

## Policy Statement

Cobram Regional Care (CRC) is committed to ensuring that your privacy is respected in accordance with the Australian Privacy Principles. This policy sets out how we aim to protect the privacy of personal and sensitive information, rights in relation to personal and sensitive information managed by CRC and the way in which we collect, use, disclose and access personal and sensitive information. By providing personal or sensitive information to CRC, you consent to its use, storage and disclosure in accordance with this Privacy Policy.

All requests related to privacy should go to the CRC Privacy Officer.

### The Privacy Officer

CEO/Director of Nursing  
Cobram Regional Care  
16 Campbell Rd (PO Box 535), COBRAM VIC  
Tel: (03) 58 719 100  
Email: [receptiona@cobramregionalcare.com.au](mailto:receptiona@cobramregionalcare.com.au)

## 1. Definitions

### Personal information

'Personal information' is information or an opinion (including information that forms part of a database) about an individual whose identity is reasonably apparent, or can be reasonably ascertained, from the information or opinion. This definition applies whether the information is true or not and whether it is recorded in material form or not.

### Sensitive information

'Sensitive information' is a form of personal information that is afforded a higher level of privacy protection than other personal information. It includes information such as, but not limited to, medical history, racial or ethnic origin. Given the nature of CRC's business, where it is reasonably necessary, we may collect sensitive information.

### When will we collect your personal information?

We may collect information:

- when your details are provided to CRC in an application for services, a consent form, survey, feedback form or incident report
- from a client of CRC or a resident at the residential service
- from a person subscribing to any publication of CRC, including electronic publications
- when entering your personal information into, or you agree to have personal information entered into, one of CRC's online systems or databases
- when you access the CRC website or engage via social media
- when you contact CRC via email, telephone or mail
- when you participate in any program, activity or event organised or authorised by CRC
- when you apply for employment or a volunteer position with CRC
- if you are elected or appointed to the Board or a committee of CRC.

Personal information may also be collected, including from third parties, when we are required to do so by law (for education, work health and safety laws, charitable collections, and medical treatment or as a consequence of other legislation in Australia).

## 2. Data collection

What type of personal data will we collect?

CRC considers the collection of relevant, personal data as fundamental to the provision of individualised, quality care. Information is collected throughout each phase of health intervention, treatment and health research initiatives that often extend beyond the resident/client contact.

The information collected by us about a particular person will vary depending on the circumstances of collection. It may include, but is not limited to, a person's contact details (name, email and/or postal address, phone number), date of birth, gender, religion, credit card details, driver's licence number, pension number, passport number, superannuation details, employment history, qualifications or communication history with us.

### CRC website

Information is automatically collected through your use of the CRC website.

We may use temporary (session) cookies or permanent cookies when you access our web site. This allows us to recognise your browser and track the web pages you have visited. Cookies are small text files that websites may place on your computer or device. Most often, cookies are used to recognise repeat users of websites and remember user preferences. Cookies are also used to allow the website to track usage behaviour and aggregate data to allow CRC to customise a user's experience on our website.

The information may be used and disclosed by CRC for purposes including statistical analysis, and to assist CRC to improve the functionality and usability of marketing materials, including the website. You can switch off cookies by adjusting the settings on your web browser. Services that our website may use from time to time include Google Analytics, a service which transmits website traffic data to Google servers in the United States.

Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand website traffic and webpage usage. By using our website, you consent to the processing of data about you by Google in the manner described in Google's most updated version of its Privacy Policy (located on the Google website) and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or use the opt-out service provided by Google.

We are constantly developing and enhancing our use of online technologies and make reasonable efforts to ensure we keep this Privacy Policy and related documents up to date in this regard.

## 3. Storage, security and protection of information

Security of personal information is important to CRC.

We store information in different ways, including paper and electronic form. We have taken steps to protect the information we hold from misuse, loss, unauthorised access, modification or unauthorised disclosure. We manage the security of your personal information through strict confidentiality requirements of our employees, volunteers and service providers, as well as security measures for system access and our website. Information we collect from and about individuals may be stored electronically on multiple databases and combined or linked with other information held about you for the purpose of providing our services, such as billing, communication and provision of care.

## 4. Use of personal information

We use personal information only for the purposes for which it was collected and would be reasonably expected (and as otherwise required, permitted or authorised under law). We may state a more specific purpose when we collect your information.

CRC may use personal information to:

- verify identity
- complete background checks
- operate and administer our services and other functions/programs relating to our services
- provide information and communications in relation to our services and CRC comply with laws and regulations
- respond to emergency situations involving or requiring medical treatment.

We may use health information to ensure that our services, and any programs that we operate, are conducted safely and in accordance with any special health requirement of participants. Health information may also be kept for insurance purposes. In addition, we may use de-identified health information and other sensitive information to carry out research, to prepare submissions to government, or to plan programs or activities.

### Marketing and opting-out

We may use non-sensitive personal information to provide better services and for marketing purposes (including disclosure of such information to service providers). To opt out of receiving emails, SMS or posted marketing or communications materials, please contact our Privacy Officer. On receipt of an opt-out request, the Privacy Officer will notify the relevant department of the opt-out request.

## 5. Disclosure of personal information

CRC may disclose personal information to:

- State/Commonwealth Governments or their agencies or statutory/regulatory bodies, hospitals or other health care settings and health professionals
- companies we engage to carry out functions and activities on our behalf
- our professional advisers, including our accountants, auditors and lawyers
- our insurers
- organisations or in other circumstances permitted by law.

### Cross border disclosure

Currently there are no occasions where CRC discloses personal information to an overseas entity. In the event of such a circumstance, we will endeavour to ensure such parties are subject to a law, binding scheme or contract that effectively upholds principles for fair handling of the information that are suitably similar to the Australian Privacy Principles.

### Other disclosures

In addition, we may also disclose personal information:

- with express or implied consent
- when required or authorised by law
- to an enforcement body when reasonably necessary
- to lessen or prevent a threat to an individual or public health or safety
- where a permitted health situation exists.

## **6. Accessing and correction information held by CRC**

We will take all reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete, up-to-date, relevant and not misleading. We rely on the accuracy of personal information as provided to us both directly and indirectly. Individuals have a right of access to their information held by CRC. We encourage regular review and update of personal information.

A request for access to personal information is made by completing a '1.7.4 Request to Access Information' form and returning this form to the CRC Privacy Officer. The form is available on request from the Privacy Officer. To protect your privacy, CRC will not process a request for access to personal information without proof of identification. When you request information on behalf of another person, you must be their authorised representative or their legal representative if the person is deceased. The Privacy Officer will advise the applicant requesting the information of the evidence required to process the request.

A fee may be charged to prepare the requested information to cover costs such as staff time and photocopying. This fee will be discussed prior to preparing and providing the information. We will respond to your request within a reasonable period, usually within 30 days. If it is found that the personal information we hold is inaccurate, incomplete or out-of-date, we request notification and the details will be corrected. A register of requests is maintained by the Privacy Officer.

## **7. Resolving privacy issues and complaints**

Any issues or complaints in relation to the collection, use, disclosure, quality, security of and access to personal information may be made to the CRC Privacy Officer. We will respond to a complaint within a reasonable period and attempt to resolve the complaint.

If we are unable to resolve a complaint or the complainant is unsatisfied with the outcome, contact the Office of Australian Information Commissioner by phoning **1300 363 992** or visit the website [www.oaic.gov.au](http://www.oaic.gov.au) to lodge a complaint. Specific complaints relating to the handling of sensitive personal information may be referred to the Health Services Commissioner, Victoria.

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### **Consent:**

*I acknowledge that personal / health information collection is required for the purposes outlined above and will only be disclosed to third parties required by law.*

*I understand that this consent only applies to how my personal / health information is handled, not my medical / dental treatment.*

**Signed:** \_\_\_\_\_ **Dated:** \_\_\_\_\_

**Consumer:** \_\_\_\_\_

**Consumer Representative:** \_\_\_\_\_

**Relationship:** \_\_\_\_\_