



Privacy Policy

1.0 Purpose

Boab Health Services has guidelines for all staff regarding privacy in all of the company's operations.

2.0 Scope

The following policy is to be adhered to on a companywide level.

3.0 Responsibility

All employees.

4.0 Definitions

5.0 Description

This Privacy Policy describes the ways and circumstances under which personal information is collected, stored, used and disclosed by Boab. The Policy is intended both as a guide to staff for the advice of the broader community. This policy complies with the Privacy Amendment (Private Sector) Act 2000 and with the 10 National Privacy Principles (NPPs).

NPP 1 – Collection and NPP 10 – Sensitive Information

Any information, including personal details, relating to a client that is collected as part of any Boab program will be treated as confidential and will only be used for purposes for which the information is relevant. Only information that is necessary to deliver the health service will be collected. This information will be collected lawfully, fairly and not intrusively.

Information will only be collected with the clients consent to do so.

Clients must always be informed about -

- Why their information is being collected
- Who is collecting it
- How it will be used
- Who it may be given to and
- That they can access it if they wish

NPP2 – Use and Disclosure

'Use' refers to the handling of information within Boab and 'Disclosure' refers to the transfer of information to a third party outside of Boab.

Boab staff may use or disclose information for –

- The primary purpose that the information was collected
- A directly related purpose if the client would reasonably expect this to occur
- If the client gives consent to a proposed use or disclosure
- If one of the other provisions within this policy applies

Exceptions

Personal information may be used for purposes other than for which it was collected as per the Freedom of Information Act:

- with the consent of the person concerned;
- to prevent a serious threat to a person's health or life;
- as required or authorised by law;
- where reasonably necessary for the enforcement of criminal or revenue law.

Title	Policy Template	Version	4
Authorised by	Quality Committee and CEO	Date Reviewed	29/08/2015
This document is CONTROLLED only when stored at: http://companyweb/06 HR/HR Pol 09.doc			Page 1 of 4

Disclosure of personal staff information

Personal information concerning employees is confidential and will only be used for purposes for which the information is relevant.

Exceptions

Personal information of clients and staff may be used for purposes other than for which it was collected:

- with the consent of the person concerned;
- to prevent a serious threat to a person's health or life;
- as required or authorised by law;
- where reasonably necessary for the enforcement of criminal or revenue law.

Access

Employees have access to their personal information held by BOAB. Employees may also make corrections and additions to personal information to make sure that the information is accurate, up to date and complete. To do this, please contact the CEO.

NPP3 – Data Quality

All Boab staff are required to take reasonable steps to keep client information up-to-date, accurate and complete. Data quality and integrity must always be maintained.

NPP4 – Data Security

All Boab staff must take reasonable steps to protect and secure all client information from loss, misuse and unauthorised access. Information that is no longer needed should be destroyed or archived and stored as per the current legislation.

All staff should take steps to protect client information against security risks.

Client information is stored electronically on a client information management system such as MMEx or Communicare, these sites are password protected. Staff must store all client information electronically in Boab's MMEx account.

In the instance that hard copies of client information are received due to clinic sending or providing paper copies, clinicians should in a timely manner scan these documents and upload to MMEx. Where there are issues with connection to MMEx (i.e. in some remote communities) staff should maintain a file on their Boab issued computer for access when visiting that community.

In the period between receiving paper copies and carrying out the above storage paper files must be stored in a locked cabinet or file when transporting. This files should never be left unattended i.e. in unattended luggage or backpacks, on unattended desks or in unattended vehicles.

NPP5 – Openness

Boab Health Services and all staff must be open about how they handle client information and provide customers with this information if requested. An information sheet is located on Boab's intranet.

NPP6 – Access and Correction

Clients have access to their personal information held by BOAB. Access can only be denied in certain circumstances i.e. where access may pose a serious risk to a client's life or health.

Clients may also make corrections and additions to personal information to make sure that the information is accurate, up to date and complete. Boab staff must take reasonable steps to correct information.

Title	Policy Template	Version	4
Authorised by	Quality Committee and CEO	Date Reviewed	29/08/2015
This document is CONTROLLED only when stored at: http://companyweb/06 HR/HR Pol 09.doc			Page 2 of 4

NPP7 - Identifiers

There are restrictions on how Commonwealth government identifiers, such as Medicare numbers can be used or disclosed. Boab staff are not permitted to adopt these identifiers for their own record keeping systems. These identifiers may only be used or disclosed for the reason they were issued.

NPP8 – Anonymity

Where lawful and practicable, clients must be given the option to use Boab Health Service without identifying themselves.

NPP9 – Transborder data flows

If health information needs to be transferred out of Australia, this may occur if laws with similar privacy protection to the NPPs bind the recipient. Otherwise, health information should only be transferred with the clients consent or if other provisions under the NPPs apply.

Privacy on the web site www.Boabhealth.com.au

In complying with the Privacy Amendment (Private Sector) Act 2000, Boab provides the following advice to users of this web site about the collection, use, disclosure and storage of personal information.

The aim of this advice is to inform users of this site about:

- what personal information is being collected;
- who is collecting personal information;
- how personal information is being used;
- access to personal information collected on this site; and
- security of personal information collected on this site.

What personal information is being collected?

Unless this web site asks for specific personal information in order to respond to requests for information or to register users for particular services, only the following information will be collected when you use this site:

- your server address;
- your top level domain name (for example .com, .gov, .au, .uk etc);
- the date and time of your visit to the site;
- the pages you accessed and the documents downloaded;
- the previous site you visited; and
- the type of browser you are using.

This information is collected for statistical purposes and to enable us to improve the navigation functions of our web site.

Who is collecting personal information?

The above information is collected by our Internet Service Provider. Where this site specifically asks for your personal information (for example to respond to requests for information or to register users for particular services), your personal information will only be collected by staff of Boab Health who have responsibility for responding to such requests or administrating such registrations.

Title	Policy Template	Version	4
Authorised by	Quality Committee and CEO	Date Reviewed	29/08/2015
This document is CONTROLLED only when stored at: http://companyweb/06 HR/HR Pol 09.doc			Page 3 of 4

How is personal information used?

Personal information collected on this web site will only be used for the purposes stated at the time of collection. Your personal information will not be added to a mailing list or used for any other purpose without your consent.

Complaints Handling

Any complaints in relation to BOAB's handling of personal information should be directed to the Quality Management Officer. In most cases the complainant will be asked to lodge their complaint in writing and identify themselves so that BOAB can respond to them personally. Unless a complaint can be dealt with immediately to the satisfaction of both parties, BOAB will provide a written response to the complaint within 30 days of its being received. If an individual believes their complaint has not been appropriately handled by BOAB, they should contact the Office of the Federal Privacy Commissioner, Privacy Hotline 1300 363 992 (local call charge) or via <http://www.privacy.gov.au/publications/npps01.html>

7.0 Documentation

7.1 Policies

[HR Pol 02](#) Complaints and Grievance

7.2 Procedures

[HR Pro 01](#) Complaints and Grievance

7.3 Documents

[HR Doc 39](#) Orientation check list

7.4 Other References

Privacy Amendment (Private Sector) Act 2000

The National Privacy Principles

Office of the Federal Privacy Commissioner

Title	Policy Template	Version	4
Authorised by	Quality Committee and CEO	Date Reviewed	29/08/2015
This document is CONTROLLED only when stored at: http://companyweb/06 HR/HR Pol 09.doc			Page 4 of 4