



General Operational Privacy Guidelines

Policy Statement

Healthy Living NT is committed to the maintenance of client, consumer and member privacy. These general operational guidelines support HLNT's Privacy Policy and Privacy Statement and must be adopted by all staff.

Operational Guidelines

- No information regarding a client may be released to any non-authorized third party without the client's express and specific individual consent. This consent (if provided) is limited to the specific request and shall not be construed as a general on-going consent. (Authorized third parties include Healthy Living NT Access Points and their staff, the client's primary care provider or specialist, or the client's carer. However, they should only be provided with relevant client information from Healthy Living NT i.e. information provided to an Access Point should relate to NDSS or Healthy Living NT membership status or insulin status, not clinical details).
- Healthy Living NT personnel will ensure that a person's medical status is not inadvertently released to any non-authorized third party. When asked 'my neighbour John Smith is a diabetic/heart patient isn't he?' the standard response is "I don't know – we don't give out that sort of information anyway."
- Healthy Living NT personnel will not make any verbal or physical recognition acknowledgment of a client when meeting with them in general social, business or public forums unless a prior or separate relationship (not related to their medical condition) is established. Where no other relationship exists, the client must initiate recognition/contact, prior to Healthy Living NT personnel acknowledging them. The client must also initiate the subject of their medical condition.
- All client files must be securely maintained in lockable filing cabinets, which are to be kept in a non-public area of Healthy Living NT's offices to prevent inadvertent viewing by the public. Files should only be accessed by Healthy Living NT health professionals and administrative staff involved in data entry/appointment management. Management and volunteers do not have a general requirement to access client files.
- Client files in use in public areas or consulting rooms shall be placed face down to minimise the possibility of unauthorised access or sighting of the client name.
- When clients are seen by multiple Healthy Living NT health professionals handover must remain confidential and not heard or within ear-shot of other staff, clients or visitors.



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- All identifiable client or member information including items such as sales forms should be routinely stored in a lockable cupboard, storeroom or equivalent when the office is closed (i.e. after hours).
- Hard copies of membership, education client or NDSS register lists should not be routinely kept except for normal operational purposes. Where they are required for a specific purpose, they should be immediately destroyed when no longer required.
- The only acceptable means of destruction of client information is by shredding, or confidential destruction through a commercial waste contractor. A certificate of confidential destruction should be obtained where a commercial waste operator is used.
- When client files are off-site (eg when conducting external clinics), they must not be stored overnight in a vehicle (locked or otherwise). They must be secured inside your home and returned to the office the following morning.
- Access to the appointment diary is limited to Healthy Living NT staff only. Ensure that public access to the screen is not possible.
- Cross-referencing of exclusive information between Healthy Living NT's databases (Education, Member and NDSS) is not allowable. Cross-referencing of common data such as a person's address and contact details is allowable.
- In the case of phone sales orders, every effort should be made to determine the identity of the caller, including their registration/membership number, date of birth and current address.
- Mail orders should be dispatched in discretely wrapped packaging. Where the client specifically requests it, Healthy Living NT will not include the sender's name and address on the packaging.
- In the case of photographs taken at function, stories for Territory Way or media releases, formal client consent must be obtained prior to publication. Where consent is not provided, publication cannot occur.
- When leaving phone messages for a client, professional judgement should be used when leaving a message on a mobile phone or home phone, staff should ensure they leave only their name and contact number and the reason for the call. If it is a work phone then just leave your name and number and that it relates to a private call, not the name of the organisation or the reason for the call.
- HLNT staff are to ensure that all visitors such as students, company representatives or contractors with access to personal client information and IT systems complete a non disclosure agreement and understand HLNT's privacy and confidentiality requirements
- In the event an attendance certificate is provided to a client (for subsequent provision to their employer) it should not disclose the client's medical condition but be generalised to "*attended health education session.*"

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