



ST JOHN OF GOD  
Health Care

# Privacy Policy



## Introduction

St John of God Health Care (SJGHC) is committed to upholding the dignity of each person. Guided by the value of respect, we will manage all personal information in accordance with the Australian Privacy Principles (APPs) under the *Privacy Act 1988* (Cth) (**Privacy Act**) and relevant State legislation. This Privacy Policy details how your personal information is collected, used, stored and disclosed by St John of God Health Care and how you may contact us if you would like to access or correct your personal information.

This Privacy Policy applies to all trading entities of St John of God Health Care in Australia and listed under Contacts for Privacy Enquiries.

## Definitions

A number of terms used in this policy have specific meanings as defined in the Privacy Act:

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

- (a) whether the information or opinion is true or not; and
- (b) whether the information or opinion is recorded in a material form or not.”

Some personal information is also classified as ‘sensitive information’.

**Sensitive information** includes any personal information concerning a person’s race or ethnicity, their religious, political or philosophical beliefs or affiliations, sexual preferences, biometric information used for biometric verification or identification, biometric templates and health information including genetic information. Sensitive information is afforded a higher degree of privacy protection and is subject to additional standards under the Privacy Act in relation to its handling.

**Health information** is a subset of personal information (that is also considered to be sensitive 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;
- other personal information collected to provide, or in providing, a health service;
- other personal information about an individual collected in connection with the donation, or intended donation, by the individual of his or her body parts, organs or body substances; or
- genetic information about an individual in a form that is, or could be, predictive of the health of the individual or a genetic relative of the individual.

## Information collected by St John of God Health Care

St John of God Health Care collects personal information about individuals including patients, their relatives, employees, job applicants, contractors, vendors and suppliers, health professionals, students and volunteers.

St John of God Health Care will only collect and hold personal information that is reasonably necessary for the performance of its services or obligations as an employer or accreditor of health practitioners. As a patient, we may collect information about your health history, family history, lifestyle, cultural or ethnic background and test results to assist in providing health care to you.

If you are employed by St John of God Health Care or if you have applied for a position at one of our facilities, we will often collect information about your work history, contact details, referees and any other information that you might submit in your job application. We collect similar background information about contractors, vendors, suppliers and health professionals who provide services to St John of God Health Care and also about students and volunteers that attend our facilities. Where required, information from police checks, working with children checks and pre-employment medical screenings may also be collected.

St John of God Health Care usually collects your personal information directly from you and with your explicit consent. We will only collect your personal information from someone else if we have your consent, or if it is authorised or required by law, or if it is unreasonable or impracticable for us to collect that information from you, for example, where your life is at risk and you are unable to respond and we need your personal information in order to provide emergency treatment.

## How does St John of God Health Care store your information?

St John of God Health Care may store your information in a range of mediums including electronic systems, electronic instrumentation, paper files, or images.

All information collected by St John of God Health Care is stored securely. All electronic patient records are stored in Australian Data Centres. Where personal information is stored by a third party, St John of God Health Care requires them to comply with the Privacy Act and our Privacy Policy.

## Use and disclosure

St John of God Health Care will only use or disclose your personal information for the primary purposes for which it was collected or for directly related secondary purposes which you would reasonably expect (or that we have told you) or as permitted or required by law. If there is any doubt about this expectation then we will obtain your consent before using or disclosing your personal information for a secondary purpose.

The purposes for which we may use or disclose your personal information include the following:

### 1. Provision of health services:

Personal information and sensitive information is collected by us for the primary purpose of ensuring that patients receive quality health services whilst under our care. Accordingly, this

information may need to be shared among members of your treating team. Where necessary, your personal information, including your health information, may be disclosed to other health care providers involved in your ongoing care or to provide further treatment, for example your general practitioner (GP), home service provider or district health nurse.

In addition, aspects of your personal information we collect may be used or disclosed for other purposes, including:

- (a) *Contractors and other health professionals:* Some of the services provided within or by our facilities may be outsourced or provided by a contractor (i.e. physiotherapists or outpatient services). We may provide your personal information to them in order to assist in your care. Further, if you require certain medical devices or a prosthesis for your treatment, we may disclose your personal information to suppliers or manufacturers of those devices. We require all contractors to handle your personal information in accordance with the Privacy Act and our Privacy Policy.
- (b) *Relatives, guardian, close friends or legal representatives:* Unless you have advised us not to disclose your health information, we may provide information about your condition to your next of kin, nominated relative, guardian or appointed legal representative.
- (c) *Quality assurance and business management:* From time to time, we may need to use or disclose aspects of your personal information for administrative processes such as accreditation and evaluation, audits, risk and claims management, education and training of staff, quality assurance activities and to monitor patient satisfaction. As a result, we, or someone we authorise, may contact you in the future to request your feedback on our services.
- (d) *Health service management:* Your personal information may be used for contacting you about appointments and may be used or disclosed to your health fund, Medicare and also to insurers, lawyers and your doctor for claims management, and to other advisers in the ordinary course of managing our business.
- (e) *Billing:* For billing and invoicing purposes, we may share relevant aspects of your personal information with third parties such as your other health care providers, Medicare, your private health insurance fund or external collection or account management agencies.
- (f) *Data required by law:* We have legal obligations to provide information to various entities, for example if your medical record is subpoenaed or for compulsory reporting to State and Federal authorities. We may also provide your personal and health information to government agencies where we are providing health services under contracts with Government as required under those contracts. More information regarding these obligations is available on request.
- (g) *Direct marketing and St John of God Foundation (fundraising):* We would like to contact you to provide marketing or promotional information in relation to other services we offer or to provide information from St John of God Foundation in relation to fundraising or community projects. We will always seek your express consent before we use your information in this way and you may opt out at any time.

(h) *Research*: We are committed to conducting research across a wide range of health fields with the aim of improving patient outcomes, public health and safety and teaching. We would like to use your health information for this purpose, which generally includes information contained in existing patient data, medical records and diagnoses by private specialists you have seen in the past. Only authorised persons approved by an ethics committee will have access to your information. We will not disclose your identity to unauthorised persons and we will never sell your personal information or data under any circumstances. We will always seek your express consent before we use your information in this way and you may opt out at any time.

(i) *Religious denomination*: St John of God Health Care values the religious beliefs of those for whom we care. Should you indicate on admission your religious denomination, and also consent to being visited by an authorised representative of your faith group, this information will be passed onto our Pastoral Services team, who may talk with you about how to best facilitate this visit.

## 2. Employees:

St John of God Health Care collects, uses and discloses personal information about its staff in order to perform its obligations as an employer and as required by law.

However, the handling of past and current employee records are exempt from the Privacy Act where there is a direct relationship between St John of God Health Care and the past/current employee. Despite this exemption, St John of God Health Care applies similar principles as if the handling of employee records were covered by the Privacy Act. We retain employee records for seven years as stipulated in the *Fair Work Act 2009*.

## 3. Students, volunteers and job applicants:

We also collect personal information of job applicants, students and volunteers for the primary purpose of assessing their suitability for employment or undertaking work experience or clinical placement or providing other relevant assistance, as the case may be. Other purposes which we may use personal information about those individuals include to contact them, for insurance purposes and to satisfy our legal obligations. We may store information provided by unsuccessful job applicants to send job alerts for future recruitment, where they have consented to this.

## 4. Health professionals, contractors and suppliers:

St John of God Health Care collects personal information about contractors, suppliers and health professionals that provide services to St John of God Health Care for the primary purpose of assessing and engaging their services or expertise and for other purposes where legally required. Personal information about certain health professionals is also collected, used and disclosed for their accreditation under the credentialing process set out in St John of God Health Care's by-laws.

## 5. St John of God Health Care website:

When you visit our website, we do not attempt to identify you and we do not store your personal information. We will only collect and store your personal information if you choose to provide this to us via an online form or by email, for example through our general enquiry or contacts page.

We note that our Internet Service Provider makes a record of your visit to our website and logs the following information for statistical purposes:

- Your server address;
- Your top level domain name (for example, .com, .gov, .au, .org);
- The date and time of your visit;
- The pages and documents you accessed; and
- The type of browser you are using.

This information is only used to evaluate the effectiveness of our website and, in the event of an investigation, a law enforcement agency or other government agency may exercise its authority to inspect the logs maintained by our Internet Service Provider.

Our website uses temporary cookies for security purposes. The cookies do not identify you as an individual user, but identifies your ISP and browser type. This means we do not store any personal information from visitors to our website.

Our website may contain links to websites of third parties. We are not responsible for the privacy policy and practices of such third party websites.

## Data quality

St John of God Health Care takes reasonable steps to ensure that the personal information that we collect and hold is accurate, complete and up-to-date. We maintain and update the personal information we hold as necessary or when you have advised us that your personal information has changed.

## Data security

We take steps to protect the personal information we hold against interference, misuse, loss and unauthorised access. St John of God Health Care has data protection and security measures including administrative, physical and technical access restrictions to records containing personal information, with only authorised people able access records.

When personal information is no longer required, it will be destroyed, deleted or de-identified securely in line with our retention and destruction policy and accepted document disposal schedules.

## Cross-border disclosure

If we are required to disclose your personal information overseas, we will take reasonable steps to ensure that the overseas recipient will not handle your personal information that would result in breaching the APPs. We will usually enter into a written agreement with the overseas recipient that requires the recipient to comply with the APPs.

## Requests for access and correction

If you wish to access or amend your personal information, you should make your request in writing to the privacy officer or the Health Information Manager at the relevant hospital or service.

You may wish to complete and lodge an application form which is available on request or from our website at:

**[www.sjog.org.au/privacy](http://www.sjog.org.au/privacy)**

Requests for access and amendment can be made by post or fax. Post and fax details are contained in the relevant application forms. Our full contact details can be found on our website at:

**[www.sjog.org.au/contactus](http://www.sjog.org.au/contactus)**

## Fees and charges

While we do not charge an application fee for making a request for access or amendment, you may be charged administration, photocopying or counter fees. Information on our fees are contained in the application forms referred to above. Alternatively, you can contact the privacy officer or Health Information Manager at the relevant hospital or service.

## Response to your application

We will respond to your request for access or amendment within a reasonable period. We will provide access or make the correction requested unless otherwise required or where we are permitted by law to withhold the information or not make the amendment. We will notify you of the basis of any denial of access or amendment to your personal information.

Where we allow access, the relevant officer will arrange to give you access to your personal information in the manner you have requested, if it is reasonable or practicable to do so. The manner of access may be by email, by phone, in person, hard copy or by electronic means.

If we agree that the personal information requires correction or amendment, the relevant officer will make the alterations or notation. If we do not believe an amendment is necessary, you may insert an addendum (noting your comments) into the record.

## How to make a complaint

If you have any concerns about your privacy or wish to make a complaint about a privacy breach, please contact us at the details listed to the right.

Your complaint should be in writing addressed to the privacy officer or Health Information Manager of the relevant hospital or service and you should provide us with sufficient details together with any supporting material regarding your complaint.

On receipt of your complaint, we will take steps to investigate the issue and will notify you of the outcome. The relevant officer may contact you by telephone or arrange to meet with you. Alternatively, we may respond in writing depending on the complexity and the nature of the matters in dispute. We will endeavour to respond to your complaint within a reasonable period.

If you are not satisfied with our response, you can contact us to discuss your concerns further or complain to the Office of the Australian Information Commissioner (Cth): see

[www.oaic.gov.au](http://www.oaic.gov.au)

## Contacts for privacy enquiries

Listed to the right are the contact details of our Australian hospitals and services. Full contact details can be found on our website at [www.sjog.org.au/contactus](http://www.sjog.org.au/contactus)

Please ask to speak to the privacy officer or Health Information Manager.

## Hospitals

Ballarat, VIC - (03) 5320 2111  
Bendigo, VIC - (03) 5434 3434  
Berwick, VIC - (03) 9707 1900  
Bunbury, WA - (08) 9722 1600  
Burwood, NSW - (02) 9715 9200  
Frankston Rehabilitation, VIC - (03) 9788 3333  
Geelong, VIC - (03) 5226 8888  
Geraldton, WA - (08) 9965 8888  
Hawkesbury, NSW - (02) 4560 5555  
Mt Lawley, WA - (08) 9370 9222  
Midland (Public and Private) - (08) 9462 4000  
Murdoch, WA - (08) 9366 1111  
Pinelodge Clinic, VIC - (03) 8793 9444  
Richmond, NSW - (02) 4570 6100  
Subiaco, WA - (08) 9382 6111  
Warrnambool, VIC - (03) 5564 0600  
Wembley Day Surgery, WA - (08) 9382 6111

## Home Nursing

Health Choices, VIC & WA - 1300 475 442

## Pathology

St John of God Pathology, VIC 1800 636 633  
St John of God Pathology, WA 1300 367 674

## Social Outreach

Accord, VIC - (03) 9727 2466  
Bloomsbury House, VIC - (03) 5320 2601  
Drug & Alcohol Withdrawal Network, WA - (08) 9382 6049  
Fremantle Counselling Centre  
(Ferns House), WA - (08) 6226 9444  
Horizon House, WA and VIC - (08) 6103 5594  
Pomegranate House, VIC - (03) 5320 2260  
Raphael Services Ballarat VIC - (03) 5320 2016  
Raphael Services Bendigo, VIC - (03) 5447 0771  
Raphael Services Berwick, VIC - (03) 9707 3988  
Raphael Services Blacktown, NSW - (02) 9839 0900  
Raphael Services Fremantle, WA - (08) 6226 9455  
Raphael Services Geelong, VIC - (03) 5221 7333  
Raphael Services Subiaco, WA - (08) 9382 6828  
South West Community Drug Service, WA - (08) 9721 9256



**ST JOHN OF GOD**  
Health Care

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