



At Vasey RSL Care Ltd (“**Vasey RSL Care**”), we recognise the importance of your privacy and understand your concerns about the security of the personal, health and other personally identifying information you provide to us.

This important notice is our **Privacy Policy Statement** which sets out how we manage your personal and other information. This Privacy Policy Statement tells you:

- The kinds of personal and health information we may collect or hold from you or about you;
- How we use it;
- Who we share and disclose it with;
- Your rights of access and correction; and
- How to make a complaint.

Please read this Privacy Policy Statement carefully and let us know if you have any questions.

The Main Privacy Laws Applying to Vasey RSL Care

The main laws that govern Vasey RSL Care’s privacy and data protection practices include:

- The *Privacy Act 1988 (Cth)* – which includes the Australian Privacy Principles (“**APPs**”), (collectively, “**Privacy Act**”); and
- The *Health Records Act 2001 (Vic)* – which includes the Health Privacy Principles (“**HPPs**”), (collectively, “**Health Records Act**”).

The APPs and the HPPs detail how personal and health information may be collected, used, disclosed, stored and destroyed, and how an individual may gain access to or make complaints about the personal and/or health information held about them.

There are also a range of other laws that are relevant to Vasey RSL Care’s privacy and data protection practices, and which specify what personal and health information we must or can collect from you or about you, and who we can share it with. These depend on the way we engage with you, your relationship with us and the type of services you receive from us. For example, we may collect and share personal information from you and about you:

- Under family, community and social security laws relevant to your accommodation, pension, rent assistance, and means testing for other payments, rebates and benefits you may receive;
- Under taxation laws relevant to your eligibility for accommodation, pension, and other payments, rebates and benefits you may receive;
- Under aged care laws and quality standards relevant to your care and accommodation in our facilities, and your participation in our other programs and services; and
- Under defence and veterans’ affairs laws relevant to your service and entitlements.

Definitions

Under the privacy laws:

- **“Personal Information”** generally includes information or an opinion about an identified individual, or about an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.
- **“Sensitive Information”**, a subset of Personal Information, is information or an opinion about an individual’s racial or ethnic origin, political opinions, political association membership, religious beliefs or affiliations, philosophical beliefs, professional or trade association membership, trade union membership, sexual orientation or practices or criminal record. It also includes health information, genetic information, biometric information and biometric templates.
- **“Health Information”** generally includes information or an opinion about an individual’s health or disability, the health services provided or to be provided to them, their expressed wishes for the provision of future health services, personal information collected to provide a health service, personal information collected in connection with organ and body-part donation, and predictive genetic information.
- **“Protected Information”** under the *Aged Care Act 2024* (Cth) (Aged Care Act), is relevant if it is personal information, or it is information (including commercially sensitive information) the disclosure of which could reasonably be expected to found an action by an entity (other than the Commonwealth) for breach of a duty of confidence.

The Kinds of Information We Collect

Vasey RSL Care collects a wide variety of personal, sensitive, protected and health information which relates directly to our functions and activities. Vasey RSL Care’s functions and activities include the provision of residential and home care services, housing services, workforce planning, recruitment and selection, provision of a safe environment, student placements, learning and development, and raising awareness of the organisation as a service provider and employer. The information we may collect varies depending on how we interact with you.

Residents, Program Participants and Service Recipients

If you are a prospective or current resident in our tenancy or residential aged care facilities, a prospective or current participant in our in-home care programs, or a recipient of our other services, we commonly collect your name, address, date of birth, contact telephone numbers, email address, emergency contact, personal representative details, power of attorney details, next of kin, photograph and service history.

We also collect a variety of other personal and protected information, depending on the facility or program you are in, and/or the services you receive. For example, in our tenancy, residential aged care and in-home care programs, we commonly collect:

- Government-related identifiers: including your driver licence, passport, Services Australia Customer Reference Number, Pension Number, Department of Veterans' Affairs status, Care Recipient Identification Number and Medicare Number.
- Financial information: including your income statements, bank summaries, superannuation statements, taxation records, Services Australia service records, Medicare service records, ACAT Assessment and bank account details.
- Service records: DVA status and armed services records.
- Health information: including your medical records, medication records, DVA and/or Medicare, dietary requirements, health assessments, referrals, previous service providers, allergies and vaccination status.
- Other information: including photographs, and voice and image recording from your participation in care assessment, wellbeing/lifestyle and promotional activities.

We also collect information about your use of and/or participation in our programs and services. This can be:

- For reporting purposes (e.g., to report on the number of participants and manner of participation in our programs and activities);
- For care and assessment purposes (e.g., to identify safe practices for administration of medication); and
- For promotional purposes (e.g., if you provide works, or feature in photographic or video images or testimonials etc for Vasey RSL Care's use in internal publications and newsletters and for external and public facing promotion and publicity).

Family Members and the General Public

We collect personal information from or about the family members and friends of our residents and program participants, including from and about the "registered supporters" of our residents and program participants (as defined in the Aged Care Act).

We may also collect personal information about family members and friends when they participate in various programs, services and activities (e.g., including photographic and/or video images taken at Vasey RSL Care's various events).

Employees, Vendors, Contractors, Students and Volunteers

If you are a prospective or current employee, contractor (including contracted labour hire), student or volunteer to Vasey RSL Care, we commonly collect your name, address, date of birth, contact telephone numbers, email address, emergency contact and next of kin details, previous occupation/s, qualifications, eligibility and fitness to work in Australia, citizenship and/or visa status, background police, criminal and bankruptcy checks, dietary requirements, allergies, vaccination status and other health or medical conditions relevant to your position. We may also collect other sensitive information relevant to your position and our workplace diversity initiatives etc. including spoken languages and personal identifiers such as gender or nationality/cultural identity.

We recognise our responsibility to safeguard personal and sensitive information collected in the course of employment. We will not intrude upon an employee's private affairs or misuse their personal information. Access to employee data is strictly limited to authorised personnel and is used only for legitimate business or legal purposes.

We will not collect, use, or disclose personal or sensitive information about an employee without their knowledge and, where appropriate, consent, except where required or authorised by law or where necessary to protect health and safety. We uphold a reasonable expectation of privacy in our systems and processes and are committed to avoiding any intentional or reckless misuse of employee information.

For employees, vendors and contractors, we also collect relevant financial information (e.g., for payment of wages, accounts and service fees, superannuation, and taxation etc).

We also collect information about Vasey RSL Care's employees, vendors and contractors when they contribute to or participate in our various functions and activities. This can be:

- For workforce reporting purposes;
- For the care and assessment of our residents, program participants and service recipients (e.g., if you feature in a recorded care assessment); and
- For promotional purposes (e.g., if you provide works, or feature in photographic or video images or testimonials etc for Vasey RSL Care's use).

Donors

If you are a prospective or current donor to Vasey RSL Care, we commonly collect your name, address, date of birth, email address, payment information (e.g., bank account and/or credit card details), and Will and bequest details.

We may also collect personal and protected information about donors when they attend or participate in Vasey RSL Care's various programs and events (e.g., including photographic and/or video images taken at events).

Stakeholders

From our other stakeholders, we commonly collect your name, address, date of birth, contact telephone numbers, email address, qualifications, occupation and place of employment.

Website

We also collect personal and protected information from you or about you when you browse our website, make a general enquiry, or engage with us on social media.

Our website may from time-to-time use cookies to analyse website traffic and help us provide a better website visitor experience. Cookies are very small files which a website uses to identify you when you come to the site and store details about your use of the site. Most web browsers automatically accept cookies. You can reject cookies by changing your browser settings but making this change may prevent you from taking full advantage of our website.

Our website may from time to time have links to other websites that are not owned or controlled by Vasey RSL Care. Links to third party websites do not constitute sponsorship, endorsement or approval of those websites. These links are for your convenience only, and Vasey RSL Care is not responsible for the privacy practices of such linked organisations.

How We Collect Information

Personal and health information is collected in a number of ways including:

- Directly from you (such as where you provide information to us when you complete an application form, send us an email or letter, sign an agreement, complete a survey, log in to our various service apps and portals, or engage with us on social media).
- From your authorised representative(s), registered supporter(s), family member(s) or friend(s) (if it is unreasonable or impracticable to obtain the information from you).
- From your participation in our programs and services.
- From your attendance at our various internal and publicly held events and functions.
- From and related to your employment or engagement with us (e.g., by direct application, through labour hire agencies, and/or universities and student placement services).
- From third parties such as Aged Care Assessment Service, hospitals, doctors, allied health providers or other public or private referral agencies.
- From Government sources such as Services Australia, the Department of Veterans' Affairs, Medicare, My Aged Care and the State and Federal Police.
- Via our website, when you subscribe to receive email or e-news.
- Through images and recordings.

Vasey RSL Care primarily collects sensitive information about an individual with the individual's consent, if that information is reasonably necessary for, or directly related to, one or more of our functions or activities. For example, we may ask about or receive from you information about your cultural and ethnic background, religious beliefs and affiliations and sexual orientation in our tenancy, residential aged care and in-home care applications. When undertaking assessments to develop a care plan, staff may also ask about cultural and ethnic background, religious preference, customs, beliefs and sexual orientation, as we value individual interests and foster choice to support choice. We may also use this information to extend the support that we or other organisations may be able to provide to you. This is not an exhaustive list of the information we collect. We may ask for information about a pension number to obtain a pensioner discount or to obtain services or equipment on your behalf. You may also be asked to provide personal information about other individuals to us (e.g. contact details of your next of kin, preferred contact). If so, we rely on you to inform these other people that you are providing personal information to us and advise them about our privacy policy statement.

Automated Decisions

There may be limited cases where we use your personal information through our automated decision-making platforms to make a decision which may affect your rights or interests, or which are used to assist substantially and directly in making that decision.

We do not make decisions solely through the use of these automated decision-making platforms. If we are to make a decision solely through the use of an automated decision-making platform, we will notify you directly and provide an opportunity for review

The types of personal information that we may use in automated decision platforms include: your name, address, date of birth, service history, health -related information and other relevant demographic or assessment data.

Consequences of Not Providing Your Information

You do not have to provide any personal or protected information to us. However, if you do not provide all or any of the personal or protected information we request, or if you do not consent (or if you choose to withdraw your consent at a later stage), then:

- We may not be able to answer (or fully answer) your enquiry;
- We may not be able to provide (or fully provide) the services you have requested from us; and/or
- You may not be able to participate in any or the full extent of our services, programs, events and activities

For example, if you are a resident in our tenancy, residential aged care and in home care programs, the collection and use of your personal and protected information and health information is necessary to provide our services, to comply with government requirements, and to ensure that your care needs are met.

You can be anonymous or use a pseudonym when dealing with us, unless:

- The use of your true identity is a legal requirement; or
- It is impracticable for us to deal with you on such basis.

For example, you are able to make general enquiries about our programs and activities on a 'no-names' basis. However, enrolment into our facilities, programs and services does require the provision of the personal, protected and health information detailed above.

How We Hold Information

Vasey RSL Care holds information in a number of ways which includes hard [paper] copy or electronic [digital] format. We also have storage facilities we own and operate ourselves. We take reasonable steps (including the implementation of reasonable technical and organisational measures and safeguards) to maintain the security of your information and protect it from unauthorised disclosure, misuse, interference, loss, modification and unauthorised access.

These steps we take are physical, electronic and operational, and include security measures for electronic information and our storage facilities are locked. Strict confidentiality requirements are in place for our employees, volunteers and service providers.

Use and Disclosure of Information

Vasey RSL Care uses and discloses your personal, protected and health information only for the purposes for which it was collected or for any other purpose that is otherwise directly related to our functions or activities or otherwise permitted by law. If information is required for another reason, we will ask for your (or your authorised representative's) permission.

For residents who live in a residential aged care facility and consumers of the home care package program, we collect information to assess your requirements and to undertake care planning. As part of care planning, staff will talk to other internal and external service/health providers who are expected to disclose any concerns that may arise in carrying out your care plan. Staff may also need to consult your doctor, other health professionals and relevant service providers in order to monitor, plan, implement and evaluate your care needs. Vasey RSL Care may also be bound to comply with mandatory reporting and information sharing schemes to protect resident and program participant wellbeing.

Your information is used to provide services to you, to provide you with information about services and to assist you with enquiries. Information is also used to improve or develop our services, and to monitor and evaluate our quality and performance.

We also use the information you provide to administer and manage the services we provide to you, to charge and bill you for them (if relevant) and to collect any amounts you may owe to us.

Vasey RSL Care uses information:

- For internal record keeping and to assist our organisation to operate;
- For our workforce planning and management;
- To monitor usage of, and participation in, our programs, activities and services and to better understand how our services and resources are being used by you and others;
- To analyse your needs and improve your experience with us;
- For advancing our lobbying, advocacy, patriotic and charitable purposes and interests;
- For promotional and publicity purposes;
- To comply with our legal obligations.

In many instances, we are specifically authorised or required by law to collect and hold the personal, protected and/or health information we seek from you and about you. These laws include for us to comply with tenancy, residential aged care, veterans support, health provider, taxation, workplace health and safety, site surveillance, education, superannuation, health insurance and other applicable laws.

Vasey RSL Care also discloses information to:

- Your authorised representative(s) and/or registered supporter(s) with your consent or when you ask us to;
- Hospitals or other health care providers and health professionals;
- Professional advisers, including our accountants, auditors and lawyers;
- Our contracted vendors and service providers (e.g., our catering providers in our residential aged care facilities, our third-party services providers who manage our IT and marketing systems, and the organisations and agencies which conduct our fitness-to-work assessments);
- Our insurers;
- Government departments and regulatory authorities (e.g., Department of Veterans' Affairs, Services Australia, the Australian Taxation Office);
- Others who have this right by law (e.g., accreditation bodies).

Reasonable steps are taken to make sure personal information, protected information and/or health information we collect, use or disclose, is accurate, complete and up-to-date. Reasonable steps are taken to protect data and personal and protected information we hold from misuse, interference and loss; unauthorised access; unauthorised modification; and unauthorised disclosure. We take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose, subject to relevant legal requirements regarding document retention and deletion.

For applicants for employment, volunteering, student placement, traineeships and contractors, we collect personal and health information to consider you for these purposes. Your information is disclosed as advised to you as part of the application process or contracting process.

Where we wish to use or disclose your personal or protected information for other purposes, we will obtain your consent.

We may also disclose your personal or protected information to third parties (including government departments and enforcement bodies) where required or permitted by law.

Under the Privacy Act and under an eligible data breach declaration, we may be asked or required to share and/or handle a limited amount of personal information to prevent or reduce the risk of harm to individuals whose personal information has been or may have been breached. We will do so in accordance with the requirements of the Privacy Act, and the particular conditions of the relevant declaration.

Under the Privacy Act and under an emergency declaration, we may be asked or required to share and/or handle a limited amount of personal information to prevent or reduce the risk of harm in an emergency or disaster that affects Australians either in Australia or overseas. We will do so in accordance with the requirements of the Privacy Act, and the particular conditions of the relevant declaration.

Overseas Disclosure of Information

Vasey RSL Care is from time to time affiliated with or uses the services of other businesses/ organisations/people located overseas. For example, some of Vasey RSL Care's IT systems are hosted "in the Cloud", and some of Vasey RSL's catering providers are part of multi-national groups. We will only disclose your personal information to overseas recipients where:

- It is necessary to complete the transaction you have entered into; and
- You have provided consent; or
- We believe on reasonable grounds that the overseas recipient is required to deal with your personal information by enforceable laws which are similar to the requirements under the APPs;
- The country has been listed by the Australian Government as a "white-listed" country that provides substantially similar privacy protections; or
- It is otherwise permitted by law.

Destruction and De-identification of Information

Vasey RSL Care will retain your personal, protected and health information whilst it is required for any of our business functions and activities, or for any other lawful purpose. This includes retaining your information for certain periods of time even after we have completed our engagement with you, or you have departed our programs and services.

We use secure methods to destroy or to permanently de-identify your personal information when it is no longer needed. Depending on the program or service you have engaged with:

- Paper records containing confidential information are disposed of in confidential bins and are emptied into industrial shredder.
- Electronic records are deleted from the files and back up storage.

Other

Marketing, Recruitment and Promotional Activities

From time to time, we may contact you to provide you with information about other services offered by us that may be of benefit to you and your family. This includes information or services that can help improve your wellbeing. You may also wish to sign up to our e-newsletter or other publications. When we contact you, it may be via mail, phone, email or text-message. When you become a resident or consumer of Vasey RSL Care you consent to us using your personal information for direct marketing (as described in this document), unless you have contacted us to withdraw your consent. If you do not wish to receive marketing material from us, you can contact us at any time to let us know. See contact details at the end of this document. When you contact us to make this request, we will action your request within five working days. Opt-out procedures are also included in our marketing and promotional communications.

If you request not to receive marketing material, please note we will still contact you in relation to our ongoing relationship with you. For example, we will still send you any bills, statements and notices that are relevant to the services we provide you.

In order to raise awareness about Vasey RSL Care as a service provider and/or employer, Vasey RSL Care regularly releases advertisements, information and photographic and video imagery about organisational news and events online, in print media or via other channels. This enables Vasey RSL Care to engage with existing and potential consumers, employees, volunteers and its wider community. The Content can include photos and video recordings depicting an individual or group of individuals (whether they be a resident, family member, friend or employee, etc) poems, stories, artworks, and testimonials etc, mentioning an individual's name, quoting an individual in an article, content provided for external publications (e.g., other website or magazine articles), activities including taking photos or recordings, or collecting other material such as interviews, artworks, prose or testimonials. You [or your legal representative] will only be asked to provide explicit consent when sensitive content is being used in whole or in part for these types of purposes. Where it is impracticable for us to obtain your consent, signage notifying of the collection of personal information will be displayed at the relevant program, activity, function or event, etc. You have the right to withdraw consent or opt out at any time by emailing the Privacy Officer. The use of personal information in these ways is variously intended for internal publications (e.g., resident newsletters), as well as for external and public-facing advertising, publicity and promotional materials.

For volunteers, students, employment applicants, and other persons who have provided their details to us in relation to this, we may contact you regarding future job and volunteering opportunities and Vasey RSL Care news and events. You may opt out of this process via the Vasey RSL Care recruitment website or choose the unsubscribe options available on the communications when you receive them. Alternatively, you can opt out by contacting the Privacy Officer.

For donors, we will contact you to request your participation in one-off and ongoing donation initiatives, bequests and campaigns. You may opt out of or cancel your donations to Vasey RSL Care at any time. We will still contact you as required by law (e.g., to provide invoices for taxation purposes).

CCTV and Surveillance

Vasey RSL Care has installed or may install surveillance devices in communal spaces of its residential aged care facilities and community halls of the ex-service accommodation. In these cases, signage is in place at the entry of the facility which states surveillance devices are used in common areas of the establishment and/or in the outside vicinity. Surveillance feed from communal or outside vicinity is only reviewed if there is a complaint or an incident to assist with investigation. If additional or further surveillance in communal spaces or outside a building is to be installed, you will be informed of this change. Vasey RSL Care does

not allow surveillance equipment to be installed in a resident's room due to the intimate and private acts performed, for example showering, bathing, and to do so would compromise the resident's dignity.

Access to and Correction of Information

Under the Privacy Act and the Health Records Act, individuals have the right to request access to the personal and health information held about them. These access rights are subject to exemptions and exceptions recognised by law.

Under the Aged Care Act, individuals have the right to seek, and be provided with, records and information about the individual's rights and the funded aged care services the individual accesses, including the costs of those services.

We have procedures in place for receiving, assessing and responding to your requests to access personal and/or health information, and to receive information about your aged care services. We may need to verify your identity before progressing your request. We will not charge for the lodgement of an application to access personal and/or health information or protected information. We may however charge you for providing access to the personal and/or health information or protected information. Those charges will not be excessive and will be consistent with specific legal requirements regarding charges for records access.

Should you wish to access or correct any of the personal or health information collected by Vasey RSL Care, please see the contact details at the end of this statement.

Individuals also have a right to request personal information be corrected.

We have procedures in place for receiving, assessing and responding to your requests to correct personal information. We will take reasonable steps to correct information that is not accurate, complete, relevant or up to date. If Vasey RSL Care and the individual cannot agree as to whether the information is accurate, complete, relevant or up to date, we will, on request, record a statement of the dispute. We will also take such further steps as are required by the relevant privacy legislation.

If we deny an individual access to his or her personal and/or health information or we refuse to correct personal and/or health information that is in our possession, we will endeavour to provide reasons for that decision. We will also outline how you can object to that determination.

Privacy Complaints

If you feel that Vasey RSL Care has not complied with its privacy obligations in relation to the handling your personal information, we ask that you contact us directly first to attempt to resolve the matter. You may speak to the manager of the facility/service, complete a Privacy Complaint form, provide a written letter or contact the Vasey RSL Care Privacy Officer.

We take complaints very seriously. If you lodge a complaint about privacy this will be acknowledged and an estimated time frame for when you will receive a response to the complaint will be provided.

Vasey RSL Care Privacy Officer

PO Box 203, HAWTHORN VIC 3122

T: 03 9810 5500

E: privacyofficer@vaseyrslcare.org.au

If Vasey RSL Care is not able to resolve your privacy complaint, you have other options to escalate your complaint, depending on the personal and/or health information involved. This includes lodging a complaint with:

Australian Information Privacy Commissioner Office of the Australian Information Privacy Commissioner GPO Box 5218 Sydney NSW 2001 www.oaic.gov.au/privacy/privacy-complaints T: 1300 363 992 E: enquiries@oaic.gov.au	Health Complaints Commissioner Level 26, 570 Bourke Street Melbourne VIC 3000 https://hcc.vic.gov.au/make-complaint T: 1300 582 113	Aged Care Quality and Safety Commission https://www.agedcarequality.gov.au/contact-us/complaints-concerns/make-complaint T: 1800 951 822
--	--	--

This Privacy Policy Statement has been issued by Vasey RSL Care Limited, effective as at June 2025. From time to time, we may need to change this Privacy Policy Statement. If we do, we will post the updated version on our website www.vaseyrlscare.org.au and it will apply to all of your information held by us at that time.