

JARRAH HOUSE PRIVACY POLICY

Our privacy commitment

The Women's Alcohol And Drug Advisory Centre Incorporated, trading as Jarrah House (**Jarrah House**) is committed to protecting the privacy and confidentiality of its clients and their families.

Jarrah House is bound by the *Privacy Act 1988 (Cth)* and the Australian Privacy Principles, as well as the *Health Records and Information Privacy Act 2002 (NSW)* and Health Privacy Principles, which govern the handling of health information in NSW.

This Privacy Policy sets out Jarrah House's approach to the handling of individuals' personal and health information.

If you have any queries relating to the Jarrah House's Privacy Policy or the manner in which we handle your personal or health information, please contact senior management on (02) 9661 6555 or at ceo@jarrahouse.com.au.

How does Jarrah House collect your personal or health information?

Jarrah House collects personal and health information from people who are connected to its operations and activities, including clients and their children, staff members, donors, research study participants, recipients of support services, health professionals, suppliers, volunteers, students and service providers.

Where possible, Jarrah House will collect your personal and health information directly from you. This may be in person (for example, when you enquire about programs at Jarrah House, when you are admitted and received treatment at Jarrah House, when you make a donation), on the telephone (for example, if you contact Jarrah House), by mail or online (for example, if you visit our website).

We also obtain personal and health information from third parties such as government departments and bodies, contractors, vendors, health professionals, social and community workers. If we collect information about you from a third party and it is unclear that you have consented to the disclosure of your personal or health information to Jarrah House, we will take reasonable steps to notify you of the collection.

We may also collect personal or health information about third parties from you, such as information about your children, partner, or other family members. Where you provide personal or health information of a third party who is over the age of 16, you must have their consent to provide that information, and it is your responsibility to ensure that they are aware of this Privacy Policy, understand it and agree to accept it. Where you provide personal or health information of a third party who is under the age of 16, you must ensure that you are entitled to provide such information on their behalf (for example you are their parent). Health or personal information about those third parties will be dealt with in accordance with applicable laws and this Privacy Policy.

Research studies with ethics approval from an Australian Human Research Ethics Committee (**HREC**) may have additional obligations in relation to collection of personal or health information. Such projects will comply with the conditions of the ethics approval by the relevant HREC. In particular, collection of health information from health professionals and health record databases must be provided for in a peer-reviewed protocol that is approved by the relevant HREC, and consent must be obtained from the relevant individuals.

Why does Jarrah House collect your personal and health information?

Jarrah House may collect and use your health or personal information for a number of purposes, including:

- Enquiries: to respond to your enquiries about our programs
- Referrals: to respond to referrals to our programs, or to refer you to other programs or services
- Treatment: to provide you with the best treatment and to assess whether Jarrah House has the treatment resources to provide you the best care. This could include (but may not be limited to) your name and contact information, your date of birth, collection of your medical information (including mental and physical health), information related to substance use, employment status, living arrangements, care arrangements for your children, details in relation to offences and legal proceedings, current and previous health service and other providers, sexual practices or behaviour, financial details (such as income, insurance and payment details), cultural background, family history and relationships, and usernames and passwords when setting up an account on our website.
- Support services: to provide you with information and support services, and to evaluate and report on these services
- Funding and management: government funding, staffing and resource management (such as accommodation, equipment and resources required to provide treatments), ensuring the safety of Jarrah House and its residents, responding to complaints, evaluation of our programs and services, audits, compliance with laws
- Research: to conduct and/or fund research, as well as prevention, diagnosis and treatment (however your health information would be de-identified for this purpose)

Jarrah House staff, including Jarrah House health providers, the CEO, board members, students and volunteers, may have access to your health information. For Jarrah House to manage your treatment it is important that our staff, including our executive officers (such as the CEO) share your health information with each other where required.

What happens if you don't provide all this information?

You are free to provide (or not provide) any information you choose. However, if you do not provide some or all of the information requested, Jarrah House may not be able to offer you services or provide you with information about our programs, events and projects. In addition, Jarrah House may not be able to provide you with appropriate care and may have to refer you to another service.

To whom does Jarrah House disclose your personal or health information?

We may need to disclose your personal or health information to others in order to carry out our activities. This may include:

- External support services: to health care professionals (for example your GP, psychiatrist, or other facility that is going to take over your care), lawyers, other professionals, counsellors, funders, government bodies, co-ordinators, volunteers, students, service providers, agencies and not-for-profits that provide support services

- Government departments and bodies: for example, the Department of Health, the Department of Family and Community Services, the police, the Department of Community Services
- Researchers: to conduct research studies on addiction, as well as diagnosis, treatment and rehabilitation
- Contractors and service providers: who perform services on our behalf, such as information technology services providers (including offshore cloud computing service providers), database contractors

Jarraah House may also use your health and personal information for statistics, teaching or funding. Where practical, we will de-identify any information disclosed for those purposes.

Website usage information and cookies

When you access our website, we may use software embedded in our website (such as Javascript) and we may place small data files (or cookies) on your computer or other device to collect information about which pages you view and how you reach them, what you do when you visit a page, the length of time you remain on the page, and how we perform in providing content to you. Our website may use Google Analytics features, which tracks your internet usage and discloses this to other members of the Google Ad network.

A cookie does not identify individuals personally, but it does identify computers. You can set your browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it in each instance. You can also opt out of Google Analytics by clicking on Ad Settings.

Jarraah House may gather your IP address as part of our business activities and to assist with any operational difficulties or support issues with our services. This information does not identify you personally.

Overseas transfer

Jarraah House does not transfer any personal or health information outside Australia

Where is your personal and health information stored?

Your personal and health information is stored in both hard copy and electronic form. Information stored electronically is password protected, which may be a Jarraah House database, a database maintained by a cloud hosting service provider or other third party database storage or server provider. Backups of electronic information may also be made and stored in a similar manner.

Hard copy information is generally stored in our offices, which are secured to prevent access by unauthorised people. It may be stored for a time with a third party for specific purposes.

We will retain any health information for 7 years after we last provided a health service to you. If a health service was provided to a person under 18, we will retain that health information until they reach the age of 25. This information may be archived or stored with a third party service provider. We will destroy or de-identify personal information which is not health information after we no longer need it for the purposes for which we could use or disclose it.

Where personal or health information is stored with a third party, we have arrangements which require those third parties to maintain the security of the information. We take

reasonable steps to protect the privacy and security of that information, but we are not liable for any unauthorised access or use of that information.

Due to the complexity of Jarrah House's operations, your health and personal information may be stored simultaneously in more than one database or location.

Access to your personal and health information

Jarrah House will, upon your request, and subject to applicable privacy laws, provide you with access to your health and personal information (or a third party for whom you are responsible at the time of request, such as your child) that is held by us. However, we request that you identify, as clearly as possible, the type/s of information requested. We will deal with your request to provide access to your health information within 45 days and you agree we may charge you our reasonable costs incurred in supplying you with access to this information.

Your rights to access personal or health information are not absolute and in certain circumstances, privacy laws dictate that we are not required to grant access. If we do not provide access, we will let you know why.

Participants in research studies should note that access to personal, sensitive or health information is not generally granted.

Updating your personal and health information

You may ask us to update or delete the health or personal information we hold about you (or a third party for whom you are responsible at the time of request, such as your child) at any time. We will take reasonable steps to verify your identity before granting access or making any corrections to or deletion of your information. We also have obligations to take reasonable steps to correct personal or health information we hold when we are satisfied that it is inaccurate, out- of-date, incomplete, irrelevant or misleading for the purpose for which it is held.

How to contact us or make a complaint

If you have any questions about this Privacy Policy, if you wish to update information we hold about you, or if you wish to make a complaint about our collection, use or disclosure of your health or personal information, please contact please contact us by writing to us at Jarrah House, P.O. Box 6026 Malabar NSW 2036, by calling (02) 9661 6555, or by emailing ceo@jarrahouse.com.au.

We will take reasonable steps to remedy any issues resulting from our failure to comply with our privacy obligations within 45 days of receiving your complaint.

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