

1. POLICY STATEMENT

Warrigal (trading as Warrigal Care) is committed to protecting your privacy. As part of our commitment, this [Privacy and Disclosure of Information Policy and Procedure](#) which outlines how Warrigal manages the personal information that it holds about its care recipients.

This statement of privacy applies to the [Warrigal application myWarrigal](#) (developer: Checked in Care) and the collection and use of data. By using the [Warrigal application myWarrigal](#) you consent to the data practices described in this statement

2. KEY RESPONSIBILITIES

The following responsibilities apply to Warrigal staff.

Chief Executive Officer (CEO)	1.1 Approve arrangements that are outside the provisions of this Policy and Procedure
Executive Leader People and Culture	2.1 Monitor and review this Policy and Procedure to ensure compliance 2.2 Appoint Privacy Officer
Employee Relations Advisor and HR Business Partner	3.1 Establish, implement, monitor and review this Policy and Procedure. 3.2 Communicate Policy and Procedure to ensure up-to-date and accessible to all stakeholders. 3.3 Provide guidance and assistance to managers and employees on the application of this Policy and Procedure as required. 3.4 Determine any issues that are in dispute, or have not been determined locally in a manner consistent with the Policy and Procedure. 3.5 Inform employees of their obligations under this Policy and Procedure.
Privacy Officer	4.1 Provide guidance and assistance to managers and employees on the application of this Policy as required. 4.2 Respond to enquiries or complaints from individuals on privacy matters ensuring these enquiries or complaints are dealt with seriously and promptly. 4.3 Conduct investigations into complaints where required ensuring confidentiality.
Managers and Coordinators/ Supervisory Employees	5.1 Implement policy and procedure within areas of control. 5.2 Comply with requirements outlined in the Policy and Procedure. 5.3 Promote best conduct and regularly remind employees of their responsibilities in relation to the Policy and Procedure. 5.4 Determine the appropriate course of action in managing any conflict in relation to this Policy and Procedure within areas of control.
Warrigal Employees	6.1 Comply and adhere to requirements outlined within this Policy and Procedure

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3. Application Purpose

The purpose of the [myWarrigal application](#) is for Warrigal care recipient and their primary contacts to remain informed about Warrigal services, and the personal activities relating to the Warrigal care recipient. This includes, but is not limited to, activity schedules, fee statements, events, information regarding COVID-19, service requests, as well as general Warrigal news updates. The application also provides users the opportunity to directly contact Warrigal via communication buttons.

4. PROCEDURE

4.1 Application Users

Application users include, but are not limited to;

- Warrigal care recipients
- Primary contacts of Warrigal care recipients
- Warrigal staff members

You are solely responsible for ensuring the security of all accounts and passwords that you use for myWarrigal.

4.2 Collection of Your Personal information

Warrigal only collects information that it needs in order to provide its products and services. Warrigal is a private provider of aged care providing care and services to older people. Its services include:

- Provision of private residential aged care facilities
- Provision of care and services to residents
- Provision of respite, low, high and dementia care within our homes
- Provision of aged care services in the care recipient's private residence (home services)
- Provision of aged care services in the community (social support)

To effectively provide such services Warrigal needs to collect certain information to ensure the health and safety of individuals and to allow us to best determine the appropriate level of care to provide, including but not limited to the use of the myWarrigal phone application.

The type of information collected by Warrigal may include, but is not limited to:

- Name, gender, address, phone number(s)
- Date of Birth
- Health information
- Your billing details
- Records of our interactions with you such as notes and recordings of telephone conversations you have had with our employees and participation information at Warrigal events
- Preferences for different activities, events and types of care
- Feedback on services
- Your image and video as well as content you have posted in provisioned applications by Warrigal

Warrigal will endeavour to collect directly from you. However from time to time, we may also collect information from other sources, such as your family. If you choose not to provide the information that Warrigal requires to provide its services effectively, we may not be able to provide you with the service(s) you have requested.

4.3 Use of Personal Information

Warrigal collects and uses your personal information to operate the [myWarrigal application](#), and to deliver the services that you have requested. Warrigal also uses your personally identifiable information to inform you of products and services available from Warrigal. Personal information is collected in order to provision access to the [myWarrigal application](#); provide information about your services and to offer you relevant

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Warrigal services. The information that you post or that Warrigal posts within the [myWarrigal application](#); may also be visible to other Warrigal staff and customers that use the application.

Warrigal may, at times, contact you via surveys to conduct research about your opinion of current services or of potential new services that may be offered.

4.4 Use of Personal Images/Videos

myWarrigal has the ability to access images and video from your device's gallery or camera. You will be prompted by the application to permit myWarrigal to access these images and video. When you approve myWarrigal to access your selected images and videos, those images and videos are able to be shared with selected individuals who use the [myWarrigal application](#). myWarrigal does not share these images on platforms outside of the application, however, you acknowledge that it becomes possible for those images and videos to be shared outside of myWarrigal once your permission to access your images is granted (for example, via the screenshot function). Warrigal will request permission to use any images or videos if intended for use outside of the application.

4.5 Disclosure of Personal Information

Warrigal does not sell, rent or lease its customer lists to third parties. Warrigal may from time to time contact you on behalf of external business partners about a particular offering that may be of interest to you. In such cases, your personally identifiable information (such as email, name, address, telephone number) is not transferred to the third party.

Warrigal may share data with trusted partners to help us perform statistical analysis, send you email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from using your personal information, except to provide these services to Warrigal and they are required to maintain the confidentiality of your information.

Warrigal will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to (a) confirm the edicts of the law or comply with legal process served to Warrigal, (b) protect and defend the rights of Warrigal and, (c) act under circumstances to protect the personal safety of users of Warrigal or the public.

5. DEFINITIONS

Care recipient	Resident/customer of Warrigal's Residential or Community Services, or their authorised person.
Warrigal application myWarrigal	The myWarrigal application, is for the Warrigal care recipient and their primary contacts to remain informed about Warrigal services, and the personal activities relating to the Warrigal care recipients. The link to myWarrigal Application is accessed via the myWarrigal website https://www.mywarrigal.com.au/

6. RELATED DOCUMENTS

- 6.1 [Privacy and Disclosure of Information Policy and Procedure](#)
- 6.2 [Code of Conduct](#)
- 6.3 [Managing Performance and Behaviour Policy and Procedure](#)
- 6.4 [Employee Records Policy and Procedure](#)
- 6.5 [Confidentiality Agreement](#)

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7. REGULATORY COMPLIANCE

- 7.1 [Privacy Act 1988](#)
- 7.2 [Privacy Amendment \(Enhancing Privacy Protection\) Act 2012 \(Cth\)](#)
- 7.3 [Privacy Amendment \(Notifiable Data breaches\) Act 2017 \(Cth\)](#)
- 7.4 [Health Records and Information Privacy Act 2002 \(NSW\)](#)
- 7.5 [Freedom of Information Act 1982 \(Cth\)](#)
- 7.6 [State Records Act 1998 \(NSW\)](#)
- 7.7 [Fair Work Act 2009 \(Cth\)](#)
- 7.8 [Aged Care Act 1997 \(Cth\)](#)
- 7.9 [Relevant Aged Care Standards and Accreditation Agency \(ACSAA\) Outcome Standards](#)

8. REFERENCES

- 8.1 [Google Data Policy](#)

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