

Privacy Policy

FRM-182

Application:	Company
Purpose:	To provide a statement and direction on the management of privacy for UoMC operations
References:	Information Privacy Act (Vic) 2000 Health Records Act (Vic) 2001 Privacy Act (Cth) 1988 UoM Privacy Policy (MPF1104) UoM Privacy Procedures (MPF1105) UoM Guidelines for staff on how to comply with UoM Privacy Policy
Associated Policies/Procedures:	FRM-148 Records Management Policy FRM-151 Retention and Disposal Authority Shepparton Medical Centre Privacy Statement
Associated Forms:	

1. SCOPE

UoM Commercial Ltd (UoMC) is a wholly owned subsidiary of The University of Melbourne. UoMC operates on behalf of its owner, and therefore must comply with the Privacy Policy of The University of Melbourne. The University's Privacy Policy is available at: <http://policy.unimelb.edu.au/MPF1104>.

At times UoMC will operate in areas where other legislative requirements must be met, i.e. the Health Records Act as it relates to patient information at the Shepparton Medical Centre.

2. POLICY

2.1. Privacy respected

UoMC respects the privacy of individuals, and will be transparent about how we use and store all personal and health information given to the Company by staff, students and members of the public.

UoMC will collect, use, disclose and manage personal and health information in accordance with the Acts, and in particular with the Information Privacy Principles and Health Privacy Principles.

2.2. Collection

UoMC will collect personal and health information only where this is necessary for one or more of its functions or activities.

UoMC will collect information fairly, and where possible directly from the individual. Sensitive information will be collected only with the individual's consent or as required or authorised by law.

When the Company collects information about an individual, it will take reasonable steps to inform the individual of:

- the purposes for which the information is collected
- to whom the Company would usually disclose this kind of information (if applicable)
- any law that requires the particular information to be collected

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- the main consequences (if any) for the individual if he or she does not provide all or part of the information.

2.3. Use and disclosure

UoMC may only use or disclose an individual’s personal or health information:

- for the purpose for which it was collected (the primary purpose); or
- for a secondary purpose that is related to the primary purpose (if the information is sensitive information or health information, it will only be used or disclosed for a secondary purpose which is directly related to the primary purpose) and the individual would reasonably expect his or her information to be used or disclosed for this secondary purpose; or
- with the individual’s consent; or
- as otherwise allowed under the Acts, or as required or authorised by law.

2.4. Management

UoMC will take reasonable steps to ensure that personal and health information is:

- kept accurate, complete and up to date
- protected from misuse, loss, unauthorised access, modification or disclosure
- secured in accordance with the Acts
- destroyed or permanently de-identified when no longer needed, in accordance with the Company’s *FRM-148 Records Management Policy* and *FRM-151 Retention and Disposal Authority*.

UoMC will take reasonable steps to let a person know, generally, what personal information it holds and how it collects, holds, uses and discloses that information. To this end, the Company will publish this policy and related information on its public website.

Individuals may seek to access or make corrections to their personal information held by the Company. Staff must contact the Privacy Officer for advice on the appropriate procedure.

3. PROCEDURES AND GUIDELINES

UoMC will follow The University of Melbourne’s Procedures and Guidelines and student-related documentation to ensure ongoing privacy compliance. These documents are:

- UoM Privacy Procedures (MPF1105) <http://policy.unimelb.edu.au/MPF1105#section-1>
- UoM Guidelines for staff on how to comply with UoM Privacy Policy <http://www.unimelb.edu.au/unisec/privacy/studentinfo.html>

4. RESPONSIBLE OFFICER

The UoMC Company Secretary is responsible for the development, compliance monitoring and review of this policy and any associated guidelines.

Contact with the UoMC Privacy Officer is to be in writing via privacy-officer@commercial.unimelb.edu.au

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5. DEFINITIONS

Acts	Information Privacy Act 2000 (Vic), Health Records Act 2001 (Vic) and Privacy Act (Cth) 1988
Personal information	Information or an opinion (including information or an opinion forming part of a database), whether true or not, that is recorded in a material form, about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion, but does not include health information
Health information	<p>a. Information or an opinion about: the physical, mental or psychological health (at any time) of an individual; or a disability (at any time) of an individual; or an individual's expressed wishes about the future provision of health services to him or her; or a health service provided, or to be provided, to an individual, that is also personal information; or</p> <p>b. Other personal information collected to provide, or in providing, a health service; or</p> <p>c. Other personal information about an individual collected in connection with the donation, or intended donation, by the individual of his or her body parts, organs or body substances; or</p> <p>d. Other personal information that is genetic information about an individual in a form which is or could be predictive of the health (at any time) of the individual or of any of his or her descendants.</p>
Sensitive information	Information or opinion about an individual's: racial or ethnic origin; political opinions; membership of a political association; religious beliefs or affiliations; philosophical beliefs; membership of a professional or trade association; membership of a trade union; sexual preferences or practices; or criminal record that is also personal information.
Information privacy principles	A set of 10 principles contained in the Information Privacy Act 2000 (Vic) governing the collection, management, use and disclosure and transfer of personal information by organisations such as UoMC.
Health privacy principles	A set of 11 principles contained in the Health Records Act 2001 (Vic) governing the collection, management, use, disclosure and transfer of health information by organisations such as UoMC.
Australian privacy principles	The Australian Privacy Principles (APPs) regulate the handling of personal information by Australian government agencies and some private sector organisations. The APPs cover the collection, use, disclosure and storage of personal information.

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