



Privacy and Security Policy

Version 1.0	Updated 09/09/2025	Next review 09/09/2026
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1. Policy Statement

Marco Polo Portal is committed to protecting the privacy, confidentiality, and security of all personal information we collect and hold. We recognise that participants, support coordinators, and providers place significant trust in us to safeguard their sensitive information, and we comply with the **Privacy Act 1988 (Cth)**, the **Australian Privacy Principles (APPs)**, and the **NDIS Code of Conduct and Practice Standards**.

This policy sets out how we collect, use, store, share, and protect personal information, including sensitive NDIS participant data.

2. Scope

This policy applies to:

- All directors, employees, and contractors of Marco Polo Portal.
- All systems, platforms, and services where personal information is collected, processed, or stored.
- Information relating to participants, families, support coordinators, providers, staff, and stakeholders.

3. Legal & Regulatory Framework

Marco Polo Portal complies with:



- **Privacy Act 1988 (Cth) and Australian Privacy Principles (APPs).**
- **NDIS Act 2013 (Cth).**
- **NDIS Code of Conduct.**
- **NDIS Practice Standards** – specifically:
 - Privacy and Dignity Standard
 - Information Management Standard
- **Notifiable Data Breaches (NDB) Scheme** under the Privacy Act.
- Relevant State/Territory privacy, health records, and child protection laws.

4. Collection of Information

We only collect personal information necessary for our services, including:

- Participant details: name, contact information, funding details, disability-related needs and preferences.
- Provider and support coordinator information.
- Usage data relating to our platform.

Collection will always be:

- **Lawful and fair.**
- **Direct from the individual** where possible, or with their consent.
- **Limited to what is necessary** for service delivery.



5. Use & Disclosure of Information

We use personal information to:

- Provide matching and support services under the NDIS.
- Communicate with participants, coordinators, and providers.
- Improve our services and platform.

We only disclose personal information:

- With the individual's consent.
- Where required by law (e.g. safeguarding, court orders).
- To service providers or contractors who meet our privacy and security standards.

6. Data Security & Storage

Marco Polo Portal implements robust safeguards to protect personal information against loss, unauthorised access, modification, or disclosure:

6.1 Technical Controls

- Encryption of data in transit and at rest.
- Secure hosting with providers that comply with **ISO 27001** and use renewable energy.
- Multi-factor authentication (MFA) for staff access.
- Regular security updates and vulnerability testing.

6.2 Organisational Controls



- Role-based access to sensitive information.
- Staff training on privacy, security, and NDIS confidentiality obligations.
- Secure destruction of personal data once no longer required.

6.3 Incident Response

- All suspected breaches are investigated immediately.
- If a breach is likely to result in serious harm, notification will be made under the **Notifiable Data Breaches Scheme** to:
 - The Office of the Australian Information Commissioner (OAIC).
 - Affected individuals.

7. Participant Rights

Under the Privacy Act and NDIS Practice Standards, participants have the right to:

- Access their personal information held by Marco Polo Portal.
- Request corrections to inaccurate or incomplete information.
- Withdraw consent for use of their information (where lawful).
- Complain about privacy or security breaches.

8. Complaints & Feedback

Complaints regarding privacy can be made to:



- **Marco Polo Portal Privacy Officer:** Aaron Cotton
- **NDIS Commission:** 1800 035 544
- **Office of the Australian Information Commissioner (OAIC):** www.oaic.gov.au

All complaints will be investigated promptly and handled confidentially.

9. Responsibilities

- **Board of Directors** – accountable for compliance with privacy and security laws.
- **Privacy Officer** – responsible for implementation, monitoring, breach reporting, and training.
- **Employees & Contractors** – must comply with this policy, complete annual training, and report suspected breaches.

10. Monitoring & Review

- This policy will be reviewed annually, or earlier if required by changes in law, regulation, or NDIS standards.
- Regular privacy and security audits will be conducted to ensure compliance and continuous improvement.

11. References

- Privacy Act 1988 (Cth) & Australian Privacy Principles



- Notifiable Data Breaches Scheme
- NDIS Act 2013 (Cth)
- NDIS Code of Conduct
- NDIS Practice Standards – Privacy & Dignity; Information Management
- Office of the Australian Information Commissioner Guidelines

Approved by:

Board of Directors, Marco Polo Portal

Date: 09/09/2025