

# Privacy Policy

Ref: 3.1/0926

|                          |                                                                                                                       |
|--------------------------|-----------------------------------------------------------------------------------------------------------------------|
| <b>Policy Group</b>      | 03 General                                                                                                            |
| <b>Related Policy</b>    | CitiReach Complaints Policy (3.4)<br>CitiReach Human Resources Policy (2.1)<br>Citipointe Church Privacy Policy (9.3) |
| <b>Commencement Date</b> | 14.09.2026                                                                                                            |
| <b>Review Date</b>       | 14.09.2027                                                                                                            |

## Intent

CitiReach collects personal and sensitive information about the participants, families and Personnel it works with in order to deliver safe, high-quality NDIS supports. This policy explains how CitiReach collects, holds, uses and discloses that information, consistent with the Australian Privacy Principles (APPs) in the Privacy Act 1988 (Cth) and the confidentiality standards of the NDIS Code of Conduct.

CitiReach is a business name of Christian Outreach Centre trading as Citipointe Church. Information collected for CitiReach's NDIS service is held and managed by CitiReach for CitiReach's purposes, and is not shared with the wider Citipointe organisation except as this policy describes.

## Scope

**Inclusions:** All personal information CitiReach collects about participants, their families and representatives, Personnel, and other individuals it deals with in the course of its NDIS service.

**Restrictions:** Nil.

**Exclusions:** Information that has been de-identified and can no longer reasonably be attributed to an individual.

## Objectives

1. To comply with the Privacy Act 1988 (Cth) and the Australian Privacy Principles.
2. To be transparent with participants, families and Personnel about what information CitiReach collects and why.
3. To protect personal and sensitive information from misuse, loss and unauthorised access.
4. To support participants to exercise their rights to access and correct their own information.

## Policy Provisions

### ***What We Collect***

1. In the course of providing NDIS supports, CitiReach may collect:
  - 1.1. Contact and identifying details of participants, families and representatives.
  - 1.2. NDIS plan information, funding details and support needs.
  - 1.3. Health and disability information relevant to a participant's supports, including medical, behavioural and allied health information.

- 1.4. Incident, complaint and feedback records.
- 1.5. Personnel employment, qualification and screening information.

### ***How We Collect It***

2. CitiReach collects personal information directly from the individual, their nominated representative, or their support coordinator wherever practicable, and only collects information from a third party (such as the NDIA, another service provider, or a family member) where necessary to deliver a participant's supports or as authorised by the participant.

### ***How We Use and Disclose It***

3. CitiReach uses and discloses personal information only for the purpose it was collected, or a purpose the individual would reasonably expect, including:
  - 3.1. Delivering and coordinating a participant's NDIS supports.
  - 3.2. Reporting to the NDIA or NDIS Commission as required by law.
  - 3.3. Responding to an incident or complaint.
  - 3.4. Internal administration, quality assurance and training.
4. CitiReach does not sell personal information, and does not disclose it to a third party for marketing purposes.
  - 4.1. Information is disclosed outside CitiReach only with the individual's consent, where required or authorised by law (including mandatory reporting to the NDIS Commission), or where necessary to prevent a serious threat to someone's life, health or safety.

### ***Storage and Security***

5. CitiReach takes reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification or disclosure, including:
  - 5.1. Restricting access to participant records to Personnel with a legitimate need.
  - 5.2. Storing electronic records behind access controls, and physical records in a locked location.
  - 5.3. Securely destroying or de-identifying information no longer required, subject to legal retention requirements.

### ***Access and Correction***

6. A participant, family member or Personnel member may request access to, or correction of, the personal information CitiReach holds about them by contacting the Head of Operations. CitiReach responds within a reasonable period and will only refuse access in the circumstances permitted under the Privacy Act.

### ***Data Breaches***

7. CitiReach responds to any suspected data breach in accordance with the Notifiable Data Breaches scheme, including assessing whether the breach is likely to result in serious harm and, where required, notifying the Office of the Australian Information Commissioner and affected individuals.

### ***How to Make a Privacy Complaint***

8. A concern about how CitiReach has handled personal information can be raised under the Complaints Policy (3.4), including by emailing [feedback@citireach.com.au](mailto:feedback@citireach.com.au). If not satisfied with CitiReach's response, a person may complain to the Office of the Australian Information Commissioner.

## Supporting Procedures and Guidelines

- CitiReach Privacy Collection Notice
- CitiReach Data Breach Response Procedure
- OAIC Notifiable Data Breaches scheme guidance

## Relevant Commonwealth/State Legislation

- Privacy Act 1988 (Cth)
- Australian Privacy Principles
- National Disability Insurance Scheme Act 2013 (Cth)
- NDIS Code of Conduct (NDIS Provider Registration and Practice Standards) Rules 2018 (Cth)
- Fair Work Act 2009 (Cth)
- Social, Community, Home Care and Disability Services Industry Award 2010 (Cth)

## Definitions

**CitiReach** – CitiReach Community Support Services, a business name of Christian Outreach Centre trading as Citipointe Church, providing NDIS community supports in Brisbane, accountable to the Citipointe COM.

**NDIS** – the National Disability Insurance Scheme, established under the National Disability Insurance Scheme Act 2013 (Cth).

**NDIS Commission** – the NDIS Quality and Safeguards Commission, the independent regulator of NDIS providers and workers.

**Participant** – a person accessing NDIS-funded supports from CitiReach.

**Personnel** – CitiReach employees (permanent and casual), contractors and volunteers.

**Sensitive Information** – a subset of personal information under the Privacy Act 1988 (Cth) that includes health information and information about disability, given a higher level of protection.

## Policy Dissemination and Procedures

Procedures relating to this policy are drafted by the CitiReach Head of Operations, with input from the Citipointe Compliance Office where the policy touches Citipointe's own framework. Personnel are informed of this policy and any related procedures through induction, team meetings, and access to CitiReach's policy folder.

## Accountabilities

|                                  |                                                                     |
|----------------------------------|---------------------------------------------------------------------|
| <b>Implementation</b>            | CitiReach Head of Operations                                        |
| <b>Compliance</b>                | CitiReach Head of Operations                                        |
| <b>Monitoring and Evaluation</b> | CitiReach Head of Operations, with the Citipointe Compliance Office |
| <b>Development/Review</b>        | CitiReach Head of Operations, with the Citipointe Compliance Office |

## Revisions

Reference No: 3.1

| Version | Approval Date | Committee/Board | Resolution/Minute |
|---------|---------------|-----------------|-------------------|
| /0926   | 14.09.2026    | Citipointe COM  | Pending adoption  |