Privacy and Confidentiality Policies and Procedures

HiFlex Physio

Obligations

HiFlex Physio is bound by the provisions of the Privacy Act 1988, including the Australian Privacy Principles.

Focus

The policy objective is set forth as follows:

- The right to privacy, dignity, and confidentiality is recognised and respected
- Data privacy and protection in adherence to the principles stipulated in the Australian Privacy Principles (APPs) and the Information Privacy Principles and the Health Privacy Principles (HPPs).
- Methods for managing personal information are open and transparent
- Information obtained for relevant purposes only
- Regulation of access and correction of personal information

The policy applies to all persons within and involved in HiFlex Physio.

General Principles

- All information relating to Members, and Staff will be treated confidentially
- Generally, personal information will not be released to another person without consent.
- Members have the right to access their own records in the presence of the Manager or Assistant Manager.
- Privacy must be given to each Member when undertaking personal activities, e.g. shower rooms.
- Members are to be addressed by their preferred name.

Personal Information

HiFlex Physio collects and holds the personal information of Members, employees, volunteers, and contractors. The personal information we hold includes the following:

Members/ Representatives

- Name
- Date of Birth
- Current address
- Next of Kin details
- Relevant Medical information with consent of the member
- Financial and Billing information

Employees

- Name
- Date of Birth / Country of Birth
- Address and contact details
- Details of Next of Kin
- Occupation
- Employment history
- Employment Application Form
- Citizenship, Passport, and Visa permit
- Medical history or fitness for work information
- Employment References
- Tax File Number
- Bank Account Details
- HR/Personnel Records including Superannuation Fund
- Workers compensation or injury information
- Qualifications, Training, and Competency records.

Contractors

- Name
- Address and contact details
- Qualifications, licenses, etc.
- Contractor Agreement
- Insurances including Workers Compensation, Professional and Public Liability

Collection and Use of Personal Information

Consistent with the company's obligations under Australian law, such as but not limited to tax office obligations, and industrial instruments, the company will only collect personal information considered necessary for the fulfillment of said requirements as well as the provision of services defined in the company's objective.

In general, such personal information will be obtained directly from the individual, provided that consent from said individual is stated.

Collecting personal information can be done through the following methods:

- forms or telephone calls
- written information sent through faxes and e-mails
- face to face meetings
- assessments

In cases wherein the personal information is collected from sources other than those mentioned above, the company will inform the said individual of such circumstance.

Unsolicited information considered unnecessary and irrelevant to operations of the company, we The company will de-identify or dispatch of unsolicited details including personal information that is not relevant to the functions of the organisation.

When you use our website, we do not attempt to identify you as an individual user, and we will not collect personal information about you unless you specifically provide this to us (e.g. through an online form).

Information recorded and logged by our website's Internet Service Provider upon usage will include your company address, your top-level name (e.g., .com, .gov, .org, .au, etc.), date and time of entry, type of web browser, information accessed such as pages and documents.

Our website management agent may use statistical data collected by our ISP to evaluate the effectiveness of our website. We are required to allow law enforcement agencies and relevant government agencies with the proper authority to inspect our ISP logs, if an investigation warrants such an inspection.

Our website uses temporary 'cookies' to identify and interact more effectively with your computer. A 'cookie' is a small text file placed on your computer by the web server when you access our website.

Our use of temporary cookies means that when you close your browser, no personal information is retained that may identify you in the future.

Disclosure of Personal Information

Personal information will generally only be disclosed by authorised persons.
Personal information may be disclosed if we:

- Are required by Australian law or obligated through a court/tribunal order
- Have the client's consent to disclose their information
- Reasonably believe that the disclosure of such information is necessary to lessen or prevent an imminent threat to an individual's life, health or safety, or a significant threat to public health or safety
- Have reason to believe that any unlawful activity has been, is being, or can be engaged in.

If it is necessary to transfer personal information interstate or overseas, as per the provisions of APP, the proper steps will be followed to make sure that the APP will not be violated in relation to said information.

Personal information relating to persons will not be used for other purposes such as fundraising or direct marketing activities without seeking written consent.

No unauthorised statements will be made regarding HiFlex Physio, its Members, or staff to any media representatives.

Referral Letters to Health Professionals

When disclosing Members' personal information for the purpose of creating referral letters for health professionals (medical and/or allied health professionals), Employees must have the member complete a consent form. This consent form must be attached to each referral letter that will be submitted.

Consent Form

Consent Form	
Part A. Member Information (Individual whose information will be disclosed)	
Full Name:	
Date of Birth:	
Contact Number:	
Part B. Recipient of Information	
Full Name:	
Contact Number:	
Part C. Description of Information and Reason for Disclosure	
Reason for Disclosure:	
Information to be Disclosed:	
Part D. Signature	
I authorise the disclosure of the information detailed above to the identified recipient.	
Signature of member	
Name of Member	**Date**

Security of Personal Information

We will follow appropriate steps to protect our personal information against misuse and loss and against unauthorised access, alteration or disclosure.

We keep all personal information secure and confidential and take all reasonable steps to ensure that personal information is secure.

To comply with legal responsibilities, all our electronic systems that hold personal information haveup to date security protection systems and are reviewed regularly and tested to ensure they areefficient and able to meet any potential interference that might occur. These systems are stored in a computer room inside the organization.

We will also train all employees with access to personal information of members and other staff regarding their obligations relevant to the confidentiality of said information.

We shall ensure that electronic and paper records are disposed of safely.

In the event of loss of personal information, we shall:

- Seek to identify and secure the incident in order to prevent further infraction
- To assess the seriousness and nature of the damage
- To initiate an internal investigation
- To report the breach to the police where criminal activity is suspected
- Notify the Privacy Commissioner during cases concerning a significant breach of security
- Inform the individual(s) concerned where appropriate and possible.

Access To Personal Information

We will take the appropriate steps to make sure that we have access to personal information within a particular period, based on the provisions stated in the APPs.

We provide written reasons for denying or denying access to personal information. This correspondence shall contain information about the mechanisms for filing a complaint.

HiFlex Physio Information

- Employees must ask for permission to access and share HiFlex Physio information from the CEO or General Manager.
- Employees must access information inside the computer room where electronic files are stored.
- Discussion of information must be carried out inside meeting rooms with recognised and authorised employees only.
  - If discussion is to be done remotely, make sure there are no third-party applications running to ensure the safety and privacy of the meeting.
  - Approvals are stored at Head Office.

Version Control & Document History

Date	Summary of modifications	Version
2018	Version 1 produced for PGA	1.0
28 June 2021	Added the following: • Referral Letters to Health Professionals • Consent Form example	1.1
4 November 2021	Fixed minor typographical error under ‘Obligations’.	1.2

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