

Review Date: New policy
Date Developed: January 2017
Principal Responsibility: Orthopaedic Outreach Committee
Validated: 16/9/2017 Committee Meeting

Approved by:	Title: Chair Orthopaedic Outreach Committee	Name: Graham Gumley	Signature/date
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OUTCOME:

Orthopaedic Outreach collects, uses and discloses information and how the organisation may access and correct this information will be in accordance with this policy.

DEFINITION:

- **Privacy** – the handling of personal information about an individual or organisation. This includes the collection, use, storage and disclosure of personal information, and access to and correction of that information.
- **Personal Information** – recorded information and/or opinion about an individual whose identity is apparent or could be easily ascertained from the information and/or opinion.
- **Cross border** – outside of Australia

POLICY

- Orthopaedic Outreach is committed to maintaining the privacy of all of personal information about an individual or organisation including applicants for funding, sponsors, and other individuals who interact with Orthopaedic Outreach.
- This Privacy Policy has been developed in line with the Australian Privacy Principles as established under the Privacy Act 1988 (Cth) (Privacy Act).
- Orthopaedic Outreach is bound by the Australian Privacy Principles that establish the benchmark for how personal information should be handled. Orthopaedic Outreach has adopted those principles as part of its standard business procedures. All personal information obtained and held by Orthopaedic Outreach is dealt with in a uniform manner and every effort is made to maintain its security.

STRATEGIES:

1. Personal Information
2. Collection of Personal Information
3. Use & Disclosure of Personal Information
4. Storage and Security of Personal Information
5. Access to Personal Information
6. Currency of Personal Information
7. Correction of Personal Information
8. Direct Marketing
9. Cookies
10. How to Make a Complaint
11. Consent

1. Personal Information

- Orthopaedic Outreach holds personal information about its members, applicants for funding, sponsors and other individuals who interact with Orthopaedic Outreach. This information includes, but is not limited to, name, address, phone number, fax number and email address. It may also include other personal information and financial information.
- Orthopaedic Outreach does not collect any Sensitive Information (as that term is defined in the Privacy Act), including information or opinions about your political affiliations, sexual preferences, religious beliefs and racial or ethnic origin.

2. Collection of Personal Information

2.1 Orthopaedic Outreach collects and holds personal information for the purposes of:

- facilitating the provision of services by Orthopaedic Outreach and delivery of Orthopaedic Outreach's international clinical, surgical and training endeavours;
- facilitating the provision of services by Orthopaedic Outreach affiliate bodies (including AOA);
- providing relevant information to members;
- organising continuing education and training programs;
- Orthopaedic Outreach's administrative functions;
- supporting and managing password protected, member-only access to the Orthopaedic Outreach website and other Orthopaedic Outreach online platforms; and
- supporting and managing an online member and public directory on the Orthopaedic Outreach website.

2.2 Orthopaedic Outreach collects personal information in a number of ways, including:

- directly from the contact person and/or a designated nominee through various online and hard copy registration and application forms issued to facilitate the provision of services by Orthopaedic Outreach;
- via the Orthopaedic Outreach website;
- via Orthopaedic Outreach's online payment facility;
- via fax and other electronic means, including credit card payment remittance slips;

3. Use and Disclosure of Personal Information

- Orthopaedic Outreach has a policy of not disclosing personal information contained on its database to any outside body, other than its affiliate bodies named in clause 2.1. This means that use of the database containing personal information is restricted solely to Orthopaedic Outreach. However, where required to do so by law, Orthopaedic Outreach will disclose personal information.

4. Storage and Security of Personal Information

- Orthopaedic Outreach stores personal information in a combination of secure computer based storage facilities and paper based files and records.
- Orthopaedic Outreach generally uses accepted technology and security so that it is satisfied that personal information is transmitted safely to it through the internet or other electronic means.
- Orthopaedic Outreach will use its reasonable endeavours to protect personal information from misuse, unauthorised access, disclosure, modification or loss. Orthopaedic Outreach's officers, employees, agents and third party contractors are expected to observe the confidentiality of personal information.

- Despite its reasonable endeavours, Orthopaedic Outreach is unable to ensure or warrant the security of any personal information transmitted to Orthopaedic Outreach and all personal information disclosed to Orthopaedic Outreach is at the sender's own risk.
- Where Orthopaedic Outreach no longer requires personal information it has collected and stored and is not required by or under an Australian law, or an order of a court or tribunal, to retain the information, Orthopaedic Outreach will take such steps as are reasonable in the circumstances to destroy the information or to ensure that the information is no longer personal information

5. Access to Personal Information

- Upon request, Orthopaedic Outreach will inform you of the type of personal information held about a member. The member has the right to access their personal information stored on computer, on a database, in personnel files or in any other form at Orthopaedic Outreach to ensure that it is accurate, unless Orthopaedic Outreach has a legal duty of confidentiality or non-disclosure.
- If a member would like to exercise their right to access their personal information, please contact the Operational Manager & Nurse Consultant. It is Orthopaedic Outreach's policy that all requests for access be made in writing. The Operational Manager & Nurse Consultant will arrange for an access form to be sent to the member and can assist with any enquiries the member may have about the process. Orthopaedic Outreach must respond to a request by you to access your personal information within a reasonable period after the request is made.
- Orthopaedic Outreach, in its discretion, may refuse to grant a member access to their personal information to the extent that such denial is permitted by the Australian Privacy Principles. If Orthopaedic Outreach refuses a member's request to access their personal information under the Australian Privacy Principles, Orthopaedic Outreach must, in writing:
 - (a) where reasonable, give reasons for the refusal; and
 - (b) notify the member of the mechanisms to complain about the refusal; and
 - (c) inform the member of any other matter prescribed by the regulations

6. Currency of Personal Information

- Orthopaedic Outreach will take all reasonable precautions to ensure that the personal information it collects, uses and discloses is accurate, complete and up-to-date. However, the accuracy of that information depends to a large extent on the information provided by the member. In order to prevent inaccuracies in a member's personal information the member should:
 - (a) let Orthopaedic Outreach know if there are any errors in your personal information; and
 - (b) keep Orthopaedic Outreach up to date with any changes to your personal information such as name, address and telephone number

7. Correct Personal Information

- A member may contact the Operational Manager & Nurse Consultant appointed by Orthopaedic Outreach to correct any personal information that is inaccurate, out-of-date, incomplete or to request that personal information be deleted. A member can contact the Operational Manager & Nurse Consultant on 02 8071 8000 or at G.Hextell (ghextell@orthoreach.org.au).

- If Orthopaedic Outreach is satisfied that a member's personal information is inaccurate, out-of-date, incomplete or irrelevant, or if a member requests Orthopaedic Outreach to correct their personal information then Orthopaedic Outreach must take reasonable steps to correct the member's personal information to ensure that, having regard to the purpose for which it is held, it is accurate, up-to-date, complete and relevant.
- Orthopaedic Outreach must respond to a request by a member to correct their personal information within a reasonable period after the request is made.
- Orthopaedic Outreach will not charge a fee for the making of the request or for correcting personal information.
- If Orthopaedic Outreach has previously disclosed a member's personal information to another entity, Orthopaedic Outreach will take reasonable steps to notify the other entity of the correction (unless it is impracticable or unlawful to do so) if a member makes such a request.
- If Orthopaedic Outreach refuses a member's request to correct information, Orthopaedic Outreach must, in writing:
 - (a) give reasons for the refusal except to the extent it would be unreasonable to do so; and
 - (b) notify the member of the mechanisms available to complain about the refusal; and
 - (c) inform the member of any other matters prescribed by the privacy regulations.

8. Direct Marketing

- Orthopaedic Outreach may use personal information for direct marketing purposes, including for the purposes set out in clause 2.1(a), to communicate opportunities related to your Orthopaedic Outreach membership, such as conferences and events being organised by Orthopaedic Outreach, via email, text message and postal mail.
- If a member does not wish to receive any marketing material they can opt out by contacting the Operational Manager & Nurse Consultant on (02) 8071 8000 or by email at ghextell@orthoreach.org.au
- Orthopaedic Outreach does not pass on any personal information to third parties for direct marketing purposes, other than to its affiliates named in clause 2.1(c).

9. Cookies

- A Cookie is a feature stored on a computer's hard drive by your web browser. On each visit to the Website, the Orthopaedic Outreach web browser will recognise the Cookie and give Orthopaedic Outreach information about your visit. Orthopaedic Outreach uses Cookies for the purpose of allowing a member to have their password saved for easy repeated access to the website. Orthopaedic Outreach may also use Cookies to learn about A member's preferences and the way that they use the Website, so that it can improve the Website. Most browsers accept Cookies automatically, but you should also be able to alter the settings of the browser to refuse Cookies. You should note that de-activating Cookies may mean that you will no longer be able to enjoy the full operational capabilities of the Website.

10. How to Make a Complaint

- If a member is concerned that Orthopaedic Outreach may have handled their personal information inappropriately or a member has a complaint regarding an

interference with their privacy, they can contact Operational Manager & Nurse Consultant on (02) 8071 8000 or by email at ghextell@orthoreach.org.au

- Upon receipt of the complaint, Orthopaedic Outreach will handle the complaint in accordance with its Complaints Handling Policy. This requires Orthopaedic Outreach to:
 - (a) confirm receipt of the complaint;
 - (b) advise the complainant what steps will be taken to investigate their complaint;
 - (c) provide an approximate timeframe within which the complaint will be resolved;
 - (d) make a decision in relation to the complaint; and
 - (e) inform the complainant of the outcome of the complaint and the reasons for the decision.
- In response to any complaint, AOA will:
 - (a) treat all complaints sensitively, seriously and sympathetically;
 - (b) attempt to resolve the matter promptly;
 - (c) keep accurate records of the complaint, Orthopaedic Outreach's investigation of the complaint and the outcome reached.

11. Consent

- The member acknowledges and agree that by providing their personal information to Orthopaedic Outreach that Orthopaedic Outreach, its related bodies corporate and partners and each of their officers, employees, agents and contractors are permitted to collect, store, use and disclose your personal information in the manner set out in this Privacy Policy and in accordance with the Australian Privacy Principles

PERFORMANCE INDICATOR/S

Accuracy of stored information on random audit

Number of complaints