

STA-PRI-001v1

## Privacy Statement

Sunshine Coast Health Network is committed to ensuring that your personal and health information is handled in accordance with Australian privacy laws.

Our employees, commissioned services and contractors are bound by the legal requirements of the Australian Privacy Principles from the Privacy Act 1988.

As custodians of your data we ensure that the personal information you give us is protected. We collect only essential information to allow us and our commissioned services to perform our services.

In case of direct health service delivery for example triage and care coordination, the SCHN is required to collect identified personal, sensitive and clinical information in order to perform these services. Should you choose not to provide personal information requested, we may not be able to accurately provide the services you require.

Beyond direct health service delivery to you, your de-identified information will assist us with various activities including targeted service commissioning as well as health planning and policy development to help improve your local health systems.

### Collection of Your Personal and Health Data

We limit our collection of personal information where possible. We collect the minimum information required to provide triage and care coordination services and deidentify information where possible to perform provider performance monitoring, funder reporting and population health planning. We collect, hold and use personal data about an individual only as permitted or required by applicable laws.

### What personal information do we collect?

The information we collect depends on our relationship with the individual, the nature of the function we are performing and the services we are commissioning.

Individual	Type	Information collected
Stepped Care intake and triage Clients	Identified	Including but not limited to: Name, date of birth, address, contact details, next of kin details, carer's details, and referrer details, reason for referral, medical history, diagnosis, medications, and consent.
Clients of other commissioned services	De identified	Including but not limited to: Identifier, year of birth, reason for referral, diagnosis, medications, and consent.
Service providers	Identified	Including but not limited to: Names, addresses, phone numbers and other contact details, information about professional qualifications, information about the services offered or provided and provider numbers.

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Clinical Council and other advisory stakeholders	Identified	Including but not limited to: Names, addresses, phone numbers and other contact details, bank details where payment for services apply.
Website users	De Identified	We do not use IP trackers or have any log in requirements to access our website. We do not collect cookies but do have links to third party websites that do collect cookies.
Stakeholders using our Engage online platform	Identified	Including but not limited to: Name, gender, IP address, submissions to the site for example: opinions, voting results (unless anonymous), chat logs etc.
Prospective SCHN employees	Identified	Including but not limited to: Names, addresses, phone numbers and other contact details, and information about work history and performance, qualifications, services offered or provided and other relevant details.
SCHN employees	Identified	Including but not limited to: Names, addresses, phone numbers and other contact details, and information about work history and performance, qualifications, TFN and bank details for tax and payroll purposes, emergency contacts.
SCHN Contractors	Identified	Including but not limited to: Names, addresses, phone numbers and other contact details, and bank details for tax and payroll purposes.

## Security of information collected

We take all legally required data protection measures in accordance with our Data Management and Cyber IT Security Policies to mitigate the risk of data loss, misuse and unauthorised access. Our data systems that collect client information are cloud based and hosted externally in Australia where service level agreements uphold the highest IT security standards to satisfy our security needs. Our Identity Management Policy holds our system owners to a permission model of least privilege; ensuring access is only available to those where access is necessary to provide services. It is our policy to use only system and tools hosted in Australia. It may be the contingency of these providers to use overseas servers during a system failure. In this case our SLA requires they still abide by Australian privacy law standards.

## Use of your personal and health data

We only collect personal information where it is necessary to provide our services, we take all legally required and commercially reasonable steps to ensure that your personal data is reliable for its intended use that is; accurate, complete and, where necessary, appropriately updated.

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Services and activities that require the use of your personal data
Triage and care coordination
Clinical service delivery
Promoting our services and events
Disseminating relevant information and supports to our stakeholders
Providing relevant information to our stakeholders
Compliance for funding
Quality assurance and audit, risk management
Contract management and performance monitoring
Research with appropriate ethics and consents
Perform administrative operations
Perform payroll and staff management
Performing IT archiving, systems development, and testing

## Disclosure of your information

The SCHN may use and disclose personal information to related companies, agents or contractors who provide products and services to the SCHN or on behalf of the SCHN. In dealing with these agents or contractors, The SCHN ensures that the information provided is used for the express purpose for which it is disclosed.

Organisation or entities where we may disclose your information
The SCHN's commissioned services for the purpose of service delivery
The SCHN's agents, contractors, and external advisers
Commonwealth and State government agencies and other funders
External payment systems operators
Legal or government entities to comply with a legal request for your personal information for example subpoena or warrant

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SCHN collects client consent for the above disclosures excluding cases where compelled by law or duty of care for example when there is an immediate threat or risk of harm to themselves or others.

The non-collection of personal data may result in limited access to our services and programs.

### Our website, social media and cookies

Our website [www.ourphn.org.au](http://www.ourphn.org.au) does not collect browsing information that identifies you. Our website is built on Word Press and uses third-party applications that collect information for security purposes called Word Fence. We also use Google Analytics to collect statistics on pages viewed. Users can change browser settings to limit the information collected when accessing our website. As users do not need to log in into our website, we do not require the storage of cookies. We currently do not have any comments features active on our pages that collect temporary user cookies. If this changes we will ensure a pop-up message is used to alert users to the use of cookies. On our home page we have an embedded search feature to an external web application that is not run or managed by the SCHN called Healthdirect service finder

#### Health Direct Service Finder

The Healthdirect Australia Online Services make records of your visits and logs the following information for statistical purposes:

- the user's server address.
- the user's top-level domain name.
- the date and time of access to the site.
- pages accessed and documents downloaded.
- the previous site visited; and
- the type of browser software in use.

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We use YouTube's Privacy Enhanced Mode for videos uploaded to our website. This avoids being redirected to a third-party website that may collect your user information without your consent.

We use social networking services such as Twitter, Facebook and YouTube to communicate with the public and health professionals about our work. When you communicate with the SCHN using these services, we may collect your personal information, but we only use it to help us to communicate with you and the public. The social networking service will also handle your personal information for its own purposes. These services have their own privacy policies. You can access the privacy policies for Twitter, Facebook and YouTube (a Google company) on their websites.

### Direct marketing

Our newsletters and promotion materials are based on an opt-in subscription model. You can opt out of a subscription easily at any time.

### Solicited and unsolicited personal information

As aforementioned we do not collect any information unless for the specific purpose to perform our services. In alignment with our Notifiable Data Breach Policy we will contain and destroy any unsolicited personal information.

### Access and amendments to your information

Australian privacy law gives you the right access and to correct the personal information we hold about you if it is:

- inaccurate
- out of date
- incomplete
- irrelevant
- misleading

Individuals may request access to their own personal or health information held by the SCHN by writing to the:

Amendments Request
Chief Executive Officer Sunshine Coast Health Network PO Box 3067 Maroochydore, QLD, 4558

Requests will be acknowledged within seven (7) working days, and the intent is to provide a decision on requests within 30 days from original request date.

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Any amendments will be considered subject to the Australian Privacy Principles.

Valid reasons for refusal include:

- the organisation believes that giving you access may endanger the life, health or safety of any individual, or endanger public health or safety
- giving you access would have an unreasonable impact on the privacy of other individuals
- your request is frivolous or vexatious
- your personal information is part of existing or anticipated legal proceedings between you and the organisation

If we refuse your request to access or correct your personal information, then we will let you know in writing:

- the reasons for refusing to correct your personal information
- your right to request that a statement be associated with your personal information
- how to make a complaint

Generally, we will not charge fees for giving you access to your personal information. However, we reserve the right to charge reasonable fees where requests for personal information contain complications or are resource intensive.

## Feedback process

For individuals receiving health services who wish to make a privacy complaint should in the first raise privacy issues directly with the service provider.

If they are unhappy with the response, they can escalate this to Sunshine Coast Health Network Ltd via the following methods as outlined on our website <https://www.ourphn.org.au/provide-feedback/>

The feedback officer will manage feedback in accordance with the External Feedback Management Policy 12.1 which can also be found on the feedback page of SCHN website as above.

If an individual believes their privacy complaint has not been appropriately handled by the Sunshine Coast Health Network Ltd, they should contact the Office of the Australian Information Commissioner 1300 363 992 (local call charge) or visit their website [www.oaic.gov.au](http://www.oaic.gov.au)

Please contact the Privacy Officer [privacyofficer@ourphn.org.au](mailto:privacyofficer@ourphn.org.au) if you require clarification or further detail.

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