



1. Applicability

- 1.1 This Policy applies to all Employees, Contractors and Subcontractors of Bloom Agency Pty Ltd (Bloom Agency or the Company) in respect of all conduct by Employees, Contractors and Subcontractors which is connected to their employment. For the avoidance of doubt this could include, but is not limited to, work carried out in any capacity by Employees, Contractors and Subcontractors who are:
- (a) on duty;
 - (b) dressed in a Bloom Agency company uniform;
 - (c) representing Bloom Agency;
 - (d) at a work function organised by Bloom Agency;
 - (e) undertaking any activities outside of work that are relevantly connected to their employment or Bloom Agency; or
 - (f) using social media.
- 1.2 The Privacy Policy (Policy) operates in conjunction with other relevant policies, industrial instruments and legislation.
- 1.3 No policy can address every situation that may arise. Accordingly, this Policy is not a substitute for each Employee's responsibility and accountability to exercise good judgment and obtain guidance where they have any concern that particular conduct may not be acceptable to the Company.
- 1.4 Nothing in this Policy will affect the Company's right to discipline or dismiss an Employee in accordance with the terms of their contract of employment or relevant industrial instrument.
- 1.5 Bloom Agency may create, vary or rescind this Policy and any other Bloom Agency policies or procedures from time to time at its absolute discretion.

2. Purpose and Principles

- 2.1 The purpose of this Policy is to set out what personal information the company collects, their responsibilities as a company, protecting information and addressing breaches.
- 2.2 Bloom Agency policy is to respect and protect the privacy of all people connected with the company including, but not limited to, customers, Employees, Contractors and Subcontractors.
- 2.3 In dealing with personal information, Bloom Agency will abide by the obligations imposed on the company under federal law, including the *Privacy Act 1988* (Cth) (*Privacy Act*) and the *National Disability Insurance Scheme Act 2013* (Cth) (*NDIS Act*).
- 2.4 All customers have a right to privacy of their personal information, and Employees, Contractors and Subcontractors should not seek information that is not relevant or necessary to perform their duties.
- 2.5 Personal information is information or an opinion about an individual whose identity is reasonably identifiable.



2.6 Examples of personal information include:

- (a) a person's name;
- (b) address;
- (c) date of birth;
- (d) details about their health or disabilities.

3. Compliance

All privacy concerns at Bloom Agency are managed by Sam Bell, Participant, People & Policy Manager. Contact can be made by phone on 0402 474 780 or by email at sam@bloomagency.net.au.

4. Responsibilities of Managers and Employees

4.1 Managers are responsible for:

- (a) ensuring that their Staff are aware of and comply with all Bloom Agency policies;
- (b) upholding and promoting all Bloom Agency policies, procedure and values;
- (c) providing Staff with a positive role model;
- (d) ensuring that work and employment processes and practices comply with all applicable Bloom Agency policies;
- (e) taking reasonable steps to prevent Staff engaging in conduct contrary to any applicable Bloom Agency policy;
- (f) taking appropriate action to deal with any employee grievances and breaches of any applicable Bloom Agency policy.

Managers also have responsibilities as Employees (see section 4.2 below).

4.2 Employees are responsible for:

- (a) their own behaviour and actions at all times;
- (b) being aware of and complying with all Bloom Agency policies;
- (c) ensuring that their behaviour is, at all times, consistent with applicable Bloom Agency policies, procedures and values;
- (d) reporting concerns regarding possible breaches of any Bloom Agency policy, promptly, honestly and respectfully.

4.3 All Employees, Contractors and Subcontractors are provided with a welcome pack which includes important documents that must be signed off as read and understood. The Bloom Agency Privacy Policy is included in this pack.



- 4.4 Staff to take reasonable and necessary steps to keep any electronic information safe and secure. All Employees, Contractors and Subcontractors are not to discuss or disclose personal information about colleagues or customers. If there has been a breach in privacy, i.e., an un-authorised person has gained access to a customers Participant Profile, staff are to inform the Bloom Agency Corporate Compliance Manager as a matter of urgency.
- 4.5 Bloom Agency utilise an App to share relevant documentation, including but not limited to:
- (a) Participant Profiles;
 - (b) case notes and goals; and
 - (c) employee rosters.

Each Employee has a unique log-in and password and access to customer information is only granted to those which they are working with.

- 4.6 Documentation containing personal information should not be printed unless necessary and approved by the Bloom Agency Corporate Compliance Manager.
- 4.7 Electronic devices containing personal information should have a pin-code, password or other locking mechanisms to avoid un-authorised access.

5. Collecting Information

Bloom Agency may collect and hold information which is reasonably necessary to conduct its business. The kind of information the company collects and holds includes, but is not limited to, personal information about customers and other users of our services, and about Bloom Agency Employees, Contractors and Subcontractors.

Examples of personal information that Bloom Agency may collect includes:

- (i) name;
- (ii) contact details;
- (iii) date of birth;
- (iv) age
- (v) gender
- (vi) details about customers' physical or mental health, including disabilities information about customers' support requirements;
- (vii) details of guardians and nominees, including names, addresses and contact details;



- (viii) details of feedback or complaints about services provided by the company;
and
- (ix) employee records.

6. How Bloom Agency collects information

- 6.1 The company will often collect personal information from the customer/nominee directly. This is completed prior to commencement of a service agreement in the initial intake and planning meetings. Information is gathered and documented on a Participant Profile. The company will also update personal information as required or at minimum when a new Service Agreement is developed.
- 6.2 The company may also collect personal information from other people or organisations. The company will gain consent before doing so on an Exchange of Information Form. Consent can be revoked at any time.
- 6.3 Personal information about employees and prospective employees may also be collected in order to conduct employment and employment-related activities such as payroll services, recruitment and selection, performance management, reporting and workplace health and safety.

8. Protecting Personal Information

Bloom Agency takes steps to ensure that no-one outside the company can access information held without that person's consent, unless that access is authorised or required by legislation. Systems and procedures are in place to protect personal information from misuse and loss, as well as from unauthorised access, modification or disclosure. These steps include:

- (a) paper records held securely;
- (b) access to personal information is on a need-to-know basis, by authorised personnel;
- (c) company premises have secure access; and
- (d) unique employee log-in and password when accessing company IT systems.



9. Breaches

Bloom Agency will take seriously and deal promptly with any accidental or unauthorised disclosure of personal information. The company follows the “OAIC (Office of the Australian Information Commissioner) Data Breach Preparation and Response” when handling accidental or unauthorised disclosures of personal information. Legislative or administrative sanctions, including criminal sanctions, may apply to unauthorised disclosures of personal information.

If any customers suspect a breach of privacy, they are encouraged to make contact with Bloom Agency as soon as possible (see section 3. Above). Should a customer be dissatisfied with the outcome or not wish to discuss the matter directly with Bloom Agency, they may contact the NDIS Quality and Safeguards Commission by calling 1800 035 544.

10. Document Governance

The Policy Owner will review and update this Policy as required and at a minimum annually to maintain its relevance.



Bloom Agency Pty Ltd (ACN 648 049 941) ATF Jamieson & Bell Trust (ABN 71 414 054 766).