


RISK		Policy No: 005-0427	
High	x	Policy developed by: CEO	
Med			
Low		Next Review due: April 2027	

<b>POLICY TITLE:</b>	<b>PRIVACY POLICY</b>
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<b>POLICY PURPOSE</b>	<p>The Privacy Act 1988 (Cth) and the 13 Australian Privacy Principles 2014 (APP) provide guidelines to ensure that organisations who collect, use, disclose, store and destroy personal information, do so in a way that protects and maintains the privacy and confidentiality of an individual, organisation or entity.</p> <p>This policy provides guidelines for the way Lakeside Villages will comply with the Privacy Act and the relevant Australian Privacy Principles.</p>
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<b>PROTOCOL</b>	<p>Lakeside Villages will respect and protect the privacy of every resident, prospective resident (and their families) as they relate to Woodbridge Retirement Village. We will treat our resident's and prospective resident's (and their families), Board Member's, staff's and contractor's personal, including health related, information in accordance with the requirements of the relevant Australian Privacy Principles under the Privacy Act (Cth) 1988.</p>
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<b>POLICY STATEMENT</b>	<p>In order to provide a high level of service, Lakeside Villages is required to collect personal information from prospective, incoming, outgoing and current residents for a variety of purposes.</p> <p><b>Personal information</b> is defined in S6 of the Privacy Act 1988 (Cth) (Privacy Act) and means information that identifies or could reasonably identify an individual. There are some obvious examples of personal information, such as a person's name and address. Personal information can also include medical information, images taken with mobile devices, bank account details, photos, videos and even information about what an individual likes and their opinions and where they work or socialise.</p> <p>In order to protect this personal information:</p> <ul style="list-style-type: none"> <li>• Lakeside Villages Inc. will only collect the Information we need to provide our services and to support our residents to live independently in our village (e.g. health issues that will help our Wellbeing Co-ordinator to advise on additional services a resident may consider at their expense, POA, Wills &amp; Executor details, Guardianship Orders, contractual matters or photographs for advertising and marketing our villages). <ul style="list-style-type: none"> <li>○ Individuals must have the option of not identifying themselves. There are exceptions to this requirement – where it is impracticable to deal with individuals who have not identified themselves (APP2.2(b)).</li> <li>○ Collection of personal and sensitive information which is required for Lakeside Villages' function and activity must have the individual's consent (APP3).</li> </ul> </li> </ul>
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- Sensitive information may be required or authorised to be collected under an Australian law or a court/tribunal order (APP3).
- Lakeside Villages will inform residents and prospective residents and their families of why and how we will collect, use, store, disclose and manage their personal information.
  - Privacy Policy information must be provided to all prospective residents and is included in the Residence Contract. This informs them of Lakeside Villages' commitment to comply with the Australian Privacy Principles (APP1).
- The typical circumstances in which Lakeside Villages will use and disclose personal information are as follows (APP6):-
  - Provision of safe and quality accommodation and services, such as CHSP and HCP services, which relies on accurate and current personal information.
  - Referrals and dealings with other professionals (Conveyancers, Real Estate agents, Lawyers, General Practitioners, etc).
  - Referrals to Services and/or Government Agencies such as My Aged Care, Personal Alarms, DVA, transport, concessions etc.
  - The use of de-identified data for quality assurance and audit data and Village Accreditation (Audits/evaluations/continuous improvement).
  - Statutory Reporting requirements.
  - Billing / debt recovery.
- Lakeside Villages will obtain consent to use personal and sensitive information for the purposes of sourcing safe and quality support services in the home. Further consent will be sought from the prospective or current resident and/or family prior to disclosing personal information where the disclosure is not related to the specific care and support services (APP3 and APP6).
  - Outside the requirements of the use and disclosure of resident information which are directly related to the resident's service provider, the consent of the resident will be required before information about them can be released or revealed to a third party.
  - As part of the Residence Contract, which prospective residents are asked to sign, they acknowledge their awareness of and understanding of the Lakeside Villages' Privacy Policy. If a resident has not read/received the policy information it can be provided upon request to the Office.
- Lakeside Villages will ensure that information we collect is stored securely and is kept accurate and up to date (APP10).

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- Lakeside Villages commits to ensuring that all personal information it keeps concerning its residents and prospective residents and their families remains accurate, complete and up to date.
- Lakeside Villages takes reasonable and proportionate steps to protect personal and sensitive information held in both paper-based and electronic form.
  - Physical records (including resident files, contracts and personal information) are:
    - Stored in a compactus in an area that is secure when not in use.
    - Accessible only to authorised staff on a “need to know” basis.
    - Not left unattended in public or common areas.
  - Electronic records are:
    - Stored on password-protected systems and authorised cloud based platforms.
    - Access controlled through unique logins and role-based permissions.
    - Protected by appropriate security measures including device passwords, antivirus software and software updates.
  - Portable devices (such as laptops, tablets or USB drives) used for work purposes are protected by passwords and handled in a manner that minimises the risk of loss or unauthorised access.
  - Lakeside Villages regularly reviews its information handling practices to ensure that personal information remains secure.
- Personal Information will be destroyed when there is no longer a need or legislative compliance to retain the information (APP11).
  - Lakeside Villages contracts confidential waste services to dispose of confidential waste and provide certificates of destruction.
- Lakeside Villages subscribes to the policy of openness required under the Australian Privacy Principles relating to the management of personal information (AAP12).
  - Personal information will be stored securely. Residents have a right to have access to the information that we hold in their record, subject to some exceptions allowed by law and in accordance with the Australian Privacy Principles.
  - They can also request an amendment to their record should they believe that it contains inaccurate information (APP13).
- Access to personal information (Authorisation) (APP1 and APP5).
  - All staff who are involved in the collection, use and disclosure of resident information are fully aware of their obligations and responsibilities under the Australian Privacy Principles 2014 under the Privacy Act 1988 (Cth) through orientation and induction and ongoing education and training.

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- All Board Members and staff must receive appropriate training in the Australian Privacy Principles and Lakeside Villages' privacy obligations relevant to their role. Privacy training will be provided as part of induction and refreshed periodically to ensure ongoing compliance with the Privacy Act 1988 (Cth).
- Board Members and Staff will sign a Confidentiality Agreement on appointment/commencement of employment.
- Lakeside Villages has a small multidisciplinary team providing services to our residents; CEO, Maintenance Officer, Wellbeing Coordinator, Sales and Marketing Officer and Administration Officer. While providing services to residents, staff will have access to unit and resident information and will be on a "need to know" basis only.

The Privacy Act 1988 (Cth) and the Australian Privacy Principles will be applied to Lakeside Villages' collection, use, storage and destruction of all personal information collected for the purposes of Board Member appointments, staff employment and engagement of contractors.

### **Use of digital tools and Artificial Intelligence (AI)**

Lakeside Villages may use digital tools, cloud based services and limited AI-assisted technologies to support administrative efficiency, document drafting, quality improvement and operational planning.

Lakeside Villages will not use AI systems to make automated decisions about residents without appropriate human oversight.

Lakeside Villages will only use AI or automated tools in accordance with the Artificial Intelligence (AI) Use Policy:

- Personal and sensitive information is only used where lawful, necessary and consistent with the purpose for which it was collected (APP 6).
- Staff are instructed not to enter identifiable resident, resident family, staff or contractor information into public or unsecured AI platforms.
- Where third-party systems are used, reasonable steps are taken to ensure those providers handle information in accordance with Australian Privacy requirements (APP 8).

AI tools are used to assist, not replace professional judgement. Final decisions affecting residents or staff are made by authorised personnel.

Lakeside Villages will review its use of AI technologies as laws, guidance and best practice evolve.

### **Notifiable Data Breach**

Lakeside Villages will comply with the Notifiable Data Breaches scheme under the Privacy Act 1988 (Cth). In the event of an eligible data breach that is likely to result in serious harm,

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	Lakeside Villages will promptly notify affected individuals and the Office of the Australian Information Commissioner in accordance with legislative requirements.			
<b>MONITORING OF COMPLIANCE</b>	Consumer feedback Incident reporting			
<b>DISTRIBUTION</b>	All staff			
<b>RELATED POLICIES</b>	Policy 003 – Risk Management Policy Policy 005 – Privacy Policy Policy 015 – Confidentiality Agreements Policy Policy 020 – Artificial Intelligence (AI) Use Policy Policy 022 - Information & Cyber Security Policy Policy 023 - IT Acceptable User Policy			
<b>STANDARDS AND REFERENCES</b>	<b><i>Privacy Act (Cwlth) 1988, Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Privacy Amendment Act) 2014</i></b> <b><i>Australian Privacy Principles 2014</i></b> <b><i>Fair Work Act 2009</i></b> <b><i>Retirement Villages Act and Regulations (SA)</i></b> <b><i>Corporations Act 2001 (Cth)</i></b> <b><i>Associations Incorporations Act 1985 (SA)</i></b>			
<b>DOCUMENT CONTROL</b>	Version	Date From	Date to	Amendments
	1.0	August 2017	March 2018	Original Policy Development
	2.1	March 2018	February 2024	Board approval
	3.0	February 2024		Annual Board Review – minor updates to reflect village operations
	3.1	February 2025	February 2026	Annual Board review
	3.2	April 2026	April 2027	Board review

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