

Privacy Policy	Approved	Chief Executive Officer (CEO)
	Author	Head of Human Resources (HR)
	This review date	April 2026
	Next review date	April 2030
	Version	3.0

Purpose To outline the circumstances in which we obtain personal information including the personal information of residents employees, contractors, volunteers and other persons who provide services to us, how we use and disclose that information, and how we manage requests to access and/or change that information.

Scope This policy applies to residents employees, contractors, volunteers and other persons who provide services to Manor Court.

Introduction During Manor Court's activities we respect, manage, and protect personal information in accordance with the Aged Care Quality Standards, the Privacy Act 1988 (Cth) (Privacy Act) and the 13 Australian Privacy Principles (APPs).

Contact Contacting our Privacy Officer at:

- feedback@manorcourt.org.au
- 03 9742 0699
- writing to Manor Court and addressing the letter to the Privacy Officer.

If practical, you can contact us anonymously (i.e., without identifying yourself) or by using a pseudonym. However, if you choose not to identify yourself, we may not be able to give you the information or provide the assistance you might otherwise receive if it is not practical to do so.

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Policy

What is Personal Information and How Do We Collect It?

Personal information is information or an opinion about an individual from which they can be reasonably identified. Depending on the circumstances, we may collect personal information from the individual in their capacity as a resident, contractor, volunteer, stakeholder, job applicant, visitors or others that encounter the organisation.

While providing aged care services, we may collect and hold:

- Personal Information including names, addresses and other contact details, dates of birth, next of kin details, photographic images, and financial information.
- Sensitive Information (particularly in relation to resident records) including government
- identifiers (such as TFN), religious beliefs, nationality, country of birth, professional
- memberships, powers of attorney, guardianship orders and criminal records.
- Health Information (particularly in relation to resident records) including medical records,
- disabilities, and psychological reports.

As part of our recruitment processes for employees, contractors, volunteers and other persons who provide services to us, we may collect and hold:

- Personal Information including names, addresses, e-mail addresses and other contact details, dates of birth, financial information, citizenship, employment references, regulatory accreditation and driver's license information.
- Sensitive Information including government identifiers (such as TFN), nationality, country of birth, professional memberships and criminal records.
- Health Information (particularly in relation to prospective staff and resident records) including medical records, disabilities, psychological reports, vaccination evidence.

Generally, we will seek consent from the individual in writing before we collect their sensitive information (including health information).

Employee records are not covered by the APPs where they relate to current or former employment relations between the organisation and the employee.

However, a current or former employee's health records are covered by the Victorian Health Privacy Principles.

Collection of Personal Information

The collection of personal information depends on the circumstances in which Manor Court is collecting it. If it is reasonable and practical to do so, we collect personal information directly from the individual.

Solicited Information	Manor Court has, where possible, attempted to standardise the collection of personal information by using specifically designed forms. However, given the nature of our operations we also receive personal information including about residents, employees, volunteers and other persons who provide services to us, which may be collected in any format including: • face-to-face meetings, paper records, letters and notes; • electronic records, including via our website; • emails and messaging records; • telephone; • Human Resources information systems; • payroll, financial transactions and rostering systems; • CCTV or security system records or e-mail monitoring; • device and network logs; and • information held by third-party service providers on behalf of the organisation. We may also collect personal information from other people (e.g., a third-party administrator, referees for prospective employees) or independent sources. However, we will only do so where it is not reasonable and practical to collect the personal information from the individual directly.
Unsolicited Information	Manor Court may be provided with personal information without seeking it through our normal means of collection. This is known as “unsolicited information” and is often collected by: • misdirected postal mail – letters, notes, documents • misdirected electronic mail – emails, electronic messages • employment applications sent to us that are not in response to an advertised vacancy additional information provided to us which was not requested. Unsolicited information obtained by Manor Court will only be held, used and or disclosed if it is considered as personal information that could have been collected by normal means. If that unsolicited information could not have been collected by normal means, then we will destroy, permanently delete or de-identify the personal information as appropriate.
Collection and Use of Sensitive Information	We only collect sensitive information if it is: • reasonably necessary for one or more of these functions or activities, and we have the individual’s consent • necessary to lessen or prevent a serious threat to life, health or safety • another permitted general situation • another permitted health situation. We may share sensitive information with other entities in our organisation structure, but only if it is necessary for us to provide our products or services.

How Do We Use Personal Information?	Manor Court only uses personal information that is reasonably necessary for one or more of our functions or activities (the primary purpose), a related secondary purpose that would be reasonably expected by you, or for an activity or purpose to which you have consented.
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Our primary uses of personal information include, but are not limited to:

- providing aged care services
- satisfying our legal obligations including our duty of care obligations
- keeping residents, their carers/representatives and communities informed about relevant matters through correspondence, newsletters and magazines
- marketing, promotional and fundraising activities
- supporting the activities of the Board
- supporting community-based causes and activities, charities and other causes in connection with the organisation's functions or activities
- helping us to improve our day-to-day operations including training our staff and to enable research, surveys and reviews of the workplace and services we provide to be conducted, including research and review undertaken by third party providers
- systems development, developing new programs and services, undertaking planning, research and statistical analysis
- administration, including for insurance purposes
- the employment of staff
- the engagement of volunteers.

We will only use or disclose sensitive or health information for a secondary purpose if you would reasonably expect us to use or disclose the information, and the secondary purpose is directly related to the primary purpose.

We may disclose personal information to related bodies corporate, but only, if necessary, for us to provide our services.

We will not disclose information about an individual to overseas recipients (for example, to facilitate overseas travel) unless it is necessary and with their consent.

Storage and Security of Personal Information	Manor Court stores Personal Information in a variety of formats including, but not limited to: • databases • hard copy files • personal devices, including laptop computers • third party storage providers such as cloud storage facilities • electronic files.
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Manor Court takes all reasonable steps to protect the personal information we hold from misuse, loss, unauthorised access, modification, or disclosure.

These steps include, but are not limited to:

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- restricting access and user privilege of information by staff depending on their role and responsibilities
 - ensuring staff do not share personal passwords
 - ensuring hard copy files are stored in lockable filing cabinets in lockable rooms, and staff access is subject to user privilege
 - ensuring access to Manor Court's premises are secured at all times
 - implementing physical security measures around the buildings and grounds to prevent break-ins
 - ensuring our IT and cyber security systems, policies, and procedures, are implemented and up to date
 - ensuring staff comply with internal policies and procedures when handling the information undertaking due diligence with respect to third party service providers who may have access to personal information, including customer identification providers and cloud service providers, to ensure as far as practicable that they are compliant with the APPs or a similar privacy regime
 - the destruction, deletion, or de-identification of personal information we hold that is no longer needed or required to be retained by any other laws.

Our public website may contain links to other third-party websites outside of Manor Court. Manor Court is not responsible for the information stored, accessed, used, or disclosed on such websites and we cannot comment on their privacy policies.

Responding to Data Breaches

Manor Court will take appropriate, prompt action if we have reasonable grounds to believe that a data breach has, or is suspected to have, occurred. Depending on the type of data breach, this may include a review of our internal security procedures, taking remedial internal action, and notifying affected individuals and the Office of the Australian Information Commissioner (OAIC).

If we are unable to notify individuals, we will publish a statement on our website and take reasonable steps to publicise the contents of this statement.

Disclosure of Personal Information

Personal information is used for the purposes for which it was given to Manor Court, or for purposes which are directly related to one or more of our functions or activities.

Personal information may be disclosed to government agencies, other residents, other aged care providers, recipients of our publications, visitors, carers, advocates, our services providers, agents, contractors, business partners, related entities and other recipients from time to time, if the individual:

- has given consent; or
- would reasonably expect the personal information to be disclosed in that manner.

Manor Court may disclose personal information without consent or in a manner which an individual would reasonably expect if:

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- we are required to do so by law
 - the disclosure will lessen or prevent a serious threat to the life, health or safety of an individual, or to public safety
 - another permitted general situation applies
 - disclosure is reasonably necessary for a law enforcement related activity
 - another permitted health situation exists.

We may also provide personal information such as names, e-mails addresses and other contact information to third party suppliers in the event that such information is reasonably necessary to enable them to carry out the functions for which they are engaged by us to perform.

These may include employee surveys, satisfaction surveys, workplace reviews and other engagement surveys as well as client satisfaction surveys and other reviews of client services which are being undertaken on our request and behalf by a third party provider and which reasonably require the personal information to be disclosed for the effective provision of those services.

Disclosure of Personal Information to Overseas Recipients

Personal information about an individual may be disclosed to an overseas organisation while providing our services. For example, when storing information with a “cloud service provider” which stores data outside of Australia.

We will, however, take all reasonable steps not to disclose an individual’s personal information to overseas recipients unless:

- we have the individual’s express or implied consent;
- we have satisfied ourselves that the overseas recipient is compliant with the APPs, or a similar privacy regime;
- we form the opinion that the disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety; or
- we are taking appropriate action in relation to suspected unlawful activity or serious misconduct.

Mental Capacity, Privacy and Consent

Where a resident lacks the capacity to consent to the use of their personal information, we will seek consent from their representative or guardian in accordance with Commonwealth and State guardianship laws.

The Quality of Personal Information

We take all reasonable steps to ensure the personal information we hold, use and disclose is accurate, complete and up to date, including at the time of using or disclosing the information.

If Manor Court becomes aware that the Personal Information is incorrect or out of date, we will take reasonable steps to rectify the incorrect or out of date information.

Access and Correction

You may submit a request to us to access your personal information we hold, or request that we change your personal information. Upon receiving such a

of Personal Information	request, we will take steps to verify your identity before granting access or correcting the information.
	If we reject the request, you will be notified accordingly. Where appropriate, we will provide the reason/s for our decision. If the rejection relates to a request to change personal information, an individual may make a statement about the requested change, and we will attach this to their record.
Complaints	You can make a complaint about how Manor Court manages personal information, including a breach of the APPs, by notifying us in writing as soon as possible. We will respond to the complaint within a reasonable time (usually no longer than 30 days), and we may seek further information in order to provide a full and complete response. Manor Court does not charge a fee for the handling of complaints. If you are not satisfied with our response, you may refer the complaint to the OAIC. A complaint can be made using the OAIC online Privacy Complaint Form or by mail, fax, or email. A referral to OAIC should be a last resort once all other avenues of resolution have been exhausted.
Our Privacy Officer	The Executive Officer is our Privacy Officer. Our Privacy Officer is responsible for: • promoting a culture where each resident's privacy is respected, and the personal information of individuals is protected in accordance with our obligations under the Aged Care Quality Standards and the Privacy Act 1988 (Cth) • integrating privacy obligations into existing practices and procedures and policy documents providing or organising ongoing training support for managers to ensure that all relevant persons receive privacy training • managing privacy queries, feedback and complaints • liaising with regulators (where necessary) • monitoring privacy compliance performance • analysing performance to identify the need for corrective action • ensuring privacy issues are factored into contracts with external suppliers • ensuring our Privacy Program and Privacy Policy are reviewed on a regular basis • ensuring personal information audits are conducting on a regular basis.

Definitions and related information

Definitions

Term	Definition
OAIC	Office of the Australian Information Commissioner
APP	Australian Privacy Principles

Related documents

Related legislation

Privacy and Personal Information Act, 1998

Version Control

Version no.	Issue Date	Nature of Amendment
3.0	15/4/2026	Change of responsible persons.
