

AIM:	The Privacy of the South Bank Day Hospital patients is protected, that is all employees and Medical Practitioners comply with the federal Privacy Act 1988 and relevant state privacy and health records legislation.
SCOPE:	All Medical Practitioners and Staff

Privacy Policy

1. Purpose

In this Privacy Policy, the expressions “SBDH”, “we” “us” and “our” are a reference to South Bank Day Hospital.

SBDH respects and is committed to protecting your right to privacy. We recognise the confidence you place in us through your dealings with us.

SBDH has obligations to protect your personal information under the Privacy Act 1988 (Cth) (**Privacy Act**). This Privacy Policy governs the way that we collect, use, keep secure and disclosure personal information.

2. What is personal information?

In general terms, under the Privacy Act, personal information means information or an opinion about an identified person or a person who is reasonably identifiable. Examples of personal information include your name, address and contact details.

Sensitive information is a subset of personal information and includes information or an opinion on things like your race or ethnic origin, philosophical beliefs, opinions, religious beliefs or affiliations, health information, genetic information or biometric information

We do not use sensitive information to send you direct marketing communications without your consent.

3. What personal information we collect and why?

The type of personal information we collect from you will depend on your relationship with us. In general, we collect the following information:

- your name, gender and date of birth;
- your contact details such as address, phone number and email address;
- your emergency contact and next of kin details;
- if you are a patient:
 - your health information including your medical history, medications, and medical notes and reports about you;
 - billing information including your health insurance and medicare numbers;
- Your opinions via surveys and questionnaires (is applicable); and
- Details about any donation or contribution you may make to our Foundation.

The personal information is necessary for us to provide the best healthcare service that we can to you.



4. How we collect and hold personal information?

Where possible, your personal information is collected directly from you.

We may also receive your personal information from third parties, including your next of kin, carer or other family member. If we collect details about you from someone else, we will whenever reasonably possible (unless we are exempt) make you aware that we have done this and why. We will also endeavour to ensure your consent was provided.

If you provide personal information to us about someone else, you must ensure you are entitled to disclose that information to us without the need for us to take any additional steps in respect to how we use and disclose that information. You must also ensure the individual concerned is aware of the details of our Privacy Policy and has given their consent.

How our website collects information.

If you use our website, we may collect your personal information using “cookies” other forms of analytics on our website. This enables us to track the effectiveness of our website. A cookie identifies your computer, but not you personally. You can usually disable cookies on your web browser, or chose whether to accept it or not.

Opting out of direct marketing communications.

Where we use your personal information to send you marketing communications by post, email or phone, we will provide you with an opportunity to opt out of receiving such communications.

If you do not wish to receive direct marketing communications from us, please contact us. Our full contact details are provided in the ‘Contact Us’ section below.

Can I decline to provide personal information?

You can decline or in some circumstances, choose what information to provide to us (including being anonymous or using a pseudonym). However without your personal information, we may not be able to meet your expectations, or provide the best service we can. For example, you may not be able to obtain a tax deduction for your donation to the Foundation if you do not provide us with your personal information.

If you are a patient and you decline to provide us with certain information, this could adversely impact the quality of care SBDH can provide to you, and in some cases may be dangerous to your health. In those circumstances, SBDH may refuse to provide services to you.

5. How we use and disclose personal information?

We only use and disclose your personal information for the purpose for which it was collected, or as consented to below:

(a) Specifically for patients:

(i) Disclosure of your personal information to your health care provider at SBDH, your local doctor or to your other health service providers;



- (ii) Disclosure of your personal information to staff involved in the provision of your care at SBDH (including staff who may not be our employees);
- (iii) Disclosure of your personal information to Medicare, DVA or your private health insurer for the purposes of billing;
- (iv) Disclosure of your personal information for management of the health service (such as billing and debt recovery, complaint handling, incident reporting);
- (v) Disclosure of your personal information to your spouse, partner, parent, child, other relative, guardian or next of kin where SBDH considers:
 - (A) SBDH is reasonably satisfied the disclosure is necessary to provide appropriate care and treatment to you, or the disclosure is made for compassionate reasons;
 - (B) The disclosure is not contrary to any wish you expressed before you became unable to give or communicate consent, and of which we are aware or could be reasonably expected to be aware; and
 - (C) Disclosure is limited to the extent reasonable and necessary for providing appropriate care or fulfilling the compassionate reasons.
- (b) For all persons from whom personal information has been collected:
 - (i) to verify your identity or to process donations (including administration of donations);
 - (ii) fundraising activities;
 - (iii) in undertaking our research services;
 - (iv) marketing, events and promotional activities by us;
 - (v) your employment (or potential employment) or your provision of volunteer services (or potential services);
 - (vi) any other matters reasonably necessary to facilitate the primary purpose.

6. Disclosure of personal information to overseas recipients.

We generally do not disclose personal information to overseas recipients.

In the unlikely event that we need to disclose personal information to overseas recipients we will take reasonable steps to ensure that overseas recipients use and disclose personal information in a manner consistent with this Privacy Policy and the Privacy Act.

7. How we secure and store your personal information.

The security of your personal information is important to us and we take all reasonable steps to ensure that your information is stored securely including:

- Ensuring the personal information collected and used is accurate and up to date;
 - Taking reasonable steps to protect your personal information from unauthorised access, use or disclosure (by implementing both physical protection and electronic security measures);
 - Implementing specific security precautions for processing online payments including the use of encrypted links, dedicated private connections and Secure Sockets Layer (SSL) encryption;
 - Destroying or de-identifying personal information if it is no longer required;
8. How you can access, update or correct your personal information?

SBDH takes all reasonable steps to ensure that the personal information we hold is accurate, complete and up-to-date, relevant and not misleading.

We encourage you to contact us if there are:

- errors or inaccuracy in the personal information we hold about you;
- changes to information such as your name or address. you would like access to the personal information we have collected or hold about you;

In limited circumstances, we may refuse your request for access or correction. If this occurs, we will provide you with written reasons for this decision.

We will respond to any request for access or correction (whether that be acceptance or refusal with reasons) within a reasonable time frame after the request is made.

9. How to make a complaint and how we will deal with it?

We value our patients and supporters and will do our best to address and resolve any privacy issues you have. If you have a complaint about a breach of the Privacy Act relating to your personal information please contact us.

SBDH strives to satisfy any questions that you have or resolve minor complaints within five days. For more serious or complex complaints, where it is anticipated the investigation and resolution may take longer, the complainant will be advised of the process and the expected timeframe for resolution.

If you are unhappy with a response that you have received from SBDH, you may direct your complaint directly to the Office of the Australian Information Commissioner.

10. SBDH Contact Details

You can contact us in the following ways:

- In person to: 140 Melbourne Street, South Brisbane QLD 4101 Australia
- By mail to: South Bank Day Hospital, PO Box 5886, West End QLD 4101 Australia
- By phone on: +61 7 3239 5050
- By fax on: +61 7 3844 1914
- By email at: kelly.langdon@qei.org.au
- Attn: Kelly Langdon, Chief Operating Officer

Changes to this privacy policy

We may make changes to this policy from time to time without notice. Any changes will be reflected on this page. This policy was last updated in December 2019.

RISK DESCRIPTION	PREVENTATIVE MEASURES	MANAGEMENT PLAN	EVALUATION METHOD	IMPACT	LIKELIHOOD	RISK SCALE FACTOR
Breach of Privacy	Staff acknowledge and respect the patients privacy requirement and , medical records and take measures to respect the intellectual property of the South Bank Day Hospital	Privacy Policy discussed at orientation and signed off by the staff member Staff sign off on Privacy Statement	Audit on awareness of Privacy Policy	Extreme	Possible	High