



Privacy & Confidentiality Policy

Policy Owner: Director

Applies to: Workers, including employees, casual employees, interpreters, volunteers, contractors, consultants, and representatives acting on behalf of Echo Interpreting.

Effective Date: 28 May 2026

Review Cycle: Every 2 years or as legislation changes or operational requirements change.

1. Purpose

Echo Interpreting is committed to protecting the privacy, confidentiality, dignity, and rights of clients, participants, workers, and stakeholders.

As a provider of interpreting and communication access services, Echo Interpreting recognises that workers may have access to highly sensitive personal, health, legal, educational, employment, financial, and disability-related information.

This policy establishes requirements for the collection, use, storage, disclosure, protection, and management of personal and confidential information and supports Echo Interpreting's legal, ethical, safeguarding, and service quality obligations.

All workers are expected to maintain the highest standards of privacy and confidentiality in the performance of their duties.

2. Scope

This policy applies to all workers and representatives of Echo Interpreting, including:

- Employees
- Casual employees
- Interpreters
- Volunteers
- Contractors and consultants where applicable
- Management and representatives acting on behalf of Echo Interpreting

This policy applies to information in all formats, including:

- Verbal communications
- Written records
- Electronic records
- Emails and messaging platforms
- Audio, video, and online communication systems
- Mobile devices and digital platforms

3. Legislative Framework

This policy is informed by and aligned with relevant legislation and regulatory frameworks, including but not limited to:

- Privacy Act 1988 (Cth)
- Australian Privacy Principles (APPs)
- Notifiable Data Breaches Scheme (Cth)
- Health Records Act 2001 (Vic) where applicable
- NDIS Act 2013 (Cth)
- NDIS Code of Conduct Rules 2018
- NDIS Practice Standards (where applicable)
- Applicable privacy and information management legislation in Australian jurisdictions where Echo Interpreting operates

4. Definitions

Personal Information

Information or an opinion that identifies, or could reasonably identify, an individual.

Sensitive Information

Information that attracts additional privacy protections, including health information, disability information, racial or ethnic origin, religious beliefs, sexual orientation, criminal history, and other information classified as sensitive under privacy legislation.

Confidential Information

Any information obtained through work with Echo Interpreting that is not publicly available and relates to:

- Clients or participants
- Interpreting assignments
- Workers
- Business operations
- Suppliers or stakeholders
- Organisational systems, records, or processes

5. Privacy Principles

Echo Interpreting is committed to:

- Collecting information lawfully, fairly, and only where reasonably necessary
- Using information only for legitimate business, service delivery, or legal purposes

- Protecting personal and confidential information from unauthorised access, disclosure, loss, misuse, or alteration
- Limiting access to information on a need-to-know basis
- Supporting individuals to access and correct their personal information where appropriate
- Responding promptly to privacy concerns and breaches
- Maintaining privacy and confidentiality throughout all service delivery activities

6. Interpreter Confidentiality and Professional Practice

Interpreters engaged by Echo Interpreting are expected to maintain strict confidentiality in accordance with:

- This Policy
- The Code of Conduct Policy
- The ASLITA Code of Ethics
- Applicable privacy legislation
- Client confidentiality requirements

Interpreters must not use, disclose, discuss, record, retain, or share confidential information obtained through assignments except where authorised, legally required, or necessary to perform their professional duties.

Confidentiality obligations continue after an assignment concludes and after employment or engagement with Echo Interpreting ends.

7. Collection of Information

Echo Interpreting may collect personal and sensitive information for purposes including:

- Booking and delivering interpreting services
- Client and participant support
- Employment and workforce management
- Invoicing and financial administration
- Legal, contractual, safeguarding, and compliance obligations
- Quality improvement and risk management activities

Information will be collected directly from individuals wherever reasonably practicable and only with lawful authority or consent.

8. Use and Disclosure of Information

Personal and confidential information will:

- Only be used for legitimate business purposes, service delivery, safeguarding, compliance, or legal purposes
- only be accessed by authorised persons
- not be disclosed without consent unless authorised or required by law
- not be discussed outside professional contexts

Workers must not disclose confidential information:

- Before, during, or after assignments
- To family members, friends, colleagues, or unauthorised persons
- Through social media or public forums
- In circumstances where an individual may reasonably be identified

9. Confidentiality Obligations

All workers must:

- Maintain confidentiality at all times
- Access only information required to perform their role
- Take reasonable steps to protect information from unauthorised access or disclosure
- Ensure conversations cannot be overheard in public or shared environments
- Secure notes, documents, devices, and records
- Comply with organisational policies and professional obligations

Workers must take reasonable steps to ensure confidential information cannot be overheard, viewed, recorded, accessed, or disclosed during remote, online, mobile, or digital work activities.

Confidentiality obligations continue after employment or engagement with Echo Interpreting ends.

10. Information Security and Storage

Echo Interpreting takes reasonable steps to protect personal and confidential information, including:

- Secure digital systems and password protection
- Restricted access to information and systems
- Secure storage and disposal of records
- Approved communication and file-sharing platforms
- Appropriate user access controls
- Secure handling of mobile devices and electronic records

Workers must use approved systems, devices, and communication platforms when handling Echo Interpreting information and must take reasonable steps to protect passwords, devices, and access credentials.

Unauthorised storage of Echo Interpreting information on personal devices, personal cloud services, or unauthorised systems is prohibited unless expressly approved.

11. Privacy Breaches

A privacy breach may include:

- Loss or theft of information
- Unauthorised access or disclosure
- Accidental sharing of confidential information
- Inappropriate use of personal information
- Loss of devices containing confidential information
- Information security incidents affecting personal information

All actual or suspected privacy breaches, confidentiality breaches, information security incidents, or unauthorised disclosures must be reported immediately in accordance with Echo Interpreting's **Safeguarding & Incident Management Policy** and **Incident / Near Miss Reporting Procedure/Form**.

Echo Interpreting will:

- Assess and investigate reported breaches
- Take reasonable steps to reduce harm
- Implement corrective actions where required
- Notify affected individuals or authorities where required by law

Where a breach involves a child safety concern, safeguarding concern, participant risk, or potential reportable incident, Echo Interpreting may escalate the matter in accordance with legal, safeguarding, regulatory, or NDIS obligations.

12. Access and Correction

Individuals may request access to, or correction of, their personal information held by Echo Interpreting.

Requests should be made in writing and will be managed in accordance with applicable privacy legislation.

13. Breach of Policy

Failure to comply with this policy may result in:

- Disciplinary action
- Removal from assignments
- Suspension of system access

- Termination of employment or engagement
- Referral to external authorities where appropriate
- Legal action where appropriate

The response will be proportionate to the nature, seriousness, and consequences of the breach.

14. Related Documents

This policy should be read and applied in conjunction with:

- Code of Conduct Policy
- Safeguarding & Incident Management Policy
- Child Safety Policy
- Complaints and Feedback Policy & Procedure
- IT, Systems & Acceptable Use (including Social Media) Policy
- Incident / Near Miss Reporting Procedure/Form
- Privacy/Data Breach Procedure (where applicable)

15. Policy Acknowledgement

All employees and contractors are required to acknowledge that they have read, understood, and agree to comply with this Policy.