



# PRIVACY NOTICE:

The right to privacy and confidentiality is embedded in a number of Victorian and Federal Acts that all staff, carers and residents of Doutta Galla **must** abide by including:

1. Privacy Act 1988 (Cth)
2. Health Records Act 2001 (Vic)
3. Quality of Care Principles, S96-1(1) Aged Care Act 1997

## What is Privacy?

Privacy is defined as the right or expectation of every individual not to be interfered with, free from surveillance and eavesdropping, bodily privacy, along with a moral right to be left alone and have personal information withheld from public knowledge or observation.

## Australian Privacy Principles:

Although Doutta Galla is exempt from being regulated by the Australian Privacy Principles (APPs), we firmly believe that the protection of private and personal information is paramount and have adopted these principles to ensure best practice at our organisation. These principles govern how our organisation manages:

1. Open and transparent management of personal information
2. Anonymity and pseudonymity
3. Collection of solicited personal information
4. Dealing with unsolicited personal information
5. Notification of the collection of personal information
6. Use or disclosure of personal information
7. Direct marketing
8. Cross-border disclosure of personal information
9. Adoption, use or disclosure of government related identifiers
10. Quality of personal information
11. Security of personal information
12. Access to personal information
13. Correction of personal information

## How we abide by the Privacy Principles:

### 1. Open and transparent management of personal information:

Records of personal information are stored in both paper (resident/employee files) and electronic records (iCare health records management, EmpLive, MicrOpay payroll records). Access to information is strictly limited according to a 'needs to know' basis. We also ensure IT security through the use of password protection, restricted access, and firewalls etc.

Access to information is provided in accordance with relevant legislation, however all individuals should be aware that Doutta Galla is not bound by the Freedom of Information Act 1982, given our not for profit, health care provider status.

### 2. Anonymity and Pseudonymity:

Where appropriate we provide options for individuals to submit information anonymously – for example via our whistleblower processes; feedback/suggestion process (Opportunity to Comment forms) and our survey processes.

### 3. Collection of Information:

We only collect information that is directly relevant for the purposes of provision of care for residents, or management of staff in our organisation in accordance with our legal responsibilities.

### 4. Notification of Collection:

At the point of resident admission or staff employment, individuals are notified of the collection of any personal information and provided copies of the relevant privacy statement/policy. These documents are readily available on our intranet and website.

### 5. Use or disclosure of your information:

Information collected is only used in accordance with the purposes for which we collect it – including provision of care to our residents, for the purposes of management of our staff or information that is directly related to one of our functions or activities as an organisation.

We do not pass on any information unless:

- a) consent has been given by the resident, their authorised legal representative or our employee;
- b) we have informed you that information may be passed on to a third party (such as for Medicare purposes);
- c) it is required or authorised by law;
- d) or in specific circumstances where criminal activity, abuse, neglect or imminent risk of abuse or harm of a person is known or suspected to have occurred.

### 6. Direct Marketing:

Doutta Galla does not permit the disclosure or use of our resident or staff information for the purposes of Direct Marketing.

### 7. Cross-border disclosure of personal information:

Our organisation does not disclose information to individuals or entities outside of Australia. Data collected is preferably stored via a host provider located within Australia. Any agreement for data storage outside of Australia includes strict conditions upon which the data is to be stored and must not be used/accessed by any entity or individual not authorised.

### 8. Adoption, use or disclosure of government related identifiers

Any government related identifier (Medicare number, Centrelink number, tax number etc) is strictly stored, used and disclosed in accordance with the APPs. Access and use of this information is highly restricted to authorised staff only.

### 9. Quality of personal information:

Our processes and procedures are designed to capture high quality information that is accurate and up to date. We also have multiple processes that enable the updating of this data on a regular basis or as required.

### 10. Security of personal Information:

Personal information collected by Doutta Galla is subject to strict controls to ensure security is maintained. As well as protecting the use and disclosure of your information we also control the destruction and de-identification of data when it is no longer required or as stipulated by law.

### 11. Access to personal information

Individuals may access their personal information in accordance with our organisation's policies and procedures. To ensure that access is controlled we have three Privacy Officers who each are responsible for information related complaints or requests within their areas.

### 12. Correction of personal information

If at any point you believe that information that the organisation has collected, stored, accessed or used about you that is incorrect, out of date or inaccurate, at any time you may provide the correct information and request that your records be reviewed and updated as appropriate.

## Want More Information?

Our Privacy Policy and Privacy statement can be accessed via:

1. Our website at <http://www.dgas.org.au/>
2. Our intranet: [Human Resources/DGAS Manual, Forms and Letters](#)
3. By making a request to the Facility Manager or administration officer

## Making a Complaint or Request for Information:

If for any reason you would like to make a complaint about the collection, use, disclosure, management, storage or security of personal information about you that is used/stored by the organisation, you may:

## Make a Complaint:

1. **To the Facility Manager** – via letter or by using our Opportunity to Comment Form
2. **By writing directly to the appropriate Privacy Officer** (see below)
3. **Make a complaint to our Whistleblower service provider (STOPLine)**
  - a. **Call:** 1300 304 550
  - b. **Email:** [dgas@stopline.com.au](mailto:dgas@stopline.com.au)
  - c. **Write to:** Doutta Galla c/o  
**The STOPLine**  
Locked Bag 8  
HAWTHORN VIC 3122

## Requests for Access to Information:

All information requests must be submitted **in writing** to the appropriate Privacy Officer as follows:

1. **Resident information (including medical records):**  
Write to:  
**The Privacy Officer – Residential Care**  
General Manager, Operations and Service Development  
75 Moreland Street  
FOOTSCRAY VIC 3011
2. **Employee Records:**  
Write to:  
**The Privacy Officer – Staff Records**  
General Manager Organisational Capability  
75 Moreland Street,  
FOOTSCRAY VIC 3011
3. **Financial/Corporate Records:**  
Write to:  
**The Privacy Officer – Finance and Corporate**  
General Manager – Commercial and Corporate Services  
75 Moreland Street  
FOOTSCRAY VIC 3011