



Privacy Policy

1. Privacy Policy

Ambulance Victoria (**AV**, **we** or **our**) is a statutory authority established by the *Ambulance Services Act 1986* (Vic). AV provides out-of-hospital, mobile and emergency health care to the Victorian community.

AV takes the protection of health privacy and personal information seriously. AV is committed to protecting personal and health information that it handles while performing its services and functions. This Privacy Policy explains how we handle your personal and health information.

AV applies the privacy principles set in the *Privacy Data and Protection Act 2014 (Vic)* (**PDP Act**), and the *Health Records Act 2001 (Vic)* (**HR Act**). The privacy principles guide how we collect and manage your personal and health information.

Importantly, we:

- Are transparent about the way we handle personal and health information
- Only collect personal and health information that is necessary for providing our services and administering our functions
- Ensure personal and health information are handled in accordance with the law, which includes limiting use and disclosure to purposes related (or for sensitive and health information, directly related) to our services, functions and activities, and
- Take reasonable steps to keep all personal and health information secure.

2. Personal and health information

Put simply, **personal information** is information about a person whose identity is apparent (or could reasonably be ascertained) from that information.

The personal information we collect about you may include sensitive information or health information. **Sensitive information** includes information such as race, ethnicity, religious beliefs, sexual preferences, and criminal records. **Health information** is information about physical, mental or psychological health, disability or genetic makeup or which is collected to provide, or in providing, a health service. AV takes extra care when we collect and handle sensitive and health information.

In the remainder of this policy, references to 'personal information' also includes sensitive and health information.

The types of personal information we collect and use depends on our relationship with you. Click on the relevant link below to find out **what types of personal and health information we collect, how we collect this information,** and **why we collect your information**. This information is also set out in other sections of this policy.



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3. Patients



3.1 This is AV's collection notice to you:

AV is required to provide a collection notice to you when we collect your personal information or as soon as possible after we collect it. Often, we collect your personal information when we are providing you with emergency medical care so it is not possible (nor appropriate) for us to provide notice at that time. As such, we have published this policy so that it can be our collection notice to you.

In circumstances where we collect your personal information (other than when providing healthcare services), this policy may be provided to you as our collection notice either in hard copy or by web link.

In this policy we will set out all the information which is required in a collection notice such as:

- How to contact our organisation
- That you can gain access to the information we hold about you
- The purpose for which we collect your information
- How we use or to whom we disclose your information, and
- Any important consequences if you choose not to provide us with your personal information.

3.2 How we collect your personal and health information

AV collects and uses personal and health information provided to us about our patients. We collect and use this information to provide healthcare to our patients, and to provide, administer and improve our services.

We may collect information directly from you, or from a third party (such as a bystander, family member, health care professional or service, prison staff or government department) if you are unable to provide this information or where we need to obtain this information about you pursuant to the law. If we collect your personal or health information from a third party, we may also collect their personal information if necessary to provide and administer our services.

We may collect personal or health information from you:

- In person
- When providing you with patient care services, through triage, examination and treatment

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- Via phone, email or post, and
- When you submit a form, including through our website.

3.3 Personal and health information we collect

AV may collect your:

- Name and date of birth, contact information, such as email, postal and residential address or phone
- Details or a recording of your 000 call (or a call made on your behalf), that we receive from Triple Zero Victoria and other voice phone recordings, such as when you receive our telehealth or video-health services
- Examination and treatment information as well as physical information about you, such as your age, weight, gender and/or ethnicity
- Medical history, conditions, medications, allergies or information relating to your health and prior care
- Your location when attended by AV, including details of the scene (such as details of family members, attending third parties and/or social situations)
- Transportation information, including the time and method of transport
- Billing and payment information (such as banking information or information relating to your pension, private health insurance, Department of Veteran Affairs membership, Centrelink or Workcover numbers or details) or any hardship request details, and
- Information relating to any feedback or complaints you make about AV services.

3.4 Why we collect and use personal and health information

AV primarily collects and uses personal and health information from or about you for the purpose of providing medical care and to improve and administer the care we provide to you.

Where your personal or health information is used for another purpose, we will get your consent unless we are allowed to use your personal or health information for another purpose pursuant to law.

For example, AV may use your personal and health information to:

- Dispatch ambulances and paramedics, attend emergency healthcare requests, treat our patients and provide out-of-hospital, mobile and emergency health services and the creation of care plans.
- Provide our complex care services (including air ambulance, adult retrieval, and stroke telemedicine services)
- Provide secondary triage services to determine the most appropriate services for you
- Liaise with your doctors or other health care providers, where required
- Settle your invoice or for debt recovery purposes. If we do not have sufficient information to contact you, we may use the personal information of a third party (such as a family member) that we collected when attending you to obtain your personal information
- Train paramedics and other ambulance employees or volunteers
- Fund, manage, plan, monitor, improve or evaluate AV's services, including by conducting research projects

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- Meet occupational health and safety obligations, including to ensure the safety of our paramedics, employees, volunteers and patients
- Record patient details in AV's special patient information (SPPT) system for use by paramedics and operational staff when attending an address. The SPPT system is a database that records information relating to a particular location for example relating to access, directions, medical and care plan information and safety and occupational violence risk
- Undertake patient reviews and investigate incidents, for the purposes of quality and improvement, or as required under law (i.e., for coroner cases, medication audits, or to undertake our statutory duty of candour obligations), and
- Answer your queries, communicate with you and investigate and respond to your complaint or compliment.

4. Members

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4.1 How we collect your personal information

AV collects and uses personal information from our members. We may collect your information you over the phone, by email, via our websites, in writing, or face-to-face. We may also receive your information from Service Victoria, where you may choose to buy, renew or update your Ambulance Victoria membership.

We collect personal information when you:

- Enquire or communicate with AV, via phone, email or post
- Register to become an AV member, and
- Respond to a survey or fill out an AV form.

4.2 Personal information we collect

AV may collect:

- Name, date of birth, gender, contact information, such as email, address or phone number
- Details of your family, including dependents
- Membership payment information
- Details of our communications or interactions with you, including voice recordings and transcripts of phone calls, and
- Information about your enquiries, feedback or complaints.

AV uses external contractors to administer our membership and to provide related services on our behalf. In providing these functions and services, our contractors collect and use your personal information that is related to your membership with AV. We have agreements in place with our contractors to ensure your information remains secure and protected according to the law.

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4.3 Why we collect and use personal information

We collect and use personal information for several reasons. We may use your personal information to:

- Process your application and payment for membership, and otherwise manage membership renewals and updates
- Set up your online AV membership account
- Send health related information and to promote our services, community awareness, health messages and education campaigns that AV believes may be of interest or value to its members, and
- Answer your queries or communicate with you.

5. Donations



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5.1 When we collect personal information

AV collects and uses personal information from our donors. We may collect your information directly from you, via phone or email, through our website, in writing, or face-to-face.

We collect your personal information when you:

- Enquire or communicate with AV, via phone, email or post, and
- Make a donation or complete an AV form.

We may also receive your donation information (and personal information) via third parties when you make your donation via volunteer groups or other third parties (e.g., My Cause or Grassrootz).

5.2 Personal information we collect

AV may collect your:

- Name and date of birth, contact information, such as email, address or phone number
- Information about your donation or contribution to AV, and
- Information about your enquiry, feedback or complaint.

5.3 Why we collect and use personal information

We may use your personal information to:

- Process and manage your donations to AV
- Thank our donors and publish details of their donation in our annual report or in relation to special purpose donations (where you have provided consent for us to do so), and
- Answer your queries or communicate with you.

6. General Public

6.1 Personal information we collect

AV collects and uses your personal information when you (members of the public) interact with us.

AV may collect:

- Information about your enquiry or communication with us, including your name and contact information, where provided
- Information provided when you participate in an AV program (such as GoodSAM), training or other service
- Details of your complaint or concern and/or request, and
- Details of your call to Triple Zero.

6.2 Why we collect and use personal information

We collect and use your personal information to:

- Communicate with you and respond to your enquiries
- Deliver our programs, services and training
- Respond to your complaint or concern, and
- Process your request to access or correct your personal information.

7. Website visitors

7.1 How we collect your personal information

AV collects and uses your personal information when you interact with us on our websites and mobile applications. We collect personal information when you:

- Visit our website or mobile applications
- Send us an enquiry, including through our 'Feedback Form' from on our website, and
- Contact us via social media.

7.2 Personal information we collect

AV may collect:

- Analytics information from your use of our website and mobile applications, and
- Information about your enquiry or communication with us through our website or mobile application, including your name and contact information when provided.

A note about analytics information: We collect personal information from your use of and interaction with our website, mobile applications, and social media accounts. This information

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helps us to understand how you use our websites or interact with us online. The information we collect may include information that enables us to personalise your experience on our website.

We generally collect this information using "cookies". A cookie is a small piece of data that our website asks your browser to store on your PC, laptop, smartphone or another device. Cookies act like signposts, markers or tiny pieces of memory that enable us to give you the best experience possible when visiting our website.

You may choose to accept cookies or disable cookies. The use of cookies by AV, however, supports your use of our website and mobile applications.

Information we collect and process when you use our website and mobile applications may include:

- Your device's IP address and other device information
- The date and time you visited our website
- The web browser you used to access our website
- The site that referred you to our website
- How you navigated around our website, and the duration of the session, and
- Approximate location of the device you used to interact with our website.

7.3 Why we collect and use personal information

We collect and use your personal information collected when you use our website and other media, for several reasons. We may use your personal information to:

- Improve your experience with our websites and mobile applications
- Personalise your experience on our website, and
- Communicate with you and respond to your enquiries, feedback or complaint.

8. Anonymity

If you contact us with a general question, you may interact with us anonymously or using a pseudonym.

There are some instances however, where we are unable to interact with you anonymously. If you choose to not provide your personal or health information to us, we may not be able to provide you with appropriate or safe medical assistance, services or contact you.

Should you require assistance from AV and wish to remain anonymous or use a pseudonym, we will assist you to the best of our abilities and discuss your options with you at that time.

9. Who we share your personal and health information with

9.1 Our contractors

As stated above, AV uses external parties (i.e., contractors) to provide some services and functions on our behalf, such as professional advisors, health services, data storage, payment

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processing, website analytics or assurance and/or audit services relating to the assessment of essential AV information or financials. We may share your personal information with these contractors where it relates to the services that they are providing AV.

We ensure that our contractual arrangements with contractors who store or process personal and health information on our behalf, require them to process, use and store your information in compliance with the privacy laws.

9.2 Disclosures

Please note that AV does not share your personal or health information unless we have your consent, or where we have a lawful ability or requirement to do so. To provide some key examples, AV may disclose personal information to:

- Hospitals in order to handover a patient, for their continued care and treatment
- Family or next of kin (only where that person is your legal guardian or power of attorney, you have consented or where AV is legally permitted to disclose the information)
- Other medical providers, including general practitioners, other agencies and care partners or other primary care providers for the ongoing management of a patient's health
- AV's telehealth provider/s, home visiting nurses or other alternative providers
- A database managed by the Victorian Department of Health which is accessible by Victorian public hospitals, ambulance services and the Secretary for the purposes of (1) providing medical treatment to patients, and (2) management/administration of health service information
- The Transport Accident Commission, Workcover, public/ private hospitals, Department of Veteran Affairs, prisons, Victims of Crime Commission other state ambulance services for the purpose of settling a patient's invoice or assessment of claims
- The Victorian Department of Health, Victorian Agency for Health Information and Safer Care Victoria for information regarding patient cases or complaints
- The Coroner, under the Coroners Act 2008 (Vic), where a patient is deceased, and
- Other government departments, agencies and statutory authorities.

10. Storage, security and retention of personal and health information

10.1 Storage

AV has a strong focus on securely storing data, including personal and health information, within Victoria and Australia, or otherwise within jurisdictions that have comparable privacy laws. We do this to ensure your personal and health information is appropriately protected.

Personal and health information is primarily held electronically. Personal information may be held in AV owned and managed systems, or data storage systems provided by our contractors.

10.2 Security

We have implemented a range of information security practices and controls to ensure that AV and the personal information that we hold is protected. We have implemented a Cyber Security

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program that aligns with the Victorian Department of Health's requirements, including in order to protect personal information from unauthorised access, disclosure, alteration and loss.

Any concerns about the security of your personal information collected or used by AV should be reported to us using our contact details below.

10.3 Retention

AV retains personal and health information in accordance with the *Public Records Act 1973* (Vic) and our obligations to the Public Record Office of Victoria in relation to our obligations regarding the provision of emergency services and patient information.

AV may also be obligated to retain personal and health information for longer periods, such as where documents are involved in a Freedom of Information request, related to criminal matters such as child sexual abuse incidents and allegations, or for other litigation purposes.

Where AV disposes of your personal and health information, it does so securely and in accordance with the Public Record Office of Victoria's Disposal Standard.

11. Social media

AV maintains a number of social media accounts for the purpose of promoting AV, important community awareness and health messages and education campaigns.

Before you interact with us via Facebook, X (formerly Twitter), Instagram or LinkedIn, please be aware that personal information supplied to us through or posted on any social media outlet becomes subject to the relevant privacy policy of the social media platform. You may instead choose to head to the <u>AV website</u> or contact us directly, via the details available below.

12. Your rights

AV supports your right to:

- 1. Access personal and health information we hold about you; or
- 2. Correct your personal and health information, where it is inaccurate, incomplete, or out of date.

If you would like to access or correct your personal or health information, please follow the steps outlined in the Ambulance Victoria Freedom of Information Request process, available online at https://www.ambulance.vic.gov.au/freedom-of-information/

Before you apply to access or to correct your personal information, you will need to verify your identity. This is to ensure that we do not alter your personal information unless you have requested it or to ensure that we do not share your personal information with anyone not authorised to have it.

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13. Questions or concerns?

If you have a question or concern about AV's handling of your personal information, or would like to submit a privacy complaint, please contact us:

AV Privacy Advisor Email: <u>privacy@ambulance.vic.gov.au</u> Phone: 9840 3501 Address: 375 Manningham Road, Doncaster Vic 3108

In most cases, we will be able to respond to you promptly. There may be some instances however where we may need more time to gather additional details to understand your concern or investigate the matter.

If you have made a privacy complaint, would like more information about privacy and your rights, or are not happy with how we responded to your concern, you can contact:

Health Complaints Commissioner Telephone: 1300 582 113 Website: www.hcc.vic.gov.au

Office of the Victorian Information Commissioner Post: PO Box 24274, Melbourne Victoria 3001 Telephone: 1300 006 842 Email: enquiries@ovic.vic.gov.au Website: www.ovic.vic.gov.au International callers + 613 8684 7565 International Interpreter and Translation Service (TIS) on 13 14 50

14. Changes to this policy

AV may update this policy from time to time. The current version will be posted on AV's website and a copy may be obtained at any time by contacting AV.

15. Further information

Privacy and Data Protection Act 2014 (Vic) Health Records Act 2001 (Vic) Victorian Data Sharing Act 2017 (Vic) Public Records Act 1973 (Vic) https://hcc.vic.gov.au/ https://www.ovic.vic.gov.au/ https://www.vic.gov.au/about-information-sharing-schemes-and-risk-management-framework

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