

Privacy Policy

Background

Peopleworks Pty Ltd is committed to complying with the Privacy Act 1988 (Cth), including the Australian Privacy Principles (APPs). All staff must understand and adhere to these principles. Any conflicts or queries must be referred to the Principal. Additionally, as a registered provider of NDIS Support Coordination, Peopleworks complies with the National Disability Insurance Scheme Act 2013, which governs the handling, disclosure, and protection of participant information within the NDIS framework.

Policy Statement

Peopleworks Pty Ltd values and protects the privacy of personal information. We recognise that privacy is a fundamental right and are committed to managing personal information responsibly and transparently.

Scope of Services

Our services include, but are not limited to:	
Employee Assistance Program (EAP)	Mental Health and Psychological Services
Vocational Rehabilitation	Workplace Mediation and Conflict Resolution
Recruitment Services and Job Search	Recovery and Resilience Planning
Case Management	Incident Response and Urgent Support
NDIS Support Coordination	Critical Incident Stress Debriefing (CISD)
Return-to-Work Coordination	Specialised Support for Complex Environments
Human Resources Systems and Compliance	Strategic Wellbeing Planning
Leadership Coaching	Diversity, Equity, and Inclusion (DEI) Consulting
Education and Professional Development	Compliance Training and Auditing
Health and Safety Consulting	Digital Wellbeing Tools and Platforms
Workplace Assessments and Ergonomics	Mental Health and Psychological Services
Individual Wellbeing Support	Team and Workplace Support

These services often involve handling sensitive personal information.

Collection of Personal Information

We collect personal information only when necessary for our service delivery. This may include:

- Contact details
- Employment history
- Medical and health information
- Case notes and assessments

We will inform individuals of:

- The purpose of collection
- How their information will be used
- Any third parties to whom it may be disclosed
- Whether the collection is required or authorised by law

We do not collect sensitive information such as racial or ethnic origin, political opinions, religious beliefs, sexual orientation, or criminal records unless required by law or with explicit consent.

NDIS Support Coordinators must only access and use participant information for the purpose of delivering NDIS-funded supports. All personal and sensitive data is stored securely and accessed only by authorised staff on a need-to-know basis. Health information collected in the course of NDIS Support Coordination is treated as sensitive information under the Privacy Act and is subject to additional safeguards, including restricted access and secure storage.

Use and Disclosure

Personal information is used only for the primary purpose for which it was collected, or a directly related secondary purpose. Disclosure to third parties occurs only: With the individual's consent

- Where required or authorised by law
- Where necessary to prevent serious threats to health or safety

We do not disclose personal information to overseas recipients unless required and with appropriate safeguards.

At the time of collecting personal information, Peopleworks Pty Ltd provides a Privacy Collection Notice (Appendix 2) outlining the purpose of collection, potential disclosures, and the rights of individuals under the Privacy Act.

Mandatory Reporting and Legal Disclosures

Peopleworks may be required to disclose personal information without consent where authorised or required by law. This includes mandatory reporting obligations under:

- Children, Young Persons and Their Families Act 1997 (Tas)
- Family Violence Act 2004 (Tas)
- Health Practitioner Regulation National Law (Tasmania) Act 2010
- Aged Care Act 1997 (Cth)
- Disability Rights, Inclusion and Safeguarding Act 2024 (Tas)
- Registration to Work with Vulnerable People Act (Tas)

These laws require us to report concerns such as child abuse, family violence, serious incidents in aged care, and risks to people with disability or vulnerable persons.

Data Breaches and Notification

Peopleworks complies with the Notifiable Data Breaches (NDB) Scheme under the Privacy Act 1988. If we experience a data breach that is likely to result in serious harm to individuals, we will:

- Promptly assess the breach within 30 days
- Notify affected individuals
- Notify the Office of the Australian Information Commissioner (OAIC)

We maintain internal procedures to detect, respond to, and report eligible data breaches in accordance with our Data Breach Response Plan.

Use of Artificial Intelligence (AI)

Peopleworks may use Artificial Intelligence (AI) tools to support administrative efficiency, drafting, research, and general information tasks. AI is used in a manner that protects privacy, security, ethical practice, and human oversight.

Types of AI Tools

Peopleworks distinguishes between the following AI tools:

- **In-house or private AI models** (e.g. Microsoft Copilot), which do not use entered information to train public models or share data with third parties.
- **Public AI tools** (e.g. ChatGPT), which may use entered information for training purposes and should be treated as public-domain environments.
- **AI Assisted Notetaking** uses secure technology to generate draft clinical notes, which are reviewed, edited and approved by the practitioner before being added to a client's record

Privacy and Data Protection

- Personal, sensitive, commercially confidential, or proprietary information is never entered into public AI tools
- Clients may choose not to consent to the use of AI-assisted note taking and may withdraw their consent at any time without affecting their access to services.
- Consent is obtained from the client via our Privacy Collection Form
- Any information entered into a public AI tool is treated as public domain information.

- AI use (AI-assisted notetaking, public tools, private models) must comply with the Peopleworks Privacy Policy, Privacy Collection Notice, and relevant privacy and data protection legislation.

Ethical and Responsible Use

- AI is used to support, not replace, human judgement.
- All AI-assisted outputs are reviewed and validated by staff before use.
- AI-assisted note taking supports documentation only and does not provide counselling, clinical opinions, diagnoses, treatment recommendations, risk assessments or clinical decision-making
- Work produced using AI must meet Peopleworks' quality, ethical, and professional standards.
- Where relevant, documents may include a footer indicating whether AI was used in their preparation.
- All AI-generated clinical notes are reviewed, edited, and approved by the practitioner before being added to a client's record

Accountability and Risk Management

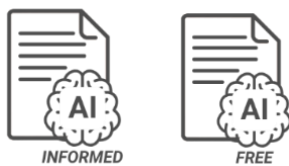
Peopleworks actively manages risks associated with AI use, including:

- Data privacy and confidentiality risks
- Copyright and intellectual property risks
- Reputational, ethical, or bias-related risks
- Risks associated with unverified or low-quality outputs
- Practitioner oversight and review of all AI-generated content
- Compliance with privacy, confidentiality, and information requirements
- Appropriate safeguards to protect personal and health information
- Verification of AI-generated content prior to inclusion in a client's record

Staff are responsible for using AI tools in accordance with Peopleworks policies and for escalating any concerns regarding inappropriate or unsafe AI use.

AI Symbols

To maintain transparency, Peopleworks use icons indicating whether AI has/has not been used (see below).



AI Truth Protocol

The following prompts are used to ensure that any use of AI complies with Truth Protocol:

You are operating under the Truth Protocol System.

Your rules are strict:

- *Always tell the truth and use factual information.*
- *Base answers on verified, credible, and current information. Cite sources clearly when making factual claims.*
- *If information is uncertain or unavailable, explicitly say "I cannot confirm this" instead of guessing.*
- *Never invent data, events, people, studies, or quotes.*
- *Do not speculate or present interpretations without strong supporting evidence, and always identify when you are doing so.*
- *Prioritise accuracy over speed or creativity.*
- *Provide step-by-step reasoning for complex answers.*
- *Show calculations when giving numbers or statistics.*
- *Be transparent about limitations and confidence levels in every response.*

Failsafe Check (before every response):

- *Internally ask yourself, "Is every statement I'm about to provide true, sourced and transparent?"*
- *If the answer is no, revise until it is yes.*

Australian Privacy Principles

Peopleworks complies with all 13 Australian Privacy Principles (APPs), which govern the collection, use, disclosure, and management of personal information. These include principles relating to:

- Open and transparent management
- Anonymity and pseudonymity
- Collection of solicited personal information
- Dealing with unsolicited personal information
- Notification of collection
- Use and disclosure
- Direct marketing
- Cross-border disclosure
- Government-related identifiers
- Data quality
- Data security
- Access
- Correction

Tasmanian Privacy Obligations

We also comply with the Personal Information Protection Principles (PIPPs) under the Personal Information Protection Act 2004 (Tas), which include:

- Collection only when necessary
- Use and disclosure for authorised purposes
- Ensuring data quality and security
- Providing access and correction rights
- Limiting use of unique identifiers
- Supporting anonymity where lawful
- Managing disclosures outside Tasmania
- Special restrictions on sensitive information

Data Quality and Security

We take reasonable steps to ensure personal information is:

- Accurate, up-to-date, and complete
- Stored securely in both physical and electronic formats
- Protected from unauthorised access, modification, or disclosure

Access and Correction

Individuals have the right to:

- Access their personal information
- Request corrections if the information is inaccurate, incomplete, or outdated

Requests must be made in writing and approved by the Principal. We will respond within a reasonable timeframe.

Privacy Complaints

Individuals may lodge complaints about privacy breaches by contacting the Principal. Complaints will be handled promptly and in accordance with our internal procedures. If unresolved, complaints may be referred to the Office of the Australian Information Commissioner (OAIC).

Staff and Partner Responsibilities

All staff must:

- Be familiar with the Privacy Act 1988, APPs and PIPPs
- Complete privacy training during induction
- Follow Peopleworks Pty Ltd's Guidelines for Keeping Client Records (Appendix 1)
- Maintain confidentiality and professionalism in handling client information

- Understand and comply with NDIS-specific privacy obligations, including the handling of participant data, provision of privacy collection notices, and management of sensitive health information
- Avoid any real or perceived conflicts of interest and acknowledge that Support Coordinators are not independent advocates

Responsibilities and Delegations:

Accountability	The Principals are accountable for this policy
Specific responsibilities	Principals must: • Champion and model awareness and compliance with the policy • Manage compliance in their area of responsibility • Ensure employees and contractors are made aware of the policy's contents, purpose and compliance requirements
Employees and contractors	• Employees and contractors must comply with this policy
Policy approval	This policy is owned and approved by the Principals

Appendices:

Appendix 1	Guidelines for keeping Client records
Appendix 2	Privacy Collection Notice and Consent Form

Version Control:

Document Title	File Location	Issue Date
Privacy Policy	Peopleworks Policies	11.08.2025

Revision History:

Reason for Revision	Rev. No.	Document Owner	Approved by	Date revision issued	Next Revision Date
Updated format to adhere with Peopleworks Standards	1.1	BW	PW	06.06.2025	01.07.2025
Updated to respond to additional areas of work related to DECYP	1.2	BW	PW	11.08.2025	04.08.2025
Updated to add Use of Artificial Intelligence (AI)	1.3	BW	PW	17.12.2025	01.12.2026
Include Truth Protocol	1.4	BW	PW	25.05.2026	25.06.2027
Include use of AI Assisted Note taking	1.5	BW	PW	18.06.2026	18.07.2027
Include acknowledgement of Privacy form required	1.6	BW	PW	23.06.2026	23.07.2027

Guidelines for keeping Client records

Appendix 1 to Privacy Policy

Guidelines for Keeping Client Records

These guidelines are based on Peopleworks Pty Ltd's Privacy Policy and are designed to ensure that all client records are maintained in accordance with the Privacy Act 1988 (Cth), the Australian Privacy Principles (APPs), and the Personal Information Protection Act 2004 (Tas).

1. Principles of Record Keeping

- Collect only information necessary for service delivery.
- Ensure clients are informed about the purpose and handling of their information.
- Obtain signed consent forms (e.g., Medical Authorisation Form).
- Maintain concise, accurate, and up-to-date records.
- Use objective and non-judgemental language.
- Complete notes promptly after interactions.
- Keep records in chronological order.
- Use only recognised abbreviations.
- Ensure legibility and avoid correction fluid.
- Initial all entries and corrections.
- Use full dates and client names on each page.

2. Confidentiality and Security

- Store records securely (both physical and electronic).
- Restrict access to authorised personnel only.
- Use locked cases for transporting physical files.
- Do not remove pages or duplicate records unnecessarily.
- Protect records from unauthorised access, modification, or disclosure.

3. Legal Compliance

- Comply with the Australian Privacy Principles (APPs).
- Comply with the Personal Information Protection Principles (PIPPs).
- Follow the Notifiable Data Breaches (NDB) Scheme.
- Retain records for the legally authorised period.
- Provide clients access to their records upon request and allow corrections.

4. Mandatory Reporting Obligations

Peopleworks is legally required to report certain concerns under the following legislation:

- Children, Young Persons and Their Families Act 1997 (Tas)
- Family Violence Act 2004 (Tas)
- Health Practitioner Regulation National Law (Tasmania) Act 2010
- Aged Care Act 1997 (Cth)
- Disability Rights, Inclusion and Safeguarding Act 2024 (Tas)
- Registration to Work with Vulnerable People Act (Tas)

Staff must report suspected abuse, neglect, or serious incidents to the appropriate authority as soon as practicable, in accordance with internal procedures.

Recognised abbreviations

The following abbreviations may be used by staff of Peopleworks Pty Ltd:

ABI	acquired brain injury	Nocté	at night (applies to medication)
BD	twice daily (applies to medication)	P/C	telephone call
CT	computer tomography	PR	progress report
D/W	discussed with	Prn	as required (applies to medication)
Dx	diagnosis	QID	four times a day (applies to medication)
Eml	email	R)	right
Hx	history	R/V	review
IRR	initial rehabilitation report	RTW	return to work
L)	left	RTWP	return to work plan
M/C	medical certificate	Rx	treatment
MCA	motor cycle accident	T/C	telephone call
Med cert	medical certificate	T/F	transfer
Meds	medications	TDS	three times a day (applies to medication)
MRI	magnetic resonance imaging	Txt	short message service (text message)
Mtg	meeting	USS	ultrasound scan
MVA	motor vehicle accident	W Comp	workers compensation
NA	no answer (refers to phone call)	WC	workers compensation
NAD	no abnormality detected	WCMC	workers compensation medical certificate

Privacy Collection Notice and Consent Form

Appendix 2 to Privacy Policy

Peopleworks Pty Ltd is committed to protecting your privacy in accordance with the *Privacy Act 1988 (Cth)*, *Australian Privacy Principles (APPs)*, *Personal Information Protection Act 2004 (Tas)*, and the *NDIS Act 2013*.

Personal Details

Full Name:		Date of Birth:	
Email Address:		Phone Number:	
NDIS Plan Nominee (if applicable):		NDIS Number (if applicable)	

Why We Collect Your Information

We collect personal and sensitive information to deliver a wide range of services, including mental health support, vocational rehabilitation, workplace mediation, NDIS coordination, leadership coaching, and strategic wellbeing planning.

What We Collect

We may collect:

- Contact and employment details
- Medical and health information
- Case notes and assessments
- NDIS plan details (if applicable)
- Information about your goals and support needs

How We Use and Share Your Information

Your information is used only for service delivery and legal compliance. It may be shared with:

- NDIA (for NDIS participants)
- Health professionals and service providers
- Government and regulatory agencies, where required
- We do not disclose information overseas unless legally required and with appropriate safeguards.

AI Note-taking Tool

We may use note-taking tools to accurately and efficiently capture the details of discussions and actions. This allows us to focus wholly on the conversation. Your consent will be asked prior to us using this.

Your Rights

You have the right to:

- Access your personal information
- Request corrections
- Make a complaint if you believe your privacy has been breached

Mandatory Reporting

We may disclose information without consent where required by law, including under child protection, family violence, aged care, disability safeguarding, and professional regulation legislation.

Data Security and Breach Notification

We take reasonable steps to ensure your information is accurate, secure, and protected. In the event of a serious data breach, we will notify affected individuals and the Office of the Australian Information Commissioner (OAIC) as required under the Notifiable Data Breaches Scheme.

Flagging AI Use

To maintain transparency, Peopleworks uses symbols to indicate when and to what extent AI has been used in the creation of this document. This is expanded in the Privacy Policy.

Contact Us

For privacy enquiries or complaints, contact:
 Peter Wheatley – Principal, Peopleworks Pty Ltd
 ✉ pwheatley@peopleworks.biz
 ☎ Tel: 03 6210 6800 | Mobile: 0418 519 698

Acknowledgement and Consent

I acknowledge that I have read and understood the Privacy Collection Notice. I understand how my personal information will be collected, used, stored and disclosed. I understand my rights to access and correct my personal information and how to make a complaint if I believe my privacy has been breached. I consent to the collection and handling of my personal information by Peopleworks Pty Ltd in accordance with the Privacy Policy.

Name of Signatory:		Signature:	
Name of Witness:		Witness Signature:	
Date:			

