



## 1. Introduction

This Privacy Policy sets out how At Work OH&S (the Company) manages personal information provided to it, or collected by it, and how to contact us if you have any privacy concerns.

The Company is bound by the Australian Privacy Principles contained in the *Privacy Act 1988*, the *Privacy Amendment Act 2004* and the *National Privacy Principles 2001*.

## 2. What kinds of personal information does the Company collect?

The Company will collect different types of personal information depending on how you interact with us. Information collected by the Company can be made prior to final approval of case management and is stored by the Company for seven years (from last date of service), or longer if directed by employers and/or agents or other legislative frameworks.

The type of information the Company collects and holds includes (but is not limited to) personal information about:

- Injured Workers
- Private Psychological Service Patients
- Businesses
- Medical Practitioners
- Insurers/Agents
- Staff (including volunteers, applicants, and contractors)
- Other service providers used for or by the Company

The Company may collect financial details for the purpose of processing payments to/from clients and other service providers. This information will only be collected and stored in a secured, industry approved, management system with the consent of the individual and/or business where necessary.

The Company may be required to collect and/or supply personal information to an authorised body. This will not be done without the consent of the individual and/or business.

Types of information collected or received by the Company includes (but is not limited to) the following:

- Full name
- Date of birth
- Contact details – including address, phone number and email
- Employment details – including company, supervisor and contact details
- Health information – including nature and date of injury, care management
- Case notes – including diagnosis, prognosis and summary of conversations.
- Accreditation certificates and insurance policies (contractors)

### Personal collected from third parties

The Company generally collects personal information directly from third-party referrals through completed forms via email.



### Personal Information you provide

The Company may collect personal and/or professional information directly from the individual, usually through face-to-face meetings or phone calls.

### 3. How is your personal information used?

The Company will use personal information it collects from you for the primary purpose of providing support services to its clients and partners.

The Company may use your professional information to send marketing and/or partnership opportunities that relate to its services and programs. You can contact us at any time if you no longer wish to receive any marketing material from us.

### 4. Management and security of personal information

The Company stores its information electronically in our IT systems, secure servers and databases. The Company has in place steps to protect the personal information stored from misuse, interference and loss, unauthorised access, modifications or disclosure including password access rights and where necessary paper-based records being shredded or securely removed and destroyed.

The staff of the Company are required to respect the confidentiality of all stakeholder information and the privacy of individuals and/or businesses in which they support.

Where it is possible to do so, personal information will be discussed face-to-face or via telephone. However, should information need to be sent it can be sent electronically using only the Company supplied email. A copy of the email will be stored on the Case Management system for record keeping purposes.

### 5. Data breach notification

In the event of any loss, unauthorised access or disclosure of personal information that is likely to result in serious harm, the Company will investigate and notify the individual and/or business within 24 hours of being made aware of the breach. The Australian Information Commissioner will be notified as soon as practicable, in accordance with the *Privacy Act*.

### 6. Access and correction of personal information

An individual and/or business has the right to request access for any information that pertains to them directly which the Company holds and can ask the Company at any time to update or correct any inaccuracies.

To make a request to access or update any personal information the Company holds about you, please contact the Managing Director in writing, via email. The Company will require you to verify your identity and specify what information you require. The Company is unable to give you information about anyone else that does not pertain directly to you and your file.

Requesting your information is free. However, the Company may charge an industry-approved fee to cover the cost of retrieving, reviewing, copying and supplying information to authorised bodies.

We will allow access to make the changes requested, unless we consider the Privacy Act or another relevant law requires us to withhold the information, or not make changes. If we cannot provide you with access to that information, we will provide you with written notice explaining the reason for refusal. If we refuse you access or to correct your personal information, you can make a complaint about this, by following the complaint procedures in this privacy policy (see below).



### 7. Consent and Rights of Access

Upon commencement of services, request will be made for you to complete and provide the Company with a consent for authority to collect and disclosure personal information to allow holistic case management.

The Company respects that some clients will want a family member and/or trusted advisor to speak on their behalf or provide direction on their care management.

Where another person, not already registered and approved by you, requests access to your information you will be directly notified. The Company will not grant consent or right of access to another party without your written consent for them to do so.

### 8. Enquiries and Complaints

If you would like further information about the way the Company manages the personal information it holds, or wish to complain that you believe the Company has breached the Australian Privacy Principles, please contact:

Managing Director  
Ph: +61 2 4721 5098  
[managingdirector@atworkohs.com.au](mailto:managingdirector@atworkohs.com.au)

Director  
Ph: +61 2 4721 5098  
[director@atworkohs.com.au](mailto:director@atworkohs.com.au)

The Company will investigate the complaint, and respond to you as soon as we can. We will endeavour to do this within 10 working days of your complaint. If this is not possible, we will contact you and let you know when we will respond to your complaint.

The Company takes any privacy complaint seriously and will deal with all complaints fairly and promptly. However, if you are not satisfied with our response to your complaint you can refer your complaint to the Office of the Australian Information Commissioner (in writing):

Office of the Australian Information Commissioner (OIAIC)  
GPO Box 5218  
Sydney NSW 1042  
[enquiries@oiac.gov.au](mailto:enquiries@oiac.gov.au)  
Ph: 1300 363 992

### 9. Using other websites

The Company's website may contain links or references to other websites to which this privacy policy may not apply. You should review the privacy policy of each of those websites and assess whether those policies are acceptable to you before using those websites.



## 10. Policy Management

The Company may, from time to time, review and update this document to take account of new laws and technology, changes to the Company's operations and practices and to make sure it remains appropriate in the changing professional environment.

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### Distribution

V2.0	At Work OH&S Intranet	4 Dec 2020
V2.0	Staff team meeting announcement	8 2020
V2.0	Website	8 Dec 2020



### Annexure A – Standard Information Collection Notice

1. At Work OH&S (The Company) collects personal information, including sensitive information about employment, health and personal circumstances, before and during the duration of care under the service provided.
2. The Company collects this information in a variety of means, including forms submitted by you, agents and/or medical practitioners, electronic notes or notes of conversations held with staff, employers and/or agents.
3. The primary purpose of collecting this information is to enable the Company to provide adequate and safe practice to ensure your care and wellbeing, and/or the care and wellbeing of your staff or client.
4. From time to time the Company discloses personal and sensitive information to the types of entities listed in our privacy policy, for administrative and rehabilitation purposes including the transfer of file to another rehabilitation provider, legal claims and other service providers within the claim.
5. The Company may disclose your personal information to its Case Management provider for purpose of software management, and/or store personal information in the 'cloud' which may reside outside of Australia but is in protected by cloud-based security and encryption.
6. The At Work OH&S Privacy Policy is available on our website and also sets out:
  - a. How you may seek access to or correction of personal information collected about you; and
  - b. How you may complain about the Company's management of your personal information
7. We can be contacted at

Ph: +61 2 4721 5098  
[info@atworkohs.com.au](mailto:info@atworkohs.com.au)



### Annexure B – Privacy Information Management Plan

1. All information concerning an injured worker, patient or corporation is confidential.
2. The rehabilitation case manager or assigned psychologist must ensure that all information is kept confidential. Access to case files will be limited to those with a legitimate need to know. All electronic client files are safeguarded on a Case Management database and a password is required for access.
3. The rehabilitation case manager must update the client file as soon as they are notified of any changes and/or amendments.
4. Case managers do not require the worker's consent to release information to SIRA or Comcare, however, our consent form will indicate to the injured worker that information will be released to SIRA or Comcare upon request.
5. All reports distributed to employers and/or medical practitioners must be marked Confidential.
6. Information from a file will not be released to any party unless they are a legitimate party involved in the client's rehabilitation, otherwise they will be directed to access it via the payer (eg. agent).
7. Under no circumstances is a case manager to release any privileged information contained within the file to any party. Other parties are to be directed to the agent for access.
8. No client file is to be emailed from one case manager to another.
9. Reports must be prepared directly in the Case Management software and not to be stored on any desktops, servers or portable drives.



### Annexure C – Confidentiality and Security of Client Files

1. Should a staff member of the Company be made aware of any data and/or privacy breach they must notify the Managing Director and/or Director immediately for action.
2. All electronic client files will be stored on a secure Case Management database and any hard copies received must be immediately scanned and uploaded, and then securely destroyed.
3. All confidential and privileged information is to be stored on the client's electronic file.
4. If a client wishes to read their file, under the Freedom of Information Act, 1989 the case manager must explain to them that they are happy to comply with the client's request, but need that request in writing. This signed request is to be placed in the client's electronic file and shall specify that the request is made under the Freedom of Information Act, 1989; Section 1, Part 1 s5(1) 9(a) and (b).
5. A client can apply for an amendment of his/her records if they are incomplete, inaccurate or misleading. This application must be made in writing.
6. The client may only view their file in the case manager's presence.
7. The rehabilitation case manager must update the client file as soon as they are notified of any changes and/or amendments.