

MACKILLOP GRANGE

PRIVACY POLICY *Privacy Act (Clth) 1988*

INTRODUCTION

1. This Privacy Policy applies to all information obtained by or disclosed to MacKillop Grange (**Village**).
2. The Village has adopted the National Privacy Principles as contained in the Privacy Act (Clth) 1988 (**Privacy Act**) as amended from time to time.
3. This Privacy Policy details the nature of the information collected by the Village, why it is collected and how it is used.
4. The mission of the Village is to conduct its aged care services in compliance with all applicable laws and regulations and in accordance with the highest ethical standards. This mission and the related activities and functions of the Village necessitate the holding of personal information on the residents of the Village (**Residents**).
5. The Village regards its obligations under the Privacy Act as extremely important and its actions are directed to complying with the Privacy Act.

PERSONAL INFORMATION COLLECTED

6. The personal information (including sensitive information) of Residents collected by the Village is information that is necessary for the Village to carry out its purpose stated in clause 10 below. The personal information collected may include the following:
 - (a) name;
 - (b) address;
 - (c) phone number;
 - (d) health;
 - (e) history;
 - (f) family history;
 - (g) ethnic background; and
 - (h) current lifestyle;of each Resident. However this list is not exhaustive.
7. The information referred to in paragraph 6 is obtained from:



- (a) the public domain; and
 - (b) the Resident or his or her representative or family.
8. We may collect personal information (but not sensitive information) from people through our marketing, business development, operational, human resources, research or other activities.
9. Where information is obtained from a third party, reasonable steps will be taken to ensure the subject Resident is made aware of the information being obtained. We will obtain your written consent before collecting sensitive information unless an lawful exception applies. An example of an exception is an emergency where it is unreasonable or impracticable in the circumstance to obtain your consent and collecting that information would lessen a serious threat to life, health or safety.

THE PURPOSE FOR HOLDING THE PERSONAL INFORMATION

10. The personal information collected is necessary to enable the Village to fulfil its mission of providing each Resident with the care services each Resident has respectively requested, and to ensure that the Village is acting in the best interests of each Resident by making a thorough assessment of each Resident's needs and medical history prior to making any recommendations in relation to each respective Resident.

USE AND DISCLOSURE OF PERSONAL INFORMATION

11. Modern aged care service practices mean that a Resident's care will be provided by a team of professionals working together. A Resident may require assistance from professionals, for example, a medical practitioner, pharmacist, physiotherapist, dentist, diversional therapist etcetera. At these times the Village staff may need to consult with such professionals and share the personal information of a Resident in order to determine the care plan and requirements of that Resident.
12. This personal information will not be released to third parties unless:
- (a) the Resident has consented to the disclosure of the information; or
 - (b) the Village is required by statute or law to disclose, reproduce, use or disseminate the personal information; or
 - (c) the personal information is in or enters the public domain, otherwise than as a result of a breach by the Village of its duties hereunder or as a result of disclosure by any person receiving the personal information from the Village; or
 - (d) the Resident requires treatment at a hospital and the hospital requires access to the personal information of the Resident and the Village has received the prior written authorisation of the Resident (unless it is an emergency and the Resident's life is at risk, in which event no prior authorisation from the Resident is required).
13. Where the Village outsources any of its services or hires contractors to perform services within the Village, the Village requires such service people or contractors to also comply with the Privacy Act and this Privacy Policy.



14. If we collect information about you and you would reasonably expect us to use or disclose the information for the purpose of marketing, we will ensure that an easy-to-use, unsubscribe or opt-out procedure is available to you in all our marketing communications.
15. We will never sell or trade your personal information and we do not disclose your personal information to overseas recipients.

PERSONAL INFORMATION – QUALITY

16. This Privacy Policy is premised on ensuring the information held by the Village is accurate, complete and up-to-date.
17. If any of the information provided has changed or is considered incorrect, the Resident concerned should contact the management of the Village ("Management").
18. You are encouraged to contact the management of the Village if you become aware that any personal information of yours that we hold is misleading, incorrect or out of date. This will assist us with maintaining an accurate record of your personal information.

PERSONAL INFORMATION – SECURITY

19. All personal information is held by the Village under lock and key.
20. The purpose of such security is to protect all personal information from misuse, loss, unauthorised access, modification or disclosure.
21. We also secure our computer and networks to protect our electronic data, for example by using firewalls, anti-virus software, identification codes and passwords and other security measures, in order to control access to computer systems. We also regularly back-up our electronic data to minimise loss of data in the event of system failures.

ACCESS TO PERSONAL INFORMATION

22. A request to access information should be made to Management.
23. If a request is declined, the person making the request will be told why. There are circumstances where, by law, we may not give you access to the personal information we hold about you. For example, we cannot give you access if it would unreasonably affect someone else's privacy or if giving you access poses a serious threat to someone's life, health or safety.

DESTROYING PERSONAL INFORMATION

24. Personal information will be retained for an appropriate period as determined by the Village or required by law and thereafter will be destroyed by a secure means.

CHANGES TO THE PRIVACY POLICY

25. The Village may make changes to this Privacy Policy at any time. Any such changes will be publicised to the Residents.



COMPLAINTS ABOUT PRIVACY

26. If a Resident has a complaint about the handling by the Village of a Resident's personal information or a Resident is of the opinion that this Privacy Policy has not been complied with, the Resident can lodge a complaint with Management. We will acknowledge receipt of your complaint, and try to investigate and respond to you within 30 days. If you are unhappy with the outcome, you can lodge a complaint with the Office of the Australian Information Commissioner.
27. Management is happy to discuss any complaint or comment a Resident may have about the handling of his or her personal information or to answer any question the Resident may have about this Privacy Policy.
28. All complaints will be dealt with fairly and as expeditiously as possible.

Date of this Policy: 6 May 2014