

Policy

Outlook Christian Living is committed to respecting the privacy of personal information. It is bound by a set of National Privacy Principles and Victorian Health Privacy Principles that establish the benchmark for how personal information should be handled. These principles have been embraced by Outlook Christian Living as part of standard operating procedures.

This means that all personal information that enters Outlook Christian Living is handled in a uniform manner and the highest regard is taken for maintaining the security of records at all times.

Our organisation holds contact information about its employees and clients, including date of birth, next of kin information and medical records. It also holds limited financial information.

Outlook Christian Living may, from time to time, disclose some of this personal information to the Commonwealth Government or its agencies. This will be done in accordance with the provision of the Aged Care Act or other relevant law and will be done for the purpose of informing decisions about funding and medical care. The Commonwealth Government is also subject to laws dealing with privacy and has its own policies that are designed to safeguard your personal information.

If you are concerned that Outlook Christian Living may have handled your personal information inappropriately or would like to know more about our privacy practices, including your right to request access to any personal information held by our organisation, please contact our Chief Executive Officer on 9795 7566.

It is the policy of Outlook Christian Living that all requests for access are made in writing. Our Chief Executive Officer will arrange for an access form to be sent to you and can assist with any enquiries you may have about the process.

All complaints are taken seriously, we will endeavour to deal with them promptly.

Outlook Christian Living will respond to all requests for access within 45 days and, in most cases, will be able to respond well before that time.

Association for Christian Senior Citizens' Homes Inc t/as Outlook Christian Living

504 Police Road, North Dandenong. 3175

P: 9795 7566 F: 9795 2088 E: admin@outlookcl.com.au

Inc. Ass. No. A010731822

Introduction

This Privacy Policy outlines how Outlook Christian Living will manage the personal information it holds about its residents, staff, volunteers, contractors and other stakeholders.

In line with our philosophy, Outlook Christian Living respects and upholds the individual's rights to privacy and rights to their personal information. Consequently, Outlook Christian Living is committed to protecting the privacy of all stakeholders, including protecting the privacy of personal information it collects, holds and administers in the process of providing its services. These commitments are undertaken to comply with the Privacy Act 1988 and other relevant legislation.

When collecting personal information, Outlook Christian Living will, where possible, indicate the purpose for the collection and use of the information, to whom it may be disclosed and how you can request access to the information.

All feedback or concerns about this policy or how personal information is handled by Outlook Christian Living is to be referred to the Chief Executive Officer.

Purpose for Collecting Information

Outlook Christian Living primarily collects personal information on its residents to ensure delivery of optimum health and aged care services. The main purpose for which our organisation collects and holds this information is to process applications for residency, and, in the case of the Aged Care Facility, to assess the level of medical care appropriate to the resident's needs, to make decisions about the level of funding that a resident will be entitled to receive and to provide relevant information to health professionals.

Openness

When collecting personal information, the organisation will, where possible, indicate the purpose for the collection and use of the information, to whom it may be disclosed and how you can request access to the information.

Outlook Christian Living will make the document available to any appropriate person who asks for it.

Type of Information we Collect, Use and Store

To ensure the delivery of optimum health care and services to residents, we will collect the relevant and appropriate information. Information regarding residents' representatives, staff, volunteers, and contractors is also collected (as required) as follows:

- Name and contact details of residents' representatives, staff, volunteers, contractors (including but not limited to address, telephone number and email address).
- Work Related particulars of staff, contractors, volunteers (including but not limited to taxation numbers, registration numbers, insurance particulars, work history, vaccination status, references).
- Relevant demographics and social information for residents, staff, volunteers (including but not limited to date of birth, gender, marital status, country of birth, spoken languages).
- Residents' clinical care and health information (Aged Care Facility only).
- Residents' health status and services provided (Aged Care Facility only).
- Residents' billing details.
- Name and contact particulars of any relevant carers and family members.
- Name and contact number of resident's general practitioner and other relevant health care providers (Aged Care Facility only).
- Residents and staff financial institution information.
- Government related identifiers for residents (including but not limited to Medicare, Centrelink, Department of Veteran Affairs).
- Records of our interactions with residents, representatives, staff, volunteers, contractors such as system notes, etc.
- Resident's preference for particular activities and/or events (Aged Care Facility only).
- Feedback on services.

Collection of Personal Information

Outlook Christian Living will not collect personal information unless the information is necessary for one or more of its functions or activities.

- The organisation will collect personal information only by lawful and fair means and not in an unreasonably intrusive way.

Privacy Policy

- The organisation will collect personal information about an individual from the individual. The organisation will take reasonable steps to ensure that the individual is aware of:
 - a. The identity of the organisation and how to contact it;
 - b. The fact that he or she is able to gain access to the information;
 - c. The purposes for which the information is collected;
 - d. The organisations (or the types of organisations) to which Outlook Christian Living usually discloses information of that kind;
 - e. Any law that requires the particular information to be collected;
 - f. The main consequences (if any) for the individual if all or part of the information is not provided.
- If it is reasonable and practicable to do so, Outlook Christian Living will collect personal information about an individual only from that individual.
- If the organisation collects personal information about an individual from someone else, it will take reasonable steps to ensure that the individual is or has been made aware of the matters listed above except to the extent that making the individual aware of the matters would pose a serious threat to the life or health of any individual.

Consequences if Personal Information Is Not Collected

Outlook Christian Living is committed to providing its residents with the best of care to improve and maintain their quality of life. If requested personal information is not collected because it is refused or not available, Outlook Christian Living may not be able to provide the service(s) that the resident requests, requires or might be entitled to.

We will endeavour to collect all information directly from the individual; however, from time to time as required we may collect information from other sources, such as from family, health practitioners, hospitals, etc.

Use of Personal Information

Outlook Christian Living will not use or disclose personal information about an individual for a purpose other than the primary purpose of collection and in accordance with regulatory requirements.

The organisation uses the personal information it collects for the purposes of providing, managing and administering its service(s). This includes, but is not limited to:

- Provision of residential aged care services to residents (Aged Care Facility only).
- Practising effective risk management.
- Complying with relevant laws and regulations.
- Resolution of complaints.
- Fulfillment of marketing promotions.

Disclosure of Personal Information

Outlook Christian Living will not use or disclose personal information about an individual for a purpose other than the primary purpose of collection and in accordance with regulatory requirements.

To be able to effectively provide our service(s), Outlook Christian Living may disclose information to others within the organisation. In order to provide, manage and administer our services and to operate an efficient and sustainable business, the organisation may also disclose information to third parties which may include (but are not limited to) the following:

- Contractors or service providers engaged by us.
- Any persons acting on our behalf, including professional advisers.

Privacy Policy

- Government and regulatory bodies (e.g. the Department of Social Services).
- Where disclosure is permitted or required by law.
- When another organisation helps us process transactions, store data, access data or provide services to you in order for them to perform their role.

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

Outlook Christian Living will ensure personal information will not be disclosed in the absence of a legal obligation to disclose it. If the organisation will use or discloses personal information without written consent it will make a written note of the use or disclosure.

Data Quality

Outlook Christian Living will take reasonable steps to ensure that personal information it collects, uses and discloses, is accurate, correct and up to date. It does so via its own internal quality system and auditing procedures.

If there is a belief that any stored information that is held about a person is incorrect, incomplete or out-of-date, Outlook Christian Living will endeavour to rectify the situation promptly and efficiently. Management will respond to all requests within a reasonable period and will take reasonable steps to amend records as required.

Personal Information Storage and Security

Outlook Christian Living holds personal information in a combination of secure electronic and hard copy formats. We take all reasonable steps to ensure that any personal information held by us is protected from misuse, loss and unauthorised modification or disclosure. Such steps include, but are not limited to:

- Secure physical storage of documents.
- Premises security measures.
- Network and communications security measures.
- Quality system procedures.

Outlook Christian Living will keep information for as long as it is required to be able to provide the intended service(s) and to meet legal and regulatory requirements. The organisation will take reasonable steps to permanently de-identify or securely destroy personal information that we no longer require for any purpose except in limited permitted circumstances.

Accessing Personal Information

Any person has a right to reasonable access to any information that Outlook Christian Living holds about this person. To request access to personal information, our Chief Executive Officer must be contacted. When the request is made, management may ask a person to complete relevant forms. We reserve the right to charge for providing access to certain information, as permitted by law, and a person will be informed of this at the time of request. Outlook Christian Living will respond to all requests for access within 45 days and, in most cases, will be able to respond well before that time. We will always endeavour to meet all requests for access in the manner requested by a person 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 management is unable to give access to the information that was requested, we will give written reasons for this decision when we respond to each such request. If a person has any

concerns about the refusal, is not happy with our response, or does not feel the complaint has been resolved, a person is able to seek advice from:

Office of Australian Information Commissioner

P: 1300 363 992 F: +61 2 9284 9666

Email: enquiries@oaic.gov.au

GPO Box 5218, Sydney NSW 2001

Correcting Personal Information

To enable Outlook Christian Living to provide stakeholders with the best possible service, it is important that the information we hold about individuals is accurate. We will take reasonable steps to ensure all personal information is accurate, complete and up-to-date at the time of collecting, using or disclosing it. If there is a belief that any stored information that is held about a person is incorrect, incomplete or out-of-date, Outlook Christian Living will endeavour to rectify the situation promptly and efficiently. Management will respond to all requests within a reasonable period and will take reasonable steps to amend records as required and within a reasonable period of time.

Cross Border Disclosure of Personal Information

Outlook Christian Living will not transfer personal information to third parties outside Australia unless they are subject to similar privacy laws or schemes, or consent of the individual has been obtained, or other provisions of Australian Privacy Principles 8 – Cross Border Disclosure of Personal Information apply.

Obligations for Obtaining Consent

Outlook Christian Living will provide an opportunity for residents, staff, volunteers and contractors to sign a written consent. Relevant consents will be discussed with individuals. Residents, staff and contractors are requested to provide written consent for the use and disclosure of personal information collected from them for the purpose of providing optimum care to residents. In the absence of consent being received from a resident or person authorised to act on their behalf; under the Privacy Act 1988 information can and will only be released to another:

- a. If there is a statutory obligation to disclose certain information (for example subpoenas, warrants, coronial inquiries, provision of other acts).
- b. If public interest requires the release of confidential information

Identifiers

If required, Outlook Christian Living might identify residents and staff by a number of unique identifiers internally assigned by the organisation. The organisation may however retain a record of other external agency personal identifiers that are required to provide services, coordinate with other agencies; or otherwise fulfil service, operational and other reporting requirements and obligations

Anonymity

Wherever it is lawful and practicable, individuals will have the option of not identifying themselves and participate in activities anonymously (e.g. completing evaluation forms, surveys, etc.)

Privacy Concerns, Complaints, Suggestions

Outlook Christian Living is committed to ensuring compliance with Privacy Legislation. Any suggestions, complaints, compliments that might improve this policy area are encouraged to be submitted via submission of a Communication Form, this will be actioned via our Continuous Improvement System.

Australian Privacy Principles

APP 1 — Open and transparent management of personal information

Ensures that APP entities manage personal information in an open and transparent way. This includes having a clearly expressed and up to date APP privacy policy.

APP 2 — Anonymity and pseudonymity

Requires APP entities to give individuals the option of not identifying themselves, or of using a pseudonym. Limited exceptions apply.

APP 3 — Collection of solicited personal information

Outlines when an APP entity can collect personal information that is solicited. It applies higher standards to the collection of 'sensitive' information.

APP 4 — Dealing with unsolicited personal information

Outlines how APP entities must deal with unsolicited personal information.

APP 5 — Notification of the collection of personal information

Outlines when and in what circumstances an APP entity that collects personal information must notify an individual of certain matters.

APP 6 — Use or disclosure of personal information

Outlines the circumstances in which an APP entity may use or disclose personal information that it holds.

APP 7 — Direct marketing

An organisation may only use or disclose personal information for direct marketing purposes if certain conditions are met.

APP 8 — Cross-border disclosure of personal information

Outlines the steps an APP entity must take to protect personal information before it is disclosed overseas.

APP 9 — Adoption, use or disclosure of government related identifiers

Outlines the limited circumstances when an organisation may adopt a government related identifier of an individual as its own identifier, or use or disclose a government related identifier of an individual.

APP 10 — Quality of personal information

An APP entity must take reasonable steps to ensure the personal information it collects is accurate, up to date and complete. An entity must also take reasonable steps to ensure the personal information it uses or discloses is accurate, up to date, complete and relevant, having regard to the purpose of the use or disclosure.

APP 11 — Security of personal information

An APP entity must take reasonable steps to protect personal information it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure. An entity has obligations to destroy or de-identify personal information in certain circumstances.

APP 12 — Access to personal information

Outlines an APP entity's obligations when an individual requests to be given access to personal information held about them by the entity. This includes a requirement to provide access unless a specific exception applies.

APP 13 — Correction of personal information

Outlines an APP entity's obligations in relation to correcting the personal information it holds about individuals.