

## PRIVACY POLICY

September 2021

### IOH is committed to protecting your privacy

This document outlines IOH's policy on handling the personal information it collects about individuals including clients and patients.

IOH respect the confidentiality of your information and ensures the management of personal information is done in an open and transparent way, abiding by the [Privacy Act 1988 and Australian Privacy Principles \(Cth\)](#) and [Health Records and Information Privacy Act 2002 \(NSW\)](#). When IOH request personal information, we will normally explain why it is needed, how it will be used and who it may be shared with.

This policy answers the following questions about privacy at IOH:

<b>Why does IOH need my personal information?</b>	<b>2</b>
Will my information be used for direct marketing?	
My right to not provide personal information	
<b>What types of personal information does IOH collect?</b>	<b>2</b>
When and how is my consent given?	
How does IOH collect personal information?	
Can I remain anonymous or use a pseudonym when dealing with us?	
<b>How does IOH protect my personal information?</b>	<b>3</b>
Who does IOH share personal information with?	
Will my information be disclosed to international recipients?	
How is my information updated?	
How long will my information be kept?	
<b>How can I contact IOH about privacy?</b>	<b>4</b>
How can I gain access to my personal information?	
How do I raise privacy concerns?	
How can I escalate my concerns?	
<b>What about website privacy?</b>	<b>5</b>
<b>About this policy</b>	<b>6</b>

## Why does IOH need my personal information?

IOH collects, holds, uses and discloses personal information to provide health and safety services to our clients and to abide by legislated requirements to retain records. If you are acquiring or receiving a service from IOH, IOH will collect and hold your personal information for the purposes of:

- Providing you with the relevant service
- Maintaining a record of the service provided (including medical or case history)
- Communicate with authorised third parties in relation to the service provided to you
- Refer you to additional health services (eg Imagery, Pathology, Specialists)
- Providing information on other services that may benefit you or your company

IOH only retains and uses personal information for its intended and consented purpose. IOH will only disclose personal information to authorised third parties as approved in the personal consent signed when registering for a service.

## Will my information be used for direct marketing?

IOH will only use your information for direct marketing where we have your explicit consent or you have provided us with your details as a contact for your company.

You can opt out of receiving direct marketing information from IOH at any time. IOH newsletters and alerts allow for unsubscribing. Please refer to '[How can I contact IOH about privacy?](#)' later in this document if you believe you are receiving unsolicited marketing.

## My right to not provide personal information

You have the right to not provide information; however, IOH may be unable to provide the requested services to you. You must not provide false information.

## What types of personal information does IOH collect?

IOH may ask for a range of personal information to assist us in providing you with relevant health and safety related products and services. The information we may request includes (but is not limited to) name, address, date of birth, contact details (including next of kin), employment details, health information and payment information. Personal Information may include data, documentation, correspondence, photos, videos or audio recordings that help us provide the service, ensure accuracy and manage any potential risks.

IOH may collect sensitive information, which includes health and medical information. When this is required IOH will ask for specific consent outlining the purpose for which this information will be collected, used and disclosed.

## When and how is my consent given?

Written consent will be obtained in most cases to collect, use and disclose health information. Consent may also be verbal and where such consent is obtained it will be recorded.

- This consent is distinct from consent for medical treatment.
- The consent must be adequately informed ie. The patient must be advised of what is intended to be done with the information.
- The consent relates to a particular situation.

The following information must be conveyed:

1. The organisations for which the information is being collected.

2. That the individual may obtain access.
3. To whom the information is usually disclosed.
4. Consequences (if any) if information is not provided, (eg. our inability then to provide proper care to that person).

Consent need not be obtained if:

- Laws require collections eg. public health information
- Serious or imminent threat to life and health.
- Research relating to public health or safety.
- Notification to Medical Defence organisation.

Separate consent will be required:

- If IOH is approached by another for information about an individual. This includes a request for information by a hospital.

### **How does IOH collect personal information?**

IOH will collect information directly where this is reasonable and practical. We gather this information either through applications or other forms that you complete, or by recording the information you provide during consultations, phone calls, interviews and other forms of communication.

We may also record personal information from third parties, such as your employer, insurer, other health professionals or any other stakeholder involved in your case or service.

### **Can I remain anonymous or use a pseudonym when dealing with us?**

You have the right to be provided with services anonymously; however, IOH may be limited in what services and information can be provided. Please contact IOH if you have a need to receive services anonymously or under a pseudonym.

### **How does IOH protect my personal information?**

IOH take steps to store your information securely. We hold your personal information in a combination of secure computer storage facilities, paper-based files and other formats.

IOH take a number of steps to protect personal information from misuse, loss, unauthorised access, modification or improper disclosure. These include department and role based access to information and instructing our staff and associates who handle personal information to respect the confidentiality of customer information and the privacy of individuals.

### **Who does IOH share personal information with?**

From time to time IOH may share your personal information with other entities depending on the service provided. These entities may include:

- Subcontractors or service providers who are engaged to provide activities that assist in completing your booked service.
- Your employer or prospective employers
- Your employer's or your insurer or an agent for your employer's insurer.
- Medical and allied health providers
- Regulatory bodies

IOH in most instances will have you complete a written consent that outlines to whom and for what reasons your personal information is being disclosed.



## Will my information be disclosed to international recipients?

IOH only operates in Australia and does not disclose information to any international recipients.

## How is my information updated?

IOH makes every effort to maintain accurate information. IOH will check your information each time you are provided with a new service. If you believe incorrect information is maintained by IOH, please contact us to have this corrected.

Corrections to health records are separately written, dated and signed. The original information marked as updated and not deleted.

## How long will my information be kept?

IOH may be legally required to maintain some of your records for a significant period of time; however, once we believe information is no longer needed we may remove any identifying details or destroy the records entirely.

## How can I contact IOH about privacy?

You can contact us to:

- seek more information about anything contained in this policy, or to request a copy of this policy in a different format
- update or correct your personal information
- opt out of receiving direct marketing material
- ask about accessing or correcting the personal information we hold about you; or make a privacy related complaint.

Contact IOH by:

- By telephone: **1800 811 169**
- By email: [ioh@ioh.net](mailto:ioh@ioh.net)
- In writing: PO Box 1131, Wollongong NSW 2500.

## How can I gain access to my personal information?

IOH will give individuals access to information it holds concerning the individual as long as there is not a valid exemption under the privacy legislation. If the information is a copy of information that is the property of another organisation IOH may direct you to access the information from them directly.

If access is granted it may be provided in a number of ways:

1. During a consultation.
2. Inspection of a record.
3. By provision of a copy of the record.

# Where possible the professional should discuss the contents of the record with the individual.

Requests for copy of record:

1. Original documents are never provided;
2. Request must be in writing;
3. Identity of the requestor must be confirmed;

4. The request will be acknowledged in writing;
5. Total time will not exceed 30 days;
6. Fees may be charged. A fee to the individual will be charged where a consultation is provided for the exclusive purpose of providing health information.

Information may be withheld in certain circumstances, including, but not limited to:

1. Patients involved in any form of legal claim (or commencing proceedings).
2. Where provision of the information will be detrimental to the individual.
3. Where intermediaries are used to access the information.
4. Where access to the information may impact on privacy of others.
5. Giving access would be unlawful. Legal requirements exist under the Workers Compensation legislation that may prevent IOH from granting access to records.

### **How do I raise privacy concerns?**

To raise privacy concerns, please contact IOH via the channels listed at the start of this section. Your concern will be referred to the relevant manager for response.

IOH take privacy-related complaints very seriously and will contact you promptly to let you know what actions we are taking regarding the matter.

### **How can I escalate my concerns?**

If you feel your complaint has not been satisfactorily addressed in the first instance, or that it is taking too long to resolve, you can escalate your concerns to be escalated to the IOH Privacy Officer. Contact details are as follows:

- By email - [PrivacyOfficer@IOH.net](mailto:PrivacyOfficer@IOH.net)

If you still have concerns further assistance may be available from:

The Office of the Australian Information Commissioner

- Phone: 1300 363 992
- Website: [www.oaic.gov.au](http://www.oaic.gov.au)
- Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

## **What about website privacy?**

### **Cookies**

Cookies are small files of data stored on your computer that tell our website your past use of our site. This assists us provide you with a more relevant and effective experience. You may choose to block cookies from your browser, but some parts of the IOH websites may not function correctly.

### **Links to third party sites**

IOH websites have links to external third party websites that may benefit you. Third party websites are not covered by this policy and should contain their own privacy statements.

### **Website Analytics**

Website analytics tracks traffic patterns to and from the IOH websites, anonymously surveying users' movements around the sites. The information is non-personal and aggregated. You cannot be identified from this information.



## **About this policy**

Any information IOH hold is governed by the most current IOH Privacy Policy. The policy is publicly available via our website [www.ioh.net](http://www.ioh.net). This policy is reviewed and updated from time to time. IOH will include a notification about any updates in our regular newsletter.

This policy applies to staff, contractors and tenants of IOH.