

Privacy and Information Management Policy

Policy

Geelong and Bellarine Podiatry will comply with:

1. the Privacy Act 1988 and the Privacy Amendment Act 2012 to protect the privacy of individuals' personal information
2. the Victorian Privacy and Data Protection Act 2014 <https://www.legislation.vic.gov.au/in-force/acts/privacy-and-data-protection-act-2014/026>

This includes having in place systems governing the appropriate collection, use, storage and disclosure of personal information, access to and correction and disposal of that information.

Outcome

Compliance with legislative requirements governing privacy of personal information. All Geelong and Bellarine Podiatry participants are satisfied that their personal information is kept private and only used for the intended purpose.

Procedure

Ensuring all Geelong and Bellarine Podiatry Staff Understand Privacy and Confidentiality Requirements

1. The Directors of Geelong and Bellarine Podiatry will review their Privacy Policy annually and ensure they understand their responsibility to protect the privacy of individuals' personal information.
2. All Staff will undergo training related to Privacy and Confidentiality Requirements at the time of induction and then annually.

Managing Privacy of Participant Information Storage

- a) Participant information collected is kept in an individual participant record.
- b) A participant record includes: personal information, clinical notes, investigations, correspondence from other healthcare providers, photographs and/or video footage
- c) A password protected, secure computer and multi-factorial authenticated practice management software system 'Cliniko' are used at Geelong and Bellarine Podiatry as a means of protecting information stored on the computer. Other security related procedures such as user access passwords, multi-factorial authentication also assist with the protection of information.
- d) Participant information is stored for seven years post the date of last discharge. In the case of participants aged under 18 years, information is kept until their 25th birthday and 7 years post discharge.
- e) Participant related information, or any papers identifying a participant are destroyed by shredding and deleting from the computer and all databases.
- f) User access to all computers and mobile devices holding participant information is managed by passwords and automatic inactive logouts.

Managing Privacy and Confidentiality Requirements of Participants

- a) Geelong and Bellarine Podiatry refers to their Privacy Policy on the participant's NDIS Service Agreement.
- b) The NDIS Service Agreement includes 5 Consents:
 - i. Consent for sharing and obtaining Information
 - ii. Consent for receiving services
 - iii. Consent for photography
 - iv. Consent to participate in Participant Satisfaction Surveys

v. Consent to participate in Quality Management Activities

These consents are discussed with the participant and /or their decision maker in a way they can understand prior to the commencement of service.

- c) Persons contacting Geelong and Bellarine Podiatry with an enquiry do not need to provide personal details. However, once a decision is made to progress to utilising Geelong and Bellarine Podiatry's services, personal and sensitive information will need to be collected.
- d) Geelong and Bellarine Podiatry may need to share pertinent participant information with other Allied Health Professionals at the time of case conferencing or when determining support plans. Information is only shared in order to provide the best service possible and is only shared with those people whose Professional Codes of Ethics include privacy and confidentiality. Permission to share information is sought from the participant prior to the delivery of services and as required at other points of intervention as / if required.
- e) Personal information is not disclosed to third parties outside of Geelong and Bellarine Podiatry, other than for a purpose made known to the participant and to which they have consented, or unless required by law.
- f) Participants are informed there may be circumstances when the law requires Geelong and Bellarine Podiatry to share information without their consent.

Keeping Accurate Participant Information

Participants are informed of the need to provide us with up to date, accurate and complete information. Geelong and Bellarine Podiatry staff update information on the participant record at the time of reviews or when they become aware of change in information. AHP staff at Geelong and Bellarine Podiatry update the participant record as soon as practical after the delivery of services to ensure information is accurate and correct.

Using Participant Information for Other Purposes

Under no circumstances will Geelong and Bellarine Podiatry use personal details for purposes other than stated above, unless specific written consent is given by the participant or their representative.

Participant Access to Their Information

Participants have the right to access the personal information Geelong and Bellarine Podiatry holds about them. To do this, participants must contact the Director of Geelong and Bellarine Podiatry.

Management of a Privacy Complaint

If a person has a complaint regarding the way in which their personal information is being handled by Geelong and Bellarine Podiatry, in the first instance they are to contact the Director. The complaint will be dealt with as per the *Incident and Complaint Management Policy*. If the parties are unable to reach a satisfactory solution through negotiation, the person may request an independent person (such as the [Office of the Australian Privacy Commissioner](#)) or the [NDIS Quality and Safeguards Commission](#) to investigate the complaint. Geelong and Bellarine Podiatry will provide every cooperation with this process.

Reference

- a) ['Guidelines on Privacy in the Private Health Sector', Office of the Australian Information Commissioner](#)