

Policy

Document ID: 001182

Version: 1.0

Privacy

Date Approved: 04/06/2024

Review Date: 04/06/2025



Purpose

To detail how the Sunshine Coast Hospital and Health Service (SCHHS) manages personal information.

Background

The *Information Privacy Act 2009* (Qld) (IP Act):

- regulates how Queensland government agencies, including the Sunshine Coast Hospital and Health Service (SCHHS), must manage personal information.
- provides a right for individuals to apply for access and amendment of their personal information.

The SCHHS is required to comply with the Privacy Principles outlined in the IP Act, known as the National Privacy Principles (NPPs)—refer to [Appendix 1](#).

These privacy principles include rules about the collection, use, quality, security, and disclosure of personal information. They also provide conditions under which personal information may be transferred outside of Australia and rules regarding contracted service providers.

The specific obligations of the SCHHS when collecting and handling your personal information are outlined in the IP Act.

This privacy policy will be updated if and when information handling practices change.

What is personal information?

Personal information is defined by the *Information Privacy Act 2009*. Put simply, it is information that identifies a living person (or could lead to them being identified).

Personal information may be in any form, such as in correspondence, databases, audio recordings, images, alpha-numerical identifiers, or any combinations of these. It can also be spoken or communicated in other mediums, including sign language or social media.

What is sensitive personal information?

Sensitive information is a subset of personal information, and it is important because of the heightened meaning or value to the individual concerned. Refer to [Appendix 2](#) for examples of sensitive information.

The SCHHS can only collect sensitive information in certain circumstances and must, before it discloses sensitive personal information, take reasonable steps to ensure that the subject of the personal information can no longer and cannot in the future, be identified from the personal information.

What is confidential information?

Confidential information is information about a person who is receiving or has received a public health service. Confidential information includes care and treatment information.

Unlike personal information, which is only about a living person, confidential information can be about a living or deceased person.



Queensland laws set out requirements for how we handle confidential information.

These laws include:

- Part 7 *Hospital and Health Boards Act 2011*
- *Public Health Act 2005*
- *Mental Health Act 2016*.

To keep things simple, we use the term personal information in this Privacy Policy.

What personal information do we collect?

The SCHHS collects, holds, uses, and discloses personal information to carry out its functions and activities.

The SCHHS ensures personal information and handling practices are transparent and documented, and that people are given collection notices that comply with the privacy principles.

Large amounts of personal information, some of which is sensitive and health information, are of clients, patients, suppliers, business partners and employees. Refer to [Appendix 2](#) for examples of the types of personal information held by the SCHHS.

The [Queensland Health Information Asset Register](#) provides details regarding information collected for the purpose of better health outcomes for Queenslanders.

The SCHHS website contains our privacy statement to provide visitors and users of the website with information specific to the site's purpose and how to access your personal information.

How is personal information managed?

The SCHHS ensures the accuracy of the personal information we hold and keeps it secure through its lifecycle. In addition to the NPPs, we also apply *Information Standard 18* of the *Queensland Government Information Security Classification Framework*.

Our contracted service providers also observe strict personal information management requirements.

Quality of personal information

Before we use your personal information, we may check with you to make sure it is accurate, complete and up to date. If you think we hold personal information about you that is inaccurate or out of date, please contact us.

Security of personal information

SCHHS securely handles and destroys personal information. To do this we have a range of information security practices that align with the Queensland Government information security standard. This includes, for example, only allowing certain staff to access your information, using a login and password.

Protection of personal information from unauthorised access and disclosure is a priority for us. Any concerns about the security of your personal information held by SCHHS should be reported.

Microsoft 365

Microsoft 365 is a set of cloud-based productivity tools and integrated cloud services. Microsoft 365's commonly used featured platforms for collaborative work include (but not limited to):

- Microsoft Teams—a collaboration and video conferencing platform that acts as a central hub for workplace communications via text chat, voice call, video call, calendar, notes, documents, and apps (including, from time to time, recording and capture of video and voice calls). Refer to the [Queensland Health privacy notice: Use of Microsoft for meetings and recordings](#)
- SharePoint—a cloud-based content collaboration and management platform where files can be shared and stored
- OneDrive—a personal cloud-based storage service. These platforms are integrated and provide Queensland Health with different avenues for sharing, organising and storing information.

SCHHS uses these platforms in a manner consistent with our responsibilities and obligations under the *Information Privacy Act 2009* (Qld), *Right to Information Act 2009* (Qld) and *Public Records Act 2002*; and the [Queensland Government Customer and Digital Group Collaboration platform \(Microsoft Teams\) guideline](#).

Collection by Microsoft when using Microsoft 365

Microsoft may collect your personal information as a result of using Microsoft 365 services and applications. [Microsoft's privacy statement](#) explains the personal data Microsoft processes, how Microsoft processes it, and for what purposes.

Contracted service providers and personal information

SCHHS uses contracted service providers to provide particular services and functions to the Health Service. Some examples include:

- electronic document management
- cloud-based storage
- community surveys and feedback collation.

To provide these services and functions, service providers may collect and use personal information on our behalf. SCHHS still controls and is responsible for the information. SCHHS ensures that service providers meet our privacy and confidentiality requirements. We do this by entering into a contract or service agreement with them that includes privacy and confidentiality clauses.

Storage

SCHHS stores personal information that we collect in both electronic and analogue formats; that is, we use paper-based and electronic storage systems. The privacy rules apply, irrespective of how we store personal information.

For electronically held and managed personal information, we use Australian/Queensland data centres and back-up systems wherever possible. Where personal information must be stored in an overseas location, we take care to ensure that privacy and security controls are in place (e.g. through strict contractual requirements and avoiding storage locations where privacy rules appear insufficient).

Retention

SCHHS will keep your personal information for the minimum period of time as required in a retention and disposal schedule approved by the Queensland State Archivist. The minimum retention period varies between classes of records according to the purpose and use of the records.

Once the minimum retention period has been met, records (including any personal information associated with the records) are securely destroyed using disposal methods appropriate for the type of format and security classification of the records.

The following retention and disposal schedules document the minimum retention periods for records maintained by the SCHHS:

- [General Retention and Disposal Schedule \(PDF, 1.8MB\)](#)
- [Health Sector \(Corporate Records\) Retention and Disposal Schedule \(PDF, 580KB\)](#)
- [Health Sector \(Clinical Records\) Retention and Disposal Schedule \(PDF, 440KB\)](#)

Social media

The SCHHS maintains a number of social media accounts for the purpose of pushing out information about:

- our services
- health and wellbeing, generally
- important health alerts.

Please be aware that personal information given to us or posted on any social media site becomes captured by that social media platform's privacy policy. You may instead choose to [contact us directly](#).

For information regarding SCHHS social networking services, email SC-Communications@health.qld.gov.au.

Monitoring of buildings

CCTV cameras

Some SCHHS locations are equipped with Closed Circuit Television (CCTV) cameras. These are used to monitor safety and accessibility, as well as to deter (and capture evidence of) unlawful behaviour.

The CCTV cameras in use throughout the health service are all owned by the SCHHS. The footage from the cameras is generally stored for 30 days before it is destroyed.

If you would like to enquire about the CCTV cameras, or you would like access to the footage, you can contact Protective Services Manager on 07 5470 6319.

Secure check-in

Some SCHHS buildings have a secure check-in facility for visitors, consultants and contractors attending our premises. This electronic or analogue check-in collects personal information, such as name and mobile phone number. Secure check-in facilities are owned and controlled by SCHHS. The Health Service is responsible for the management of any personal information provided. For more information about the secure check-in facilities you can contact Protective Services Manager on 07 5470 6319, who can put you in touch with the relevant Facility Manager.

How does the SCHHS use and disclose personal information?

What does use and disclosure mean?

In broad terms, use refers to the treatment and handling of personal information within the SCHHS, particularly when it involves making decisions on the basis of the information.

Disclosure refers to making personal information available to people outside the SCHHS, other than to the individual concerned, and includes the publication of personal information.

Use and disclosure of personal and health information

We may collect personal information directly from you or from someone else, such as your local doctor or a relative in an emergency situation.

We collect personal information when you:

- visit our website (Sunshine Coast Hospital and Health Service)
- take part in surveys
- communicate with us or provide us with feedback
- visit a health care facility
- fill in a form (including online and paper forms)
- apply for a job with us
- ask us a question or make a complaint
- request access to, or correction of, your personal information.

When we ask you for your personal information, we will provide you with a notice to explain what personal information we need and why. This is called a 'Privacy Notice'. We may provide you with a written or spoken

Privacy Notice. For example, when you fill out a form that asks for your personal information, it will contain a Privacy Notice that explains why we need your information.

There may be times when we share your personal information. When we share your information, we do so in accordance with privacy law.

We may share your personal information with:

- your local doctor, or with a healthcare facility—e.g., we release your personal information (including health information) in order to facilitate your treatment
- your family, spouse or guardian—e.g., where you have nominated them for the purpose. If you do not wish for us to share your information with a person or organisation, you can ask us not to share it.
- SCHHS will not otherwise give your personal information to other government agencies, organisations or anyone else unless:
- we have your express permission
- there is a lawful ability or requirement for us to do so.

Why do we collect personal information?

We collect personal information to provide health and wellbeing services and to fulfil our other functions. Specifically, we collect personal information to:

Provide you with health and wellbeing services	We may use your personal information to provide you with our services to improve your health and wellbeing
Ensure you receive appropriate treatment and follow up care	We may use your personal information to provide you with treatment and follow-up care that is appropriate for your needs.
Decide on applications for services or benefits	We may use your personal information to make decisions about your applications for our services or benefits.
Communicate with you and receive your feedback	When you communicate with us via our website (www.sunshinecoast.health.qld.gov.au), your correspondence is treated as a public record. We keep your correspondence for as long as required by the <i>Public Records Act 2002</i> (Qld) and other relevant laws. Your personal information included in the communication will never be shared with others unless you give us permission. SCHHS does not reply to all communication received via our website.
Conduct research to improve healthcare practices	We may use personal information for research to help us to improve Queensland healthcare practices. All research must meet ethical requirements and be authorised by our Health Service Chief Executive.
Conduct community wellbeing and other research through online surveys	We may ask you to take part in online surveys that appear on our website. The surveys, for example, may relate to health issues such as smoking. These surveys are voluntary, and you can often remain anonymous. If you would like to participate, you may be asked to agree to certain Terms and Conditions about the use and/or disclosure of your information. We sometimes conduct surveys using online platforms provided by external service providers. These providers may store information outside of Australia.
Make payments to, and generally manage employment of SCHHS staff	If you are a SCHHS staff member, we will use your personal information to manage your employment and make payments to you.
Process requests to access or correct personal information	SCHHS may use your personal information to process your request to access or correct your personal information.
Process requests to access other SCHHS information	We may use your information to process requests to access other SCHHS information. To find out more you can access our Right to Information page.
Investigate privacy complaints	We may use your personal information to investigate your privacy enquiry or complaint, and to communicate with you about your enquiry or complaint. We set our further information below about how to make a privacy enquiry or complaint with us.
To conduct website analytics	When you visit our website (www.sunshinecoast.health.qld.gov.au), we may make a record of your visit and for statistical purposes only log the following information: server address top level domain name (e.g. .gov) date and time of your visit to the site pages visited and documents downloaded previous sites visited browser type. No attempt is, or will be, made to identify users or their browsing activities except, in the unlikely event of an investigation, where a law enforcement agency may exercise a warrant to inspect activity logs. We use Google Analytics (including display advertising features) on our website to gather anonymous information about visitors to our website. When you visit our web pages, your browser automatically sends anonymous information to Google. Examples of the information include the web address of

the page that you're visiting, your IP address and demographic information. Google may also use cookies.

We use this data to analyse the pages that are visited, to improve your experience and make sure our website is useful.

Read more about:

how Google uses data

our Website Privacy Statement.

How can I apply to access or amend my personal information?

How to apply for access

SCHHS supports your right to apply for access to information held about you.

Information about how you can make an application to apply for access to your personal information is available on our website here [Accessing your medical Records](#) and here [Right to Information](#). This includes information about seeking access 'administratively' (which is generally a simpler and quicker method of seeking access) or making a formal access application under the IP Act, or under the RTI Act, whichever is applicable.

Formal access or amendment applications need to be made and processed in accordance with the relevant legislation.

Access under an administrative arrangement does not affect an individual's right to seek access to the documents under the IP Act or RTI Act. In addition, if the application cannot be processed administratively, it will generally be referred for processing under the IP Act or RTI Act, whichever is appropriate.

Access to employee records

You are entitled to apply for access to your employee records held by the SCHHS through the administrative access process. The process is the same for both current and former SCHHS employees.

Applications for access to your employee records are to be made in writing to:

SCHHS Workforce

PO Box 547

Nambour MC Qld 4560

SC-WorkforceAdvisory@health.qld.gov.au

However, in some instances, not all information can be provided through this administrative process and an application under the IP Act or RTI Act may be required. Contact the Clinical Information Access Unit via email: SCHHS_CIA@health.qld.gov.au before applying to access documents that may be subject to a formal process, and they will be able to guide you as to the best way forward. Additional information is available [here](#).

How to make an amendment application

If there is information in your health record that you believe is incorrect, that is, the information is out-of-date, inaccurate, incomplete, or misleading; you may apply to have the information amended.

Before making a formal amendment application, you should contact the area within SCHHS you had previous contact with as they may be able to amend your personal information without the need for a formal process. The informal option will apply in many cases—for example, where you wish to update your current contact details.

However, where a formal application to amend personal information under the IP Act is required, please contact the Clinical Information Access Unit at SCHHS_CIA@health.qld.gov.au.

How to make a privacy complaint

The SCHHS takes breaches of privacy very seriously. Complaints regarding allegations of breaches of privacy are dealt with in accordance with the SCHHS's complaints management process. If you are receiving, or have received health treatment from us, and consider that we have inappropriately dealt with your personal information, you may lodge a complaint to [Patient Liaison Officer](#) in the first instance.

If you are an employee or have had some other dealing with the SCHHS and believe that we have not dealt with your personal information in accordance with the privacy principles outlined in the IP Act, (that is the National privacy principles), you may lodge an information privacy complaint. You can do so directly to the Principal Privacy Officer via email at SCHHS_PRIVACY@health.qld.gov.au or by using the below contact details.

How to contact us

For privacy related queries please direct your enquiries to:

Principal Privacy Officer
Sunshine Coast Hospital and Health Service
Sunshine Coast University Hospital
6 Doherty Street
Birtinya QLD 4575
Ph: 07 5202 1406
E: SCHHS_PRIVACY@health.qld.gov.au

If your query relates to another Hospital and Health Service, you will need to contact that HHS directly.

A list of Privacy and RTI contact officers for other HHS's is available [here](#).

References and further reading

Alignment to SCHHS Strategic Plan

Drive a values-based organisational culture

Primary legislation, policy, standards or other authority

Queensland Health, Privacy Policy, 27 Sept, 2023.

National Safety and Quality Health Service (NSQHS) Standards 2nd ed

- Clinical Governance

Forms and other related or supporting documents

Consultation

Key stakeholders who contributed to and/ or reviewed this version include:

Executive Director, Legal and Governance
Acting Executive Director, Workforce
Director, Communications and Engagement
Director, Digital Health and Clinical Information Systems
Director, Internal Audit
Senior Medical Officer, Hospital in the Home
Manager, Strategic and Operations Planning
Manager, Protective Services
Manager, Clinical Informatics Operations
Manager, ICT Strategy and Architecture
Lead Health Information Manager
Principal Advisor Ethics and Integrity
Principal Privacy Officer
Senior Coordinator, Clinical Information Access
Community Health Information Manager
Privacy Collaborative

Compliance is addressed by

- Existing SCHHS Audit: Clinical Information Systems – Privacy, Confidentiality and Access Management & Privacy Maturity Assessment
- Department or SCHHS Quality program: N/A
- Reporting mechanism: N/A
- Key indicators and/ or outcomes: N/A

Document approval

Version	Prepared by	Endorsed by	Authorised by	Review due
1.0	Principal Privacy Officer	Privacy Collaborative Governance Improvement Committee	Executive Director, Legal and Governance	04/06/2025
Approved by: Sunshine Coast Hospital and Health Board 04/06/2024				
Supersedes: N/A				
Keywords: Privacy, patient, information, client, confidentiality, breach, complaint, disclosure, consumer, personal, collection, data, sensitive				

Appendix 1 National privacy principles – quick guide

NPP1: collection

The SCHHS collects only what is necessary for its functions or activities, and does so lawfully, fairly and without unnecessary intrusion. The SCHHS must collect personal information from the person it is about wherever possible, and take steps to notify a person about what information is being collected, why (including whether there is a lawful requirement to collect it) and what the SCHHS intends to do with it.

NPP2: use and disclosure

Personal information may be used and disclosed in particular circumstances. If certain conditions are met, a person's consent to use and disclose their personal information is not always necessary. There are rules if the SCHHS intends to direct market to a person through use of their personal information.

NPPs 3 and 4: information quality and security

The SCHHS must take steps to ensure the personal information held is accurate and up-to-date, and is kept secure from unauthorised access, use, modification, disclosure, destruction or loss.

NPP5: openness

The SCHHS has a policy on how personal information is managed. It must be made available to anyone who asks for it.

NPPs 6 and 7: access and correction

You have a general right of access to your own personal information. You also have a right to have such information corrected if it is inaccurate, incomplete or out-of-date.

NPP8: anonymity

Wherever possible, the SCHHS allows a person to interact with the health service anonymously if they wish to do so.

NPP9: sensitive information

Sensitive information (which includes health information) is a subset of personal information and can only be collected in certain circumstances. The SCHHS must take reasonable steps to de-identify sensitive information before disclosing it.

Appendix 2 - Personal information

The SCHHS holds personal information of patients, consumers, clients, suppliers, business partners and employees, such as:

- name
- contact details
- date of birth
- signature
- photographs
- unique physical characteristics (e.g. tattoos, birthmarks)
- fingerprint or other 'biometrics'
- driver's licence number
- financial/bank details
- educational history
- unique identifying number
- medical/health/diagnostic information
- cultural background, relationship details and family circumstances
- details of office bearers in funded organisations (i.e. names)
- disability funding and service provision
- complaints and investigations
- personal information recorded by way of camera surveillance systems (CCTV)
- occupation and employment history
- criminal history
- recruitment information.

Personal information includes *sensitive information* and *health information*. The types of sensitive personal information which the SCHHS holds include personal information about any of the following:

- race or ethnic origin
- political opinions
- membership of a political association
- religious beliefs or associations
- philosophical beliefs
- membership of a professional or trade association
- membership of a trade union
- sexual preferences or practices
- criminal records.

Sensitive health information about a person which may be held by the SCHHS includes the following types of personal information:

- Details about a person's health at any time (e.g. that a person is 'off work sick today').
- A disability of a person at any time (e.g. short-term disability following a stroke).
- A person's express wishes about future health services to be provided to them (e.g. a 'do not resuscitate' request).
- A health service that has been, is being, or will be provided to a person (e.g. patient treatment plan).
- Personal information collected about a person for the purpose of, or during the course of providing a health service (e.g. diagnostic tests).
- Personal information collected in connection with the donation, or intended donation, by the person of their body parts, organs or body substances (e.g. blood or urine samples).