

Statement of Policy: Client Information Privacy

Purpose

This statement describes the personal information handling practices of EACH and gives individuals an understanding of the type of personal information that EACH manages.

References

- Health Records Act 2001(Vic)
- Health Services Act 1988(Vic)
- Information Privacy Act 2000 (Vic)
- Privacy Act 1988 and the Australian Privacy Principles

Definitions

Personal information 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.

Personnel include all staff, trained volunteers, authorised students on placement and contracted workers.

Introduction

EACH is committed to protecting individuals' rights to privacy. EACH complies with federal and state legislation relating to confidentiality and privacy where relevant. All personnel within EACH maintain the highest standards of professional practice and codes of conduct regarding the confidentiality of personal information.

EACH personnel receive training and understand their obligations under the laws and ethical codes of professional conduct relating to privacy and confidentiality and always ensure that the confidentiality of client information is protected.

Consent

When we collect your personal information, our personnel will discuss the content of this policy with you and request your consent to the collection. If you do not consent to collection of your personal information, the level or type of service that we can offer to you is limited. Most of our services require collection of relevant personal information as this enables us to provide you with the most appropriate care, support and/or treatment.

Anonymous

It is the right of an individual not to identify him or herself when accessing services from EACH. If you choose not to disclose your identity, the level or type of service that we can offer is limited. Most of our services require collection of your personal information as this enables us to provide you with the most appropriate care, support and/or treatment.

Collection

Information is collected in a respectful, lawful and non-intrusive way. Wherever possible, information is collected directly from you rather than from a third party. We only collect personal information for purposes that are directly related and necessary to our activities and the services that we provide, and which is essential to the quality and effective administration of our services.

We also collect personal information related to our members, our volunteers and employees and others who participate in the functions and operations of EACH.

Use and Disclosure

We only use your personal information for the purpose for which it was given to us, or for purposes that are directly related to one of our functions or activities relevant to you. Personnel, who are involved with your care, support and treatment will access your personal information. Information that is essential for your continuing care may be shared with other appropriate service providers within EACH.

We do not disclose personal information to other organisations or anyone else unless:

- You have consented to the disclosure,
- You would reasonably expect, or have been told, that information of that kind is usually passed to those individuals, bodies or agencies,
- Is otherwise required or authorised by law,
- It will prevent or lessen a serious and imminent threat to somebody's life or health,
- It is reasonably necessary for a law enforcement function.

Some information, which contains no personal identification, is used to help plan our services, for reporting purposes to our funding bodies and for quality improvement. This information may also be used for research that will help us to provide better overall healthcare for the community. As this information is not personally identifiable, specific consent to this is not required.

Personal information may be transmitted to organisations outside your home state. This will only be done where you have given explicit consent, or where the recipient organisation is subject to similar, binding privacy obligations and it is reasonably believed that you would give consent and it is impracticable for you to do so.

We do not disclose personal information to overseas recipients.



Data Quality

We take steps to ensure that the personal information we collect is accurate, up to date and complete. This includes maintaining and updating personal information when you advise us that your personal information has changed, and at other times as necessary.

Data Security

We take reasonable steps to protect the personal information we hold against loss, unauthorised access, use, modification or disclosure and against other misuse. These steps include password protection for accessing electronic information and securing paper files with physical access restrictions.

Access to personal information held on computer systems is controlled and monitored. Only personnel required by their duties to have access to client records and information systems are authorised to access such information.

When no longer required, personal information is destroyed in a secure manner in accordance with the law and the requirements of our funding agreements.

Access and Correction

Access to your personal information is available to you on request. However, information relating to others or where the information would otherwise be exempt from disclosure by law will not be given. Proof of identity must be presented to us before personal information will be released.

If we do not agree to provide access to personal information, we will advise you of the steps to take to seek a review of, or to appeal our decision (as applicable).

Whilst EACH is not a government agency, because we provide services under contract with government, we do receive requests for personal information under *Freedom of Information* legislation. This would occur when an individual receiving services at EACH has made a request for access to their personal information directly with the government agency responsible for administering and funding that service. EACH is contractually obliged to comply with these requests.

You can take steps to request a correction of your personal information held by us. Requests should be in writing and must provide evidence to support the requested changes. If we do not agree to make the requested changes to personal information, you may make a statement about the requested changes and we will attach this to our file.



How to contact us

Contact us to obtain further information regarding this privacy policy or to provide any comments.

Telephone 1300 00 EACH (1300 00 3224)
Email privacyofficer@each.com.au
Post Building 2, 254 Canterbury Road, Bayswater 3153

If you have concerns about the way we handle your personal information, or you would like to make a complaint relating to privacy matters, please use the above contact details. Your concerns will be referred to the EACH Complaints Officer who will conduct an investigation into the matter if this is required.

Privacy complaints:

- Will be treated seriously,
- Will be dealt with properly,
- Will be dealt with in a confidential manner, and
- Will not affect the standard of services that you receive from us.

Information collected online by EACH.

Collection

It is our usual practice to collect information about all visitors to our online resources. That information is very limited and only used to identify generic visitor behavioural patterns.

Sometimes we use third party platforms to deliver information. These are sites hosted and managed by organisations other than ourselves. Before deciding if you want to contribute to any third party site you should read their privacy policy.

There are several methods and packages that we use to collect visitor behaviours on each of our online platforms. We use Google Analytics on our websites. Information and data collected through Google Analytics is stored by Google on servers in the United States of America, Belgium and Finland. You can opt out of the collection of information via Google Analytics by downloading the [Google Analytics Opt-out browser add on](#).

When you visit any of our online resources, our metric tools may collect the following information about your visit for statistical purposes:

- server address
- top level domain name (for example .com, .gov, .au, .uk etc.)
- the date and time of your visit to the site
- the pages you accessed and documents downloaded during your visit
- the previous site you visited
- if you've visited our site before
- the type of browser used.

We record this data to maintain our server and improve our services. We do not use this information to identify anyone personally.



main office
building 2, 254 canterbury road bayswater vic 3153
1300 00 EACH (1300 00 3224) f 03 9876 0100
info@each.com.au each.com.au
abn 46 197 549 317

Cookies

Most of our online platforms use sessions and cookies. The core functionality on these platforms will be largely unaffected if you disable cookies in your browser but you may be unable to access some advanced functions.

Use and disclosure

We do not give personal information collected online to other agencies, organisations or anyone else without consent unless the individual would reasonably expect, or has been told, that information of that kind is usually passed to those agencies, organisations or individuals, or the disclosure is otherwise required or authorised by law.

Data quality

We will correct any personal information that we hold about you on request.

If you are on one of our automated email lists, you may opt out of further contact from us by clicking the 'unsubscribe' link at the bottom of the email.

Data security

There are inherent risks in transmitting information across the internet and we do not have the ability to control the security of information collected and stored on third party platforms. In relation to our own servers, we take all reasonable steps to manage data stored on our servers to ensure data security.

Access and correction

For information about how to access or correct personal information collected on our website see ['Access and correction' \(above\) in](#) this document.