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Document History

Version	List of changes per section	Author	Date Effective
V.1	First Issue	Elizabeth Gavey	3/12/2013
V.2	Updated to comply with Privacy Act 1988 changes effective on 12 March 2014.	Elizabeth Gavey	12/03/2014
V.3	Amended to reflect Company Name change	J. Gay	17/07/2015
V.4	Revised to include Privacy Amendment (Notifiable Data Breaches) Act 2017	S. Aristidi	07/02/2018

Document Approval

Name	Title	Signature	Date
James Baker	CEO	Verbal approval	15/3/2018

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PCCS Privacy Policy

1. Purpose

The purpose of this policy is to describe how Primary & Community Care Services Limited (PCCS) manages personal information, as required by the Australian Privacy Principles.

2. Scope

This policy is applicable to all PCCS staff.

3. Documents:

3.1 Associated documents

PCCS Privacy Statements

3.2 Reference documents

- Privacy Act 1988 and associated regulations, as amended
- Office of the Federal Privacy Commissioner, Privacy Fact Sheet 17 - Australian Privacy Principles (January 2014).
- ACSQHC, *National Safety and Quality in Health Service Standards, 2012*
- Privacy Amendment Act 2017 (Notifiable Data Breaches)

4. Records

Record Name	Type	Record ID	Collected by	Location	Index	Retention period
N/A						

5. Definitions

Definition	Explanation
Privacy Act	Means the Privacy act 1988 (Cwth) as amended
Personal Information	Means information or an opinion about an identified individual, or an individual who is reasonably identifiable: <ul style="list-style-type: none">• whether the information or opinion is true or not; and• whether the information or opinion is recorded in a material form or not
Data Breach	When personal information held by an agency or organisation is lost or subjected to unauthorised access, modification, disclosure, or other misuse or interference.
Eligible Data Breach	Eligible data breach arises when the following three criteria are satisfied: <ul style="list-style-type: none">• there is unauthorised access to or unauthorised disclosure of personal information, or a loss or personal information, that an organisation holds• this is likely to results in serious harm to one or more individuals and• the entity has not been able to prevent the likely risk of serious harm with remedial action

6. Flowchart

N/A

7. Policy Statement

This document sets out the types of personal information held by Primary & Community Care Services Limited (ABN 92 154 673 793) (PCCS) and how PCCS collects, holds, uses and discloses that information as part of our business to improve *the health of the local community through increased collaboration, integration, inclusion, research and targeted health services.*

PCCS is bound by the Australian Privacy Principles contained in the Privacy Act 1988 (Cwth) and relevant state and territory privacy legislation.

What is personal information?

Personal Information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not

The types of personal information that PCCS collects will vary depending on your relationship with us.

What kinds of personal information does PCCS collect and hold?

The personal information that PCCS collects could include your name, age, date of birth, gender, the organisation you work for, your address, telephone and fax numbers and your email address.

Health professionals

If you are a health professional, PCCS may also collect details of your:

- occupation
- membership of professional associations
- provider and/or prescriber number,
- professional interests and/or the nature of your practice; and
- dealings with PCCS,

In order to:

- provide the appropriate services to you
- conduct research and evaluation programs, or
- report your participation to bodies managing the educational, continuous professional development or quality improvement programs in which you participate.

Members of the Public

If you are a member of the public, we may also collect information concerning;

- your areas of interest in order to provide you with relevant information; and
- services or information we provide to you or are provided to you on our behalf.

Suppliers

If you are one of PCCS's suppliers or provide services to or on behalf of PCCS, PCCS may collect other information about you, such as the nature of the products and services that you provide, quotes that you provide and your direct credit details.

Sensitive information

Where PCCS is providing or coordinating a health service for or on behalf of you, PCCS may collect sensitive information—such as information about your health and information about personal attributes such as ethnic or racial origin—when it relates to the provision of the service or its evaluation.

PCCS will only collect this information with your consent or otherwise in accordance with the National Privacy Principles and relevant privacy legislation.

How does PCCS collect and hold personal information?

On provision of information to us

PCCS primarily collects information about you when you use or request a product or service, complete a survey, questionnaire or enrolment form or when you communicate with PCCS by email, telephone, in writing or in person.

PCCS also collects information about you if you are providing services to PCCS or, if you apply for employment at PCCS, through the staff recruitment and selection process.

From publicly available sources

PCCS also collects personal information from the public domain, for example from professional registration boards.

Indirect collection

PCCS tries to collect personal information about an individual only from that individual, but in some circumstances PCCS may obtain personal information from a third party, such as a general practice manager, your health professional, a member of your family, a friend or your carer. If you provide personal information about another person to PCCS, we require that you inform that person you have done so.

From the website

When you visit the PCCS website, our web server may download a cookie to your computer. A cookie is a small piece of information sent by our server to your browser.

Cookies do not contain personal information about users. However, cookies can identify a user's browser. The cookies transferred by the PCCS website are used for such things as capturing information about a user's web browser or enabling login access to password protected areas of the website.

The PCCS website may also identify your location, using Location Based Services. These services allow us to identify a location, which allows PCCS to provide you with services and information, for example the location of a doctor near to you. If you do not want information collected through the use of Location Based Services, most devices have a mechanism that will allow these services to be switched off.

Protection and security

PCCS manages personal information in accordance with this policy and privacy legislation.

PCCS maintains security of personal information by restricting access to only those staff and service providers with a legitimate need to access it. Security measures are in place to prevent the misuse, unauthorised access, modification or disclosure of personal information.

PCCS has archiving policies and procedures, which provide for the destruction or de-identification of records of personal information when they no longer required, in accordance with Australian Privacy Principle 11.2.

Data collected for research purposes is stored and disposed of in accordance with National Health and Medical Research Council guidelines.

For what purposes does PCCS collect, hold, use and disclose personal information?

Personal information is collected, held, used and disclosed by PCCS in accordance with the Privacy Act and the Australian Privacy Principles to:

- provide information to health professionals and consumers
- provide and/or coordinate health services for PCCS clients
- assist PCCS to develop programs and services and profile the users of those programs and services
- conduct evaluations of PCCS materials, programs and services
- assist in PCCS conducting research (either alone or with other organisations)
- record and monitor the participation in and use of educational materials and products by health professionals
- report continuing professional development points and/or participation in practice incentive activities where relevant
- promote educational activities including events and conferences
- contact individuals for feedback on PCCS's materials, programs and services, and
- assist PCCS perform its corporate and contractual obligations.

PCCS may also disclose personal information in circumstances where it has statutory obligations or is otherwise required to do so by law or in the case of an emergency.

PCCS does not supply, sell or rent the personal information it collects to unrelated third parties for the purpose of marketing those third parties' products or services.

De-identified information (which will not identify you) may be used by PCCS or provided or sold to third parties for the purposes of research and marketing.

How you may access personal information about yourself that is held by PCCS and seek the correction of such information.

At any time you can advise PCCS of changes to your personal information or ask to be removed from our mailing lists by contacting us at our address below.

You have the right to ask for access to the personal information held about you and to advise of any inaccuracy. There are some exceptions to this set out in the Privacy Act.

If you make an access request, PCCS will ask you to verify your identity and specify what information you require. PCCS may ask the reason for your request so we can assist you most effectively. However, you are under no obligation to provide a reason if you do not wish to.

How you may complain about a breach of the Australian Privacy Principles, and how PCCS will deal with such a complaint.

If you believe your personal information is not properly protected, or that there has been a breach or potential breach of this Privacy Policy or the Privacy Act, please contact PCCS immediately and ask for your complaint or concern to be directed to the PCCS Quality Manager.

PCCS takes breaches seriously and has procedures to help identify and resolve a breach, potential breach or complaint as quickly as possible. This includes appropriate escalation processes to the CEO and the PCCS Finance Audit and Risk Committee and notification processes in the event of a breach.

Every complaint is forwarded by the staff member who receives it to the PCCS, Quality Manager. You will be notified of the process for dealing with the breach or potential breach. Your complaint will be thoroughly investigated and a suitable resolution negotiated with you. Further information about this is available in PCCS's

Notification of Eligible Data Breach

If PCCS believes that an eligible data breach has occurred PCCS must contain the breach where possible and take remedial action.

Where serious harm cannot be mitigated through remedial action:

- promptly notify individuals at risk of serious harm and provide statement to the commissioner as soon as practicable using Notifiable Data Breach Form:
<https://forms.uat.business.gov.au/smartforms/landing.htm?formCode=OAIC-NDB>
 - the statement must include the following information:
 - PCCS contact details
 - a description of the data breach
 - the kinds of information concerned and
 - recommendations about the steps individuals should take in response to the data breach
- if it is not practicable to notify individuals at risk or serious harm, PCCS must publish a copy of the statement prepared for the Commissioner on the PCCS website and take reasonable steps to bring its contents to the attention of individual at risk of serious harm.

Complaints Process

If you are not satisfied with the resolution of your complaint by PCCS you may contact the Office of the Australian Information Commissioner who may investigate your complaint and has the power to award compensation against PCCS in appropriate circumstances.

Is PCCS likely to disclose personal information to overseas recipients?

No, PCCS is unlikely to disclose your personal information to overseas recipients.

Further information

For enquiries or feedback about this policy, or for complaints about PCCS's handling of personal information, please contact PCCS on (02) 9477 8700.

You can also fax your enquiry to (02) 9477 8799 or mail to:

Director – Corporate Services
Primary & Community Care Services Limited
PO Box 173
Thornleigh NSW 2120

8. Metrics/KPIs

N/A

9. Enquiries

Quality Team