Privacy Policy

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Aim and Justification

Wellways is committed to protecting the privacy of personal information. Wellways are legally required to follow the Australian Privacy Principle (APPs) guidelines and all relevant state and territory privacy laws to guide the way in which we manage information.

This Privacy Policy explains how Wellways collects, uses, stores, and discloses personal information in accordance with the Privacy Act 1988 (Cth), the Australian Privacy Principles, and the state-based health records Acts that operate where we provide our services.

By providing us with your personal information, you consent to our handling of it as described in this Policy.

Scope

This policy applies to Wellways as an operating organisation.

Policy

Wellways look to our values of honesty, acceptance, fairness, commitment and participation in the application of our privacy and information management processes.

This Privacy Policy is made publicly available on the Wellways website and is available at all Wellways sites. Information about privacy is also available in Wellways' *Participant Handbook*.

A copy of the Wellways *Privacy Policy* can be requested by participants or members of the public at any time and ask that it be adapted to another format for accessibility. A participant may also request assistance from a Wellways employee or an independent advocate to better understand this policy.

Why we collect information

We collect and use personal information to carry out functions or activities, including but not limited to:

- the delivery of services to Wellways programs
- managing complaints and incidents
- volunteering, fundraising, community education and advocacy activities
- responding to general enquiries
- human resources, payroll and financial operations
- communicating with the public, stakeholders and the media.

We will only collect sensitive information from you if it is lawful and necessary for the provision of services to you.

Type of information we collect, use and hold

The nature and extent of information we collect will vary depending on our professional relationship with you. This can include:

- participant
- carer, kin or supporter
- employee
- volunteer
- student
- contractor
- job applicant
- donor.

This information may include personal information about you such as your name, address, telephone number and email (refer to our definitions to see what personal information means).

Depending on your relationship with Wellways, we may also collect information about you relating to:

Participant	We may need to collect sensitive information about you, such as information about your identity, your health status, disability (if applicable) and diagnosis, and any treatment and medication that is relevant to the support we provide you (refer to our definitions to further understand what sensitive information means). Only authorised roles have permission access to this information.
Job Applicants, Employees, Contractors, Students and Volunteers	We may collect personal information and/or sensitive information from current and prospective employees, students and volunteers in recruitment and selection processes and/or to support employment or engagement with Wellways. Only authorised roles have permission access to this information.
Donor	We collect personal information from financial supporters for the purposes of donation processing and receipting, but also for the purposes of relationship building, advocacy and fundraising.

How we collect your information

Wherever possible, we will collect information directly from you. We also may collect information from third parties, such as a referral agency or other service provider. Generally, you will have previously agreed (provided consent) for these entities to disclose information about you to Wellways.

We also work to ensure that all information collected is accurate, complete, up to date, is not excessive and does not intrude into your personal affairs.

Consent

We will ask you to provide us with your informed consent before we collect information about you. This usually involves documentation such as a signed agreement or by recording your agreement by other appropriate means.

Anonymity

Where practicable, you may choose to interact with Wellways anonymously or use a pseudonym. In some circumstances however, this may mean there are limitations in regard to the provision of a service or complaints handling. If this is the case, we will let you know.

Collecting through our website and third-party sites

We may collect information from you through our website when you wish to contact us or give feedback. We collect your name, email address and phone number. We store this personal information on servers located in Australia.

We sometimes use third party platforms to deliver or collect information. Before deciding whether to provide information via a third-party, you should read its privacy policy.

We may collect your email and, if you provide it, other contact details when you subscribe to our email lists. We only use this information for the purpose of sending you regular updates on our activities.

How we protect your information

We take reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification, or disclosure. This includes:

- Secure electronic systems and encryption where appropriate
- Restricted permissions access
- Regular data backup and security monitoring

We hold information securely using information technology solutions, secure physical storage, and staff induction and training. These solutions are supported by role-based access permissions and robust processes that ensure the protection of personal information against loss, unauthorised access, use, modification or disclosure and other misuse.

How long we hold your information

Most State laws require us to keep information about you for 7 years following the last occasion of contact with you (or if you are a participant under 18 years, until you are 25 years old). We do this for the remaining States in which we provide services, for operational consistency.

Other than in very rare circumstances (for example if there is a risk of legal proceedings), we securely dispose of information after that time has elapsed in accordance with relevant laws.

Please see Wellways' *Record Retention Schedule* for more information.

How we use your personal information

We only use personal information for the purposes in which we collected it from you. Any use beyond this would only occur with your informed consent.

Disclosure of personal information about you

We recognise the trust you have placed in us when you tell us about yourself. We will not disclose, transfer or release any information about you to other entities without your informed consent, unless it is deemed necessary to ensure your or another person's safety, or required by law.

If you are a participant receiving Wellways services, there may be times when your support worker needs to speak with another person or service about your support. In that case, we will explain the purpose of this disclosure and ask you to decide who we can share information with and when. You will be asked to provide formal consent to these arrangements, which will remain valid unless you request a change.

No personal information may be disclosed in any Wellways marketing or training material, research, public or media event unless you have given informed consent.

Accidental or unauthorised disclosure

We make every effort to ensure that your information is not disclosed accidentally or in an unauthorised manner. We will assess and respond to any suspected notifiable data breaches in compliance with the Notifiable Data Breach Scheme established under the *Privacy Act 1988*. We have developed a *Data Breach Response Plan* and a process to manage such events.

We are committed to notifying the Office of The Australian Information Commission (OAIC) and affected individuals if we are unable to prevent a data breach from resulting in serious harm.

You may request a copy of our *Data Breach Response Plan* if you wish to know more about how we manage data breaches.

Cross border disclosure

Occasionally, we may need to transfer personal information to another entity outside Australia. We will not do this without your consent or without being sure that the recipient's country has similar privacy laws that we are required to meet.

Some of our information management systems are hosted overseas. These systems do not hold any sensitive health information about you.

How to access and correct your personal information

You have a right to request access to any information we hold about you. You can request access this information at any time.

You can tell us if you think any information on your record is inaccurate, misleading, incomplete or out of date. You have the right to request that we amend this.

Under certain circumstances, Wellways may redact information from a record that infringes the privacy rights or safety of another individual.

Notification of changes to our Privacy Policy

We will notify you when there are significant changes to our Privacy Policy that may affect how personal information is collected, used, stored or shared.

Where appropriate, we will provide information about the changes in an accessible format and give you an opportunity to ask questions or seek further information.

How to make a complaint about privacy matters

You have a right to complain to us about how we have handled your personal information. If you need help lodging a complaint, you can contact us. All complaints are handled by our Privacy Officer.

You can choose to engage an independent advocate and/or interpreter when raising a privacy complaint. We can assist you to connect with these people.

We will contact you to acknowledge that we have received your complaint within three business days. We will then contact you with a response, or a progress report on the actions being undertaken, within 30 days (this may not be possible with anonymous complaints).

If you are not satisfied with the outcome of your complaint, you can take your complaint to the Office of the Australian Information Commissioner (OAIC) or relevant body in your state or territory.

The OAIC and these state and territory bodies have the power to investigate entities and any possible breaches of relevant privacy laws.

You can contact us by:

Email: privacy@wellways.org

Phone: 1300 111 400

Definitions

Term	Definition
personal information	Personal information (that is not sensitive information) can include, but is not limited to: • your name and pronoun • your date of birth • your contact details (such as address, telephone number, email) • your bank account details • your signature
data breach	A data breach occurs when personal information held by Wellways is lost or subjected to unauthorised access or disclosure.
notifiable data breach	Wellways has a legal obligation to make a notification to the OAIC if: • a *data breach* is believed to have occurred, and • it is likely to result in *serious harm* to the individual(s) whose personal information is involved in the breach, and • *remedial* action has not been able prevent the risk of serious harm.
consent	We make sure your consent is informed. We make sure of this by explaining how your information will be used and disclosed and by ensuring that you understand and agree to these arrangements. Consent must be given voluntarily by an individual with the capacity to communicate their agreement.

Term	Definition
sensitive information	Sensitive information is subset of personal information. Sensitive information is given the higher level of protection at Wellways At Wellways, sensitive information may include, but is not limited to: • your racial, ethnic or cultural identity • your political opinions and activity • your religious and spiritual beliefs • your sexual orientation and behaviours • your gender identity and the name and pronoun you go by • your criminal record (if you have one) • information about your physical or mental health • information about your disability and diagnosis • information about any treatments and medication you require or have had • information about the supports we provide to you.

Approval

Approved By:	**Laura Collister, CEO**
Date of Approval:	08.08.2025
Review Date:	08.08.2028

Acknowledgement

Wellways acknowledges Aboriginal and Torres Strait Islander People as the traditional custodians of the land on which we live and pays respect to their Elders past, present and future.

We are committed to inclusive communities, workplaces, policies and services for people of all backgrounds, genders, sexualities, cultures, bodies and abilities.