

CRANAplus Mental Health and Wellbeing Privacy Policy

About Us

The personal and professional demands experienced by those working in the remote health sector are significant and unique. In acknowledgment of this, CRANAplus provides Mental Health and Wellbeing services to the rural and remote health workforce and their families. We offer telephone psychological support and self-care, wellbeing workshops and resources. CRANAplus responds to emerging issues through representation and funded projects designed to address issues affecting the rural and remote workforce.

We provide a high-quality telephone psychological support service for the rural and remote health workforce. The Bush Support Line is free, operates 24/7 and is serviced by experienced health professionals. The Bush Support Line is open to all health professionals and their families in rural, remote and isolated communities, including Aboriginal and Torres Strait Islander Health Workers/Professionals, the Allied Health workforce, health students and other staff involved in health service delivery.

Policy Scope

This Policy explains how CRANAplus Mental Health and Wellbeing Service complies with the relevant Australian Federal, State and Territory Acts and Legislation in relation to the collection, use, disclosure and handling of your personal information.

The Mental Health and Wellbeing Privacy Policy extends the CRANAplus Privacy Policy to specific services and activities conducted by the Mental Health and Wellbeing Service, including the Bush Support Line and the delivery of workshops. It excludes the provision of education services, membership and online course delivery and services accessible through the CRANAplus website, which are governed by the CRANAplus Privacy Policy.

The CRANAplus Privacy Policy applies to accessing free online courses, on demand content, registering for face to face or digital events, making an enquiry through the CRANAplus website and participating in other CRANAplus services and are excluded from this Policy. This Policy does not apply to the collection or use of information about organisations, corporations or agencies.

Statement

We are committed to protecting your privacy and complying with the Privacy Act 1988 (Commonwealth) (Privacy Act) and other relevant state laws in relation to the management of personal information.

This Mental Health and Wellbeing Privacy Policy (Policy) describes how we collect, hold, use and disclose your personal information and should be read together with our Mental Health and Wellbeing Service Charter.

Application

This Policy applies to:

- Consumers contacting the Bush Support Line.
- Individuals interacting with the Mental Health and Wellbeing service, in any other capacity other than through their workplace or employer, for the purposes of requesting support or access to services or referral pathways.

What type of information do we collect?

Personal information that we collect and hold is information that is reasonably necessary for the proper performance of our functions and services in providing remote psychological counselling and support services provided by telephone.

We may collect personal information about you that includes:

- Your phone number used to contact the Bush Support Line, and your personal phone number
- Your IP address if you are using VOIP or other electronic methods in contacting the service
- Your first and last name, date of birth and email address
- The primary concern/s and other circumstances important in providing a service to you
- Information relating to your work, personal situation and limited demographic information to determine eligibility and suitability for service
- Other relevant information that you share with us relevant to the interaction

Subject to this Policy, we may also collect and hold sensitive information and/or health information disclosed by you, including (but not limited to):

- Your physical, mental or psychological health and your personal circumstances
- Information regarding your background, such as whether you are from Aboriginal and Torres Strait Islander background or a culturally and linguistically diverse background

The choice of how much information you provide to us is yours, but we require certain information from you to provide those services. In certain circumstances, you have the option of interacting with us anonymously or using a pseudonym if you feel more comfortable dealing with us that way.

In certain cases, a Service Provider may have to disclose private or confidential information shared by you to someone else to protect someone from harm. Service providers will not break their confidentiality with you unless the situation is really serious and they feel they have no choice, and where possible the Service Provider will normally talk to you about it first.

Consent

- If you engage with the Bush Support Line, you will be provided with an opportunity to consent or not consent to these policy terms. This is through a pre-recorded message upon calling the Bush Support Line or being asked directly when engaging with the service.
- If you provide consent, you are consenting to the use of your personal information as identified in this policy, including sensitive information that you have provided to us.
- If you do not consent to these Policy terms, we may not be able to provide services to you.
- We collect personal information from you directly and not through another person or source.

Personal Information

Your personal information shared with us will be held in the strictest confidence, and is accessible to Bush Support Line Service Providers and management, with highly sensitive information restricted to the person you speak to in engaging with the BSL, and management, for the purposes of:

- providing a service to you
- understanding your needs and providing support
- if you have provided your consent to be contacted after your engagement with the service, requesting feedback for the purpose of improving the quality of our service

Your personal information will not be disclosed or used in any way other than for the reasonably expected secondary purposes, in **un-identified** summary form for the following purposes:

- Analyse data, perform audits, evaluate and report
- Prevent and detect security threats, fraud or other malicious activity
- Comply with our legal obligations, resolve disputes, and enforce our agreements
- We use information gathered to review and/or improve the overall quality of our service
- Help us manage and enhance our service standards
- We use non-identifiable summary information to identify and advocate for the rural and remote health workforce
- We also use non-identifiable call data to improve our services and for statistical purposes.

Notes from your interaction with us will be digitally recorded and electronically stored by CRANaplus in a secure application.

We will not contact you, or use your personal information for any other purpose than listed in this Policy and never for the purposes of promoting our services or marketing.

We may use and disclose your personal information for the primary purpose for which it is collected, for reasonably expected secondary purposes which are related to the primary purpose, and in other circumstances authorised by the relevant Federal, State or Territory Act or legislation that applies.

Security and Protection

We take all reasonable steps to protect your information against misuse, interference, loss, unauthorised access, modification and disclosure. The protective steps we take include:

- confidentiality requirements are placed on our employees and contractors via contracts and policies
- limiting access to information to employees depending on their roles and responsibilities
- educating our employees and contractors in relation to obligations under the relevant Federal, State and Territory Acts and legislation and ethical codes of conduct for health practitioners
- document and file storage security policies
- access and release of information policies
- information privacy and security measures for restricted access to our systems and protection against unauthorised access
- maintaining digital systems and storage locations in Australia

Disclosure

We may only disclose your information (including producing documents) to another person, entity, authority or government body if:

- we are required to do so by Australian law;
- we are ordered to do so by a court/tribunal order; and/or
- there is an immediate or imminent risk of serious harm to you, an identified third party and/or the general public.
- you have disclosed to us that you or another person has engaged in, or is planning to engage in, suspected unlawful activity or serious misconduct.
- where a permitted general or health situation exemption applies under the Federal Privacy Act 1988

Where we are required to disclose information to another entity, either as requested by you, or under a relevant Australian law, we will ensure the receiving entity is governed by an Information Privacy system equal to the relevant Australian Privacy Principles, Information Privacy Principles or Health Privacy Principles that applies to your information.

Disposal

CRANApplus has had a secure electronic record system since 2019, and records relating to our provision of the Bush Support Line are retained indefinitely since 2019. If a policy for the destruction of records no longer required from 2044 (minimum 25-year retention) in accordance with relevant legislation, the method would include rendering all records non-identifiable.

Unsolicited Information

In the unlikely event where we receive unsolicited information about you, we will check whether that information is reasonably necessary for our functions. If it is, we will handle this information in the same way we do other information we seek from you. If not, we will securely destroy it.

Correcting personal information

Personal information collected under this Policy is relevant only for the purposes for which it was collected at that time, and to enable linking of records for identified individuals. If you have provided identifiable information in accessing our services, you have the opportunity to correct that personal information when and if you next engage with the service.

Contact Information

CRANApplus welcomes feedback in any form, and you can access the Complaint, Feedback, or Compliment Policy on the CRANApplus website. If you would like to provide feedback, lodge a complaint or compliment, or have a question relating to this policy, we encourage you to contact us at wellbeing@crana.org.au or use this QR Code.



Access to your information

Under certain circumstances, you may be entitled to access your information held by us.

If you wish to access your information, you must lodge a written request to the Executive Director, Mental Health and Wellbeing, PO Box: PO Box 7410, Cairns, QLD 4870 or via confidential email to bsl@crana.org.au.

Your request must contain your name and address, the contact number you used to access our services and sufficiently identify yourself and the information you wish to access. To respond to your request, we may need to confirm your identity. If you share information with us anonymously, it will not be possible to respond to your request.

We are not required to give you access to your information if:

- it would be unlawful to do so; or
- denying access is required or authorised by an Australian law or a court/tribunal order; or
- to do so would likely prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body, or,
- we are unable to confirm your identifiable information.

If we do not give you access to your information, you will receive a written notice that explains the reason for the refusal.

Further Information

This Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and the changing environment that our organisation operates in.

The most recent version of the Policy will always be available on our website or by emailing wellbeing@crana.org.au.

If you have any questions, please contact us at wellbeing@crana.org.au.

Associated Documents

Australia Government Australia Law Reform website

<https://www.alrc.gov.au/publications/2.%20Privacy%20Regulation%20in%20Australia/state-and-territory-regulation-privacy>

Department of Premier and Cabinet PC 012 Information Privacy Principles Instructions SA Feb 2017

Freedom of Information Act 1982 Commonwealth

Freedom of Information Act 1992 WA

Health Quality and Compliance Commission Act 2006 QLD

Health Records (Privacy and Access) Act 1997 ACT

Health Records Act Vic 2001

Health Records and Information Privacy Act 2002 NSW

Health Services Act 1991 QLD

Information Act 2002 NT

Information Privacy Act Vic 2000

Information Privacy Bill 2007 WA

Information Standard 42 QLD

Mental Health Act 2014

Office of Australian Information Commissioner – <https://www.oaic.gov.au/>

Personal Information Privacy Act 2004 Tas

Privacy Act 1988 (National) – includes Australian Privacy Principles

Privacy Act 1988 Cwth

Privacy Amendment Act 2012 Commonwealth

Privacy and Personal Information Protection Act 1988 NSW

State Records Act 2000 WA

The Records Information Privacy Act NSW

Victorian Government Health website – <https://www2.health.vic.gov.au/>



Katherine Isbister

Authorisation of CEO

Date Authorised: 7 April 2022



Pamela Edwards

Executive Director, Mental Health and Wellbeing

Date Authorised: 7 Apr 2022