

## **Privacy Management Annual Report 2022-2023**

### **Provision of Annual Report**

St Vincent's Health Network provides this annual report on its privacy compliance activities and privacy complaints for the 2022-2023 reporting year.

### **Part 1: Compliance activities**

St Vincent's Health Network is committed to meeting its privacy obligations under the *Privacy Act 1988 (Cth)* (Privacy Act) and the *Health Records and Information Privacy Act 2002 NSW* (HRIP Act) through appropriate governance and the provision of privacy information, training and support to staff.

St Vincent's Health Network provides ongoing privacy information and support to its staff through:

- Designating a Privacy Contact Officer for the organisation to assist with privacy queries and complaints from both patients and staff, as well as privacy education and awareness;
- A privacy intranet website which provides staff with access to:
  - SVHN Privacy Policy and Data Breach Response Plan;
  - NSW Health Privacy Manual for Health Information;
  - Links to privacy training resources.
- Discussion of privacy obligations at new staff and volunteer orientation sessions;
- Provision of face-to-face privacy education sessions by the Privacy Contact Officer, in addition to on-line mandatory privacy training for staff;
- The circulation of information for staff through internal communications and bulletins reminding staff of their privacy obligations;
- Access to a privacy information tips sheet and a privacy video that is scenario based and provides practical advice for staff;
- Access to privacy information posters and a patient information leaflet 'You and your privacy' for patients;
- Privacy audits on access to electronic medical records systems; and
- An internal assessment and investigation process for privacy complaints and informing patients of their right to make a complaint to the NSW Privacy Commissioner or the Office of the Australian Information Commission.

St Vincent's Health Network Privacy Contact Officer has continued to provide policy and compliance support and advice to health service staff, particularly in relation to access to, and disclosure of, personal health information and electronic medical records.

The Privacy Contact Officer actively participates in privacy networking and professional development, and attended privacy information and network sessions during 2022-23 which were facilitated by the NSW Ministry of Health Regulation and Compliance Unit.

## **Part 2. Privacy complaints**

As an Affiliated Health Organisation, St Vincent's Health Network is not a 'public sector agency' under the *Privacy and Personal Information Protection Act 1998* (NSW) and/or section 21 of the *Health Records and Information Privacy Act 2002* (NSW) and is therefore not subject to the Internal Review Process.

Operational privacy issues and privacy complaints are addressed as required, initially as informal complaints handled through existing complaints handling processes. Actions have been undertaken by St Vincent's Health Network as appropriate resulting from these complaints, including review of policies and practices, staff training and disciplinary action.

If a complainant is not satisfied with the outcome of an investigation, they are advised that they may make a formal complaint to the NSW Privacy Commissioner or the Office of the Australian Information Commissioner. St Vincent's Health Network also has mandatory data breach reporting obligations pursuant to the Privacy Act.

For the 2022-2023 reporting year, St Vincent's Health Network received NIL (0) formal complaints from the NSW Privacy Commissioner and ONE (1) formal complaints from the Office of the Australian Information Commissioner. Following a response from St Vincent's Health Network the Office of the Australian Information Commissioner closed the complaint with no further action.

**Report prepared by:**

**Approved by:**

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Date: 15.9.23

Date: 18.9.23