



Direct Solutions values, prioritises and respects the privacy of the individuals we interact with. Direct Solutions is committed to protecting their privacy and complying with the Privacy Act 1988 (Cth) (**Privacy Act**) and other applicable privacy laws and regulations. This Privacy Policy describes how Direct Solutions collects, hold, use and discloses personal information, and how Direct Solutions maintain the quality and security of personal information.

## **What is personal information?**

“Personal information” means any information or opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable. In general terms, this includes information or an opinion that personally identifies you either directly (e.g your name) or indirectly.

## **Collection of Personal Information**

Direct Solutions is required to collect personal Information which is reasonably necessary for undertaking functions as an Accredited Workplace Rehabilitation Provider. Direct Solutions provide services that are evidence-based and focused on assisting clients to achieve their rehabilitation outcomes. For the purposes of providing workplace rehabilitation services, Direct Solutions may collect information from multiple stakeholders, including the injured person, treating health practitioners, employers, insurers, solicitors, and any other parties with a relevant interest in the referral.

Information collection may include the following methods to obtain relevant data: verbal discussion with relevant parties, written information (emails) or via professional reports (medical).

Sensitive Information

Direct Solutions collects information relevant to the purpose of the referral. This can include sensitive information, which is a category of personal information.

*This includes:*

- Name, date of birth, mobile number, email address and postal address.
- Employment details.
- Your medical and other health information and details about your support needs
- Any other information pertaining to your need for Rehabilitation Services

Other sensitive information includes information or opinion about such things as an individual's racial or ethnic origin, gender identification, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record, or health information.

Direct Solutions will only collect sensitive information that is reasonably necessary for the services requested / being delivered and/or the client/customer has consented, or it is required by law. Health related information will be collected as required for the performance of any services performed within the Workplace Injury Management relevant scheme to which the consent is required.



## **Provision of Consent**

During the initial meeting, Direct Solutions provides clients with relevant information regarding use and disclosure of this information. Written consent is requested from all clients via the Direct Solutions Consent Form. In instances where consent is not provided, the meeting is terminated until further guidance is sought from the referring body.

## **Disclosure of Information**

Direct Solutions may be required to disclose personal information when required to do so by law, court order or government regulations. Specific circumstances when this may occur in the following situations:

- Liaison with referring agencies, including verbal discussion, provision of required reporting.
- Liaison with treating health practitioners, employers, solicitors, or any other stakeholders engaged in provision of rehabilitation services.
- Internally within Direct Solutions during file reviews or transfer of the file to an alternate rehabilitation consultant.
- When there is a serious risk or threat to a person's life or health.
- As required by law (e.g information is requested by subpoena)
- If there is suspected unlawful activity on a file.

## **Security of Personal Information**

Direct Solutions engages in activities to ensure that client's personal information is stored in a manner that reasonably protects it from misuse, loss, unauthorized access, modification, or disclosure.

Direct Solutions utilises computer-based software for all aspects of client management. All relevant client information is stored in a cloud-based case management system (including, file notes and reporting). This system is compliant with the Australian Government regulations around data security. Access to client information is provided to key personnel related to the management of the file (Rehabilitation Consultant, Manager, Administration) who need reasonable access to complete relevant tasks related to the functions of an accredited workplace rehabilitation provider.

Direct Solutions take all precautions to ensure the security of our data. Implementation of security measures such as firewalls, antivirus software and encryption to protect data from any potential threats to access. Vinci (the core program used to manage and facilitate cases) also has an identity management solution tracking access and logging individual activity. This feature allows for the ability to monitor all activity and detect and respond to any anomalies early.

Any breach will be reported immediately to the National Rehabilitation Manager who will direct personally the appropriate-if necessary- response and rectification. This includes reporting any breach of privacy to relevant parties in writing within one (1) business day of the breach occurring.

Direct Solutions follow strict process with regards to any potential breach. Completion of a Privacy Breach Register and Privacy Breach Report are completed and held according to government requirements.



## **Data Retention**

As per government requirements, Direct Solutions maintains client records for a period of seven years.

## **Access and Correction of Personal Information**

As per the Freedom of Information Act (1982), clients have the right to access and review their personal information held by Direct Solutions. At any point, clients can request amendments or corrections to their personal information if it is inaccurate, incomplete, or outdated.

If a client wishes to access or change their Personal Information, a formal request in writing can be submitted to the Privacy Officer at Direct Solutions Rehabilitation & Occupational Services Pty Ltd via email ([casemanagement@directsolutions.net.au](mailto:casemanagement@directsolutions.net.au))

## **Complaints**

Clients are provided with information regarding the ability to lodge a complaint regarding any concerns or potential breaches related to privacy and confidentiality to the Privacy Officer. Contact details are as follows:

### **Privacy Officer**

**5 Stockton Ave, Moorebank NSW 2170**

**PH: (02) 9600 7424**

**FAX: (02) 9600 7564**

**E: [casemanagement@directsolutions.net.au](mailto:casemanagement@directsolutions.net.au)**

NB: Direct Solutions notes that this Privacy Policy will be reviewed and updated as required to reflect changes in our information practices and other legislative requirements. This policy was drafted in accordance with relevant privacy laws and regulations.