



WA Primary Health Alliance Privacy Policy

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This document is based on the National Archives of Australia – [Developing an information management policy](#) template.

This document is part of the Data Governance process and links to the following WAPHA (Western Australia Primary Health Alliance) documents:

- Privacy Policy
- Privacy Code of Practice
- Privacy Impact Assessment Threshold Assessment
- Privacy Impact Assessment Template
- Information Management Framework
- Information Management Policy
- Information Management Registers
- Data Quality Framework
- Risk Management Policy.

The Primary Health Networks (PHN) National Data Governance Framework, Policy and Manual provides additional guidance on the management of data collections and de-identified information.

The following information from the Office of the Australian Information Commissioner can be used with the above policies and procedures:

- OAIC Guide to undertaking privacy impact assessments
- OAIC Guide to Health Privacy
- OAIC Guide to De-identification and the Privacy Act
- OAIC and CSIRO De-identification Decision Making Framework
- OAIC Guide to data analytics and the Australian Privacy Principles.

Further information on current frameworks, policies and procedures are available from the Business Services, Data Governance & Data Quality Manager.

Contents

Privacy Policy	4
Who we are	4
About this privacy policy	4
What is personal information?.....	4
What is de-identified information?.....	5
Can I be anonymous or use a pseudonym?.....	5
Purposes for which WAPHA collects, holds, and uses personal information	5
Kinds of information WAPHA collects and holds	6
Website and other data tracking	6
Direct marketing.....	7
Disclosure of personal information.....	7
Unsolicited personal information	7
Integrity and security of personal information.....	7
Contact us	7
Making a complaint.....	8

Privacy Policy

If you need a translator or interpreter, please contact [TIS National](#) on 131 450.

In this Policy when we use *we*, *us* or *our*, we are referring to the Western Australia Primary Health Alliance whose head office is located at Level 2, Hood Street, Subiaco WA 6008. When we use *you* or *your*, we are referring to the reader as an individual.

Who we are

[Western Australia Primary Health Alliance](#) (WAPHA) is an independent not-for-profit organisation which operates Western Australia's three Primary Health Networks (PHNs), as part of the [Australian Government's national PHN program](#) established in 2015.

The program aims to strengthen, improve, and connect the primary care system, so people – particularly those at risk of poor health outcomes – can access better care, closer to home.

We collect and report information to support its focus on building a better primary health care system, particularly for those most at risk of poor health. We support general practices to deliver the highest quality patient care, fund local primary health services based on the needs of the community; and connect local services to simplify the health care system.

We lead the planning, funding, monitoring, and evaluation of about 250 primary health care services to address local needs across seven national health priority areas including Aboriginal health, aged care, alcohol and other drugs, digital health, health workforce, mental health, and population health.

We work with local, regional, and national level agencies to improve the state of primary care and bridge the gap between primary and tertiary care.

About this privacy policy

Our privacy policy sets out how we comply with the [Privacy Act 1988](#), including the Australian Privacy Principles (APPs). WAPHA's Privacy Code of Practice sets out WAPHA's roles and responsibilities under the APPs.

The full listing of Australian Privacy Principles is located on the [Office of the Australian Information Commissioner website](#).

Under APP1, we are required to have a clearly expressed and up to date privacy policy about how we manage personal information.

This privacy policy outlines how we handle personal information and how we comply with the APPs set out in Schedule 1 of the Privacy Act. We will update this policy if anything changes, and fully review it every three years.

What is personal information?

Personal information is 'information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not; and whether the information or opinion is recorded in a material form or not'.

The term 'personal information' encompasses a broad range of information however some are explicitly recognised as personal information under the Privacy Act. For example:

- **sensitive information** - includes information or opinion about an individual's racial or ethnic origin, political opinion, religious beliefs, sexual orientation, or criminal record, provided the information or opinion otherwise meets the definition of personal information.
- **health information** – any personal information about your health or disability (this might include sensitive information).
- **employee record information** – current and former employee records are exempt from the Privacy Act, however records kept during the recruitment process are personal information. Employee records are held under the [Fair Work Act 2009](#) and [Fair Work Regulations 2009](#).

What is de-identified information?

De-identified information is when personal information has gone through a process to remove or alter the information.

Generally, de-identification includes two steps:

- removing personal identifiers, such as an individual's name, address, date of birth or other identifying information, and
- removing or altering other information that may allow an individual to be identified, for example, because of a rare characteristic of the individual, or a combination of unique or remarkable characteristics that enable identification.

We collect health information as part of our responsibilities to the Australian Government. Where possible, we collect information which has already been de-identified. We have policies and procedures to mitigate the risk of information being re-identified.

Can I be anonymous or use a pseudonym?

Unless we are required or authorised under an Australian law, or court/tribunal order, or it is impractical for us to do so, you can ask to be anonymous or for us to use a pseudonym.

For example, if you telephone us to discuss something you can ask to remain anonymous and not provide any personal information or if you reply to a survey or email us, you can use a pseudonym, such as your online username instead of giving your full name.

We use de-identified information or information that cannot be linked to an individual as much as possible to achieve our business objectives and minimise the risk to individuals of their personal information being identified by third parties.

Purposes for which WAPHA collects, holds, and uses personal information

We collect, hold, and use personal information, if it is reasonably necessary for one or more of our business functions or activities. This may include:

- commissioning health and community services
- supporting quality improvement programs for General Practices
- providing referral management services through a central referral unit
- recruitment functions
- stakeholder and relationship management
- training and events
- surveys and general research
- goods and services transactions

- reporting of quantitative and qualitative information to funding bodies.
- evaluation, monitoring and service improvement of service providers
- population health assessment and planning
- statistical analysis
- evidence based policy planning
- sharing of information with other agencies (Australian Institute of Health and Welfare, Local Health Districts or Health Service Providers, etc.)
- research purposes.

We provide information to the Australian Government as part of our obligations as a Primary Health Network. We do not sell any information we collect or hold for a commercial profit.

Kinds of information WAPHA collects and holds

The personal information we collect is necessary for one or more of our business functions or activities and can generally include personal information such as your name, address, and information specific to the service or business relationship you have with us.

We may hold your personal information in a number of ways, including:

- in our computer systems or databases,
- in paper records, and/or
- in social media and surveys.

In addition, we collect information and data which is either not linked to an individual or has gone through a de-identification process so that it is not linked to an individual. De-identified information may include data collected by general practitioners or health service providers kept in patient records.

De-identified information helps us to understand how health services are being provided, performing, and identifying future health needs. You can ask your health service provider to not allow your personal information to be shared with us.

We have information management policies and procedures to ensure that all information is kept securely. Data governance standards help us to improve the quality and accuracy of our information.

We use third party software to collect and hold information, depending on our business activities. We collect and hold information on behalf of other Primary Health Networks and third parties through our Primary Health Insights software.

Website and other data tracking

We may collect information about your visit to our website and use cookies to assist us to measure and improve our website and understand how to improve our services.

Cookies are small information files that an end user's web browser places on their computer when a website is visited. For information on disabling cookies, please go to the privacy settings section within your browser.

We retain the content and associated data of any email that you send to us if we believe we have a legal requirement to do so. Your email message content may be monitored by our employees and our response to you may also be monitored for quality assurance issues.

Direct marketing

We will only use or disclose your personal information for direct marketing purpose with your consent.

You can opt out of receiving direct marketing communications from us by emailing us or unsubscribing from the particular service or emails.

Disclosure of personal information

We will only disclose your personal information for the purpose for which is collected and with your consent, unless authorised by law to do so, or in the interests of your health and safety.

Where possible, we only disclose de-identified information to third parties where the personal information is essential for the business activity.

We will only disclose your personal information to an overseas recipient with your knowledge and where the recipient can demonstrate compliance with the Privacy Act 1988 and the Australian Privacy Principles.

Unsolicited personal information

Unsolicited personal information is personal information that we have not asked for. If we receive any unsolicited information that is not reasonably necessary or directly related to one or more of our business activities, then we will de-identify or destroy it as soon as practicable.

Integrity and security of personal information

We will protect your personal information from misuse, interference, loss and from unauthorised access, modification, or disclosure.

If we hold personal information that is no longer needed for one of our business activities or functions and we are not required by law to retain it, we will destroy the information or ensure it is de-identified.

If there is unauthorised access or disclosure of personal information which is likely to result in serious harm to you, and we have been unable to prevent this, we will notify you and report the breach to the Office of the Information Commissioner under the [Notifiable Data Breach Scheme](#).

Contact us

We aim to ensure that personal information is accurate, up to date, complete, relevant, and not misleading. If you would like to seek access to, or revise, your personal information, or feel that the information we currently have on record is incorrect or incomplete, please contact us.

We will provide a response to you about your personal information within 30 days.

Email: info@wapha.org.au

Tel: 08 6272 4900

Head office: Unit 1 Hood Street, Subiaco WA 6008.

Making a complaint

If you believe that we have interfered with your privacy in our handling of your personal information, you may lodge a complaint by contacting us. Our **Complaints and Appeals Management Policy** sets out how we will deal with your complaint.

If you are unhappy with the resolution of your complaint or the way we have handled your complaint, you may refer your complaint in writing to the Office of the Australian Commissioner – enquiries@oaic.gov.au.