

PRIVACY POLICY

Purpose

Goulburn Valley Hospice Care Service (GVHCS) collects and handles personal information which may include sensitive and health information related to patients, carers, families, staff, volunteers and donors. This information is collected primarily to enable GVHCS to fulfil its responsibilities as a provider of health services, an employer and a not-for-profit organisation conducting fundraising activities and receiving and processing donations.

This document is the GVHCS Privacy Policy and tells how GVHCS collects and manages personal information.

Definitions

- **Personal information**

When used in this privacy policy, the term “personal information” has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify an individual.

This may include name, address, telephone number, email address and profession or occupation. If the information collected personally identifies an individual, or they are reasonably identifiable from it, the information will be considered to be personal information.

Health Information is also considered personal information

- **Client**

For the purposes of this policy, client means individuals who receive GVHCS services e.g. patients, families, care givers, students and where applicable other individuals who provide information to GVHCS e.g. donors.

- **[Australian Privacy Principles](#)**

From 12 March 2014, the Australian Privacy Principles (APPs) replaced the National Privacy Principles and Information Privacy Principles. These principles apply to private and not for profit health organisations including palliative care services.

The APPs are:

- APP 1 Open and transparent management of personal information.
- APP 2 Anonymity and pseudonymity
- APP 3 Collection of solicited personal information
- APP 4 Dealing with unsolicited personal information
- APP 5 Notification of the collection of personal information
- APP 6 Use or disclosure of personal information
- APP 7 Direct marketing
- APP 8 Cross-border disclosure of personal information
- APP 9 Adoption, use or disclosure of government related identifiers
- APP 10 Quality of personal information
- APP 11 Security of personal information
- APP 12 Access to personal information
- APP 13 Correction of personal information

PRIVACY POLICY

Policy

GVHCS recognises the importance of protecting the privacy and rights of individuals in relation to their personal information

GVHCS respects all rights under *The Privacy Act 1988(Cth)* and will comply with the Act and the *Australian Privacy Principles(2014)* and other relevant legislation such as the *Health Records Act 2001 (Vic)* in respect of the collection, management and disclosure of personal information.

Application of Policy

What personal information does GVHCS collect and hold?

GVHCS may collect the following types of personal information:

- name; mailing or street address;
- email address; telephone number; facsimile number;
- age or birth date;
- profession, occupation or job title
- information about health and health services provided
- financial information
- any additional information relating to an individual that is provided to GVHCS directly or through the GVHCS website

How does GVHCS collect personal information

GVHCS collects personal information directly from individuals unless it is unreasonable or impracticable to do so. When collecting personal information, GVHCS may collect in various ways including:

- during conversations with GVHCS staff including telephone recordings
- when written information forms are completed
- via electronic means- e-mail, fax, web based applications

GVHCS may also collect personal and health information from another person involved in the care of a client. (E.g. from a carer, a hospital, a doctor or from a person authorised to provide this information on behalf of the client). Personal information is collected with the client's **informed consent** (or that of their authorised representative)

GVHCS will not collect unsolicited information.

What happens if GVHCS cannot collect personal information?

If personal information as described above is not collected GVHCS may not be able to provide the requested services or information requested.

For what purposes does GVHCS collect, hold, use and disclose personal information

1. Client/Patient/Carer Information

GVHCS collects personal information for the purposes of providing specialist palliative care

PRIVACY POLICY

and for providing de identified information and statistics to the Department of Health (Victoria) and other government and non- government organisations as required, GVVHCS may also use this information for quality improvement purposes.

2. Staff and Volunteer Information

GVVHCS collects and stores staff and volunteer information, this information relates to applications for employment/volunteer positions and ongoing employment/volunteers records including next of kin contact details, performance management records, and records of other contact with the staff member or volunteer.

3. Other information

GVVHCS collects information from its supporters and donors and does this to recognise and respond to donations, to update our records, keep contact details up to date and provide information such as Newsletters, and to respond to any complaint made.

Anonymity

Individuals are not obliged to identify themselves or disclose personal health information when seeking services from GVVHCS. However, if an individual declines to identify themselves, GVVHCS may not always be able to provide the level of service expected or required.

Use and Disclosure of information

GVVHCS may use and disclose personal information, including health information in the following circumstances:

- for the purpose of providing palliative care and other care related to our services
- manage, review, develop and improve our processes and systems
- personal information may be disclosed to third parties (GVVHCS contractors, other health providers) involved in the client's care or the provision of our services, or to other providers of goods and services to GVVHCS usually **with the consent** of the client (or their authorised representative) unless otherwise permitted by law e.g. situations involving a serious and imminent threat to the health, safety or welfare of the client or public.

GVVHCS:

- does not disclose personal or health information to any person outside Australia.
- will not use personal information for direct marketing.
- may use personal information to inform individuals about our fundraising activities.

Retention and disposal

All medical records are held for 7 years following the last contact with the client unless the client is a child when records will be held until the minor reaches 25.

PRIVACY POLICY

Employment and volunteer records are held for 7 years after cessation of service.

Business records – e.g. donor information is held for 7 years.

Personal information is destroyed or de-identified when no longer required.

Security of Information

Reasonable steps are taken to ensure personal information is protected from misuse and loss and from unauthorised access, modification or disclosure. GVHCS may hold personal information in either electronic or secure hard copy file. Electronic access is password protected.

Use of Government Identifiers (e.g. Medicare Number)

GVHCS will not use any government identifiers as our own identifier of clients.

Trans Border Data Flow

GVHCS will only transfer identified data where it is required by law, where the receiving entity commits to ensuring protection of data as required by the Australian Privacy Principles

Client Access to Information

Access to the information can be sought by writing to the Executive Manager who is the Privacy Officer. In certain circumstances GVHCS may not permit access to information, for example:

- Legal professional privilege applies
- Access would pose a serious threat to the life or health of the client or other person
- Access would have an unreasonable impact on the privacy of others

If GVHCS does not permit access, the reason for refusal will be provided

Correction of Information

Correction or amendments of personal or health information can be sought . All requests should be directed to the Executive Manager/ Privacy Officer and will be handled in accordance with APP13.1. A written response to a request for correction will be provided.

Openness

GVHCS will take reasonable steps to inform individuals from whom collect personal and health information what information is collected , held, used, disclosed, and how it is protected and how it can be accessed and corrected. This information may be given in writing or verbally depending on the nature of the service. This Privacy Policy will be available to anyone who requests it.

Data Quality

GVHCS will take reasonable steps to ensure that collected personal and health information is accurate, relevant, complete and up to date.



PRIVACY POLICY

Alleged Breach of Australian Privacy Principles

Any complaint regarding a breach of Australian Privacy Principles should be directed to the GVHCS Privacy Officer (the Executive Manager). A response will be provided within 30 days. If a complainant remains unsatisfied the complainant may contact the Office of the Australian Privacy Commissioner.

GVHCS Inc 2017