

<b>Title:</b>	<b>Catholic Healthcare Privacy Protection Framework</b>
<b>Outcome statement:</b>	<b>This policy is intended to ensure that our business operations comply with Australian privacy laws and to inform all stakeholders about our commitment to protect the personal information (including sensitive and health information) we hold.</b>
<b>Keywords:</b>	<b>Australian Privacy Principles; Access; Collect; Complaint; Consent; Correction; Disclose; Health Information; Hold; Marketing; Overseas Disclosure; Personal Information; Privacy; Sensitive Information; Use</b>
<b>Scope</b>	<b>All Catholic Healthcare Group including Catholic Healthcare Limited, Hawkesbury District Health Service Limited and any other entities operation in the Group from time to time.</b>

Catholic Healthcare Limited (*Catholic Healthcare*) is committed to treating you with dignity and respecting your right to privacy. In the course of dealing with you, Catholic Healthcare collects, uses and discloses personal and/or health information necessary for the provision of services and our business operations in accordance with this policy and the Australian Privacy Principles (*APPs*) under the *Privacy Act 1988 (Privacy Act)* and other applicable law.

The purpose of this Privacy Policy is to:

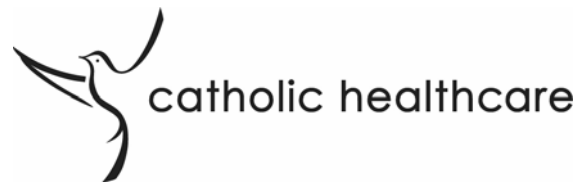
- clearly communicate the personal information handling practices of Catholic Healthcare; and
- give individuals a better and more complete understanding of the sort of personal information Catholic Healthcare collects and the way we handle that information.

This Privacy Policy applies to all three Catholic Healthcare services (*Services*) including Healthcare Services, Residential Aged Care Services and Retirement Communities Services, Community Services, and any of the facilities and entities operated by Catholic Healthcare.

Please visit our homepage for more information about our Services.

### **1. Kinds of information Catholic Healthcare collects and holds**

We only collect and hold information that is reasonably necessary for our functions and/or activities. These may include:



- **Personal information** – such as your name, contact details and any information that allows us to identify you. If you are a staff member or interested in working with us, it will also include your employment history. If you have financial dealings with us, it will include your financial details.
- **Health information** – such as your health history, past, present, and future provision of health services, healthcare identifier and any information to assist us in providing health treatment; and
- **Sensitive information** – if you are a resident, client or patient and if it is necessary for your care or you have consented to the collection of the information, sensitive information may include information about your religious beliefs or affiliations, racial or ethnic origin, sexual orientation or practices. If you are a staff member or interested in working with us, it will include sensitive information such as your criminal record check to satisfy our legal obligations.

Please note in this policy, a reference to **personal information includes health information and sensitive information** unless otherwise specified.

## 2. How Catholic Healthcare collects and holds personal information

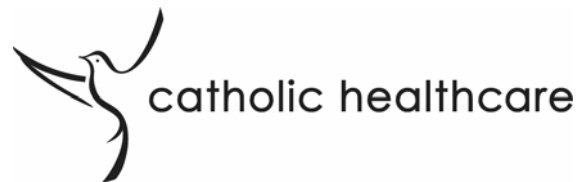
We collect personal information directly from you unless it is not practicable or reasonable to do so or you have granted us permission to obtain the information from someone else or we are otherwise authorised or required to do so. For example, we may have to collect information from your carer, health professionals, government agencies and your authorised personal representatives to provide you with your care. Every effort will be made to collect the personal information in an environment that maintains confidentiality.

Personal information collected may be held in paper stored in an authorised access only location, and/or electronic databases which are password protected and/or on private cloud computing networks.

Personal information that is no longer needed for our functions and activities and that we are not required to retain by law will be destroyed or permanently de-identified.

## 3. Purpose for which Catholic Healthcare collects and holds, uses and discloses personal information

We collect and hold personal information in order to provide services. Our primary use of personal information is in the provision of those services including treatment, care and accommodation and any related or incidental activities such as billing, rostering, recruitment and management of staff, budgeting and administration activities and activities necessary to fulfil our obligations and conduct our business in an efficient and prudent manner. In addition to this, we may also use personal information for training, research, quality and safety activities.



We may also use personal information for direct marketing purposes such as communicating with you and your representative/s about our services, news, upcoming events and fundraising activities.

Your information may need to be disclosed to government bodies and official organisations as required, to our advisors from time to time, to health care providers who may be involved in your treatment or care and as required at law.

Our staff members only have access to paper files and electronic databases on a need to know basis depending on their role and duties.

#### **4. Accessing and seeking correction of personal information**

You are entitled to access your personal information held by us. We encourage you to inform us of any changes to your personal information as soon as possible. You may ask us to correct any error or omission in your personal information.

If you wish to view your personal record please ensure that a request is made in writing. To ensure privacy of your information, appropriate identification requirements will need to be met. A small fee may be charged if the personal information is to be photocopied. In certain circumstances an appointment may be desirable which should be made in advance.

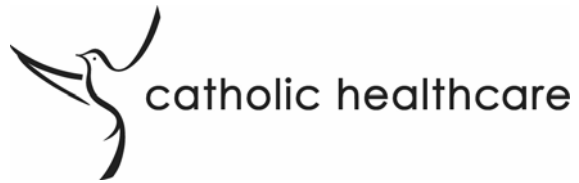
We may decline to provide access in special circumstances, for example, if a treating health professional advises us that they consider the access would be harmful to you or another person.

#### **Clients, Residents, Patients and Representatives**

Clients, residents, patients, their authorised representatives who wish to access or correct personal information should address their request in writing to the relevant privacy officer listed below.

**For Catholic Healthcare, Residential Aged Care Services,  
Retirement Communities and Catholic Community Services  
NSW/ACT**

Postal Address: The Privacy Officer  
PO Box 858  
EPPING NSW 1710  
Telephone: (02) 8876 2100  
Email: [privacy@chcs.com.au](mailto:privacy@chcs.com.au)



### **For Healthcare Services**

#### Hawkesbury District Health Service, Windsor

Postal Address: Hawkesbury District Health Service  
Privacy Officer  
Locked Mail Bag No. 10  
Windsor NSW 2756  
Telephone: (02) 4560 5555  
Email: [privacy.hdhs@chcs.com.au](mailto:privacy.hdhs@chcs.com.au)

#### St Vincent's Health & Community Service, Bathurst

Postal Address: St Vincent's Health & Community Services  
Privacy Officer  
Gorman's Hill Road  
Bathurst NSW 2795  
Telephone: (02) 6332 8965  
Email: [privacy.vincents@chcs.com.au](mailto:privacy.vincents@chcs.com.au)

#### Lourdes Hospital & Community Health Service, Dubbo

Postal Address: Lourdes Hospital & Community Health Service  
Privacy Officer  
4 Tony McGrane Place  
Dubbo NSW 2830  
Telephone: (02) 6841 8500  
Email: [privacy.lourdes@chcs.com.au](mailto:privacy.lourdes@chcs.com.au)

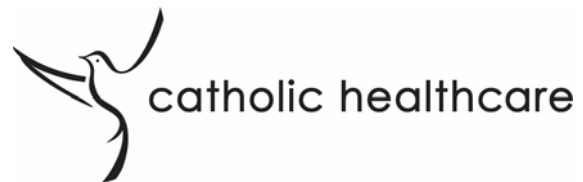
### **Staff members**

Staff members who wish to access their personal information please make contact as follows:

- Staff members who work at our Residential Aged Care, Retirement Communities, Community or Healthcare Services please contact your service manager; and
- Staff members who work at our Epping corporate office please contact the Human Resources Manager.

### **5. Complaints about a breach of the APPs**

Complaints should first be made in writing to the appropriate Privacy Officer listed above who will respond to your complaint within 30 calendar days. If you are not satisfied with the response then please contact our Chief Privacy Office below, and if you are not satisfied with this response then you may complain to the Office of the Australian Information Commissioner (**OAIC**). Please note that the Privacy Act prohibits the OAIC to investigate any complaints before you have made a formal complaint to us.



## **6. Disclosing your information overseas**

We will not disclose personal information to overseas recipients unless it is reasonably necessary and unless we have obtained consent from you.

## **7. General enquiry**

If you have any questions regarding our Privacy Statement, please contact our Chief Privacy Officer:

Postal Address: Catholic Healthcare Limited  
Chief Privacy Officer  
PO Box 858  
Epping NSW 1710  
Telephone: (02) 8876 2100  
Email: [privacy@chcs.com.au](mailto:privacy@chcs.com.au)

<b>A</b>	<b>Date created:</b>	13 February 2014
	<b>Number of this review and date of this review:</b>	Version 1, 13 February 2014
	<b>Next review due:</b>	13 February 2017
<b>B</b>	<b>References:</b>	<i>Aged Care Act 1997; Australian Privacy Principles Guidelines; Health Records and Information Privacy Act 2002; Privacy Act 1988; Privacy and Personal Information Protection Act 1998</i>
	<b>Related Policies:</b>	Collection, Use, Access to, Release of, Updating of Personal Information; Responses to Privacy/Data Breaches; Direct Marketing Protocol
	<b>Related procedures, documents and forms:</b>	Template Letter re enquiry – opening; Template Letter re enquiry – closing; Template email re enquiry – opening; Template email re enquiry – closing; Template letter to confirm authority; Template covering letter to Government Agency re Notification of Confidentiality
<b>C</b>	<b>Accreditation Standards:</b>	
<b>D</b>	<b>Hazard Identification/Risk Analysis / incident number:</b>	Compliance with Australian privacy laws
	<b>Hazard Control or risk control or compliance control method:</b>	Education; Random audit; Review of request; Communication processes around complaints
	<b>Policy Owner (position title): Approval Date:</b>	Julia Abrahams, Chief Privacy Officer
	<b>Endorsed: (Committee name)</b>	Senior Executive Committee
	<b>Policy Co-ordinator (position title)</b>	Julia Abrahams, Chief Privacy Officer