

DPV Health is committed to protecting the privacy of all personal, sensitive and/or confidential information collected, used, stored and disclosed as a necessary part of delivering high-quality healthcare services. This extends to both electronic and hard-copy records, including records of correspondence such as e-mail, phone and verbal conversations that are captured.

To ensure the privacy and confidentiality of all personal and sensitive information collected, DPV Health commits to:

## 1 Collection

- Advise people what information is being collected and how it will be used, specifically outlining the primary purpose for information collecting (i.e. provision of healthcare support) and secondary purposes (i.e. soliciting feedback, promotion of services).
- Ensure informed and valid consent is obtained for the collection of personal information.
- Collect personal information only when required for the provision of services.
- Collect only information that is reasonable and necessary for the continued delivery of Excellent Care.

## 2 Use and Disclosure

- Use personal information to support the delivery of Excellent Care and service provision.
- Only disclose personal or sensitive information where it is lawful to do so, such as with the client's explicit consent; in response to a subpoena or legal discovery process.
- Obtain consent where personal information might be used for purposes outside of the primary purpose, such as marketing or soliciting feedback on DPV Health service experience, service design, planning, evaluation and governance.

## 3 Quality of Data

- Ensure all personal information (i.e. data) collected is accurate, up-to-date and complete as advised by the individual.
- Provide people with the means of correcting or updating information as reasonable.

## 4 Security of Data

- Ensuring information (i.e. data) contained within information management systems is stored securely with permission access levels monitored and managed.
- Take reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification or disclosure. Information will be kept secure and confidential.
- Maintain an auditable trail of who has accessed electronic data and when access occurred.
- Archiving, de-identifying and/or destroying information as appropriate when the information is no longer required to be held or used to deliver Excellent Care.

## 5 Openness and Transparency of Data Collection

- Provide people with information to support their consent to information collection; even in instances where information must be collected for service provision to occur.
- Make this policy available on DPV Health's website, internal controlled document system, and hard copy if requested.

## 6 Access and Correction

- Having a process by which people can access personal information held by DPV Health and obtain a copy, or correct information, to ensure it is current and relevant.
- Undertake a "consent to share" process where nominated personal or health record information can be shared with another party, such as other health care providers or caregivers.

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## 7 Unique Identifiers

- Use unique identifiers only for the purpose of coordinating and supporting Excellent Care.
- Use unique identifiers only as reasonable, necessary, and required (e.g. NDIS Number).

## 8 Anonymity or Pseudonyms

- Only collect identifying information when required to deliver or provide a service.
- Support individuals to engage in service provision using a pseudonym whether that be individual preference or to assist with protecting an individuals' identify.
- Recognise that anonymity and the use of pseudonyms may be limited by the type of service being accessed and the fee collection process noting some health funds require persons to disclose their identifying details for treatment and payment (e.g. Medicare or Health insurance funding).
- Provide opportunity for feedback to be provided anonymously, recognising that this may impact on DPV Health's ability to follow up on the individual experience.

## 9 Movement of Data across States or Countries

- Ensure that all personal and health record information is stored wholly within Australia.
- Recognise that when information is situated outside of Victoria, the protections of the Health Records Act 2001 and Privacy Act 1988 (Cth) travel with the information, and still apply.
- Support people who may be transferring interstate or overseas to obtain a copy of their personal and sensitive information held by DPV Health.

## 10 Sensitive Information

- Only collect sensitive information as it relates to the provision and delivery of services.
- Disclose or share personal and/or sensitive information as required as an Information Sharing Entity under the Victorian Child Information Sharing Scheme (CISS) and Family Violence Information Sharing Scheme (FVISS).

## 11 Handling of Unsolicited Personal Information

- Ensure that unsolicited personal information that informs Excellent Care or service delivery is treated with the same level of privacy and confidentiality as solicited information.
- Ensure unsolicited personal information that does not inform Excellent Care or service delivery is either not recorded or destroyed, or if this is not possible, de-identified, or where this is also not possible, treated with the same level of privacy and confidentiality as solicited information.

## 12 Use of Data for Marketing Purposes

- Only use or disclose personal information for direct marketing purposes when the individual has either consented to their personal information being used for direct marketing or has a reasonable expectation that their information will be used for this purpose and opt-out provisions are clearly available.
- All marketing information released by DPV Health provides a simple means for individuals to easily request not to receive direct marketing communication from DPV Health.
- Allow people to "opt-out" of receiving SMS's, e-mails or other communication not directly related to the primary purpose.
- Discontinue direct marketing to individuals who have opted out.
- Provide multiple options to people around the type of information they may be contacted about and frequency of contact.

## 13 Making information available to another health provider

- At request of a client, make their health record information available to another provider as outlined within the health privacy principles.
- As an Information Sharing Entity under the Family Violence Protection Act's (2008) Child Information Sharing Scheme and Family Violence Information Sharing Scheme, comply with legislative

requirements in sharing personal and sensitive information whereby doing so reduces the risk of harm or actively promotes the safety of a child and/or a victim-survivor of family violence.

#### **14 Transfer or Closure of Service**

- In the event of DPV Health being sold, transferred or closed down; without DPV Health continuing to provide services; DPV Health will give notice of the transfer or closure to current and past service users, where possible.

#### **15 Feedback and complaints about DPV Health's privacy management**

- Established processes for receiving and managing complaints as outlined in the Suggestions, Compliments & Complaints Policy.
- All feedback and complaints regarding privacy matters are be directed to the DPV Health Privacy Officer in the first instance.
- Support people on their request to escalate their privacy complaint to the relevant regulatory body, such as the Health Complaints Commissioner or the NDIS Quality & Safeguards Commission.

#### **16 Privacy & Confidentiality breaches**

- All incidents involving the inappropriate collection, recording, storage, use or release of personal and sensitive information are registered on the DPV Health incident register and investigated by the relevant management representative.
- Improper or unauthorised use of personal and sensitive information may be considered as serious misconduct. Privacy related incidents are monitored by the Clinical Governance Committee and Executive.