

# Policy and Procedure – Data Management and Privacy

---

## Policy statement

The purpose of this privacy policy is to outline the practices adopted by Arcare for the management of personal and health information. It is designed to give individuals an understanding of the types of personal information Arcare collects, and how it is used, stored, disclosed and able to be accessed. If you are an employee or worker engaged by Arcare and you are seeking guidance as to your obligations in relation to privacy, please read the Staff Policy and Procedure – Privacy – Guidance for employees.

The policy also outlines how individuals can request access to and correction of their personal information held by Arcare, how to make a complaint about a breach of privacy, and how complaints will be handled.

Arcare is required to make this policy freely available and in an appropriate form, and accordingly it is able to be accessed on our public website at [www.arcare.com.au](http://www.arcare.com.au). Individuals who would like to request a copy of this policy in an alternate form, for example suitable for the vision impaired, or individuals from a non-English speaking background, may do so by contacting our Privacy Officer, and reasonable steps in the circumstances will be taken to provide the policy in an appropriate form.

## Objective of policy

Arcare is committed to protecting the privacy of information it obtains. Arcare is required to meet certain obligations under the Commonwealth Privacy Act 1988 (the Act) and is bound by the Australian Privacy Principles (the APPs). The Act governs how Arcare collects, uses, stores and discloses the personal information of individuals, and how they may access or correct their information.

Personal information broadly means information or an opinion about an individual, whether true or not, which could reasonably lead to the identification of the individual in the particular circumstances. Personal information can include name or address details, dates of birth, telephone numbers, email addresses, financial information such as banking details, or photographic or video material. An individual's name does not have to be included in information for it to constitute personal information. The test is whether the information considered as a whole would enable the individual to be identified.

A special category of personal information is known as "sensitive information", and can include information about race or ethnicity, political opinions or membership, religious or philosophical beliefs, professional or trade association or union membership, sexual preferences or practices, criminal records, health information and genetic/biometric information such as fingerprints. There are additional obligations for the management of sensitive information required by the Act.

## ***What kinds of personal information do we collect and hold?***

Arcare collects the personal information of clients, their representatives, applicants for employment at Arcare, members of the public, suppliers, contractors and service providers. The personal information collected will depend on the nature of the individual's relationship or interaction with Arcare and its employees. Arcare will only collect personal information where it is reasonably necessary for, or directly related to, one or more of its functions or activities.

Personal information collected can include names, dates of birth, gender details, address and contact details including email addresses, belonging to our clients, next of kin and other legal representatives. We collect information about our clients' income, assets and pension status. Personal and business details of suppliers and contractors and their representatives are also collected.

Additional personal information concerning applicants for employment at Arcare which is collected can include job applications, work histories, curricula vitae, educational qualifications, training records, competency assessments, details of salary and wages, training records, performance assessments, counselling details and personnel records. Sensitive information is sometimes collected when appropriate, such as criminal record check details and relevant medical histories for employment purposes.

Health information collected can include incident and accident reports, first aid records, workers compensation claims and documents, rehabilitation and attendance records, medical or other health service provider records, medical histories and other assessments for insurance or employment purposes. We collect information about

## **Policy and Procedure – Data Management and Privacy**

---

our clients' health and care needs and their medical history as it relates to the care and services we provide, information about our clients' cultural, religious, linguistic and social needs, information about our clients' interests, hobbies and community activities, and information about any potential medical, social or workplace risks involved in providing care and services to the client. Information about third parties is sometimes collected in the context of insurance claims.

### ***How do we collect personal information?***

#### General

We only collect personal information using lawful means.

Arcare collects personal information by way of several channels or methods.

Personal information can be collected when individuals telephone Arcare or interact verbally or make contact by mail or email. It is also collected when individuals access our website or use it to communicate with us. In most cases Arcare collects information directly from individuals, however where information about an individual is collected from another person or organisation, it is dealt with according to the requirements of the Act. Personal information may also be collected through publicly available sources of information, in the course of Arcare conducting market research and from current and prospective suppliers of goods and services to Arcare.

Personal information can be collected when individuals make enquiries or complaints.

To the extent reasonably practicable and reasonable for us to do so, we collect personal information about an individual directly from that individual. Additionally, we will only collect personal information when we specifically request that information. However, personal information is sometimes collected whether it has been requested by Arcare or not, for example when you send us your personal information without us asking for it.

#### Clients

We usually collect personal information about our clients in the following ways:

- Directly from the client and/or their representatives.
- From clients' health care providers and other persons/organisations who provide care and services to the client.
- Where relevant, from other aged care providers and aged care referral services.

We also receive information from the Commonwealth Government regarding our clients' eligibility to pay certain fees and charges.

#### Job applicants and service providers

We collect information about applicants for employment at Arcare:

- directly from the applicants;
- through general background check processes such as criminal history checks and reference checks;
- from other sources such as referees and employment agencies.

Information about suppliers, contractors and service providers and their employees is collected directly from our service providers.

We may also collect data from our website using various technologies, including 'cookies'. A 'cookie' is a text file our website transmits to an individual's browser which is stored on the individual's computer as an anonymous tag identifying the individual's computer (but not necessarily the individual) to us. You may configure your browser to disable cookies, but some parts of our website may not function properly (or at all) if cookies are disabled.

## **Policy and Procedure – Data Management and Privacy**

Personal and business details of suppliers, contractors and service providers are collected when they interact with Arcare, so that appropriate financial and business records can be maintained. Personal information of job applicants and employees is also collected during the application process (whether or not successful) and during the period of employment, which may also include sensitive information. Health information can be collected when circumstances require that first aid be administered, for administering sick leave or carer's leave, or where injury or insurance claims arise.

When personal information is collected, Arcare takes reasonable steps in the circumstances to notify the individual (either at or before the time of collection, or as soon as practicable thereafter) or to make them aware of certain matters. These "collection statements" are included on all forms that Arcare uses to collect personal information, displayed on our website at the point of collection, or relayed via telephone when individuals provide their personal information to us.

Arcare must notify you of its identity and contact details, where and in what circumstances your personal information may be collected from another source, whether the collection is required or authorised by law or a Court/Tribunal order, the purposes for which it is collected, the main consequences if some or all of the information is not collected, and to whom the personal information is usually disclosed. Arcare must also inform you that its Privacy Policy contains information about how to access and seek correction of personal information, how to make a complaint about a privacy breach, and how complaints will be handled. You must also be informed whether your personal information is likely to be disclosed to overseas recipients, and if it is practicable to do so, in which countries they are located.

### Dealing with Arcare on a pseudonymous or an anonymous basis

You have the right to deal with us on an anonymous or pseudonymous basis, and you do not need to provide us with your personal information. However, if you choose to interact with us on such a basis, or if you do not provide us with personal information when requested, we may be unable to provide you with all of the services that you seek from us.

If we are required or authorized by or under an Australian law, or a court/tribunal order, to deal with individuals who have identified themselves, then you will not have the option of not identify yourself, or of using a pseudonym, to the extent we are so required or so authorized.

Additionally, if it is impracticable for us to deal with individuals who have not identified themselves or who have used a pseudonym, then you will not have the option of not identifying yourself, or of using a pseudonym, when dealing with us in relation to a particular matter.

Without limiting the foregoing, we reserve the right to request and verify your identity if you make an access request for information we hold, a request to correct information we hold, or if you wish to make a complaint about how we have handled your personal information.

### Closed Circuit TV (CCTV)

CCTV recording devices are in place to ensure the safety and security of residents, visitors and employees. The CCTV footage may only be used to investigate incidents, accidents, and work issues that could potentially negatively impact on resident health and wellbeing, and any issue related to the continued safety and health of residents, visitors or employees. The recordings made by CCTV are activated by movement sensors and the footage is securely held for 10 days, at which time automatic deletion occurs. CCTV footage can be downloaded and held if necessary as part of an ongoing investigation, with footage saved to file and held securely.

The CCTV recording equipment is located in a locked room with access limited to Arcare management. Access to the CCTV system is secured and protected by password access. CCTV footage remains the property of Arcare and will only be available to Arcare management, the police, and some government agencies in limited circumstances. If there is a legal requirement for a copy of the footage, it will only be made available via subpoena and with written clearance from Arcare legal advisors.

Residents, visitors and employees are made aware of the presence of CCTV recording devices through signage displayed at the entry to a facility. In order to protect personal privacy, footage will not be shown, used or shared in any other way except when required by law or Court order.

# Policy and Procedure – Data Management and Privacy

---

## ***How do we store personal information?***

Arcare stores information securely both in paper form and electronically at its head office and on site (e.g. at a residential care facility). Authorised employees and service providers providing residents with care and services have access to personal and health information electronically.

Arcare is required to take reasonable steps to ensure that the personal information it collects, holds, uses and discloses is accurate, up to date and complete, with reference to the purpose for which it is collected, used or disclosed. Information held by Arcare is subject to regular reviews and audits for this purpose. Where it is determined that it is no longer necessary or legally required for Arcare to hold and store personal information, reasonable steps are taken to de-identify or destroy the information.

Arcare currently stores information using a combination of physical files and secure electronic document management systems.

All of Arcare's servers are located in Australia.

Security and access protocols are maintained in order to implement reasonable steps to ensure that personal information is protected from misuse, interference, loss, unauthorised access, modification and disclosure. Internal access controls and protocols ensure that only authorised employees can access personal information in circumstances where they are required to do so in the performance of their duties.

Our IT system allows electronic file access to be tracked and audited to ensure that only authorised access to personal information has occurred.

Governance mechanisms are employed by Arcare to ensure the appropriate management of personal information including maintaining a designated privacy officer role, our *Employee Information Guide*, audit programs, employee bulletins and training programs. Arcare is committed to conducting a Privacy Impact Assessment for any new project where personal information will be handled, or where a significant change to information handling procedures is proposed.

## ***For what purposes do we collect, hold, use and disclose personal information?***

### Clients

We collect, hold, use and disclose personal information about our clients for the primary purposes of providing care and services to our clients.

We also collect, hold, use and disclose clients' information for the following purposes:

- To carry on business as a provider of aged care and related services and to make improvements in how we provide our services.
- So that we can receive funding from government agencies in respect of our clients.
- In order to comply with our legal obligations under the Aged Care Act 1997 and other laws.
- So that we can improve our services through quality improvement activities such as audits, surveys and other quality improvement activities.
- For marketing and related purposes, including to directly send to individuals (subject to Arcare's compliance with its statutory obligations) information updates, marketing materials and newsletters to people subscribed to our mailing lists.
- To seek the participation of clients and other individuals (on a voluntary basis) in advertising campaigns, marketing events, launches, client testimonials and focus groups.
- For the purposes of obtaining professional advice.

# Policy and Procedure – Data Management and Privacy

---

## Employees and service providers

We collect, hold, use and disclose information about our employees and services providers for the following purposes:

- To administer employment arrangements, personnel development and management responsibilities.
- To provide care and services to our clients.
- For quality improvement and marketing purposes.
- To meet our legal obligations such as the requirement to obtain criminal record checks for employees involved in providing care to our clients and workplace laws obligations.

## ***Use of information***

When Arcare holds your personal information, it can only be used for the particular purpose for which it was collected (known as the “primary purpose”), unless certain exceptions apply. Personal information can be used for secondary or other purposes where consent has been obtained, where it is reasonably expected to be used for a related purpose, where required or authorised by law or a Court/Tribunal order, where reasonably necessary for enforcement purposes conducted by or on behalf of an enforcement body, or where certain “permitted general situations” or “permitted health situations” exist.

## ***Permitted General Situations***

Permitted general situations are where circumstances exist involving serious threats to life, health or safety of any individual, or to public health or safety, suspected unlawful activity or serious misconduct, missing persons, legal or equitable claims and alternative dispute resolution processes.

## ***Permitted Health Situations***

Permitted health situations are where a range of specific circumstances apply in relation to the collection, use and disclosure of health information. They will exist where the information is necessary to provide a health service to the individual, and either the collection is required or authorised by or under an Australian law (other than the Privacy Act), or the information is collected in accordance with rules established by competent health or medical bodies that deal with obligations of professional confidentiality which govern activities of the organisation.

A permitted health situation will also exist where the collection is necessary for research relevant to public health or public safety, the compilation or analysis of statistics relevant to public health or public safety, or the management, funding or monitoring of a health service, and:

- those purposes cannot be served by collecting de-identified information;
- it is impracticable to obtain the individual’s consent; and
- the collection is either required by or under an Australian law (other than the Privacy Act), in accordance with rules established by competent health or medical bodies that deal with obligations of professional confidentiality which bind the organisation, or in accordance with approved guidelines.

A further permitted health situation will exist if the use or disclosure is necessary for research, or the compilation or analysis of statistics, relevant to public health or public safety, and:

- it is impracticable to obtain the individual’s consent to the use or disclosure;
- the use or disclosure is conducted in accordance with approved guidelines; and
- in the case of disclosure – the organisation reasonably believes that the recipient of the information will not disclose the information, or personal information derived from that information.

Permitted health situations arise in relation to genetic information about an individual if:

## Policy and Procedure – Data Management and Privacy

---

- the organisation has obtained the information in the course of providing a health service to the individual;
- the organisation reasonably believes that the use or disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of another individual who is a genetic relative of the individual;
- the use or disclosure is conducted in accordance with approved guidelines; and
- in the case of disclosure – the recipient of the information is a genetic relative of the individual.

Finally, a permitted health situation will arise when the organisation provides a health service to the individual, and:

- the recipient of the information is a responsible person for the individual;
- the individual is either physically or legally incapable of giving consent to the disclosure, or physically cannot communicate consent to the disclosure;
- another individual providing the health service (the “carer”) is satisfied that either the disclosure is necessary to provide appropriate care or treatment of the individual, or the disclosure is made for compassionate reasons;
- the disclosure is not contrary to any wish expressed by the individual before the individual became unable to give or communicate consent of which the carer is aware or of which the carer could reasonably be expected to be aware; and
- the disclosure is limited to the extent reasonable and necessary for providing appropriate care or fulfilling compassionate reasons.

Arcare uses personal information provided during enquiry.

processes for the purposes of fulfilling client requests, providing personalised services, maintaining accounts and records, statistical analysis, conducting market research and marketing, and assessing and evaluating the use of our website. Personal information may also be used by Arcare in conducting criminal record checking and employment screening, obtaining legal advice, and participating in legal proceedings.

### ***Disclosure of or access to information***

In most circumstances, Arcare is restricted in how it may disclose your personal information. Personal information can only be disclosed for the particular purpose for which it was collected (known as the “primary purpose”), unless certain exceptions apply. Personal information can be disclosed for secondary or other purposes where we have consent to do so, where it is reasonably expected to be disclosed for a related purpose, where required or authorised by law or a Court/Tribunal order, where reasonably necessary for enforcement purposes conducted by or on behalf of an enforcement body, or where “permitted general situations” or “permitted health situations” as described above exist.

Circumstances where personal information may be disclosed broadly include arranging for insurance, progressing insurance claims and meeting occupational health and safety obligations. Arcare may disclose personal information to members of the public, clients, suppliers, contractors and service providers which is provided for the purposes of fulfilling client requests, providing personalised services, maintaining accounts and records, statistical analysis, conducting market research and marketing, and assessing and evaluating the use of our website.

We disclose a client’s relevant personal information to other persons/organisations who are involved in providing health services and other care and services to the client. This can include the client’s doctor and allied health service providers. For home care clients, it can also include people such as personal care workers, cleaners, gardeners and maintenance personnel contracted to provide services to the client in their home.

Personal information may also be disclosed for residential application assessment, administration of resident agreements, and in some circumstances in obtaining references. Other circumstances where it may be disclosed include complaint management, security purposes, and administration of job applications and employment, which

## **Policy and Procedure – Data Management and Privacy**

---

may include criminal record checking and employment screening. Personal information may also be disclosed by Arcare in obtaining legal advice and participating in legal proceedings.

Personal information may be given to State and Commonwealth government agencies and other individuals/organisations including loss adjusters, security companies, insurance companies and health service providers. It will only be disclosed to third parties where permitted by the Act, and only disclosed to Arcare employees where necessary for the performance of their duties and where they are authorised to access it.

Without limiting the foregoing, we may disclose information about an individual to a third party, including our business partners, business advisers and professional advisers, for them to complete their obligations owed to us under agreements that we have entered into for the purpose of us undertaking or furthering our business operations and activities.

We may disclose personal information that we have collected about an individual to a third party for the purpose of the third party completing obligations owed to us in respect of our marketing activities, including for the purpose of the third party completing market research and surveys on our behalf.

Personal information about individuals which we have collected may be disclosed to a third party in the event our business and/or assets are sold or offered for sale, at or before the time of a merger, acquisition or a sale.

We may disclose personal information about an individual when required by law or court order, or other governmental order or process to disclose, where we believe in good faith that the law compels us to disclose information, or where we are required to do so as a result of any obligations we owe under a contract.

We may disclose personal information about an individual to a third party if we consider it necessary to do so in order to identify, contact or bring legal action against any third party.

### ***Direct Marketing***

Arcare may use or disclose personal information (other than sensitive information) for direct marketing purposes where it has collected the information directly from the individual, the individual would reasonably expect the information to be used for that purpose, where a simple means for the individual to opt out of direct marketing communications has been provided and where the individual has not done so.

Direct marketing can also occur where Arcare has consent to use personal information for that purpose, whether or not the information was collected from the individual, where a simple means for the individual to opt out of direct marketing communications has been provided with each direct marketing communication and where the individual has not done so.

Arcare can use sensitive information for direct marketing communications where consent to do so has been obtained.

When Arcare uses personal information for direct marketing purposes or to facilitate direct marketing by another organisation, the individual may request not to receive marketing communications, request that Arcare not use or disclose their personal information to facilitate direct marketing by another organisation, and request that Arcare inform the individual of the source of their personal information where practicable or reasonable (or inform the individual that it cannot do so).

### ***How can you access and correct your personal information?***

#### **Access Requests**

Requests made by individuals to access their personal information held by Arcare will generally be granted, unless certain limited circumstances apply. Those circumstances may include where it is reasonably determined that granting access would pose a serious threat to the life, health, or safety of an individual or to public health or safety, where granting access would have an unreasonable impact on the privacy of other individuals, where the request is frivolous or vexatious, or where legal proceedings are on foot. Arcare may also deny access in some circumstances where it is required to do so by law or access would be unlawful, where commercial negotiations or decision-making processes may be prejudiced, where unlawful activity or serious misconduct is suspected, or where enforcement related activities may be prejudiced.

## Policy and Procedure – Data Management and Privacy

---

Arcare responds to requests to access personal information within a reasonable period (usually 45 days but often sooner) and gives access to the information in the manner requested where it is reasonable and practicable to do so. If access needs to be refused due to one of the above exceptions, Arcare will take reasonable steps in the circumstances to provide access that meets the needs of Arcare and the individual, including through using a mutually agreed intermediary.

If access is refused, Arcare will give the individual a written notice which sets out the reasons for refusal, how to complain about the refusal, and where it relates to a commercially sensitive decision-making process, the reasons for refusal may include an explanation of the nature of the commercially sensitive decision.

Arcare may require that reasonable charges be paid in respect of granting access to personal information, however the charges must not be excessive, and must not apply to the making of the request. Requests for access to personal information can be made using the dedicated forms that are available at all of our facilities, or by contacting our Privacy Officer directly.

Arcare reserves the right to request information from the individual making the access request in order to verify the identity of the individual making the request, in order to ensure that Arcare is not inadvertently disclosing personal information to an individual not entitled to access such request. Where the request is made by an individual on behalf of another individual, Arcare reserves the right to refuse to comply with the request until Arcare is satisfied (on a reasonable basis) that the individual on whose behalf the access request is made has consented to the disclosure of information in response to the access request, subject to Arcare's rights in relation to refusal of the granting of access to the information.

### Requests to update or correct

Arcare takes reasonable steps to ensure that the personal information it collects, uses and discloses is accurate, complete and up-to-date. However, the accuracy, completeness and currency of the information Arcare holds depends on the accuracy of the information supplied to Arcare or which Arcare collects.

If Arcare holds personal information about an individual, and is satisfied that the information is inaccurate, out of date, incomplete, irrelevant or misleading (having regard to the purpose for which it is held), or the individual requests that Arcare correct the information, then Arcare will take reasonable steps to correct the information to ensure that it is accurate, up to date, complete, relevant and not misleading.

When Arcare corrects personal information that it previously disclosed to someone else, and the individual requests that Arcare notify the other person of the correction, then Arcare will take reasonable steps in the circumstances to give that notification unless it is impracticable or unlawful to do so. If in some circumstances Arcare refuses to correct personal information as requested, it will provide the individual with a written notice that sets out the reasons for refusal, and how to complain about the refusal.

When Arcare refuses to correct personal information as requested, and the individual requests Arcare to add a statement to their record that the information is inaccurate, out of date, incomplete, irrelevant or misleading, then Arcare will take reasonable steps in the circumstances to add the statement to the record in a manner that will make it apparent to users of the information. Arcare will respond to requests to correct/update or add a statement within a reasonable period after the request is made and will not charge the individual for the making of the request, the correction, or the adding of the statement.

Requests to update or correct personal information can be made by contacting our Privacy Officer directly. Requests will usually be met or responded to within 30 days. However, as noted above, Arcare reserves the right to verify the identity of the individual making the correction request. Additionally, where the correction request is made on behalf of a third party, Arcare reserves the right to refuse to correct the information Arcare holds about the third party until Arcare is satisfied (acting reasonably) that the third party has consented to the correction request being made on his/her behalf.

### ***How can you complain about a breach of the APPs?***

All complaints concerning breaches of the Act and APPs will be examined, and unless they are considered frivolous or vexatious, will be investigated by Arcare, in accordance with its obligations under the *Privacy Act 1988* (Cth).

## Policy and Procedure – Data Management and Privacy

---

Arcare requests that any complaints or enquiries regarding Arcare’s handling of a client’s personal information should be directed in the first instance to the residence manager. The residence manager will review the complaint or enquiry and, if the residence manager is unable to handle the complaint or enquiry in first instance, will direct the complaint or enquiry to Arcare’s Privacy Officer.

Arcare follows dedicated procedures for identifying and reporting privacy breaches, and for receiving and responding to complaints.

Arcare’s Privacy Officer maintains a complaint register and will investigate complaints concerning the mishandling of personal information, security breaches, allegations of breaches of the Act and the APPs, and any matters which are referred from the Office of the Australian Information Commissioner (OAIC). Your complaint will be promptly acknowledged and will be dealt with within a reasonable amount of time depending on the complexity of the matter. You will receive updates as to the progress of your complaint if the investigation takes longer than expected. Less complex complaints can usually be dealt with within 30 days; however more complex matters may take longer to resolve. If this is the case, then Arcare will endeavour to provide the complainant with progress reports.

Where a notification of a breach of privacy, or a complaint about the handling of personal information is received, Arcare’s Privacy Officer will take immediate steps to contain the breach, which may involve securing or quarantining personal information or Arcare files which contain the personal information. A preliminary assessment will be conducted and any necessary actions taken. These actions may include notifying the individual(s) whose personal information is the subject of the breach/complaint.

Where the preliminary assessment finds that the matter is complex or of a serious nature, independent investigators and/or legal advisors may be retained to assist with the investigation. All investigations will determine whether or not there appears to have been a breach of Arcare’s obligations under the Act. At the conclusion of the investigation, recommendations may be made as to changes to information handling practices and protocols within Arcare. The complainant (or if the matter was referred by it, the OAIC) will be informed of the outcome of the investigation, any relevant findings, and any actions taken as a result.

If the complainant is not satisfied with the investigation or the outcome, they may make a further complaint to the Office of the Australian Information Commissioner.

Further information can be found at <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>

You can also contact the Aged Care Complaints Scheme in relation to any concerns you have about the care and services we provide:

Online: <http://agedcarecomplaints.govspace.gov.au/>  
Phone: 1800 550 552

### Definitions

| Term                          | Definition   |
|-------------------------------|--|
| Australian Privacy Principles | <p>The Australian Privacy Principles (APPs) are set out in a Schedule to the Privacy Act 1988.</p> <p>The APPs regulate how Arcare, as an APP entity, must collect, use, disclose and store personal information. The APPs also give individuals the right to access and correct their personal information in certain circumstances.</p>  |
| Health information            | <p>Health information means information or an opinion about:</p> <ul style="list-style-type: none"><li>• the health or a disability (at any time) of an individual;</li><li>• an individual’s expressed wishes about the future provision of health services to him or her; or</li><li>• a health service provided, or to be provided, to an individual;</li><li>• that is also personal information; or</li></ul> |

## Policy and Procedure – Data Management and Privacy

| Term                  | Definition  |
|-----------------------|---|
|                       | <ul style="list-style-type: none"> <li>• other personal information collected to provide, or in providing, a health service; or</li> <li>• other personal information about an individual collected in connection with the donation, or intended donation, by the individual of his or her body parts, organs or body substances; or</li> <li>• genetic information about an individual in a form that is, or could be, predictive of the health of the individual or a genetic relative of the individual.</li> </ul>  |
| Personal information  | <p>This is defined in section 6 of the Privacy Act. Personal information means: Information or an opinion about an identified individual, or an individual who is reasonably identifiable:</p> <ul style="list-style-type: none"> <li>a) whether the information or opinion is true or not; and</li> <li>b) whether the information or opinion is recorded in a material form or not.</li> </ul>  |
| Sensitive information | <p>This is defined in section 6 of the Privacy Act. Sensitive information means:</p> <ul style="list-style-type: none"> <li>a) information or an opinion about an individual's: <ul style="list-style-type: none"> <li>i. racial or ethnic origin</li> <li>ii. political opinions</li> <li>iii. membership of a political association</li> <li>iv. religious beliefs or affiliations</li> <li>v. philosophical beliefs</li> <li>vi. membership of a professional or trade association</li> <li>vii. membership of a trade union</li> <li>viii. sexual orientation or practices</li> <li>ix. criminal record.</li> </ul> </li> <li>b) health information about an individual</li> <li>c) genetic information about an individual that is not otherwise health information</li> <li>d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification</li> <li>e) biometric templates.</li> </ul> |

Individuals who wish to contact Arcare about information privacy or their personal information can do so by contacting Arcare at:

Email: [privacy@arcare.com.au](mailto:privacy@arcare.com.au)  
Telephone: (03) 9559 9600  
Mail: PO Box 2250 Moorabbin VIC 3189

# Policy and Procedure – Data Management and Privacy

---

## Document history

| Version No. | Date       | Amended by    | Approved by            | Notes           |
|-------------|------------|---------------|------------------------|-----------------|
| 1           | 01/10/2014 | Hamisha Rewal | CEO                    | Initial release |
| 2           | 22/05/2018 | Laura Calabro | Kristina McGeehan-Hall | Updated         |