PRIVACY POLICY

Policy and Procedure

June 2013

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Document Control

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Document Owner:	Jocelyn Yanko, Operations Manager		
Author:	Maryjane Simkovic, CEO		
Reviewer:	Jocelyn Yanko, Operations Manager		
Authorised by:	Maryjane Simkovic, CEO		

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Privacy Policy

Jem Health (HLEC Pty Ltd and Jem Medical Pty Ltd) recognises the importance of protecting the privacy and rights of individuals in relation to the management of their personal information. We are committed to the principles of the Australian Privacy Principles (APP), the Information Privacy Principles, the Health Privacy Principles and the Commonwealth and Western Australian information privacy laws and the security they provides to clients, candidates, suppliers, employees, volunteers and other contributors to the organisation. All Jem Health staff shall be competent in understanding the principles of Privacy legislation and apply Jem Health's Privacy policies and procedures in their day to day operations.

Policy Statement

The Jem Health Privacy Procedure sets out in detail the responsibilities, actions and standards of all Jem Health employees and systems in the management of privacy such as:

- The kinds of information collected and held
- How personal information is collected
- How personal information is stored
- The purpose for collection, storage, use and disclosure of personal information
- How an individual may access personal information and seek correction
- Complaints process
- How staff and stakeholders are trained and informed

The Policy is reviewed annually to ensure our ongoing compliance with:

- Australian Privacy Principles
- Privacy Act 1988
- Health Information and Privacy Act 1988
- Freedom of Information Act 1992 (WA)

Responsibilities

Management are committed to:

- Full compliance and continual review / improvement of Jem Health Privacy policy, procedures and systems.
- Ensuring all employees and stakeholders are informed of their privacy rights and responsibilities.

Employees are expected to:

- Maintain full compliance with the Jem Health Privacy Policy and related Procedures
- Taking swift action where privacy concerns are identified.

Method of information collection

Jem Health will collect personal information directly from you unless it is unreasonable or impracticable to do so. In the case of occupational health services clients, initial details are provided by your current or potential employer to allow for contact to be made and services to be delivered.

Information may be collected:

- In writing, by you completing one of our official documents to enable core business – i.e. medicalquestionnaire, payroll details etc.
- By completing a digital form
- In person as disclosed by you during the course of a consultation / conversation.
- Through your access of our website / reception services.

We may also collect personal information from third parties including:

- Information provided on your behalf with your consent.
- From a health service provider who refers you to medical practitioners or allied health professionals.
- From past or present health care professionals and specialists with your consent
- From your current, past or prospective employer as relevant.
- From third parties such as law enforcement agencies and other government entities.

Jem Health will only collect personal information necessary for the performance of our core business activities and functions and to provide services to the highest quality standards.

We collect, hold, use and disclose personal information for the following purposes:

- To provide occupational or allied health and medical services / treatments to you
- To provide health, medical and fitness assessment and facilitation services
- For administrative and billing / payroll purposes and other standard business processing functions
- To update our records and keep your contact details up to date
- To respond to complaints
- To comply with relevant laws / rules / regulations / determinations
- For purpose of data research / analysis
- Recall register for follow up visits
- For the purpose of reporting back to employer / prospective employer and, where relevant, their authorised representative (i.e. insurer)
- To answer enquiries and provide information about services as requested
- Marketing, quality control and continuous improvement

Personal information will not be shared, misused or disclosed other than as described in this Privacy Policy or are permitted under by law.

Storage and security of information

Jem Health will ensure that information is accurate and complete.
We will ensure that personal information is protected from misuse, loss, unauthorised access, modification or unauthorised disclosure. We may store information in electronic and / or hard copy form.
Where personal information is no longer required, it is destroyed in line with relevant legislation and best practice.

Disclosure

Access to personal information is limited to employees who need to use the information to deliver primary business functions and relevant and authorised third parties as described above.
Jem Health will not use or disclose information, other than for the primary purpose of collection. Where there is another purpose for the information, consent of the individual shall be obtained – unless the individual would reasonably expect the use or it is impractical to obtain consent.

Access

A person may request access to any personal information we hold about them at any time by contacting us. In instances where you are entitled to access the information we hold; it will be provided in a suitable format – in some instances an administration fee will be charged however you will be informed at time of inquiry.
There may be instances where we cannot grant a person access to their personal information we hold in line with our rights and obligations under the Act, in which case the request will be responded to in writing.

Corrections

If a person believes that personal information Jem Health holds about you is in any way incorrect, incomplete or inaccurate, they may request for an amendment. Requests must be in writing and include the basis of the request of amendment. Jem Health will consider if the information requires amendment. In the instance we do not agree that there are grounds to amend information, Jem Health will include the written request on your file for record of your disagreement.

RESPONSIBILITY FOR IMPLEMENTATION, COMPLIANCE MONITORING, MEASURING AND CONTINUAL IMPROVEMENT

Jem Health's Managing Director and Operations Manager are responsible for the effective management of the Privacy Policy and Procedure.
This Privacy Policy applies to all Jem Health stakeholders.
All Jem Health employees have a duty of care to protect the privacy of information accessed in their work.

Policy Manager	**Maryjane Simkovic**	**Signed**
Approval Authority	**Maryjane Simkovic** Managing Director	**Signed**