



QA 8.2.1 PROCEDURE: AUSTRALIAN PRIVACY PRINCIPLES (APP) POLICY

PART A – PURPOSE AND CONTEXT

- 1.0 IWC Ltd is committed to ensuring the privacy and confidentiality of all personal information affiliated with the IWC Ltd's business undertakings.
- 1.1 IWC Ltd follows the terms and conditions of privacy and confidentiality in accordance to the Australian Privacy Principles (APPs) as per schedule 1 of the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* (Cth), forming part of the *Privacy Act 1988* ('the Act').
- 1.2 The purpose of this Privacy Policy is to clearly communicate how IWC Ltd collects, manages, uses and stores personal and sensitive information.
- 1.3 The point of contact regarding any queries regarding this policy is the Corporate Coordination Team.

PART B – AUSTRALIAN PRIVACY PRINCIPLES

- 2.0 As a private sector health and community service provider and under permitted situations, IWC Ltd is required to comply with the APPs as prescribed under the Act.
- 2.1 The APPs regulate how IWC Ltd may collect, use, disclose and store personal information and how individuals, including IWC Ltd's clients may:
- address breaches of the APPs by IWC Ltd;
 - access their own personal information; and
 - correct their own personal information.
- 2.2 In order to provide clients with adequate health care and community services, IWC Ltd will need to collect and use personal information. It is important to be aware that if a client provides incomplete or inaccurate information or the client withholds personal health information IWC Ltd may not be able to provide said client with the services they are requesting.
- 2.3 In this Privacy Policy, common terms and definitions include:
- **"personal information"** as defined by the *Privacy Act 1988* (Cth). Meaning *"information or an opinion including information or an opinion forming part of a database, whether true or not, and whether recorded in a material format or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion"*; includes (but not limited to):
 - Name, date of birth
 - Address, telephone numbers and email address
 - Job applications, including résumés, cover letters and references.



- Bequest and donor information ;
 - an individual's expressed wishes about the future provision of health services to him or her; or,
 - a health service provided or to be provided to an individual.
- **"health information"** as defined by the *Privacy Act 1988 (Cth)*. This is a particular subset of "personal information" and means information or an opinion about:
- the health or a disability (at any time) of an individual;
 - an individual's expressed wishes about the future provision of health services to him or her; or,
 - a health service provided or to be provided to an individual.
 - Examples include: clinical care information such as images and scans.
- 2.3.1 Personal information also includes '**sensitive information**' which is information including, but not limited to a client's:
- race;
 - religion;
 - political opinions;
 - sexual preferences; and or,
 - criminal record
 - ethnicity
 - health information.
- 2.3.2 Information deemed '**sensitive information**' attracts a higher privacy standard under the Act and is subject to additional mechanisms for the client's protection.
- 2.3.3 The term '**client**' is used to refer to internal and external of the IWC Ltd, including:
- Clients
 - Patients
 - Staff
 - Job applicants
 - Donors/bequests

PART C – TYPES OF PERSONAL INFORMATION

- 3.0 IWC Ltd collects information from each individual client that is necessary to provide said client with adequate health and community services
- 3.1 This may include collecting information about a client's health history, family history, ethnic background or current lifestyle to assist appropriate members of the IWC team in identifying and managing client needs.
- 3.2 IWC Ltd also collects information from job seekers to facilitate the recruitment and selection process.
- 3.3 IWC Ltd may collect government identifiers for financial and billing purposes, including but not limited to:



- Medicare card
- Department of Veterans Affairs numbers
- Centrelink numbers

PART D – COLLECTION & RETENTION

4.0 This information will in most circumstances be collected directly from you via the IWC Client Information Sheet, health assessments and face to face consultation, recruitment and selection documentation etc.

4.1 In other instances, IWC Ltd may need to collect personal information about a client from a third party source. This may include:

- relatives; or,
- other health and community service providers; or
- referees nominated by job applicants

4.2 This will only be conducted if the client has provided consent for IWC Ltd to collect his/her information from a third party source; or, where it is not reasonable or practical for IWC Ltd to collect this information directly from said client. This may include where:

- The client's health and wellbeing is potentially at risk and his/her personal information is needed to provide them with emergency medical treatment.

4.3 IWC Ltd endeavours to store and retain a client's personal and sensitive information in a Client Information System stored directly on IWC Ltd's servers and in limited circumstances hard copy on premises.

PART E – PURPOSE OF COLLECTION, USE & DISCLOSURE

5.0 IWC Ltd only uses a client's personal information for the purpose(s) they have provided the information for unless one of the following applies:

- the client has consented for IWC Ltd to use his/her information for an alternative or additional purpose;
- the disclosure of the client's information by IWC Ltd is reasonably necessary for the enforcement of criminal law or a law imposing a penalty or sanction, or for the protection of public revenue;
- the disclosure of the client's information by IWC Ltd will prevent or lessen a serious and imminent threat to somebody's life or health; or,
- IWC Ltd is required or authorised by law to disclose your information for another purpose.



i. ***Health Professionals and other providers***

During the client's treatment at IWC Ltd he/she may be referred to alternative medical treatment/services (i.e. pathology or radiology) where staff of IWC Ltd may consult with other providers including senior medical experts when determining a client's needs, diagnosis or treatment.

IWC Ltd's staff may also refer the client to other service providers for further care and support (for example allied health professionals, Lifeline, Centacare, etc).

These health and community professionals will be designated providers appointed to use the client's personal and/or health information as part of the process of providing treatment, care or support. Please note that this process will be conducted whilst maintaining the confidentiality and privacy of the client's personal information.

ii. ***Alternative Health services***

At any point an IWC Ltd Medical & Health Centre client wishes to be treated by an alternative medical practitioner or health care service that requires access to his/her personal/health information IWC Ltd requires written authorisation. This written authorisation is to state that the client will be utilising alternative health services and that these health services have consented for a transfer of personal/health information.

iii. ***Other Third Parties***

IWC Ltd may provide your personal information regarding your care, treatment or condition to additional third parties. These third parties may include:

- parent(s);
- child/ren;
- other relatives;
- close personal friends;
- guardians; or,
- a person exercising a client's power of attorney under an enduring power of attorney.

Where information is relevant or reasonable to be provided to third parties, written consent from the client is required.

Additionally, the client may at any time wish to disclose that no third parties as stated are to access or be informed about his/her personal information or circumstances.

iv. ***Other Uses of Personal Information***



In order to provide the best possible environment in which to treat clients, IWC Ltd may also use personal/health information where necessary for:

- activities such as quality assurance processes, accreditation, audits, risk and claims management, client satisfaction surveys and staff education and training;
- invoicing, billing and account management;
- Providing de-identified reporting information to government departments to fulfill funding contractual obligations, including:
 - Home and Aged Community Care (HACC) quarterly minimum dataset reports (de-identified).
- to liaise with a client's health fund, Medicare or the Department of Veteran's Affairs, as necessary; and,
- the purpose of complying with any applicable laws – i.e. in response to a subpoena or compulsory reporting to State or Federal authorities.

5.1 If at any point or for any of the aforementioned reasons IWC Ltd uses or discloses personal/ health information in accordance with the APPs, IWC Ltd will provide written notice for the client's consent for the use and/or disclosure.

PART F – ACCESS AND CHANGES TO PERSONAL INFORMATION

6.0 If an individual client reasonably requests access to their personal information for the purposes of changing said information he/she must engage with the Corporate Coordination Team.

6.1 The point of contact for client access to personal information is:

Corporate Coordination Team
IWC Ltd
1300 492 492
info@iwc.org.au
Monday to Friday, 8:30am – 4:45pm

6.2 Once an individual client requests access to his/her personal information IWC Ltd will respond within a reasonable period of time to provide said information.

6.3 All personal information will be updated in accordance to any changes to a client's personal circumstances brought to IWC Ltd's attention. All changes to personal information will be subject to client's consent and acknowledgement.



6.4 If an individual requests access to his/her personal information IWC Ltd. this may incur a charge. Please contact the Corporate Coordination Team for further information.

PART G – DATA SECURITY

When you visit the IWC website, we may collect additional information about your use of the Website, which may or may not identify you. We may collect information about which pages you visit on the Website to help us determine which parts of the site you value, so that we can build and develop our Website to best meet your needs. We may also collect information about your internet browser, operating system, address of the referring site, your internet protocol address and clickstream information. This information helps us to understand how you came to find our website.

PART H – ANONYMITY

When you visit the IWC website, we may collect additional information about your use of the Website, which may or may not identify you. We may collect information about which pages you visit on the Website to help us determine which parts of the site you value, so that we can build and develop our Website to best meet your needs. We may also collect information about your internet browser, operating system, address of the referring site, your internet protocol address and clickstream information. This information helps us to understand how you came to find our Website.

PART H – COMPLAINTS HANDLING

7.0 How an individual client may complain about a breach of the Australian Privacy Principles, or a registered APP code (if any) that binds the entity, and how the entity will deal with such a complaint.

PART I – PERSONAL INFORMATION AND OVERSEAS RECIPIENTS

8.0 Use of Overseas Parties:

- (a) IWC Ltd does not engage with any overseas entities, with which personal or health information would be transferred, appointed or disclosed.

PARTJI – DISPOSAL OF PERSONAL/HEALTH INFORMATION

9.0 If IWC Ltd receives any unsolicited personal information that is not deemed appropriate for the permitted health or care situation, IWC Ltd will reasonably de-identify and dispose of said information accordingly.

9.1 If IWC Ltd holds any personal or health information that is no longer deemed relevant or appropriate for the permitted health or care situation, IWC Ltd will reasonably de-identify and dispose of said information accordingly.



PART K – ACCESS TO POLICY

10.0 IWC Ltd provides free copies of this Privacy Policy for clients and staff to access, which can be/will be located/provided:

<http://iwc.org.au/privacy-policy>

PART L – REVIEW OF POLICY

11.1 IWC Ltd in accordance with any legislative change will review the terms and conditions of this policy to ensure all content is both accurate and up to date.

11.2 Notification of any additional review(s) or alteration(s) to this policy will be provided to clients and staff within an acceptable time frame. If change occurs clients and staff are required by IWC Ltd to review/sign/acknowledge in writing etc. This Privacy policy.