

OLIVET'S PRIVACY POLICY AND PROCEDURES

Introduction

1.1 ABOUT OLIVET AGED CARE

The Christadelphian Welfare Association (Vic) Inc. ABN 47 986 487 998 ("Olivet Aged Care", "we" "us" and "our") operates a Residential Aged Care Facility, Respite Services and a Day Centre in Ringwood Victoria.

We are committed to protecting your privacy. As part of our commitment, this Privacy Policy outlines how Olivet Aged Care manages personal information.

We will use all reasonable efforts to protect the privacy of individuals' personal information and to comply with the obligations imposed by the *Privacy Act 1988* (Cth) (Privacy Act), the Australian Privacy Principles (APPs), the Aged Care Act and the Aged Care Principles.

We will only collect personal information by lawful and fair means and will only collect personal information that is necessary for one or more of our organisation's functions or activities.

If it is reasonable and practicable to do so, we will collect personal information about an individual only from that individual.

In meeting our obligations with respect to the privacy of our clients we acknowledge that people with vision or hearing impairments and those of culturally and linguistically diverse people may require special consideration.

1.2 WHO DOES THIS POLICY APPLY TO?

This policy applies to your personal information if you:

- J are a current or former resident of Olivet Aged care, or are a relative or representative of a resident;
- J are a current or former client of our Respite services or Olivets' Olive Grove House - Day Centre;
- J have made enquiries or contacted us to enquire about our services; or
- J have applied for a job with us (but you are not a current or former employee); and
- J we hold your personal information.

If you are unsure whether we hold your information or whether this policy applies to you, you should contact us (our contact details are at the bottom of this policy).

Collecting your personal information

2.1 WHAT TYPE OF INFORMATION DO WE COLLECT?

The type of information we collect from you depends on our relationship with you – for example, whether you are a resident in Olivet Aged Care, a relative of a resident, or have simply made enquiries about our products and services.

The types of information we collect in relation to residents at Olivet Aged Care, includes:

- J name and date of birth;
- J contact details (including address, phone number(s), email);
- J health information (which will include care needs, records of care assessments, clinical records about care or treatment, medical history, test results);

- J anyone you have chosen, or who has been appointed to act on your behalf, including friends or relatives, next of kin, persons appointed as power of attorney or guardian;
- J billing details;
- J records of our interactions with you, for example emails, letters, notes and in some cases voice recordings of telephone conversations you have had with our employees;
- J pension or DVA details;
- J personal preferences (for example, in relation to activities or events); and
- J feedback on services.

If you are a relative or representative of a resident in Olivet Aged Care, we may collect:

- J your name;
- J your contact details (including address, telephone number(s) and email); and
- J records of your interactions with us (including correspondence like letters and email).

If you are a client or guest of our Respite Services or Olive Grove House, we may collect the following types of information about you:

- J your name and contact details;
- J information about your health including your medical history, medications you take, test results;
- J your Medicare and private health insurance details;
- J your billing information;
- J information about your emergency contact and any person who is able to act on your behalf or is responsible for billing on your behalf.

2.2 HOW WE COLLECT YOUR INFORMATION

Olivet Aged Care collects information in a number of ways, including:

- J if you contact us by email, phone, post or online we will keep a record of that contact;
- J when you apply to become a resident at Olivet Aged Care, we will have a record of your application and your resident agreement;
- J when you become a client or guest of our Respite Services and Olivet Grove House, we will collect the information you provide on the client or guest application form.

We will always endeavour to collect information from you directly, however in some cases we may collect information about you from others. For example, we may collect your information from:

- J if someone is acting on your behalf, such as a relative, or someone has been formally appointed to act on your behalf, such a person who appointed as your power of attorney;
- J from your doctor, specialist, hospitals or other health professionals involved in your care or treatment; and
- J from government departments such as the Department of Human Services (including Medicare or Centrelink details) or the Department of Veterans' Affairs.

If you are providing us information about another person on their behalf, you must ensure that you have their permission to do so and you should inform that person (where practicable) that we will handle their information in accordance with this policy.

2.3 IF YOU DO NOT PROVIDE ALL OF THE INFORMATION WE HAVE REQUESTED

If you do not provide all of the information we have reasonably requested, we may be unable to provide you with the products or services you have requested from us.

2.4 PURPOSES OF COLLECTING YOUR PERSONAL INFORMATION

We collect and hold your personal information in order to provide you with our services and products. For residents at Olivet Aged Care, we primarily collect and hold personal information in order to provide appropriate residential care. For clients and guests of our Respite Services and Olive Grove House, we collect information in order to provide Respite and Day Centre Care and Activity services. Refer to section 3 (below) on how we use and disclose the personal information we collect

Using and disclosing your personal information

3.1 WHAT WE MAY USE YOUR INFORMATION FOR

We use your personal information to provide, manage and administer our services and products to you and to operate an efficient and sustainable business. As part of doing so, we may use your personal information to:

- J provide you with appropriate residential care and services;
- J provide clinical services to you (for example, services by nurses, doctors or other healthcare professionals);
- J contact you, or your relative or representative about matters relating to you, your care or the products and services we provide to you;
- J schedule and book activities and services;
- J process payments;
- J answer your queries and resolve complaints;
- J undertake quality assurance and service improvement;
- J carry out internal functions like administration, finance, information technology, training and audit;
- J undertake customer surveys, customer and market research and analysis;
- J monitor, price and evaluate our services and products;
- J conduct marketing and promotional activities;
- J practise effective risk management; and
- J comply with relevant laws and regulations;

3.2 DISCLOSING YOUR PERSONAL INFORMATION

Olivet Aged Care will disclose your personal information where required to provide you with our services. In some instances, we may disclose personal information to third parties, including to:

- J anyone engaged on our behalf to provide services, such as contractors or service providers. We require all service providers that we engage to protect the privacy of your information and to comply with any relevant privacy laws;
- J healthcare providers who are involved in your care, such as doctors, hospitals, allied health professionals and specialists;
- J government and regulatory bodies including the Department of Human Services, State or Territory health departments, the Aged Care Complaints Commissioner and the Aged Care Quality Agency;
- J on a confidential basis, with our Christadelphian Welfare Association (Vic) Inc.;
- J any persons acting on our behalf, including professional advisers;
- J where disclosure is permitted or required by law

Where we engage contractors, service providers or others to act on our behalf, Olivet Aged Care will take reasonable steps to protect the privacy of all information disclosed and requires such parties to comply with any relevant privacy laws. You have the right to ask these organisations or contractors for access to information they hold about you.

In the course of operating our business we may in some instances disclose information to recipients located outside of Australia, including in Sri Lanka.

3.3 DIRECT MARKETING

From time to time, we may contact you (by post, email, phone or SMS) to provide you with information about services offered by us that may be of interest to you. This includes information or services that can help you improve your wellbeing.

When you become our customer, you consent to us using your personal information for direct marketing purposes (as described in this document), unless you have contacted us to withdraw your consent. If you do not wish to receive marketing material from us you can contact us at any time to let us know. Our contact details are at the end of this policy. When you contact us to make this request, we will action your request within 5 working days.

Security, access and correction

4.1 HOW WE STORE YOUR INFORMATION SECURELY

Olivet Aged Care stores personal information in a combination of electronic and hard copy (paper-based) formats.

We take all reasonable steps to protect the personal information we hold and ensure it is secure, this includes the following measures:

-)] secure physical storage of documents;
-)] appropriate security measures on premises we occupy;
-)] network and communications security measures;
-)] restricting access to physical or electronic records only to authorised personnel; and
-)] monitoring, compliance and quality system procedures.

We keep information for as long as it is required to be able to provide the intended service(s) or to meet legal and regulatory requirements. If we no longer require personal information for any purpose, we will take steps to permanently de-identify or securely destroy it in line with organisational procedures.

4.2 ACCESSING YOUR PERSONAL INFORMATION

You have a right to reasonable access to any information that Olivet Aged Care holds about you. To request access to your information, please contact us (our contact details are outlined below).

We may ask you to submit your request in writing and provide proof that you are legally entitled to obtain access to the information you are requesting (for example, if you are making a request on behalf of someone else).

We reserve the right to charge for providing access to certain information, as permitted by law and you will be informed of this at the time of your request. We will always endeavour to meet your request for access within a reasonable timeframe and in the manner requested by you if it is reasonable to do so.

However, in some circumstances we may decline a request for access to information such as where we no longer hold the information, or where denying access is permitted or required by law. If we are unable to give you access to the information you have requested, we will give you written reasons for this decision when we respond to your request.

4.3 UPDATING OR CORRECTING YOUR INFORMATION

To enable us to provide you with the best possible service, it is important that the information we hold about you is accurate. We will take reasonable steps to ensure your personal information is accurate, complete and up-to-date at the time of collecting, using or disclosing it. In addition, if your information changes you should contact us to let us know.

If you believe any information we hold about you is inaccurate, incomplete or out-of-date, you should contact us (our contact details are below).

Privacy and security online

5.1 SECURITY MEASURES

Our security measures include, but are not limited to:

- ❖ training our Workers on their obligations with respect to your Personal Information;
- ❖ use of passwords when accessing our data storage system; and
- ❖ the use of firewalls and virus scanning tools to protect against unauthorised interference and access.

This applies to Workers who are required to have up-to-date virus protection software and firewalls installed on any device used to access documents containing Personal Information.

Contractors working on our behalf are required to:

- ❖ comply with the Australian Privacy Principles;
- ❖ have up-to-date virus protection software and firewalls installed on any device used to access documents containing Personal Information;
- ❖ notify us of any actual or potential breaches of security;
- ❖ indemnify us in relation to any loss suffered by a breach.

We will, as soon as practicable and in accordance with the law, destroy or de-identify any Personal Information that is no longer required for our functions.

5.2 RESPONSE TO A DATA BREACH

A data breach occurs when personal information is lost or subjected to unauthorised access, modification, use or disclosure, or other misuse or interference. All Workers are responsible for reporting any actual or suspected data breach to the manager on duty.

Detail about how we manage any actual or suspected data breach is set out in our Data Breach Response policy which includes our Data Breach Response Plan.

5.3 ONLINE SECURITY

Our website at olivet.com.au site uses Secure Socket Layer (SSL) encryption to keep your transactions secure and private. SSL is the industry standard for data encryption. It provides a secure link between your browser and our server, and scrambles your personal information to ensure it is kept private during transmission over the internet.

5.4 WHAT WE COLLECT WHEN YOU USE OUR WEBSITE

When you access the www.olivet.com.au website, we may collect anonymous technical information about your use of the website. This may include information such as the type of browser used to access the website and the pages visited.

This information is used by Olivet to make decisions about maintaining and improving our websites and online services. This information remains anonymous and is not linked in any way to personal identification details.

When you visit our websites we may set a cookie on your machine so that when you next visit our websites it links to your personal information that is stored on our system. A “cookie” is a small text file placed on your computer by a web server when you access a website. Cookies are frequently used on websites. Cookies in themselves do not identify the individual user, just the computer used. We use cookies to collect data to help us determine which pages are most popular, peak usage times and other information that helps us make our websites easier and more efficient for you to use.

You can choose if and how a cookie will be accepted by configuring your preferences and options in your browser. For example, you can set your browser to notify you when you receive a cookie or to reject cookies. However, if you decide not to display cookies, then you may not be able to gain access to all the content and facilities of this website.

Contacting us

6.1 OUR CONTACT DETAILS

If you would like to access your personal information, correct or update your information, give us feedback you can contact us as per the following details:

For our Residential, Respite and Day Center customers:

Call us on (03) 9870 5495 (8.30am-5pm, Monday-Friday, AEST)

Email us at Olivet Aged Care reception@olivet.com.au

Write to us at Olivet Aged Care, 7 – 9 Rupert Street, Ringwood, Vic 3134

6.2 COMPLAINTS ABOUT HOW WE HANDLE YOUR INFORMATION

If you would like to make a complaint about the handling of your information we encourage you to contact us to try to resolve the matter first. We will always try to work with you to resolve the issue. In some cases, we may need to investigate the matter first and we will keep you updated on the progress of such investigation.

	Privacy Officer	Director of Nursing	Chief Executive Officer
Phone	91315500	91315500	91315500
FAX	91315539	91315539	91315539
Email	reception@olivet.com.au	reception@olivet.com.au	reception@olivet.com.au

If we have tried to resolve your complaint and you are not happy with our response, you may contact the following:

AUSTRALIAN INFORMATION COMMISSIONER

The Australian Information Commissioner receives complaints under the Act. Complaints can be made:

Online: <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>

By phone: on 1300 363 992

By fax: on +61 2 9284 9666

In writing, by addressing your letter to the Australian Information Commissioner at the:

Office of the Australian Information Commissioner

GPO Box 5218

Sydney NSW 2001

OR

Office of the Australian Information Commissioner

GPO Box 2999

Canberra ACT 2601

AGED CARE COMPLAINTS COMMISSIONER

The Aged Care Complaints Commissioner receives complaints about aged care services under the Act. Complaints can be made:

Online: <https://www.agedcarecomplaints.gov.au/raising-a-complaint/lodge-a-complaint/online-complaints-forms/>

By phone: on 1800 550 552.

Or if you need an interpreter you can phone the Translating and Interpretation Service on 131 450 and ask them to put you through to the Aged Care Complaints Commissioner on 1800 500 552.

For hearing or speech impaired TTY users phone 1800 555 677 then ask for 1800 550 552.

For Speak and Listen users phone 1800 555 727 then ask for 1800 550 552.

For Internet relay users connect to <https://internet-relay.nrscall.gov.au/>.

In writing to:
Aged Care Complaints Commissioner
GPO Box 9848
Melbourne 3001

Privacy Officer

We have appointed a Privacy Officer to manage and administer all matters relating to protecting the privacy of individual's Personal Information.

The Privacy Officer can be contacted if any relevant person wishes to obtain more information about any aspect of this policy or about the way in which we operate to protect the privacy of individual's Personal Information.

As stated above, complaints may also be made to the Privacy Officer if any person suspects we have breached this Privacy Policy, the Australian Privacy Principles or they are otherwise unhappy with the management of their or if they are responsible for another person, that person's Personal Information.

Definitions

WHAT IS "PERSONAL INFORMATION"?

Personal Information is information or an opinion, whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

WHAT IS "SENSITIVE INFORMATION"?

Sensitive Information includes information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record, biometric information, biometric templates, health information about an individual and genetic information.

WHAT IS "HEALTH INFORMATION"?

Health Information is:

- ❖ 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 that is also personal information; or
- ❖ 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.

WHAT IS "UNSOLICITED INFORMATION"?

Unsolicited Information is all personal information received from an individual that we did not actively seek to collect.