



## Summary Report: SANDAS Privacy Roundtable

SANDAS initiated a Roundtable event in response to the many concerns raised by members in the past 12 months relating to privacy, information sharing and data vulnerability in relation to the provision of services to an often-vulnerable client group. This was in the context of changing data collection requirements of funding bodies, new legislation requiring notification of data breaches, and concerns about the privacy of vulnerable populations in the health system with the advent of My Health Record.

SANDAS brought together representatives from nine member organisations, one non-member and the Adelaide PHN to hear from two guest speakers around the issues of privacy and information sharing. The event took place on August the 14<sup>th</sup>.

### Stephanie Otorepec – Acting Director, Regulation and Strategy Branch, Office of the Australia Information Commissioner

Stephanie's presentation can be [downloaded here](#) and covered the following topics and themes:

- The role and powers of the OAIC
- The Australian Privacy Principles which outline how personal information should be collected, used, disclosed and secured
- [Australian Privacy Principles Guidelines](#) (Click to download)
- The role of health care providers and the classification of all health information (and any related information such as name and address collected in the process of providing a health service) as sensitive information for the purposes of the Privacy Act.
- The elements of consent to the collection of information
- The Notifiable Data Breaches Scheme – what constitutes a breach and what organisations need to do to notify their clients
- [Webinar – Preparing for the Notifiable Data Breaches Scheme](#) (Click to view online)
- [Data Breach Preparation and Response Guide - OAIC](#) (Click to download)
- Personal Information vs De-Identified Information
- [The De-Identification Decision Making Framework](#) (Click to download)
- [De-Identification and the Privacy Act - OAIC](#) (Click to download)

Questions and answers that were generated by Stephanie's presentation included:

- How information can be shared within organisations (between service areas) if done with client informed consent.
- The importance of considering what information is necessary to collect in order to provide an effective service, and only collect that information.
- Clients have the right to access records held about them and to request that information is corrected if they think it is incorrect. They don't have the right to have information about them deleted if it is correct and was provided with informed consent.
- Organisations do not have to provide clients with an option to remain anonymous, if it deems it is not able to provide an effective service without identifying details.
- All healthcare providers are covered by the Privacy Act, regardless of what other services they may provide and regardless of size.
- Organisations should implement systems to ensure that information is being collected, used, stored, shared and destroyed in accordance with the Privacy Principles.

- The organisation who holds client information is responsible for notifying clients of any breaches that occur to their system, even if this is not the organisation who originally collected the data or gained consent of client. (e.g. In the case of organisations providing information to a third party client management system)
- Aggregated statistical data that is not identifiable does not require client consent to be utilised.

**Donna Mayhew – SA Principal Advisor Information Sharing – Department for the Premier and Cabinet**

Donna’s presentation can be [downloaded here](#) and included the following topics and themes:

- The need for information sharing
- The complex nature of the services provided to complex clients
- The Information Sharing Guidelines process
- [Information Sharing Guidelines](#) (Click to download)
- Relevant legislation to the ISG and how ISG interacts with the Privacy Act
- Key elements to consent
- Elements of accurate record keeping
- ISG implementation in organisations
- [A Guide to Writing an ISG Appendix](#) (Click to download)
- [ISG Audit Tool](#) (Click to download)

Attendees discussed some case studies relating to ISG and asked questions about implementation.

Online training courses for the ISG are available at: <http://www.ombudsman.sa.gov.au/isg/>

Both presenters have provided contact details should organisations need support for either ensuring their organisation is compliant with the Australian Privacy Principles or implementing the ISG.

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