

Privacy statement

Privacy statement

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Privacy statement

1 Introduction

Sunshine Coast Health Network Ltd. (trading as Country to Coast QLD, hereafter **CCQ**) is committed to ensuring that personal and health information is handled in accordance with Australian privacy laws. Under the *Privacy Act 1988*, CCQ's employees, commissioned services and contractors are required to handle **Personal Information** in line with the [Australian Privacy Principles \(APPs\)](#). These 13 principles govern standards, rights and obligations around the collection, use, storage, disclosure, and modification of Personal Information.

Consistent with these principles, CCQ ensures that the Personal Information it holds is appropriately and adequately protected. It also ensures that only essential information is collected from people – the information necessary for CCQ and its commissioned services to perform their services safely and accordingly to professional standards and codes of conduct.

CCQ and/or organisations it commissions to deliver mental health services, such as Head to Health, collect identified personal, sensitive, and clinical information from people in order to perform these services safely and professionally. Should an individual choose not to provide the Personal Information requested, the service provider may not be able to provide the services the individual requires.

CCQ also uses, and may disclose to third parties, de-identified (i.e. anonymised) Personal Information for health planning and policy development activities aimed at improving regional health systems and targeting the commissioning of health services most effectively to areas and communities of need.

2 What is 'Personal Information'?

Personal Information is information that can be used to identify an individual. Examples of Personal Information include a person's name, signature, address, phone number, date of birth, sensitive or health information, credit information, employee record information, photographs, internal protocol (IP) addresses, voice print and facial recognition biometrics, location from a mobile device (because it can reveal user activity patterns and habits).

Anonymised or de-identified Personal Information is information about an individual that has been modified to prevent them from being identified. For example, gender and age information retained with name and address removed.

3 Collection of your Personal Information

CCQ only collects Personal Information from individuals that is essential for carrying out its business and functions. Where identifiable Personal Information is not essential to these requirements, CCQ only uses de-identified information.

3.1. What information is collected?

The information CCQ collects from individuals (whether directly or via third parties collecting information on its behalf) depends on their relationship with CCQ and, accordingly, the purpose for which the information is needed. The following table outlines the different relationships individuals may have with CCQ, and the corresponding type and nature of information that CCQ collects.

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Table 1. Information collected by CCQ and its partners by individual's relationship to CCQ

Individual's relationship to CCQ	Data type	Information collected
Board of directors	Identified	Including but not limited to: Names, addresses, phone numbers, email and other contact details, and information about work history and performance, qualifications, voting record, opinions recorded in minutes, bank details.
CCQ contractors	Identified	Including but not limited to: Names, addresses, phone numbers and other contact details, and bank details for tax and payroll purposes.
CCQ employees	Identified	Including but not limited to: Names, addresses, phone numbers and other contact details, and information about work history and performance, qualifications, TFN and bank details for tax and payroll purposes, emergency contacts.
CCQ volunteers or students on placement with CCQ	Identified	Including but not limited to: Names, addresses, phone numbers and other contact details, placement supervisor, educational institute, emergency contacts, results of police check. In some instances, bank details for reimbursement of expenses.
CCQ website users	De-identified	CCQ does not use IP trackers or have any log-in requirements to access its website. It does not collect cookies but does have links to third-party websites that do collect cookies.
Clients of CCQ – commissioned services	De-identified	Including but not limited to: Identifier, year of birth, reason for referral, diagnosis, medications, and consent.
Clients of CCQ- commissioned mental health services and mental health navigation services (Head to Health)	Identified	Including but not limited to: Name, date of birth, gender, Aboriginal and Torres Strait Islander status, birthplace, language spoken at home, Income source, Homelessness status, address, contact details, next of kin details, carer's details, and referrer details, reason for referral, medical history, diagnosis, risk profile, medications, and consent.
Other health sector and system partners and individuals who represent these organisations	Identified	Including but not limited to: Names, addresses, phone numbers, email and other contact details, records of communication, protocols/MoUs and other interagency agreements or contracts.
Prospective CCQ employees	Identified	Including but not limited to: Names, addresses, phone numbers and other contact details, and information about work history and performance, qualifications, services offered or provided and other relevant details.
Service providers	Identified	Including but not limited to: Names, addresses, phone numbers and other contact details, information about and evidence of professional qualifications, information about the services offered or provided and provider numbers.
Stakeholders using CCQ's Engage online platform	Identified	Including but not limited to: Name, gender, IP address, submissions to the site – for example: opinions, voting results (unless anonymous), chat logs, etc.
Vendors/Suppliers	Identified	Including but not limited to: Company name, trading name, ABS, email, phone number, contact name, bank details for account payment.

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4 Security of your Personal Information

CCQ and its partners take a range of measures, as required by the *Privacy Act*, to protect Personal Information and mitigate the risks of data loss, misuse and unauthorised access. These measures are detailed in CCQ's data management and ICT security policies.

CCQ data systems that store client information are cloud-based and hosted externally in Australia where service level agreements uphold IT security standards required to satisfy CCQ security needs.

CCQ's Identity Management Policy holds system owners to a permission model of least privilege, ensuring access to Personal Information is only available to those for whom access is necessary to provide services.

CCQ's preference is to only use data systems and tools that are hosted in Australia. It may be a contingency of these external service providers to use overseas servers during a system failure. In this case, CCQ's service level agreements require that service providers still abide by Australian privacy laws and standards.

5 Storage of Personal Information

Information collected from **clients of CCQ-commissioned mental health services** (refer to Table 1) may be stored in:

- secure third-party client information management systems used by CCQ and our commissioned mental health providers, and
- CCQ's own secure data storage systems.

6 Use of your Personal Information

CCQ and its partners only collect Personal Information where it is necessary to perform its services and conduct business activities safely and professionally. The table below summarises CCQ services and activities that require the collection and use of Personal Information.

In undertaking these services and activities, CCQ takes all legally required and commercially reasonable steps to ensure an individual's Personal Information is reliable for its intended use – i.e., that it is accurate, complete and current.

CCQ services and activities that require the use of Personal Information
Administering payroll and human resource management
Clinical service delivery including Head to Health program
Compliance for funding
Conducting research (with appropriate ethical clearance and participant consent)
Contract management and performance monitoring
Disseminating relevant information and supports to CCQ stakeholders
Paying vendors and suppliers
Performing administrative operations
Performing IT archiving, systems development and testing
Promoting CCQ services and events

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CCQ services and activities that require the use of Personal Information

Providing relevant information to CCQ stakeholders
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Quality assurance and audit, risk management
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7 Disclosure of your Personal Information

In certain circumstances, CCQ may disclose Personal Information (or permit third parties to disclose Personal Information on its behalf) to service providers and other third parties that provide products and services to or on behalf of CCQ. Consistent with [APP6](#), CCQ will only disclose Personal Information to a third party with the consent of the individual and for the express purpose for which the information was collected.

The main exception to this rule is when CCQ is compelled by law or duty of care to disclose Personal Information – for example, when an immediate threat or risk of harm to an individual is identified.

Where an individual chooses not to give consent for the disclosure and use of their information to a third party, this may result in limited access to CCQ services and programs.

The organisations or entities to which CCQ may disclose Personal Information, with an individual's consent, are noted in the table below.

Organisations or entities to which CCQ may disclose your information

Commonwealth and state government agencies and other funding bodies

External payment system operators and payment verification services.
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Legal or government entities to comply with a legal request for an individual's Personal Information – for example, a subpoena or warrant

CCQ agents, contractors and external advisers

CCQ-commissioned service providers for the purpose of service delivery
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8 CCQ website, social media, and web-based applications

8.1. Website

CCQ's website, www.c2coast.org.au, does not collect browsing information that identifies you.

The website is built on Word Press and uses third-party applications that collect information for security purposes called Word Fence. CCQ also uses Google Analytics to collect statistics on pages viewed. Users can change browser settings to limit the information collected when accessing CCQ's website.

As users do not need to log in into CCQ's website, CCQ does not require the storage of cookies. The site currently does not use comment functions that would collect temporary user cookies. If this changes, CCQ will ensure a pop-up message is used to alert users to the use of cookies.

8.1.1. *healthdirect Service Finder*

On CCQ's homepage, there is an embedded search feature linked to an external web application that is not run or managed by CCQ called healthdirect Service Finder. This application is managed by [healthdirect](#), a national virtual public health information service funded by state and Commonwealth governments for this purpose. The healthdirect Service Finder application makes records of people's visits and logs the following information for statistical purposes:

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- the user's server address
- the user's top-level domain name
- the date and time of access to the site
- pages accessed and documents downloaded
- the previous site visited, and
- the type of browser software in use.

For more information on how healthdirect uses people's Personal Information, read their privacy policy.

8.1.2. YouTube

CCQ uses YouTube's Privacy Enhanced Mode for videos uploaded to its website. This avoids website visitors being redirected to a third-party website that may collect user information without their consent.

8.1.3. Provider Connect Australia

Provider Connect Australia (PCA) is a web-based application service provided by the Australian Digital Health Agency. It enables 'publishing' organisations to make available information about their services to 'subscribing' organisations – organisations that have subscribed to PCA to receive information about a publishing organisation.

CCQ is a subscribing organisation and therefore obtains information from publishing organisations via PCA. When an organisation registers as a publishing organisation with PCA and selects CCQ as a subscribing organisation, CCQ collects the following information from system users of the PCA.

- Name
- Job role [optional]
- Speciality [optional]
- Medicare Provider Number [optional]
- AHPRA registration numbers
- AHPRA Profession, Division, Registration Type, Speciality, Field of Speciality Practice
- Healthcare Provider Identifier – Individual (HPI-I) (where the Agency acts as a contracted service provider for the publishing organisation for the purposes of the *Healthcare Identifiers Act 2010*).

Although not Personal Information, as defined by the *Privacy Act 1988*, CCQ also collects the following information to link with the Personal Information collected, referred to above:

- Organisation name
- Organisation Australian Business Number (ABN)
- Healthcare service name
- Healthcare service address
- Healthcare Provider Identifiers – Organisation (HPI-O).

Information will be held in a variety of ways, including in paper and electronic format, on secure databases that are only accessible by relevant employees.

CCQ will not make available to a third party any Personal Information supplied by you unless required or permitted by law. This may also occur where you have consented to the disclosure.

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8.2. Social media

CCQ uses social networking services such as Twitter, Facebook and YouTube to communicate with the public and health professionals about its work. When people communicate with CCQ using these services, CCQ may collect their Personal Information, but CCQ only uses this information to improve how it communicates with the public. The social networking service will also collect and use people's Personal Information for its own purposes. The privacy policies for Twitter, Facebook and YouTube (a Google company) can be accessed on their websites.

8.3. Direct marketing

CCQ's newsletters and promotion materials are based on an opt-in subscription model. Individuals can opt out of a subscription easily at any time.

9 Solicited and unsolicited Personal Information

As explained earlier, CCQ does not collect Personal Information unless it is necessary for performing its services and business functions. If CCQ receives unsolicited Personal Information, it aims to contain and destroy the information as soon as possible in line with its *Data Breach and Unsolicited Personal Information Procedure*.

10 Accessing and amending your Personal Information

Australian privacy law gives individuals the right access and correct the Personal Information entities like CCQ hold about them if that information is:

- inaccurate
- out of date
- incomplete
- irrelevant, or
- misleading.

Requests to access or amend Personal Information should be made in writing to CCQ, addressed:

Amendments Request
Chief Executive Officer
Sunshine Coast Health Network
PO Box 3067
Maroochydore QLD 4558.

CCQ will acknowledge all requests within seven (7) working days of receipt and aims to provide a decision on requests within 30 days.

Any amendments will be considered subject to Australian Privacy Principles. Valid reasons for refusal include:

- the organisation believes that giving the individual access may endanger the life, health or safety of any individual, or endanger public health or safety
- giving the individual access would have an unreasonable impact on the privacy of other individuals
- the individual's request is frivolous or vexatious, and
- the individual's Personal Information is part of existing or anticipated legal proceedings between the individual and the organisation.

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If CCQ refuses an individual's request to access or correct Personal Information, it will provide a formal response to them in writing detailing:

- the reasons for refusing to correct Personal Information
- the individual's right to request that a statement be associated with their Personal Information
- information on how to make a complaint.

Generally, CCQ will not charge fees for giving individuals access to their Personal Information. However, it reserves the right to charge reasonable fees where requests for Personal Information contain complications or are resource-intensive to execute.

11 Feedback and complaints

Individuals receiving health services who wish to make a privacy complaint should, in the first instance, raise their concerns directly with the service provider.

If the individual is not satisfied with how their health provider responds, they may escalate this to CCQ via one of the methods outlined on CCQ's website feedback page.

CCQ manages feedback and complaints in line with the Stakeholder Feedback Policy which can also be found on CCQ's feedback page.

If an individual is not satisfied with how CCQ responds to a privacy complaint, they may escalate the matter to the Office of the Australian Information Commissioner (OAIC) by calling 1300 363 992 (local call charge) or visiting OAIC's website www.oaic.gov.au.

For further information about how CCQ handles Personal Information, please contact CCQ's Deputy Director Quality, Risk and Compliance at info@c2coast.org.au.