- voice recordings; and
- any other relevant information required by MPM for us to undertake the roles and responsibilities of a Plan Manager.

My Plan Manager may collect this information from you or your nominated decision-maker when you:

- Sign up for our service;
- Visit our website;
- Contact us by any method, such as telephone, email, post, facsimile or in person;
- We contact you from you in the course of undertaking our Plan Management roles and responsibilities (e.g. budget discussions, seeking approvals etc);
- Otherwise as notified to you from time to time.

My Plan Manager may collect information from your nominated Providers, including your Support Co-Ordinators as it relates to:-

- Invoice processing and budget management;
- “Consent to Obtain and Release” information;



- any other relevant information required by MPM for us to undertake the roles and responsibilities of a Plan Manager

The types of sensitive information we collect from you may include:

- any information relating to your disability as set out your NDIA Plan and which may assist us to provide Plan Management services

My Plan Manager shall seek consent from participants when they telephone MPM before proposing to record their voice or using that recording for internal training. My Plan Manager shall advise participants if a supervisor or other staff member is to monitor a telephone call for the purpose of training or supporting My Plan Manager staff.

Use of your personal information

My Plan Manager will only collect, use and disclose personal information consistent with undertaking the role and responsibilities of a funds plan manager. This may include:

- providing you with information in relation to the products and services we provide;
- sending email notifications;
- responding to your questions or suggestions;
- improving the quality of our products or services; or
- improving the quality of your visit to our site.

Sharing your personal information

We may disclose personal information to third party contractors, who help us conduct our business. Where information is shared with these third parties, we will take all reasonable steps to ensure that third parties observe the confidential nature of such information and are prohibited from using or disclosing such information beyond what is necessary to assist us.

Other than third party contractors, My Plan Manager will seek written consent from the participant to release any information about them to an external party. For example, consent to speak with other support providers. This is ordinarily documented in our "Consent to Obtain and Release" form.

If the Consent to Obtain and Release Information form is not completed MPM may ask the person(s) seeking information to liaise directly with the participant or their nominated person.

All participants have the right to withhold consent. My Plan Manager will advise participants of any known impacts this may have on service delivery and the ability of My Plan Manager to provide services.

My Plan Manager shall work with nominees / guardians in circumstances where participants are unable to give informed consent (e.g. to a service agreement). In these cases, nominees and guardians must reflect the needs and goals as identified by the person with disability and make decisions regarding privacy and dignity to best maximise the participant's wellbeing in all aspects of his/her/their life. My Plan Manager will try to work with the nominee as required to achieve this end.

Storing your personal information

The personal information we collect will be stored electronically and securely protected. We take appropriate security measures to protect your personal information from misuse, interference or loss, and from unauthorised access, modification or disclosure.

This includes the use of technologies and security software, network firewalls and physical security to protect the privacy of your personal information.

Access to your personal information

We take reasonable steps to ensure that your personal information is accurate, complete, and up-to-date whenever we collect or use it. Participants may access their personal information at any time. If a participant disagrees with any personal information the participant has the right to ask for the information to be changed. Ordinarily this will result in a change being made. If it is not possible to make the change, a note shall be added to the relevant file to advise the participant disagrees with the information and sets out how the participant wishes to see the information presented.

All participants have the right to refuse to provide personal information to My Plan Manager. If a participant refuses to provide My Plan Manager with the information requested My Plan Manager will try to advise how this may impact upon the delivery of services and whether it will be possible to provide services without the required information.

Complaints

Participants may make a complaint about privacy matters. In doing so participants should access the My Plan Manager Complaints Policy, located on the MPM website and send such complaints to feedback@myplanmanager.com.au My Plan Manager shall treat all complaints in a confidential manner.

Nothing in this Policy prevents a complaint about how My Plan Manager has treated your personal information from being made to the Office of the Australian Information Commissioner (Tel 1300 363 992) at any time.