



PRIVACY POLICY

1. Policy Purpose

This policy explains how New Horizons manages personal information.

New Horizons is committed to protecting the privacy and confidentiality of our customers and other stakeholders in all aspects of their dealings with us by:

- Establishing transparent processes for the collection, management and disclosure of information;
- Informing individuals about their rights and responsibilities in respect of privacy provisions, and continually promoting their understanding of this;
- Only collecting relevant information and using this for its intended purposes in an ethical and responsible manner;
- Protecting the confidentiality of information with secure data management processes including limiting access to authorised users;
- Ensuring lawful disclosure of information at all times, particularly in circumstances where required by law (for example, to report child protection concerns).

2. What is Personal Information?

'Personal information' is information or an opinion, whether recorded or not, about an identified individual, or an individual who is reasonably identifiable. The Privacy Act 1988 and the Australian Privacy Principles set out how organisations can collect, store, use and disclose personal information.

We may collect, store, use and disclose personal information of the following kinds:

- names
- addresses
- dates of birth
- telephone numbers
- email addresses
- bank account details

3. What is Sensitive Information?

'Sensitive information' is a sub-set of personal information which is given a higher level of protection under the Privacy Act. We treat sensitive information very carefully because it is highly personal and if disclosed could cause severe embarrassment, result in identity theft or provide the basis for unjustified discrimination.

We only collect, store, use and disclose sensitive information with consent, except in specified circumstances as explained in Section 7 - Disclosure without Consent.

We may collect, store, use and disclose sensitive information of the following kinds:

- racial or ethnic origin
- religious or philosophical beliefs or affiliations
- sexual preferences or practices
- health and health services
- genetics
- criminal records

The most important of these is information or an opinion about:

- your health, including an illness, disability, injury or psychological condition
- your wishes about the future provision of your health services
- a health service provided, or to be provided, to you
- dispensing prescription drugs or medicines prepared by a pharmacist
- activities carried out in the course of providing aged care, palliative care or care for a person with a disability

4. Collection and Use of Personal Information

New Horizons will only collect, hold and use personal information for the purposes of carrying out its business functions and activities. These purposes include, but are not limited to:

- Receiving enquiries about our programs and services
- Assessing customer needs and identifying strategies to meet those needs
- Providing services to our customers including but not limited to aged care, disability, housing and accommodation, humanitarian and justice, indigenous, mental health and youth programs
- Handling complaints
- Referring customers to other programs or services
- Community and industry development activities
- Dealing with funding bodies and other trusted partners and organisations who work together with New Horizons
- Recruitment purposes
- Meeting contractual reporting requirements with our funding bodies
- Administrative activities

We collect personal information verbally, in writing or electronically, either directly or indirectly from an individual, a legal guardian, and/or authorised third parties, such as government and funding bodies.

5. Refusal to Provide Personal Information

You can choose to withhold your identity or use a pseudonym when dealing with New Horizons, however where we are legally required to collect your personal (including sensitive) information or if it is impracticable to deal with you anonymously, this may not be possible.

If you do not give us the information we ask for, we might not be able to provide you with some or all of our services.

6. Disclosure and Consent

Personal information is only shared with external parties to enable New Horizons to carry out its business functions and activities. In the case of sensitive information, we only share the information if the individual or their authorised guardian has given consent.

The types of people and organisations we may disclose your personal information to include:

- Government Departments (e.g. Department of Family and Community Services, Department of Social Services, Centrelink and Medicare)
- Health & Wellbeing Professionals (e.g. general practitioners, other health specialists and hospitals etc.)
- Housing Providers
- Guardians (e.g. Trustee & Guardian, other appointed Guardians or Responsible Persons)
- Other National Disability Insurance Scheme (NDIS) service providers
- Other relevant bodies such as employment and education related organisations

7. Disclosure without Consent

Privacy law requires us to disclose personal and sensitive information ***without consent*** in situations where:

- Disclosure is in the person's interest (e.g. if the person is suicidal)
- The safety of others is at risk (e.g. warning a third party who is in danger)
- There are reasonable grounds to believe a serious crime has been or may be committed
- The law requires it

8. Disclosure for Marketing and Research Purposes

New Horizons will not release or use any personal and/or sensitive information for ***direct marketing*** purposes.

We may use personal information for internal research or statistical purposes if it has been de-identified and cannot be associated with a particular individual.

We may use identifiable information for internal promotion or external marketing purposes if the individual has signed a consent form that specifies what information will be used and for what purposes, e.g. photographs, video or an article about the individual.

9. Cross Border Disclosure

At times, we may send your personal information to service providers who store data outside Australia (including the United States). If we do this, we will take all reasonable steps to ensure that such personal information is treated securely and in accordance with this Privacy Policy and any legal requirements which might apply in connection with our disclosure.

10. Data Security

New Horizons has safeguards in place to protect personal information against loss, unauthorised access, disclosure or modification and misuse.

11. Data Quality

New Horizons makes every effort to ensure that the information we collect, hold and use is accurate, up to date, complete, relevant and not misleading. Please tell us if your personal information changes.

12. Access to Personal Information

Under freedom of information and privacy laws, **customers** may ask for access to their personal information (please refer Section 14 for contact information). Requests for access will be granted unless:

- Giving access poses a serious threat to someone's life, health or safety
- Giving access may impact on the privacy of others
- The request is frivolous or vexatious (without merit)
- The information relates to existing or anticipated legal proceedings
- We suspect that unlawful activity or serious misconduct has been, is being, or may be engaged in
- Legislation or a law enforcement agency requires us to deny access

13. Correction of Personal Information

If you think that the information we hold about you is incorrect, you can ask us to correct it. New Horizons has a legal right to refuse to amend information that it believes is correct or if the law says it must not do this.

14. Complaints and Contacting us

If you wish to access or correct your personal information or have a complaint about how we have managed your personal information, please contact the Privacy Officer at New Horizons Enterprises Limited ABN 42 002 066 604 via any of the following methods:

- By phone: (02) 9490 0000
- By email: privacy@newhorizons.org.au
- By post: 15 Twin Road, North Ryde NSW 2113

Once contacted, we will:

- Acknowledge your complaint within 5 business days
- Make sure we understand your concerns
- Do everything we can to resolve the issues you've raised
- Keep you informed of the progress
- Keep a record of the complaint and our actions to resolve it
- Provide a final response within 21 business days.

Privacy complaints may also be reported to the [Office of the Australian Information Commissioner](#) by calling 1300 363 992 or by email to enquiries@oaic.gov.au. More detailed information (including information about Assisted Contact and Translating and Interpreting Services) is available at <https://www.oaic.gov.au/about-us/contact-us>.

If we become aware, or suspect, that there has been a breach of our privacy responsibilities to keep your information secure, then we will quickly and fully investigate the matter as required under our Data Breach Response Plan. If we determine that the breach might cause serious harm to anyone whose personal information is involved, then we will let them know so they can take action to protect themselves.