

# Personal and Health Information Privacy Policy

## Purpose

This document outlines Injury Doc NZ's policy related to Privacy, in line with the **Privacy Act 2020**, which promotes and protects the privacy of individual personal information, and the **Health Information Privacy Code**, which specifically relates to the management of health information.

## Scope

All Injury Doc NZ team members must comply with the following rules when collecting, using, storing, or disclosing information about patients' personal health or the treatment that they are receiving.

## Policy

Injury Doc NZ team members will understand, comply with, and implement the requirements of the Privacy Act 2020 and the Health Information Privacy Code 2020, as outlined in this document which state the processes to be followed by the Injury Doc team members in handling personal and health information.

- Injury Doc NZ Privacy Officer is *Gemma Newburn*. They have received training and are aware of their responsibilities.
- Injury Doc NZ will collect personal and health information in a manner that complies with the Privacy Act and the Health Information Privacy Code.
  - only collect the information for the purpose of treating the Injured Worker or for some other legal purpose.
  - collect the information directly from the Injured Worker unless they have consented to you collecting the information from someone else or one of the other exceptions to this rule applies; and
  - let the Injured Worker know why they are collecting the information, who will have access to the information, and that the Injured Worker is entitled to access and correct the information. They will not need to tell Injured workers this if they have collected the same type of information from them before.
  - Collect information in an unidentifiable way if appropriate.
- Injury Doc NZ complies with the Privacy Act and Health Information Privacy Code requirements when using personal and health information.
  - When they have collected personal information from an Injured Worker for one purpose, it cannot be used for any other purpose without the Injured Worker's consent.
  - There are some exceptions to this principle. These exceptions include where the information is publicly available, or where the information is used in a way that does not identify the Injured Worker. A full list of the exceptions to this principle can be found in the [Privacy Act](#).

- Before using an Injured Worker's personal information, they we will make sure that the information is accurate and up to date.
- Injury Doc NZ complies with the Privacy Act and Health Information Privacy Code when storing and destroying personal and health information.
  - Ensuring that the personal information that Injury Doc NZ holds is stored securely in a practice management system with restricted and monitored access so that it cannot be accessed or used by unauthorized people.
  - When Injury Doc NZ transfers Injured Worker's health information to someone else, this is done through secure health information transfer channels such as Health Link which acts to prevent unauthorised people from accessing or using the information.
  - Injury Doc NZ can keep Injured Worker's health information for as long as they need the information to treat them and they will securely dispose of your information when they are no longer required to hold it by law.
  - Injury Doc NZ will destroy Injured Worker's information in a way that ensures the confidentiality of the information.
  - Injured Workers are entitled to ask Injury Doc NZ to confirm whether we hold specific information about them and are entitled to access the information unless they have lawful reasons for withholding the information.
  - Injured Workers are also entitled to ask Injury Doc NZ to correct the information that they hold about them.
  - Injury Doc NZ will assist Injured Workers who ask to access their information
- Injury Doc NZ complies with the Privacy Act and Health Information Privacy Code requirements when disclosing health information.

They will not disclose an Injured Worker's information without their consent unless they reasonably believe that it is not possible for them to get the Injured Worker's consent and:

- the disclosure is for the purposes of the Injured Worker's treatment (e.g. a referral);
- the disclosure is to the Injured Worker's caregiver and the Injured Worker has not objected to the disclosure.
- it is necessary for them to disclose the information to prevent a serious and immediate threat to the Injured Worker's or another person's life or health.
- the disclosure is made for the purposes of a criminal proceeding.
- the Injured Worker is, or is likely to become dependent on a drug that they need to report under the Misuse of Drugs Act or the Medicines Act;
- the disclosure is to a social worker, or the police and concerns suspected child abuse.
- the disclosure is made by a doctor to the Director of Land Transport Safety and concerns the Injured Worker's ability to drive safely.

They will consult with Injury Doc NZ's Privacy Officer before disclosing an Injured Worker's health information without their consent. Injury Doc NZ complies with the Privacy Act and Health Information Privacy Code when correcting health information.

- Injury Doc NZ has a process to deal with data privacy breaches and notification in-line with the requirements under the Privacy Act.
- Injury Doc NZ will follow the process outlined when dealing with requests for information.
- Injury Doc NZ will ensure the confidentiality of information.
- Injury Doc NZ will follow the process outlined to deal with transferring Injured Worker's information.
- Injury Doc NZ has links relating to the Privacy Act and HIPC available for Injured Workers on the website.
- The Privacy Act and HIPC will be covered in Injury Doc NZ induction process.

## Confidentiality

- All Injury Doc NZ team members have confidentiality as part of their employment agreement or contract for service. The obligations under this clause extend after the agreement or contract has ended.

## Destruction of Confidential Material

- All confidential material is either shredded on-site or placed in a secure destruction bin.

## IT Security

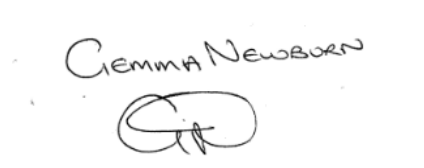
- Each Injury Doc NZ team member has their own unique log in name, and it is protected by at least 8-character passwords mixed with letters and numbers. There will be an automatic reminder to change your password every 12 months
- Injury Doc NZ uses a secure connected health network Fortinet Health hosted by Spark NZ

\*South Island patients only - please note that this organisation is contributing to, and accessing healthcare information from HealthOne -

## HealthOne

HealthOne is a South Island based secure electronic record that allows registered healthcare providers directly involved in your healthcare, to quickly access information such as your test results, allergies, medications, GP summaries and hospital information. HealthOne adheres to the principles of the Privacy Act 2020 as well as the Rules set out in the Health Information Privacy Code 2020. Access is only possible via an approved highly secure healthcare information network which is regularly audited and tested. Privacy auditing is used to check that only those directly involved in your care are accessing your information. To find out more about HealthOne please visit <https://healthone.org.nz/>. Please note that you are entitled to restrict the sharing of your healthcare records by contacting 0508 837 872 or emailing [HealthOne.privacy@pegasus.health.nz](mailto:HealthOne.privacy@pegasus.health.nz)

Policy review date: October 2025

A handwritten signature in black ink, appearing to read 'Gemma Newburn', with a stylized circular flourish below the name.

Signed:

Privacy Officer: Gemma Newburn

Date: 1/11/24