

Privacy

Category:	Compliance	Policy Number:	PRO140.3
Reviewer:	Executive Director: Finance, Risk and Governance	Revision:	004
Date Approved:	March 2022	Review Date:	June 2023

1. Purpose

- 1.1 This procedure explains how HealthShare Victoria¹ (HSV) collects, uses and discloses personal information. HSV is bound by and adopts the Information Privacy Principles set out in Schedule 1 of the *Privacy and Data Protection Act 2014 (Vic)* ("Act"). HSV views the protection of personal information as an important issue and is committed to the protection and responsible handling of personal information it collects.
- 1.2 Details of the policy statement to support the application of the Privacy Procedure is referenced within the POL140 Legislative Compliance Policy. This procedure is designed to be read in conjunction with the policy.

2. About Us

- 2.1 HSV was established on 1 January 2021 as an independent public sector and commercially oriented provider of supply chain, procurement and corporate services to partner with Victoria's public health services and suppliers in delivering best-value health-related goods and services.
- 2.2 HSV is responsible to the Minister for Health and works closely with the Department of Health. HSV is an independent statutory authority under Section 129 of the *Health Services Act 1988*. HSV partners with health services to organise collective contracts for the goods and services they purchase; providing advice and education on how to get their supply chain working at its best and ensuring health purchasing policies are complied with. Good procurement practices ultimately benefit the health and finances of all Victorians by creating health services that provide better care with high quality outcomes that are more financially efficient.

3. Procedure

3.1 Your Personal Information

- a. Personal information is recorded information or an opinion (whether true or not) about an individual whose identity is apparent or can reasonably be ascertained from the information or the opinion. Examples of personal information include a person's name, sex, date of birth, address, financial details, marital status and education and employment history. Some personal information is classed as 'sensitive information'. Sensitive information is information about a person's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or a trade union, sexual preferences or practices and criminal record.
- b. The types of personal information we may collect includes name, gender, address, telephone numbers, email contact details, occupational details, financial matters (payment and bank account details) and other information relevant to the business activities undertaken by HSV.

3.2 Collection of Personal Information

- a. HSV collects personal information necessary to its functions and activities, including facilitating the supply of goods and services, monitoring compliance with health purchasing policies, training access and records of learning, and ensuring probity is maintained in the purchasing, tendering and contracting of public hospitals.
- b. HSV collects personal information only by lawful and fair means and not in unreasonably intrusive ways. If it is reasonable and practicable to do so, HSV collects personal information about an individual only from that individual. When collecting information directly from an individual, HSV will take reasonable steps to ensure the individual is aware of why the information is being collected (including the purposes for the collection and any relevant laws), who it may be disclosed to, the main consequences if the individual does not disclose the information, and how the individual may contact HSV and gain access to the information collected. HSV will not collect sensitive personal information about you (for example, information about your racial or ethnic origin) unless HSV first obtains your consent.
- c. HSV typically collects information from a variety of sources, including:
 - i. communications between you and HSV, including via email, telephone or in writing;
 - ii. your participation in tenders, discussions and forums with HSV;

¹ HealthShare Victoria is the assumed trading name for Health Purchasing Victoria that remains as an independent public entity incorporated under the *Health Services Act 1988 (Vic)*.

- iii. when you use any services provided by (or on behalf of) HSV;
- iv. when you access or register on HSV's website or e-learning platform; and
- v. from publicly available sources of information.

3.3 Use and Disclosure of Personal Information

- a. HSV uses personal information provided for the purposes for which it was collected, or for a secondary purpose where we are permitted to do so under the Act.
- b. We may disclose personal information to third parties engaged to assist HSV to provide services to you. These third parties include:
 - i. mandated and non-mandated health services; and
 - ii. probity advisers and auditors;
- c. We take reasonable steps to ensure these third parties are bound by confidentiality and privacy obligations in relation to the protection of your personal information.

3.4 Data Quality and Security

- a. HSV has security measures designed to protect personal information from misuse, loss, unauthorised access, modification or disclosure.
- b. HSV takes reasonable steps to ensure that any personal information held is accurate, complete and up to date and is relevant to the HSV's current functions and activities.

3.5 Anonymity

- a. Wherever it is practicable and lawful, HSV will allow you to interact anonymously with us.

3.6 Access

- a. Individuals have a right to access their own personal information held by HSV and make corrections. Requests for access and correction should be made to HSV via the contact details listed at the bottom of this Privacy Procedure.

3.7 Complaints

- a. If you have a question or complaint about our Privacy Procedure or HSV's collection, use, disclosure or safe disposal or destruction of your personal information, your feedback should be directed to the General Counsel as noted below.
- b. We will promptly investigate your complaint and attempt to resolve the matter

3.8 Information transferred or stored outside of Victoria

- a. HSV adheres to the requirements of the *Privacy and Data Protection Act 2014* when transferring personal information outside of Victoria. HSV maintains Public Records Office of Victoria compliance including disposal.

3.9 Changes

- a. If HSV decides to or is required to change this Privacy Procedure, it will post changes to the HSV website page.

3.10 Acceptance

- a. You accept that your use of the HSV website or any interaction with HSV includes your acceptance of this Privacy Procedure.

4. Contacting Us

4.1 Any questions relating to this Privacy Procedure or your personal information can be directed to:

- a. General Counsel:
HealthShare Victoria
Level 34, Casselden
2 Lonsdale Street
Melbourne VIC 3000
Ph: +61 (03) 9947 3700
Email: risk&governance@healthsharevic.org.au

5. Related Documents

5.1 POL140 Legislative Compliance Policy

6. References

- 6.1 Financial Management Compliance Framework (FMCF) Direction 3.9
- 6.2 *Privacy & Data Protection Act 2014*
- 6.3 *Public Records Act 1973*