

Privacy policy

1. Purpose

Primary Health Tasmania collects personal information for the purpose of assisting its activities and functions in the primary healthcare sector.

Primary Health Tasmania respects the privacy of your personal and sensitive information it collects and is committed to ensuring that your personal and sensitive information is handled in accordance with Australian privacy laws. We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The APPs govern the way in which we collect, use, disclose, store, secure and dispose of your personal information.

This document provides information about:

- the types of personal and/or sensitive information that Primary Health Tasmania may collect, use and store
- how, why and when we collect, use and disclose information
- how personal/sensitive information is stored and protected
- who to contact if you have a query regarding the handling of personal information
- storage, protection and access of health information held by Primary Health Tasmania.

2. Definitions

We use a few key terms in this privacy policy including 'personal information', 'sensitive information' and 'health information'.

'Personal information' means information or an opinion, whether true or not, or recorded in any form or not, about an individual whose identity is apparent, or can reasonably be ascertained. For example, information about your name, signature, address, email address, telephone number, and date of birth is considered personal information as you can be identified from this information.

'Sensitive information' is personal information about an individual's racial or ethnic origin, political opinions or memberships, religious beliefs or affiliations, philosophical beliefs, professional or trade association/union memberships, orientation, practices or criminal record. For example, a person's self-identification as Aboriginal, or their dietary preferences.

'Health information' includes information about a person's physical or psychological status, health services provided to them, or their expressed wishes about the future provision of health services.

3. Types of personal information we collect

Primary Health Tasmania will only collect personal information necessary to undertake its programs, activities or functions. The type of personal information collected depends on our relationship with you and the nature of the function we are performing.

Primary Health Tasmania collects personal information about individuals as described below.

3.1 Healthcare providers

Primary Health Tasmania collects personal information from healthcare providers (e.g. general practitioners, mental health care providers, government agencies) and their employees for reasons including:

- to better understand and improve our commissioned services
- to deliver our programs and services
- to comply with our obligations under various contracts and agreements

- to ensure providers receive our publications and resources
- to ensure providers receive invitations to our events, including professional development events
- to manage feedback (compliments and complaints)
- to personalise our interactions with providers.

The type of personal information we usually collect includes one or more of the following:

- name
- birth date
- contact details (telephone numbers, mailing/business address, email address, website address)
- organisation details
- profession/role/health services provided
- relationship with Primary Health Tasmania
- credentials (e.g. professional qualifications).

Note: If your contact details are collected, Primary Health Tasmania may use the details to forward information, notifications and/or invitations to you.

3.2 Stakeholders and other members of the community

Primary Health Tasmania may also collect personal information (including sensitive information) from individuals for reasons including:

- to involve the stakeholders and community in engagement activities
- to provide stakeholders and the community with the opportunity to receive Primary Health Tasmania publications and resources
- to manage feedback (compliments and complaints).
- to invite participation in training or consultation events.

The type of information we usually collect includes one or more of the following:

- name
- contact details (telephone numbers, mailing/business address, email address, website address)
- organisation details
- relationship with Primary Health Tasmania
- organisation
- credentials (e.g. professional qualifications).

Note: If your contact details are collected, Primary Health Tasmania may use these details to forward information, notifications and/or invitations to you.

3.3 Prospective employees

The type of information we usually collect includes one or more of the following

- name
- contact details (telephone numbers, mailing/business address, email address, website address)
- professional experience
- qualifications
- referee contact details and references
- past employment
- any other information necessary to assess suitability for employment/engagement.

Note: It is the responsibility of the job applicant to ensure that the referee consents to being contacted by Primary Health Tasmania in relation to the application.

3.4 Board and committees

The type of information we usually collect includes one or more of the following:

- name
- contact details (telephone numbers, mailing/business address, email address, website address)

- professional experience
- qualifications
- dietary requirements
- bank account details (if appropriate).

3.5 Contractors, consultants and services

The type of information we usually collect includes one or more of the following:

- name
- contact details (telephone numbers, mailing/business address, email address, website address)
- invoicing and account information
- bank account details as appropriate.

3.6 Events

Through the registration process, both private and sensitive information is collected to support event delivery. Information collected via this method is added to our internal data base and used to inform you of future events that may be of interest to you via email.

If you wish to be removed from our email list for future events, please email events@primaryhealthtas.com.au.

Where necessary, we will disclose your information to a third party contractor or others in order to facilitate a specific event. This may include name, dietary needs and email address. Where this is the case, we will notify you on the event invitation and registration page.

We use Zoom for online events and Survey Monkey to obtain feedback regarding our events. The privacy policies of these online platforms can be viewed here:

- [Zoom Privacy Statement](#)
- [Privacy Notice | SurveyMonkey](#)

If a confirmed case of COVID-19 has been established and is linked to an event, we will provide attendees' private information to Public Health Services to support contact tracing.

3.7 Customer Relation Management (CRM) and directories

Primary Health Tasmanian also collects personal information from primary health providers via a general practice audit to update the Tasmanian Health Directory. This information is used to support email communication regarding targeted events, emergency notification and newsletters. At the point of collection, primary health care providers can opt out of being included in such communications.

4. Withdrawing personal information

If at any point you do not wish us to collect, use or disclose information about you or do not wish to have the information used for a related primary purpose (e.g. put on a mailing list to receive information from Primary Health Tasmania), please contact us by phone, email or mail.

The Privacy Officer
Primary Health Tasmania
GPO Box 1827
Hobart Tasmania 7001

Telephone: (03) 6213 8200
Email: privacy@primaryhealthtas.com.au

5. How we collect information

In most cases, we will collect personal information directly from you. Primary Health Tasmania will only collect information in a lawful and fair manner and in a way that is not unreasonably intrusive.

Primary Health Tasmania collects personal information in ways including the following:

- forms (either electronic or hard copy)
- online portals
- other electronic means such as emails, websites, cookies, mobile applications
- paper correspondence (written correspondence including letters, faxes, hard copy emails)
- verbal conversations or interviews
- from Primary Health Tasmania's own records. CRM, Webinar platform, PenCS software suite.

However, there may be times when personal information is collected from a third party. If this occurs, such collection will be in accordance with the Australian Privacy Principles (APPs). Examples of third parties include:

- other providers and contractors that assist us in running our events
- public sources, such as telephone directories, membership lists of business, professional and trade associations, public websites
- individuals or organisations acting on behalf of Primary Health Tasmania, such as contracted service providers.

Where Primary Health Tasmania collects personal information about an individual from third parties (other than public sources), we generally require the third party to assure us that it has obtained the individual's consent to share the information or is otherwise authorised to provide that information to Primary Health Tasmania.

6. How we use information collected

Primary Health will only collect personal information needed to undertake its programs, activities and functions.

Generally, Primary Health Tasmania uses personal information only for the primary purpose(s) for which the information was collected, or any secondary purpose that is related (in the case of sensitive information, directly related) to the primary purpose for which the individual would reasonably expect Primary Health to use the collected information, or as otherwise permitted or required by law.

Primary Health Tasmania will take reasonable steps to make you aware of the purpose(s) for which personal information is being collected at the time of collection, or as soon as practicable after collection.

Primary Health Tasmania will only use or disclose personal information for another purpose where it is able to do so in accordance with the Privacy Act or after receiving consent from you.

Primary Health Tasmania limits access to personal information held by Primary Health to ensure that employees and contractors only access personal information reasonably necessary to facilitate the completion of their duties and obligations owed to Primary Health Tasmania.

7. How and when we disclose personal information

Primary Health Tasmania may disclose personal information (and, where appropriate, sensitive information) in circumstances including the following:

- where we are required or authorised to do so by law or court or tribunal order (including in order to comply with a mandatory reporting requirement dealing with child safety or similar obligations);
- contractors, suppliers, partners, collaborators, agents or third-party service providers that provide administration or other services in connection with the operation of Primary Health Tasmania's business (e.g. individuals who are authorised to administer our computer systems, organisations we contract or partner with in facilitating training/consultation events)
- marketing providers, to facilitate the provision of marketing of Primary Health Tasmania
- government departments and agencies, including for the purpose of Primary Health Tasmania complying with its contractual obligations of planning, commissioning and reporting.

- disclosure of the information will prevent harm or injury to a person.
- Consent is given for the use of information for another purpose.

Primary Health Tasmania will take reasonable measures to ensure that when personal information is to be held by a third party, that the third party complies with the same privacy requirements applicable to Primary Health Tasmania and is used for the express purpose for which it was disclosed.

8. Storage and disposal of personal information

Primary Health Tasmania will take all reasonable steps to protect Personal Information held from:

- misuse, loss and interference.
- unauthorised access.
- unauthorised modification.
- unauthorised disclosure.

These steps include ensuring:

- all Personal Information held by Primary Health Tasmania in paper form will be stored in a secure and lockable location.
- Personal Information stored electronically, will be password and firewall protected and protected from unauthorised access using current technologies.
- Personal information is only accessible to staff to the extent for them to perform their role.
- development and implementation of organisational policies and procedures that guide staff in protecting your information.

Personal Information is kept until we are no longer legally obliged to keep it, or when the need for the Personal Information has passed. We will take reasonable steps to destroy or de-identify your Personal Information in a secure manner.

9. Remaining anonymous or using a pseudonym

You may wish to remain anonymous, or use a pseudonym, when interacting with Primary Health Tasmania.

Where possible, we will allow you to interact with us anonymously or using a pseudonym. For example, we may not need your personal information if you seek general information about a program, policy or consultation process.

However, in some circumstances, it may be impracticable to remain anonymous or use a pseudonym, or we may be legally required to deal with you in an identified form. For example, we may not be able to resolve a complaint that you have made without collecting your name. We will notify you at the time of collection if this is the case.

10. Dealing with unsolicited personal information

Unsolicited Personal Information is Personal Information Primary Health Tasmania receives that we have taken no active steps to collect.

Should Primary Health Tasmania receive Personal Information that we did not ask for, we will destroy this information as soon as practicable, provided it is lawful and reasonable to do so and notify the sender.

11. Access to and correction of personal information

Primary Health Tasmania will take reasonable steps to ensure your personal information which we may collect, use or disclose is accurate, complete and up-to-date.

A person has the right to request access to the personal information that Primary Health Tasmania holds about them and a right to request correction of the information.

Primary Health Tasmania will provide access to personal information subject to some exceptions permitted by law.

Requests by individuals to access their personal information held by Primary Health Tasmania must be

made in writing to the Privacy Officer.

The Privacy Officer
Primary Health Tasmania
GPO Box 1827
Hobart Tasmania 7001
Telephone: (03) 6213 8200
Email: privacy@primaryhealthtas.com.au

Primary Health Tasmania will respond to requests for access to personal information within a reasonable period.

If an individual asks the Primary Health Tasmania to correct Personal Information that we hold about them, or if we believe the personal information we hold is inaccurate, irrelevant or misleading, we will take reasonable steps to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up-to-date, complete, relevant and not misleading.

If the Primary Health Tasmania refuses an access or correction request, or if we refuse to give access in the manner requested, we will provide an individual with a written notice setting out:

- the reasons for our refusal (except to the extent that it would be unreasonable to do so); and
- available complaint mechanisms.

In addition, if we refuse to correct personal information in the manner requested, you may ask us to include in the information a statement that the individual considers the information is inaccurate, out-of-date, incomplete, irrelevant, or misleading.

12. Complaints

If you believe that we have breached the Privacy Act or mishandled your personal information, you can contact our Privacy Officer by phone, email, or mail.

The Privacy Officer
Primary Health Tasmania
GPO Box 1827
Hobart Tasmania 7001
Telephone: (03) 6213 8200
Email: privacy@primaryhealthtas.com.au

All privacy complaints are taken seriously. Each complaint will be dealt with on a case-by-case basis. All complaints will be investigated by us and you will be advised of the outcome.

13. Health information

Primary Health Tasmania does not collect or access health data from which individuals can be identified.

Primary Health Tasmania holds identified health information collected as part of its previous clinical service provider function. Health information will be kept for a minimum 7 years after the last occasion of service or in the case of a minor until the client reaches 25 years of age.

The privacy and security and disposal of your health information is managed as per this privacy policy.

The procedure for requesting access to your health information is managed as per our 'Request to access client health information' procedure.