

Overview

Diabetes WA Ltd, trading as Diabetes WA, is committed to protecting privacy and handling personal information openly, fairly and securely.

This Privacy Policy explains how Diabetes WA collects, holds, uses, discloses, stores and protects personal information, including health information and other sensitive information, in connection with our services and activities.

Diabetes WA is covered by the Privacy Act 1988 (Cth) and the Australian Privacy Principles. As a provider of health-related services, Diabetes WA also handles health information in accordance with applicable privacy obligations. Where Diabetes WA delivers services under government contracts, funding agreements, partner arrangements or as agent for another organisation, Diabetes WA also complies with privacy, confidentiality, information sharing, security and data handling requirements that apply to those services.

This Privacy Policy applies to personal information collected by Diabetes WA from consumers, carers, family members, supporters, donors, community members, website users, health professionals, contractors, service partners and others who interact with us.

- Privacy Act 1988 (Cth)
- Australian Privacy Principles
- Spam Act 2003 (Cth)
- Notifiable Data Breaches scheme under the Privacy Act
- Privacy and Responsible Information Sharing Act 2024 (WA), where applicable through government contracts or other binding arrangements
- Any other health records, child safety, funding, contract, accreditation or regulatory requirements that apply to a particular service, program or arrangement

Who is Diabetes WA

Diabetes WA Ltd is an Australian Public Company limited by guarantee and a registered charity. Diabetes WA uses the trading name Diabetes WA. ACN 610 729 612. ABN 77 867 587 369.

Diabetes WA is the peak body for people affected by diabetes in Western Australia. Diabetes WA provides diabetes education and self-management support, individual and group clinical services, telehealth and outreach services, screening, prevention and early intervention activities, programs for priority populations and community-based initiatives, helpline and information services, events, workshops, community engagement, advocacy, stakeholder engagement, service improvement, fundraising, donor engagement and supporter communications.

Definitions

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether recorded in a material form or not.

Sensitive information includes health information, genetic and biometric information, and information about a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, memberships, sexual orientation or practices, or criminal record.

Health information includes information about a person's physical or mental health, disability, health services provided or to be provided, expressed wishes about future health services, organ donation

information, genetic information that is predictive of health, and other information collected to provide a health service.

De-identified information means information that no longer identifies an individual and where reasonable steps have been taken to reduce the risk of re-identification.

Government related identifiers include identifiers such as Medicare numbers, Department of Veterans' Affairs numbers and other identifiers issued by an agency, government authority or contracted government service provider.

What information we may collect

Diabetes WA only collects personal information where it is reasonably necessary for, or directly related to, our functions or activities, or where collection is permitted or required by law.

The personal information collected depends on how a person interacts with Diabetes WA and may include contact details, date of birth, demographic details, carer or guardian details, government related identifiers where relevant, payment, billing, donation or transaction details, records of enquiries, feedback, complaints, preferences and communications, digital interaction information, and information needed to manage participation, eligibility or service delivery.

Diabetes WA may also collect sensitive information, including health information, where reasonably necessary and permitted by law. This may include diabetes related health information, referral and care information, relevant medical history, accessibility or support needs, cultural or language information, and other information needed to provide safe, appropriate and equitable services. Sensitive information, including health information, is usually collected with consent unless another legal basis applies.

If a person does not provide information that Diabetes WA reasonably requires, Diabetes WA may not be able to provide the service, support, response, funded program access or transaction requested.

How we collect information

Diabetes WA collects personal information by lawful and fair means. We may collect information directly from the person, through our forms, communications, appointments, activities, referrals, authorised representatives, service partners, websites, online systems, digital platforms and public sources where relevant and lawful.

Diabetes WA generally collects personal information directly from the person. In some circumstances, it may be unreasonable or impracticable to do so, or information may be provided by a referrer, treating practitioner, family member, guardian, contractor, service partner or another authorised person.

Where practicable, Diabetes WA provides a privacy collection notice at or before the time information is collected, or as soon as practicable after collection. Collection notices may be provided in forms, online registration pages, consent documents, referral pathways, service information sheets, event registration materials, website notices or other transaction specific materials. These notices may explain why information is being collected, how it may be used and disclosed, whether collection is required by law or contract, consequences if information is not provided, and how a person may access, correct or complain about the handling of their information.

Diabetes WA also acts as a National Diabetes Services Scheme, or NDSS, Agent in Western Australia on behalf of the Commonwealth Government of Australia (with the scheme administered by Diabetes Australia). Where personal information relates to NDSS services, Diabetes Australia may also handle that information in accordance with its own privacy policy, NDSS requirements and contractual responsibilities.

Unsolicited personal information

If Diabetes WA receives personal information that it did not request, Diabetes WA will assess whether it could have collected that information under this Privacy Policy, the Privacy Act and other applicable obligations.

If Diabetes WA could have lawfully collected the information, it will handle the information in accordance with this Privacy Policy. If Diabetes WA could not have lawfully collected the information, and the information is not contained in a Commonwealth record or otherwise required to be retained, Diabetes WA will take reasonable steps to destroy or de-identify the information as soon as practicable and lawful.

Why we collect, use and disclose information

Diabetes WA collects, uses and discloses personal information to provide our services, programs and activities, communicate with people, manage referrals, registrations and follow up, coordinate care or service delivery, membership, manage NDSS related services and obligations, assess eligibility, maintain records, manage risk, safety, complaints and quality improvement, undertake evaluation, reporting, planning and de identified data analysis, meet legal, regulatory, accreditation, funding and contractual requirements, process transactions, conduct fundraising and supporter engagement where permitted by law, and protect lawful interests.

Diabetes WA will generally only use or disclose personal information for the primary purpose for which it was collected, for a related secondary purpose that the person would reasonably expect, with consent, or where otherwise authorised or required by law. Sensitive information will only be used or disclosed for a secondary purpose where the person would reasonably expect that use or disclosure and it is directly related to the primary purpose, unless consent or another legal basis applies.

Consent

Where required, Diabetes WA seeks consent to collect, use or disclose personal information, including health information. Consent may be written, verbal or implied depending on the circumstances, the nature of the service and the information involved.

For some services or information sharing arrangements, Diabetes WA may require express consent.

A person may withdraw consent at any time, subject to legal, safety, contractual or operational limits. If consent is withdrawn, this may affect the ability of Diabetes WA to provide some services.

Contracted, funded and partner delivered services

Diabetes WA delivers some services under contracts, grants, agency arrangements and partnerships. These arrangements may involve service delivery, reporting, approved information sharing, technology support, evaluation, audit, assurance, accreditation, compliance and record keeping requirements.

Where this occurs, Diabetes WA takes reasonable steps to address privacy, confidentiality, security, access, retention, data sharing and reporting obligations. Where possible and appropriate, reporting is provided in de-identified or aggregated form.

Where Diabetes WA is subject to government contract obligations, including WA public sector privacy or responsible information sharing obligations passed through under contract, Diabetes WA will handle personal information in accordance with those obligations.

Disclosure of information

Diabetes WA may disclose personal information to third parties where appropriate for the purposes described in this Policy, including health and service providers, Diabetes Australia in connection with NDSS

services, government agencies, funders, regulators, service providers, contractors, technology vendors, professional advisers, auditors, insurers, legal representatives, research, evaluation or accreditation bodies, and authorities where required or authorised by law.

Diabetes WA requires third parties handling personal information on its behalf to take appropriate steps to protect it, including through confidentiality obligations, contract terms, approved access, security controls and other safeguards appropriate to the information and service.

Diabetes WA may disclose de-identified or aggregated information for planning, research, funding, advocacy, service development, evaluation or reporting purposes where individuals are not reasonably identifiable.

Government-related identifiers

Diabetes WA may collect, use or disclose government related identifiers, such as Medicare numbers or Department of Veterans' Affairs numbers, where this is reasonably necessary for a service, required or authorised by law, required under a government program, or otherwise permitted by the Privacy Act.

Diabetes WA will not adopt a government related identifier as its own identifier of an individual unless an exception applies under the Privacy Act or another law permits or requires it.

Overseas disclosure and cloud-based systems

Diabetes WA prioritises the use of Australian based systems and service providers wherever practicable.

In limited circumstances, some personal information and service transaction information may be processed, accessed or stored outside Australia, only where this is necessary to support operational, business or technology requirements. In these circumstances, Diabetes WA takes steps to ensure appropriate privacy, confidentiality and security safeguards are in place and that information is handled in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

Websites, cookies and digital services

Diabetes WA websites and digital platforms may use cookies and similar technologies to support website functionality, security, analytics and user experience.

These technologies may collect information such as browser type, device information, pages visited, date and time of access and referral source. This information may be used to maintain and improve websites and digital services.

People may be able to adjust browser settings to block or limit cookies. Some website functions may not work as intended if cookies are blocked.

Diabetes WA websites may contain links to third party websites. Diabetes WA is not responsible for the privacy practices of those third parties.

Data quality, storage and security

Diabetes WA takes reasonable steps to ensure the personal information it collects, uses and discloses is accurate, up to date, complete, relevant and not misleading, having regard to the purpose for which the information is held.

These steps may include confirming contact details, clinical details, referral information and service information where appropriate, especially where information is received from carers, referrers, service partners or other third parties.

Diabetes WA takes reasonable technical and organisational steps to protect personal information from misuse, interference, loss, unauthorised access, modification or disclosure. These steps may include access controls, secure systems, encryption or secure transmission where appropriate, staff training, confidentiality obligations, physical, technical and administrative safeguards, monitoring where available, incident response processes and alignment with relevant information security, cyber security and records management requirements.

Diabetes WA keeps personal information only for as long as it is needed or as required by law, regulation, contract, funding agreement, accreditation standard or operational need. When information is no longer required, Diabetes WA takes reasonable steps to destroy or de-identify it using secure disposal processes.

Data breaches

A data breach may occur where personal information held by Diabetes WA is lost, accessed by an unauthorised person, disclosed without authorisation, or otherwise compromised.

An eligible data breach under the Notifiable Data Breaches scheme occurs where there is unauthorised access to, unauthorised disclosure of, or loss of personal information, the incident is likely to result in serious harm to one or more individuals, and Diabetes WA has not been able to prevent the likely risk of serious harm through remedial action.

If a suspected data breach occurs, Diabetes WA will respond in accordance with its data breach procedures. This may include containing the incident, assessing the information and risk involved, taking remedial action, recording decisions, escalating internally, and notifying affected individuals and the Office of the Australian Information Commissioner where required.

Where a data breach involves a contract, funding agreement, partner arrangement, NDSS related obligation, technology provider or other third-party obligation, Diabetes WA will also comply with applicable notification requirements.

Direct communications, fundraising and promotional materials

Diabetes WA may send information about services, programs, events, appeals, campaigns or other activities where a person has asked to receive it, where the person would reasonably expect it, where consent has been provided, or where otherwise permitted by law.

Diabetes WA will not use or disclose sensitive information for direct marketing without consent, unless otherwise permitted by law.

Electronic direct communications will include an unsubscribe facility or clear instructions for opting out where required. A person can opt out of marketing or fundraising communications at any time by using the unsubscribe facility in the communication or by contacting Diabetes WA using the details below.

Even if a person opts out of promotional communications, Diabetes WA may still contact them about important service, safety, clinical, product, account, legal, administrative or NDSS related matters.

Accessing and correcting information

A person may request access to the personal information Diabetes WA holds about them, or request correction if they believe it is inaccurate, out of date, incomplete, irrelevant or misleading.

Diabetes WA will respond within a reasonable time and usually within 30 days. Diabetes WA may need to verify identity before providing access or making a correction. Where permitted by law, Diabetes WA may charge a reasonable fee for giving access to information, but will not charge for making a correction request.

In some cases, the law permits Diabetes WA to refuse access or correction. For example, this may occur where providing access would be unlawful, would unreasonably affect another person's privacy, would pose a serious threat to health or safety, would reveal confidential evaluative information, or where another exception applies. If Diabetes WA refuses access or correction, it will provide written reasons where reasonable and information about how to complain.

If Diabetes WA corrects personal information that has previously been disclosed to another organisation or government agency, a person may ask Diabetes WA to notify that organisation or agency of the correction where reasonable and required by law.

Anonymity and pseudonymity

Where lawful and practicable, a person may deal with Diabetes WA anonymously or by using a pseudonym. This may include browsing public website pages or making a general enquiry without identifying themselves. For many services, programs and activities, Diabetes WA may need to identify the person in order to provide the service safely and effectively, meet legal or contractual obligations, prevent fraud, or respond to the request.

Automated decision making

Diabetes WA is reviewing systems and processes to identify whether any computer program, including artificial intelligence enabled functionality, is used to make or substantially and directly assist a decision that may significantly affect a person's rights or interests.

If Diabetes WA uses automated decision making of this kind, Diabetes WA will include information in this Privacy Policy or a related collection notice about the kinds of personal information used, the kinds of decisions made or assisted, and how a person may seek further information or review, as required by applicable privacy law.

Diabetes WA will not rely solely on automated processing for clinical judgement or high impact service decisions unless lawful, appropriate safeguards are in place, and human review is available where required.

Complaints and enquiries

If a person has a question about this Privacy Policy, would like to access or correct information, or wishes to make a privacy complaint, they should contact the Diabetes WA Privacy Officer. Diabetes WA will review the enquiry or complaint and aim to respond within a reasonable time, usually within 30 days.

If the person is not satisfied with the Diabetes WA response, or Diabetes WA does not respond within 30 days, the person may lodge a written privacy complaint with the Office of the Australian Information Commissioner.

Contact details

Privacy Officer

Diabetes WA
PO Box 1699
Subiaco WA 6904
Phone: 1300 001 880
Email: Privacy@diabeteswa.com.au

Diabetes WA Privacy Policy

Office of the Australian Information Commissioner

Website: www.oaic.gov.au

Email: oaicintake@oaic.gov.au

Phone: 1300 363 992

Post: GPO Box 5288, Sydney NSW 2001

Related documents

This Privacy Policy should be read together with any privacy collection notices, consent forms, website notices, program information, service terms or other information provided when Diabetes WA collects or handles personal information. Diabetes WA also maintains internal policies, procedures and controls that guide privacy, information security, records management, complaints handling and related governance obligations.

Updating this Privacy Policy

Diabetes WA may update this Privacy Policy from time to time to reflect changes in services, legal obligations, systems or privacy practices. The current version will be made available on the Diabetes WA website.

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Last Approved Date 9 September, 2026