



Privacy Management Annual Report July 2016 – June 2017

Central Coast Local Health District (the District) meets its privacy obligations through appropriate governance and the provision of privacy information, training and support to staff. Compliance with privacy legislation continues to be provided by the Privacy Contact Officer (PCO).

The District has taken action in complying with the requirements of the *Privacy and Personal Information Protection Act 1998* and the *Health Records and Information Privacy Act 2002* by:

- Updating the privacy intranet website.
- Providing privacy information to the public on the District's internet site.
- Completion of staff undertaking mandatory training through Health Education Training Institute (HETI) Online, Privacy Module 1.
- Providing privacy training, which is available to staff on a one-to-one and group basis.
- Distribution of memos via area communications to educate and reiterate to staff their obligations under privacy legislation.
- The availability of key privacy resources for staff via the District's intranet and as hardcopy in the District's Privacy Resource Folder developed by the District's PCO. Key resources include:
 - NSW Health Privacy Manual for Health Information
 - NSW Health Privacy Management Plan
 - NSW Health Privacy Internal Review Guidelines
 - Information and Privacy Commission fact sheets
 - Links to legislation via the intranet
 - Fact sheets developed by the District's PCO
 - Information Privacy Leaflet for Staff
 - Health Information Privacy Leaflet for Patients
- Participating in the annual Privacy Awareness Week (extended by the District to the entire month of May 2017).
- Processing privacy internal review requests within the required timeframe.
- Progressing of the privacy prevention action plan for a proactive approach to the prevention of privacy breaches.
- Following of the District's privacy risk matrix that clearly defines processes in regard to the management of alleged privacy breaches.
- The availability of a generic privacy email account and contact number to provide advice on privacy matters for both staff and the public.

The District's PCO attended privacy information and networking sessions with the NSW Ministry of Health during 2016-17. The District's PCO has continued to provide policy and compliance support to the District staff, particularly in relation to electronic medical records (eMR) and access to, and disclosure of, personal health information.

Internal Review

Privacy law governs all aspects relating to the management of personal and personal health information held by an agency in NSW. The *Health Records and Information Privacy Act 2002* governs personal health information and the *Privacy and Personal Information Protection Act 1998* governs all other personal information and provides a formalised structure for managing privacy complaints relating to these acts.

During 1 July 2016 – 30 June 2017, the District's PCO received two applications for privacy internal review.

- **Date received:** 26 September 2016
Privacy principles breached: Nil
Details: The applicant submitted a privacy internal review request alleging a breach of Information Protection Principle – Limits on use of personal information, and Information Protection Principle – Limits on disclosure of personal information. The internal review concluded that breaches of the Information Protection Principles were unable to be substantiated.

Further review: Applicant sought further review through NCAT

- **Date received:** 30 June 2017
Privacy principles breached: Nil
Details: The applicant submitted a privacy internal review request alleging a breach of Health Privacy Principle – Access to Health Information. The internal review concluded that breaches of the Health Privacy Principle were unable to be substantiated.

Further review: Nil



Janine Bell
Manager

Date: 30/10/17



Andrew Montague
Chief Executive

Date: 30/10/17