



Liberty Behavioural Services (LBS): Privacy Policy

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Version 1.2

Updated 20/7/22

NSDS Standards addressed:

1	The service promotes individual rights to freedom of expression, self-determination, decision-making and actively prevents abuse harm, neglect and violence.	1.1	The Service, its staff and its volunteers treat individuals with dignity and respect.
		1.9	The service keeps personal information confidential and private.

Liberty Behavioural Services commits to the following Australian Privacy Principles (APP) of the *Privacy Act 1988* (Cth):

APP 1 requires the establishment of a policy document, and through having a complaints policy. The requirements APP have been met:

APP 2: Anonymity and pseudonymity

APP 2 entitles individuals to the option of anonymity or using a pseudonym, when dealing with an APP entity, except where impracticable or another prescribed exception applies.

Will address requirement through:

Liberty Behavioural Services has included the option of a pseudonym within the intake form for its services.

APP 3: Collection of solicited personal information:

- a. Permits an APP entity to collect personal information only where reasonably necessary for one or more of its legitimate functions or activities.

Will address requirement through:

Within the scope of Liberty Behavioural services, the information required to complete a Functional Analysis and Behaviour Support Plan is extensive. It includes historical, current and future data. Collection of such a wide range of information sources is legitimately part of the process of examining the maximum amount of potential causes/influences/triggers for the



behaviour, as well as the maximum amount of potential intervention points. This information is stored securely on LBS CRM Echidna & in BSP files, all notes/details collected are stored behind password protection.

- b. Requires personal information to be collected directly from the individual to whom it relates, unless impracticable or another prescribed exception applies and requires the consent from an individual in order to collect that individual's sensitive information.

Will address requirement through:

Within the scope of Liberty Behavioural Services, it is impractical to collect all information from the participant, rather extensive interviews occur with those around the participant. The participant is the central focus of the information collected. A consent form has been designed ensuring that the participant and/or representative, is able to provide informed consent regarding this process.

APP 4: Dealing with unsolicited personal information

Will address requirement through:

Within the email signature of LIBERTY BEHAVIOURAL SERVICES, a privacy statement denoting:

This email and any files transmitted with it are confidential and are only for the use of the person to whom they are addressed. If you are not the intended recipient you have received this email in error. Any use, dissemination, forwarding, printing, copying or dealing in any way whatsoever with this email is strictly prohibited.

Liberty Behavioural Services will delete and or destroy information it believes was accidentally obtained through for example a wrong email address (provided it is lawful and reasonable to do so).

APP 5: Notification of the collection of personal information

Will address requirement through:

Liberty Behavioural Services will obtain consent to collect and disclose personal information through the process of using the consent form. Where it is reasonably perceived that there is a risk of harm to self or others, including but not limited to abuse, Liberty Behavioural Services may take reasonable steps to share information in pursuit of reducing such risk.

APP 13: Correction of personal information

Will address requirement through:

Liberty Behavioural Services will take reasonable steps to correct any information that has been stored that incorrectly reflects the participant or other members personal information.



Liberty Behavioural Services has a consent form as part of its intake additional to a service agreement. These documents will outline:

- The reasonable expectation of sharing of information with other service users that occurs within the provision of services, where consent has been provided.
- Those links are developed and maintained through collaboration with other providers to share information (with consent), to meet participant needs.
- That where appropriate, and with the consent of the participant, information on the support plan is communicated to family members, carers, other providers and relevant government agencies.
- The purpose and breadth to which information is likely to be shared.

Management of personal information:

Clients information will be stored as the primary location on a computer with the following security features:

1. A primary laptop with the security features:
 - Firewall.
 - Virus protection associated with running windows 10 or equivalent.
2. A phone with password protection.
3. Email systems with their own encryption and security, additional to being password protected.

Outside of this, devices such as a workplace mobile phone and email will be used to handle information. Both will be password protected.

Conclusion of Services

Contractor - When a contractor leaves or is dismissed all files are transferred to the relevant BSP, access to emails and private information is restricted and email address is diverted appropriately

Client - Once a client terminates service with LBS their personal information will be archived using our CRM Echidna or Gsuite file storage to remove them from any further correspondence, this will be stored as necessary for up to 7 years.
Information may be released to appropriate avenues (ie. a new service provider) only with the express consent of the client.



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