

Confidentiality and Privacy

POLICY AND PROCEDURE

1. Purpose

The purpose of this policy is to establish a clear framework for how Subee Pty Ltd ("Subee") collects, stores, uses, discloses, and protects personal and sensitive information. Subee promotes a culture of privacy and confidentiality throughout the organisation to uphold the rights and dignity of clients, staff, and the business

2. Definitions

Confidentiality

Refers to the obligation to protect and secure information relating to clients, staff, and the organisation. Confidentiality involves keeping information, documents, and records secure and limiting access to authorised persons only.

Privacy

Refers to an individual's right to have personal information about them collected, used, and disclosed appropriately. Privacy is governed by the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).

3. Scope

This policy applies to:

- All personal and sensitive information collected as part of Subee's service delivery, including demographic, health, and clinical data.
- All Subee staff, contractors, students, and volunteers.

Definitions under the Privacy Act 1988:

- **Personal Information:** Information or an opinion that identifies, or could reasonably identify, an individual (e.g. name, address, contact details, or date of birth).

- **Sensitive Information:** Information or opinion regarding an individual's racial or ethnic origin, religious beliefs, political affiliations, sexual orientation, criminal record, or health and genetic information.

Subee manages both personal and sensitive information with equal care and protection.

This policy aligns with:

- Privacy Act 1988 (Cth) and Australian Privacy Principles (APPs)
- Australian Community Industry Standards (ACIS) 5.0
- NDIS (Provider Registration and Practice Standards) Rules 2018
- Aged Care Quality Standards

4. Policy Statement

Subee is committed to transparency in the collection, management, and use of information.

Subee will:

- Make this policy freely available on the Subee website.
- Collect and store only information necessary to provide quality care and meet legal and contractual obligations.
- Obtain consent before collecting or disclosing any personal or sensitive information.

Examples of information collected:

- Name, date of birth, gender, and contact details
- Health diagnosis and care needs
- Lifestyle information and goals (for care planning)
- Family and carer contact details

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www.subee.com.au

ABN 87 100 735 395

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- Allied health professional contacts
- Opinions or feedback via anonymous surveys

5. Clean Desk Policy

- All desks must be cleared of confidential documents before leaving the workplace or at the end of each day.
- Confidential information must not be visible in public or shared workspaces, including whiteboards or computer screens.
- Physical files must be stored in locked cabinets or restricted areas when unattended.

6. Collection and Storage of Information

- Wherever possible, information will be collected directly from the individual.
- If information is collected from a third party (e.g. guardian, carer), written consent must be obtained and the individual notified.
- Individuals may request to remain anonymous or use a pseudonym where practical (noting this may not be feasible for health service provision).
- Government-related identifiers (e.g. Medicare numbers) will not be used or disclosed for unrelated purposes.

Storage and Security:

- Information is stored securely on Subee's protected network with restricted access.
- Electronic data is protected with dual passwords and automatic screen locks (5-minute inactivity lock; 10-minute auto logout).

- Subee maintains electronic records only; documents are retained and destroyed per legal requirements.
- All staff must complete privacy training (Ausmed module "Keeping Secrets: The Health Care Worker's Duty of Confidentiality") and sign this policy on induction.

7. Use and Disclosure of Information

Subee will:

- Use collected information only for purposes directly related to service delivery, client care, or duty of care.
- Not use or disclose sensitive information for direct marketing.
- Permit the use of personal information for direct marketing only where:
 - It was collected directly from the individual,
 - The use is reasonably expected, and
 - An opt-out mechanism is provided.

Opt-out options:

Individuals may opt out at any time by contacting Subee via:

- Website contact form
- Email: subee@subee.com.au
- Post: PO Box 1872, Coffs Harbour NSW 2450

Subee will ensure information is accurate, current, and complete through internal reviews and audits.

Information may be disclosed to:

- Sub-contractors or service partners involved in client support

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- Health professionals, advisors, or regulatory authorities
- Only where necessary, lawful, and with appropriate safeguards

Clients may withdraw consent to information sharing at any time. This will be recorded in their client file and communicated to the relevant coordinator.

8. Assistive Technology Access

- Employees must not have or request client passwords for assistive technology (e.g. computers, tablets, smartphones).
- If a client cannot enter their password, staff must contact the Service Coordinator for an Occupational Therapy (OT) assessment to arrange an alternative access method (e.g. voice activation).
- Staff may assist clients with technology only after the client has entered their password.
Examples of permitted assistance:

- Online shopping
- Telehealth appointments
- Scheduling appointments
- Accessing online resources or games

- Staff must never connect with clients via personal social media platforms.

9. Access of Personal Information

Individuals have the right to access their personal information. Subee will provide access within 30 days of request unless:

- Access poses a risk to life, health, or safety

- It unreasonably impacts others' privacy
- The request is frivolous or vexatious
- Other exceptions apply under APP Clause 12.3

Requests may be made via:

- Website contact form
- Email: subee@subee.com.au
- Post: General Manager, PO Box 1872, Coffs Harbour NSW 2450

There is no charge for access requests.

If access is denied, Subee will provide written reasons and information about complaint mechanisms (NSW Privacy Commissioner, Australian Privacy Commissioner). Subee will not disclose personal information overseas. All data storage and backups occur in Australian facilities only.

10. Retention and Destruction

- Records will be maintained and destroyed in accordance with the Privacy Act 1988:
 - Adults: 7 years from the last service date
 - Minors: Until age 25 if services commenced before 18 years
- All records containing personal or sensitive information must be securely shredded or disposed of using a confidential destruction service.

11. Group Email Communication

- All group emails to staff, clients, or external contacts must be reviewed and authorised by two administrative staff members before sending.
- This ensures correct recipient management and prevents inadvertent disclosure.

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- Group emails must be sent using the BCC (Blind Carbon Copy) function, unless explicit written approval from the General Manager permits otherwise.

12. Breach of policy

Non-compliance with this policy constitutes a breach of Subee's confidentiality and privacy standards and may result in:

- Disciplinary action
- Performance management
- Or, in serious cases, instant dismissal

13. Acknowledgement

I acknowledge that I have read, understood, and agree to comply with Subee Pty Ltd's Confidentiality and Privacy Policy and Procedure.

Name: _____

Signature: _____

Date: _____

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