

# UnitingCare Health Privacy Policy Statement

UnitingCare Health collects personal information in order to conduct its business and to meet its legislative obligations. Organisationally it is bound by legislation in the management of matters relating to the privacy of personal information.

UnitingCare Health is committed to treating the personal information we collect in accordance with the Australian Privacy Principles in the *Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth) (Reform Act)*.

*This policy does not apply to personal information collected by UnitingCare Health that is exempted under the Privacy Act.*

This policy statement explains in general terms, what sort of personal information UnitingCare Health holds and why we hold it, and how UnitingCare Health collects, uses and discloses that information.

## WHAT IS PERSONAL INFORMATION

**Personal information:** Means information or an opinion about an identified individual, or an individual who is reasonably identifiable (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in material form or not. Obvious examples include:

- A person's name and address
- Medical / health records
- Financial institution account details
- Photographs of individuals
- Videos containing individuals
- Biometric information (thumb / iris scans)
- Information about likes and dislikes
- Place of employment.

**Health information:** Means information or an opinion about (a) the health or a disability of an individual or (b) an individual's expressed wishes about the future provision of health service to him or her; or (c) a health service that has been provided. It also includes:

- Other personal information collected to provide, or in providing a health services such as
  - Notes on symptoms, diagnosis and treatments given
  - Results of tests and investigations
  - Doctors notes
  - Billing details, or
- Other personal information about an individual collected in connection with the donation, or intended donation, by the individual of his or her body parts, organs or body substances; or
- Genetic information about an individual in a form that is, or could be predictive of the health of the individual or a genetic relative of the individual.

In order to provide you with the health services you have requested, UnitingCare Health will need to collect and use your personal information. If you provide incomplete or inaccurate information to us or withhold personal information from us we may not be able to provide you with the services you are seeking.

V2.00 June 2016

Our Values: Compassion · Respect · Justice · Working Together · Leading through Learning



## REQUIREMENTS OF THE LEGISLATION

The Commonwealth Government has enacted privacy legislation to protect information held by organisations about their customers' personal information (Privacy Act 1988).

In December 2000 the *Privacy Amendment Act (Private Sector) (Cth)* further enacted the Privacy Act, (implementing the National Privacy Principles) to include provisions that regulate the way private sector organisations collect, use, disclose, keep secure and provide access to personal information.

Under the *Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth) (Reform Act)* UnitingCare Health is required to comply with the Australian Privacy Principles. This legislation regulates how we may collect, use, disclose and store personal information including health information and how individuals (such as patients of UnitingCare Health hospitals) may access and correct their personal information held by UnitingCare Health.

## WHY WE COLLECT YOUR PERSONAL INFORMATION

Personal information is collected so that we can provide you with the services you require and to enable us to comply with our legal obligations.

## WHAT PERSONAL INFORMATION DOES UNITINGCARE HEALTH COLLECT AND HOLD?

The information we collect may include the following:

- Name
- Date of birth
- Occupation
- Address (postal and email)
- Telephone numbers
- Health Fund details
- Medicare number
- Pension or other concession details
- Medical history, test results, diagnosis and treatments
- Names and telephone numbers of persons to contact in an emergency
- Banking details to enable the processing of your account.

In the case of a medical practitioner applying for credentialing to one of our hospitals or an individual applying for a position, information will be collected relative to the application.

## HOW UNITINGCARE HEALTH COLLECTS YOUR PERSONAL INFORMATION

Wherever practicable, we will collect your personal and health information from you directly, unless for a particular reason, you are unable to provide the information. We obtain the details when you fill out documents such as:

- A hospital admission form – either electronically or in hard copy
- An administrative form, or you
- Give personal and health information in person or over the telephone
- Complete a job application form
- Complete an application form for accreditation / credentialing (medical, dental and allied health professional).

Additionally, we may obtain further information from a third party such as:

- An authorised representative (e.g. your Next of Kin or legal adviser)
- A health service provider
- A health professional who has treated you previously

V2.00 June 2016

**Our Values: Compassion · Respect · Justice · Working Together · Leading through Learning**

- A family member
- Other sources where necessary to provide a health service.

## HOW WE HANDLE YOUR PERSONAL INFORMATION

Personal information is information or opinion that allows others to identify you. UnitingCare Health will act to protect your personal information in accordance with the Australian Privacy Principles. We collect personal information to provide you with the services you request. The law also requires us to collect personal information.

Personal information may be used within the UnitingCare Health Group to administer our services, for risk management purposes and unless you tell us otherwise, to provide you with marketing information and fundraising.

We disclose relevant personal information to external organisations to help us provide services. These organisations are bound by confidentiality arrangements and legislation.

You can seek access to the personal information we hold about you. If the information we hold is inaccurate, incomplete, or outdated, please inform us so we can update it.

If we deny access to your personal information, we will let you know why.

## YOUR RIGHT FOR ANONYMITY / PSEUDONYMITY

Where it is lawful and practicable to do so, you may deal with UnitingCare Health (and UnitingCare Health hospitals) anonymously or use a pseudonym (e.g. when enquiring about a service generally), however, in order for us to provide you with a health service, we will need to know your personal details to allow us to interact with other providers and apply concessions e.g. health insurance funds, pharmaceutical benefits etc.

## CONSENT TO USE AND DISCLOSE YOUR PERSONAL INFORMATION

UnitingCare Health will only collect and use personal and health information that relates directly to the legitimate purpose for which it is being collected e.g. to provide a health service or an activity relating to the health service.

In most cases, before or at the time of providing you with a health service (if that is not practicable, as soon as practicable thereafter), the collecting staff member obtains your consent to the purposes for which we intend to use and disclose your personal information.

Having provided your consent, you are able to withdraw it at any time. To withdraw consent, contact the relevant UnitingCare Health hospital, however by withdrawing your consent, we may not be able to provide you with the service you require.

## USE OF YOUR PERSONAL INFORMATION

UnitingCare Health only uses your personal information for the purpose for which you have given it to us unless one of the following applies:

- The other purpose is directly related to the purpose for which you have given us and information and you would reasonably expect, or we have told you, that your information is usually disclosed for another purpose or to other individuals, organisations or agencies
- You have consented for us to use your information for another purpose
- UCH is required or authorised by law to disclose your information for another purpose; or
- The disclosure of your information is reasonably necessary for the enforcement of the law.

V2.00 June 2016

**Our Values:** Compassion · Respect · Justice · Working Together · Leading through Learning



Examples of when your personal information may be used / or disclosed include:

- To enable other health services providers involved in your treatment to provide continuity of care, for example: referrals to other health professionals within and external of the hospital including your local doctor or if your care is transferred to one of our other hospitals or you are transferred to another hospital – either public or private
- Providing an individual with further information about treatment options
- Conveying information to a responsible person (e.g. a parent, guardian, spouse) when the individual is incapable or cannot communicate, unless the individual has requested otherwise
- Conveying information to close family members in accordance with the recognised customs of medical practice
- Management, funding, service monitoring, planning, evaluation and complaint handling
- Legislative and regulatory compliance reporting e.g. notification to the State Coroner
- Health insurance funding and confirming eligibility for a service
- Billing and debt recovery
- Addressing liability indemnity arrangements including reporting to an insurer or legal representative.
- Preparing the defence for anticipated or existing legal proceedings
- Research or the compilation or analysis of statistics relevant to public health and safety e.g. reporting a notifiable disease.
- To ICT service providers within Australia and overseas, which specialise in secure transmission of medical records. This will enable us to share your personal and medical records with you and your medical service providers via electronic means, if required.

With your consent we may also provide your information to / use your information for:

- Chaplains accredited to our hospitals to provide you with pastoral care during your admission, or
- Marketing, fundraising or research undertaken by a UnitingCare Health hospital

*Automatic licence plate recognition:* Licence plate recognition technology may be in use at UnitingCare Health hospital car parks eliminating the use of paper parking tickets. This technology captures a photographic image of your vehicle licence plate to record your entry time and calculate your parking fee.

*Camera Surveillance:* Closed circuit television surveillance is used by UnitingCare Health hospitals for the purpose of maintaining the safety and security of staff, patients, visitors and property. These systems may, but not always, collect and store personal information.

*Contractors:* Where UnitingCare Health outsources any services or hires contractors to perform professional services within UnitingCare Health or a UnitingCare Health hospital, the contractor is required to comply with the requirements of the Privacy Act 1988 (Cth), other relevant legislation and the UnitingCare Health Privacy Policy.

*Contracted Health Services:* UnitingCare Health delivers some health services to public patients under contract from the Queensland Government, and is required to provide personal and health information of patient's treated to relevant Regional Health Services.

*Job Applications:* UnitingCare Health only collects personal information of individuals who apply for positions within UnitingCare Health for the primary purpose of assessing (and if successful) engaging the applicant. This information is then used to:

- Manage the individual's employment
- Insurance purposes
- Ensuring relevant contact information is held
- Satisfying legal obligations.

UnitingCare Health may store information about an unsuccessful applicant for the purpose of future recruitment.

V2.00 June 2016

Our Values: Compassion · Respect · Justice · Working Together · Leading through Learning



*Employee Information:* Personal information directly related to the employee relationship collected by UnitingCare Health as part of the employment process (including pre employment checks), becomes exempt under the Privacy Act 1988 immediately the employment relationship is established. UnitingCare Health will review employee requests to access to their personal record on a case-by-case basis.

Under the Act, UnitingCare Health cannot sell a list of employees to another organisation for the purposes of marketing.

*[UnitingCare Health acknowledges the recommendation by the Privacy Commissioner that the personal information of employees be handled in a manner that is consistent with that for other personal information.]*

*Volunteer Records:* Records of personal information collected and held by UnitingCare Health in relations to its volunteers will be managed in accordance with the APP's.

*Application for Accreditation by health professionals:* UnitingCare Health collects personal information from health professionals seeking accreditation and credentialing under its By-laws for Medical, Dental & Allied Health Professionals. Personal information provided to meet these requirements is collected, used, stored and disclosed by UnitingCare Health for the purposes of fulfilling its obligations within the By-laws.

## **USE OF COMMONWEALTH GOVERNMENT IDENTIFIERS**

In certain circumstances we are required to collect government identifiers such as Medicare, Pension or Veteran's Affairs numbers. We will only use or disclose this information in accordance with the law.

## **SECURITY OF YOUR PERSONAL INFORMATION**

UnitingCare Health will take all reasonable steps to keep the personal information you provide to us secure and to protect it from misuse, interference and loss as well as unauthorised access, modification or disclosure.

We have a range of procedures and policies in place to provide a secure environment for the personal (and other information) we hold. Our security measures include but are not limited to:

- Educating our staff about their obligations with regard to your personal information.
- Requiring our staff to use passwords when accessing our systems.
- Employing firewalls, intrusion detection systems and virus scanning tools to protect against unauthorised persons and viruses entering our systems.
- Using dedicated secure networks or encryptions when we transmit electronic data.
- Providing secure storage for physical records.

When information we hold is identified as no longer needed for any purpose we ensure it is effectively and securely destroyed e.g. by shredding and other means as in the case of electronic records and equipment.

## **ACCURACY OF YOUR PERSONAL INFORMATION**

It is our aim to ensure that the personal information we hold is accurate, complete, up-to-date and relevant. If you believe that any of the information we hold is not accurate, complete or up-to-date, please contact us by applying in writing to the relevant UnitingCare Health hospital to have it corrected.

Where we are satisfied that that the information we hold is faulty, we will take all reasonable steps to correct the fault. If we are unable meet your request, we will advise you formally you of the reason we cannot change your information.

No charge will be made with respect to a request to correct or for the correction of your personal information.

V2.00 June 2016

**Our Values: Compassion · Respect · Justice · Working Together · Leading through Learning**



## CROSS BORDER DISCLOSURE [TRANSFER OF INFORMATION OVERSEAS]

If UnitingCare Health transfers personal information to countries outside Australia, we will only do so in compliance with applicable Australian data protection and privacy laws. We will take all reasonable steps to protect personal information no matter what country it is stored in or transferred to.

## ACCESSING YOUR PERSONAL INFORMATION

You can request to access your own personal (and health) information held by a UnitingCare Health subject to some limited exceptions permitted or by law. Such requests must be made in writing to the relevant UnitingCare Health hospital.

Where the information requested relates to obtaining a copy of your health record, you will be required to complete a form detailing the specific information you require and submitting it to the Privacy Officer - Health Information Unit of the relevant UnitingCare Health hospital.

You may be charged a reasonable fee for providing this information. Provision of the copied documents will be conditional upon payment of the fee. You will be advised of this when you submit your request.

## UNSOLICITED PERSONAL INFORMATION

Unsolicited personal information received by UnitingCare Health will as soon as practicable, be destroyed or de-identified if it is lawful and reasonable to do so giving consideration to the options available and the resources and costs of undertaking such actions.

## VISITING A UNITINGCARE HEALTH OR A UNITINGCARE HEALTH HOSPITAL WEBSITE

This section of our Privacy Statement explains how we handle any personal information collected when you log onto either the UnitingCare Health website or the website of a UnitingCare Health hospital.

When you visit the web site of UnitingCare Health or one of our hospitals, we do not attempt to identify you as an individual or collect personal information about you unless you specifically provide it to us for example, you choose to provide your personal details via an online form or by email e.g. you make a general enquiry via the 'contact us' page or contact specific areas within our hospitals.

Our websites may automatically collect statistics about your visit. We may monitor statistics such as how many people visit our sites, the user's IP address, which pages people visit, the domains our visitors come from and which browsers they use. These statistics are used to assist us to improve the performance of our web sites.

We are, by law, obliged to allow law enforcement agencies and other government agencies with relevant authority to inspect our IP logs, if an investigation warrants such inspection.

*On Line Booking for Admission to Hospital:* UnitingCare Health hospitals offer an optional online booking system. This is accessed on each hospital's web site via a secure portal. The information collected is used only for the purpose of your immediate hospital admission. As part of this process, you will be required to consent to the collection and use of your personal information.

*Account Payment:* UnitingCare Health and UnitingCare Health hospitals use *SecurePay* for a secure environment for the authorisation of credit card and charge card transactions. Confidential information including card details are encrypted using industry standard SSL-128 bit encryptions technology.

*Cookies:* Our web sites may collect "cookies" when you access them. While they do not identify individual users i.e. no personally identifiable information is collected, however they do identify your IP address and

V2.00 June 2016

**Our Values:** Compassion · Respect · Justice · Working Together · Leading through Learning





browser type. You can choose to either accept or reject cookies either individually or by disabling the function at browser level (which while not affecting use of the website, this may affect its functionality).

*Links to Third Party Websites:* UnitingCare Health websites may contain links to those of a third party. These sites are not subject to our privacy policy and we are not responsible for the content of the web site or the privacy practices of that site. You will need to review these web sites and read their privacy policy.

*Security:* Our websites take every precaution to protect user information they collect and measures are in place to protect the loss, misuse and alteration of this information.

## **MAKING A COMPLAINT OR CONTACTING US**

We recognise that even in the best run organisations, things can go wrong. If you have a concern about the personal or health information we collect, use, hold or disclose or you believe we have breached your privacy rights in any way, you may complain.

Additionally, you may believe that the information we hold is inaccurate or incorrect and wish to have that information corrected. In these circumstances, you can contact the relevant UnitingCare Health hospital in writing at the following addresses:

The Wesley Hospital:

The General Manager  
PO Box 499  
TOOWONG QLD 4066

St Andrew's War Memorial Hospital:

The General Manager  
GPO Box 764  
BRISBANE QLD 4001

The Sunshine Coast Private Hospital:

The General Manager  
PO Box 5050 BC  
MAROOCHYDORE QLD 4556

St Stephen's Hospital Hervey Bay:

The General Manager  
1 Medical Place, Urraween  
HERVEY BAY QLD 4655

**POLICY STATEMENT CURRENCY:** This Privacy Policy Statement was last updated in April 2015 and may change from time to time. The most up-to-date version can be obtained by contacting:

UCH Risk and Quality  
Telephone: (07) 3253 4611

## **REFERENCES:**

Privacy Act 1988 (Cwlth)  
Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cwlth).  
Australian Privacy Principles guidelines Privacy Act 1988. Office of the Australian Information Commissioner. 2014.

V2.00 June 2016

**Our Values:** Compassion · Respect · Justice · Working Together · Leading through Learning

