



Privacy and Confidentiality Policy (Simple English)

Purpose

This policy explains how Soaring Sparrows protects the privacy and confidentiality of participants, staff, and stakeholder information.

It ensures personal and sensitive information is collected, stored, used, and shared according to legal, ethical, and professional standards.

Scope

This policy applies to all employees, contractors, and representatives of Soaring Sparrows who collect, store, use, or share participant information.

What Information is Collected

Information collected and stored may include:

- Personal details (name, date of birth, NDIS number, contact details)
- Health and medical information
- Support needs, goals, and plans
- Case notes, reports, and communication records
- Consent forms and service agreements
- Photographs, videos, or images (only with consent)

Why Information is Collected and Shared

Information is collected and shared to:

- To identify you
- Deliver safe, effective, person-centred support
- Meet NDIS compliance and legal record-keeping obligations
- Coordinate services and advocate for participant needs
- Respond to incidents, risks, or emergencies
- Comply with lawful requests (e.g., subpoenas, safeguarding requirements)

How Information is Collected, Stored, and Shared

Collection:

- Direct communication with participants and their representatives
- Written documents, forms, and assessments
- Communication with other providers or services (with consent)

Storage:

- Secure, password-protected cloud-based systems
- Encrypted electronic records with restricted access
- Paper-based records in locked storage if used

Sharing:

- Verbally, in writing, or electronically
- Only with consent or if required by law or duty of care
- Only with authorised individuals or agencies

Use of Images and Media

- **Advertising or Marketing:** Participant images or videos will not be used without written consent. Participants can withdraw consent at any time.
- **Service Delivery:** Images may be used to support assessments or funding applications with written consent. Shared only with relevant providers.
- **Images Not Containing Participants:** Photos of equipment, repairs, or home modifications may be shared with providers but are still confidential.

Digital Dictation

Sometimes, staff at Soaring Sparrows use **Microsoft Teams dictation** or a similar tool to help write case notes.

- These tools **turn our spoken words into text**.
- These tools **do not save your voice**.
- Staff will **explain** how it works before using it.
- Staff will **ask for your permission** before using dictation.
- You can **say no**, and staff will write notes by hand.
- Notes made from dictation are kept **safe and private** like all other case notes.

Use of Artificial Intelligence (AI)

Sometimes staff use Artificial Intelligence (AI) tools to help with tasks such as writing documents, research, training materials, and other administrative work.

Protecting Your Privacy

Staff must never enter participant information into public AI tools.

This includes:

- Names
- Personal details
- NDIS numbers
- Progress notes
- Reports or emails containing participant information
- Medical, health, disability, or behavioural information
- Any information that could identify a participant, family member, carer, or representative

Examples of public AI tools include:

- ChatGPT
- Gemini
- Copilot
- Claude
- Perplexity

These systems may store information, use information to improve their services, or keep information outside Australia.

Approved AI Tools

If AI is needed for participant-related work, staff must only use approved organisational systems.

Currently, Splose AI is the approved AI tool for participant-related activities.

When using approved AI tools:

- Information is only used for service delivery purposes
- Participant information remains within approved systems
- Privacy and confidentiality requirements still apply

Checking AI Information

AI can make mistakes.

Staff must always:

- Check AI-generated information for accuracy
- Make sure information is current and relevant
- Use professional judgement before using any AI-generated content

Staff remain responsible for all work completed using AI.

Participant Consent

Participants or their decision-makers:

- Are informed about what information is collected and why
- Provide written consent before information is shared externally
- Can withdraw or limit consent at any time (unless legally required)

Consent is documented through:

- Signed Service Agreements
- Consent to Share Information Forms
- Case notes recording verbal consent (if appropriate)

Limits to Confidentiality

Information may be shared without consent if:

- Required by law (court order, subpoena)
- Necessary to prevent or respond to serious threat to life, health, or safety
- Required under child protection or safeguarding laws
- Permitted under South Australia's Information Sharing Guidelines

Participants will be informed when it is safe and appropriate.

Responsibilities

All Staff:

- Protect participant information and maintain confidentiality
- Seek and document consent before sharing information or images
- Report suspected or actual breaches of privacy immediately

Team Leaders:

- Ensure staff comply with this policy

- Provide guidance and training on privacy and confidentiality

Director:

- Ensure compliance with privacy laws and NDIS requirements
- Oversee responses to breaches of privacy or confidentiality

Related Legislation

- Privacy Act 1988 (Cth)
- Australian Privacy Principles (APPs)
- NDIS Act 2013
- NDIS Practice Standards (Core Module – Rights & Responsibilities, Governance & Operational Management)
- South Australia Information Sharing Guidelines (ISG)

Other Relevant Documents

- Information Sharing and Storage Policy
- Complaints and Feedback Policy
- Incident Management Policy
- Code of Conduct
- Consent Form

Review

This policy will be reviewed annually or sooner if required by changes to legislation, NDIS requirements, or organisational practice.