



Reliant Healthcare Pty Ltd  
Suite 11.01, 60 Castlereagh Street  
Sydney NSW 2000  
**ABN:** 52 162 843 209

# C019

## Privacy Policy

### Distribution

<i>Position</i>	<i>Person Responsible</i>	<i>Document Type</i>
Chief Executive Officer	Alexandra Conroy	Master
General Manager	Jillian Conroy	Electronic - Document Centre
All Staff	Alexandra Conroy	Presentation

### Revision history

<i>Revision Number</i>	<i>Date</i>	<i>Details</i>
A	Dec 2013	New policy
A1	Mar 2014	Updated
A2	Apr 2016	Reformatted
A3	Oct 2017	Scheduled review
A4	Dec 2019	Updated – breach process
A5	Jan 2020	NDIS Audit – obtain & release

PART 1	ABOUT THIS POLICY .....	3
1.1	<b>Purpose</b> .....	3
1.2	<b>Multi-layered approach</b> .....	3
1.3	<b>Contents of this Privacy Policy</b> .....	3
PART 2	HOW RELIANT HANDLES YOUR PERSONAL INFORMATION .....	3
2.1	<b>Reliant’s Legal Obligations</b> .....	3
2.2	<b>What information does Reliant collect?</b> .....	4
2.3	<b>How does Reliant use your information?</b> .....	4
2.4	<b>Access to and correction of your health information</b> .....	6
2.5	<b>Data Quality</b> .....	6
2.6	<b>Data Security</b> .....	6
2.7	<b>If you have a complaint about privacy issues</b> .....	7
2.8	<b>Notifiable Data Breaches</b> .....	7
2.9	<b>How to contact us</b> .....	7
2.10	<b>Currency</b> .....	7
2.11	<b>Cross border disclosures</b> .....	7
PART 3	HOW RELIANT HANDLES YOUR PERSONAL INFORMATION WHEN YOU VISIT OUR WEBSITE.....	7
3.1	<b>Collection</b> .....	8
3.2	<b>Cookies</b> .....	8
3.3	<b>Links to third party websites</b> .....	8
3.4	<b>Use and disclosure</b> .....	8
3.5	<b>Data quality</b> .....	9
3.6	<b>Data Security</b> .....	9
3.7	<b>Access and correction</b> .....	9
	Supporting documentation.....	9
	Easy English Annexure.....	10

## **PART 1 ABOUT THIS POLICY**

### **1.1 Purpose**

Reliant Health Care Limited (Reliant) is committed to ensuring the privacy and confidentiality of your personal information.

Reliant must comply with the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth) and other privacy laws that govern how private sector health service providers like Reliant handle your personal information (including your health information).

The purpose of this Privacy Policy is to clearly communicate to you how Reliant handles your health information. It will give you a better and more complete understanding of the type of personal information that Reliant holds about you and the way Reliant handles that information.

### **1.2 Multi-layered approach**

This Privacy Policy has been developed in accordance with a 'layered policy' format endorsed by the Office of the Federal Privacy Commissioner. This means that it offers you the ability to obtain more or less detail about Reliant's information handling practices – depending on how much you wish to read, what you need to know, and how quickly you need to obtain the relevant information.

If you require only basic information about Reliant's information handling practices, you can view our 'condensed' privacy policy. This is a summary of how Reliant collects, uses and discloses your personal information and how you can contact Reliant if you would like to access or correct any personal information which Reliant holds about you.

If you require more detailed information about Reliant's information handling practices, then you will need to read this document.

### **1.3 Contents of this Privacy Policy**

PART 2 – How Reliant handles your personal information

PART 3 – How Reliant handles your personal information when you visit Reliant's website

## **PART 2 HOW RELIANT HANDLES YOUR PERSONAL INFORMATION**

### **2.1 Reliant's Legal Obligations**

As foreshadowed in Part 1 of this Privacy Policy, as a private sector health service provider Reliant is required to comply with the APPs under the Privacy Act 1988 (Cth).

The APPs regulate how Reliant may collect, use, disclose, and store personal information and how individuals (such as Reliant patients) may access and correct personal information which Reliant holds about them.

In order to provide you with the health care services that you have requested, Reliant will need to collect and use your personal information. If you provide incomplete or inaccurate information to us, or withhold personal health information, from us we may not be able to provide you with the services you are seeking.

In this Privacy Policy, we use the terms:

- "personal information" as it is defined in the Privacy Act 1988 (Cth). This 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"*

and

- 'health information' as it is defined in 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; or
  - 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, that is also personal information.

Personal information also includes 'sensitive information' which is information such as your race, religion, political opinions or sexual preferences, and health information. Information which is 'sensitive information' attracts a higher privacy standard under the *Privacy Act 1988* (Cth) and is subject to additional mechanisms for your protection.

Reliant may store the personal information we collect from you in various forms, including through an electronic medical record system. Reliant will comply with the APPs, and this Privacy Policy, in respect of your personal information in whatever form that information is stored by us.

## 2.2 What information does Reliant collect?

We collect information from you that is necessary to provide you with health care services.

Often this may include collecting information about your health history, family history, your ethnic background or your current lifestyle to assist the health care team in diagnosing and treating your condition.

We will usually collect your health information directly from you. Sometimes, we may need to collect information about you from a third party (such as a relative or another health service provider). We will do this only if you have consented for us to collect your information in this way or where it is not reasonable or practical for us to collect this information directly from you, such as where your health may be at risk and we need your personal information to provide you with emergency medical treatment.

## 2.3 How does Reliant use your information?

Reliant uses your personal information only for the purpose you have given the information to us, unless one of the following applies:

- The other purpose is directly related to the purpose for which you have given us the information and you would reasonably expect, or we have told you, that your information is usually disclosed for another purpose or to other individuals, organisations or agencies (see paragraphs (a) – (g) below);
- you have consented for us to use your information for another purpose;
- Reliant is required or authorised by law to disclose your information for another purpose (see paragraph (f) below);
- the disclosure of your information by Reliant will prevent or lessen a serious and imminent threat to somebody's life or health; or
- the disclosure of your information by Reliant is reasonably necessary for the enforcement of the criminal law or a law imposing a penalty or sanction, or for the protection of public revenue.

### (a) Use among health professionals to provide your treatment

Modern health care practices mean that your treatment will be provided by a team of health professionals working together.

These health professionals will share your health information as part of the process of providing your treatment. We will do this only while maintaining confidentiality of all this information and protecting your privacy in accordance with the law.

Your health information will be disclosed only to those health care workers involved in your treatment.

(b) Your local doctor

Reliant will usually communicate with your referring medical practitioner or nominated general practitioner when you become a client.

This is in accordance with long-standing health industry practice and is intended to inform your doctor of information that may be relevant to any ongoing care or treatment provided by them.

If you do not wish us to communicate with your nominated general practitioner you must let us know. Alternatively, if your nominated general practitioner has changed or your general practitioner's details have changed following a previous admission, please let us know.

(c) Other health service providers

If, in the future, you are being treated by a medical practitioner or health care facility who needs to have access to the health record of your care with Reliant we will require an authorisation from you to provide a copy of your record to that medical practitioner or health care facility.

The only time we would provide information about your health records to another medical practitioner or health facility outside Reliant **without your consent** is in the event of an emergency where your life is at risk and you are not able to provide consent or as approved or authorised by law.

(d) Relatives, guardian, close friends or legal representative

We may provide information about your condition to your parent, child, other relatives, close personal friends, guardians, or a person exercising your power of attorney under an enduring power of attorney or who you have appointed your enduring guardian, unless you tell us that you do not wish us to disclose your health information to any such person.

(e) Other common uses

In order to provide the best possible environment in which to treat you, we may also use your health information where necessary for:

- activities such as quality assurance processes, accreditation, audits, risk and claims management, patient satisfaction surveys and staff education and training;
- invoicing, billing, and account management;
- to liaise with your health fund Medicare or the Department of Veterans' Affairs and where required provide information to your health fund, Medicare or the Department of Veterans' Affairs to verify treatment provided to you, as applicable and as necessary;
- the purpose of complying with any applicable laws – for example, in response to a subpoena or compulsory reporting to State or Federal authorities (for example, for specified law enforcement or public health and safety circumstances);
- the purpose of sending you standard reminders, for example for appointments and follow-up care, by text message or email to the number or address which you have provided to us.

(f) Contractors

Where we outsource any of our services or hire contractors to perform professional services within our hospitals or health services we require them to also comply with the Privacy Act 1988 (Cth) (or other relevant privacy legislation) and our Privacy Policy.

(g) Other uses with your consent

With your consent we can also use your information for other purposes such as including you on a marketing mail list, fundraising or research. Please note, however, that unless you provide us with your express consent for this purpose, we will not use your information in this way.

Please note, Reliant may use or disclose your personal information as specified above via electronic processes, where available or relevant.

(h) Job applications

Reliant collects personal information of job applicants for the primary purpose of assessing and (if successful) engaging applicants.

The purposes for which Reliant uses personal information of job applicants include:

- managing the individual's employment or engagement;
- insurance purposes;
- ensuring that it holds relevant contact information; and
- satisfying its legal obligations.

Reliant may also store information provided by job applicants who were unsuccessful for the purposes of future recruitment.

## **2.4 Access to and correction of your health information**

You have a right to have access to the health information that we hold in your health record. You can also request an amendment to your health record should you believe that it contains inaccurate information.

Reliant will allow access, or make the requested changes, unless there is a reason under the Privacy Act 1988 (Cth) or other relevant law to refuse such access or refuse to make the requested changes.

If we do not agree to change your medical record/personal information in accordance with your request, we will permit you to make a statement of the requested changes and we will enclose this with your record.

Should you wish to obtain access to or request changes to your health record you can ask for our Privacy Officer (see details below) who can give you more detailed information about Reliant's access and correction procedure.

Please note that Reliant may recover reasonable costs associated with supplying this information to you.

## **2.5 Data Quality**

Reliant will take reasonable steps to ensure that your personal information that we may collect, use or disclose is accurate, complete and up-to-date.

## **2.6 Data Security**

Reliant will take reasonable steps to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure. We use technologies and processes such as access control procedures, network firewalls, encryption and physical security to protect your privacy.

Reliant will destroy or permanently de-identify any of your information that is in its possession or control and which is no longer needed for the purpose for which it was collected provided Reliant is not required under an Australian law or court/tribunal or otherwise to retain the information.

## **2.7 If you have a complaint about privacy issues**

If:

- a) you have questions or comments about this Privacy Policy;
- b) Reliant does not agree to provide you with access to your personal information; or
- c) you have or a complaint about our information handling practices

you can lodge a complaint with or contact our Privacy Officer on the details below or directly with the Federal Privacy Commissioner.

## **2.8 Notifiable Data Breaches**

If Reliant determines that personal information has been accessed without permission, acquired, used or disclosed in a manner which compromises the security of personal information, Reliant will assess the risk to affected parties

If Reliant determine that a breach causes serious harm to an individual, Reliant will notify all affected parties (including the individuals to whom the data pertains and the Australian Information Commissioner). The notification will provide recommendations about the steps individuals should take in response to the breach.

## **2.9 How to contact us**

By letter: Corporate Privacy Officer  
Reliant Health Care Limited  
PO Box 612  
Neutral Bay NSW 2089

By email: [info@relianthealthcare.com.au](mailto:info@relianthealthcare.com.au)

By telephone: (02) 9362 5500

By facsimile: (02) 9033 8672  
Attention: Corporate Privacy Officer

## **2.10 Currency**

This Privacy Policy was last updated in February 2016 and may change from time to time. The most up-to-date copy can be obtained by contacting us using the above-mentioned details.

## **2.11 Cross border disclosures**

Reliant may enter into arrangements with third parties to store data we collect, and such data may include personal information, outside of Australia. Reliant will take reasonable steps to ensure that the third parties do not breach the APPs. The steps Reliant will take may include ensuring the third party is bound by privacy protection obligations which are the same (or substantially the same) as those which bind Reliant and requiring that the third party have information security measures approved by Reliant.

## **PART 3 HOW RELIANT HANDLES YOUR PERSONAL INFORMATION WHEN YOU VISIT OUR WEBSITE**

This section of our Privacy Policy explains how we handle your personal information which is collected from our website: [www.relianthealthcare.com.au](http://www.relianthealthcare.com.au).

This Privacy Policy applies to your use of our website and the use of any of the facilities on our website.

### **3.1 Collection**

When you use our website, we do not attempt to identify you as an individual user and we will not collect personal information about you unless you specifically provide this to us.

Sometimes, we may collect your personal information if you choose to provide this to us via an online form or by email, for example, if you:

- submit a general enquiry via our contacts page;
- register to receive share market reports; or
- send a written complaint or enquiry to our Privacy Officer.

When you use our website, our Internet Service Provider (**ISP**) will record and log for statistical purposes the following information about your visit:

- your computer address;
- your top level name (for example, .com,.gov, .org, .au etc);
- the date and time of your visit;
- the pages and documents you access during your visit; and
- the browser you are using.

Our web-site management agent may use statistical data collected by our ISP to evaluate the effectiveness of our web-site.

We are, however, obliged to allow law enforcement agencies and other government agencies with relevant legal authority to inspect our ISP logs, if an investigation being conducted warrants such inspection.

### **3.2 Cookies**

A "cookie" is a device that allows our server to identify and interact more effectively with your computer. Cookies do not identify individual users, but they do identify your ISP and your browser type.

This website uses temporary cookies. This means that upon closing your browser, the temporary cookie assigned to you will be destroyed and no personal information is maintained which will identify you at a later date.

Personal information such as your email address is not collected unless you provide it to us. We do not disclose domain names or aggregate information to third parties other than agents who assist us with this website and who are under obligations of confidentiality. You can configure your browser to accept or reject all cookies and to notify you when a cookie is used. We suggest that you refer to your browser instructions or help screens to learn more about these functions. However, please note that if you configure your browser so as not to receive any cookies, a certain level of functionality of the Ramay website and other websites may be lost.

### **3.3 Links to third party websites**

We may create links to third party websites. We are not responsible for the content or privacy practices employed by websites that are linked from our website.

### **3.4 Use and disclosure**

We will use personal information collected via our website only for the purposes for which you have given us this information.

We will not use or disclose your personal information to other organisations or anyone else unless:

- you have consented for us to use or disclose your personal information for this purpose;
- you would reasonably expect or we have told you (including via this policy) that your information is usually used or disclosed to other organisations or persons in this way;



- the use or disclosure is required or authorised by law;
- the use or disclosure will prevent or lessen a serious or imminent threat to somebody's life or health; or
- the disclosure is reasonably necessary for law enforcement functions or for the protection of public revenue.

If we receive your email address because you sent us an email message, the email will be used or disclosed only for the purpose for which you have provided it and we will not add your email address to an emailing list or disclose this to anyone else unless you provide us with consent for this purpose.

### **3.5 Data quality**

If we collect your personal information from our website, we will maintain and update your information as necessary or when you advise us that your personal information has changed.

### **3.6 Data Security**

Reliant is committed to protecting the security of your personal information. We use technologies and processes such as access control procedures, network firewalls, encryption and physical security to protect the privacy of information. We will take all reasonable steps to prevent your information from loss, misuse or alteration.

If you choose to complete our online forms or lodge enquiries via our website, we will ensure that your contact details are stored on password protected databases.

Staff members associated with website maintenance have access to our website's backend system. This is password protected. Our website service is also password protected.

### **3.7 Access and correction**

If you wish to obtain information about how to access or correct your personal information collected via our website, please refer to Access and Correction at Item 2.4 of Part 2 of this document.

## **Supporting documentation**

Attached is supporting documentation in relation to this Privacy Policy. The attached documents include:

- Privacy Statement
- CO2-0-1 - Clients' Rights and Responsibilities
- Client Confidentiality
- CO17-1 - ICT Plan

CO19

Privacy Policy

Rev A4 Dec 2019

Approved: 10 Jan 20

A. Conroy

Director

## Easy English Annexure

This document is about your privacy. Privacy means

- things we know about you
- what we do with what we know.

This document will tell you

- what we know about you
- why we know things about you
- how we will use what we know
- how you can change what we know
- how to make a complaint.

There are laws to protect your personal information.

Personal information could be about

- your name
- where you live
- your date of birth
- your health or disability information.

We will keep your information private. Private means we will not tell people about it unless we have to.

What we keep

We keep personal information about different people. For example

- people who use the NDIS, Home Care Packages and other government schemes
- our staff
- disability service providers.

The personal information we keep is

- your name
- your address
- information about your disability or health issues
- what supports you get and from whom

We will not tell anyone about your personal information.

How we get personal information

We get personal information from

- you
- someone who helps you with the NDIS or other government scheme

For example,

- a carer or family member
- disability service of other health providers
- other government departments.

You can give consent for other people to give us your information.

Consent means you say yes.

You do not have to give us all your personal information.

We might ask you for your information

- by phone
- by email
- in person.

How we use personal information

We use personal information to help us

- give you services
- manage your health goals with you
- contact you.

We might need to tell other people about you because they

- help with your NDIS plan, government funding or other financial assistance
- give you supports you need.

How we keep personal information safe

We keep paper records safe in our offices.

Our offices have secure access. Secure access means you need a special pass to get in the building.

We keep information on our computers safe.

We only tell people your information if the law says they can know.