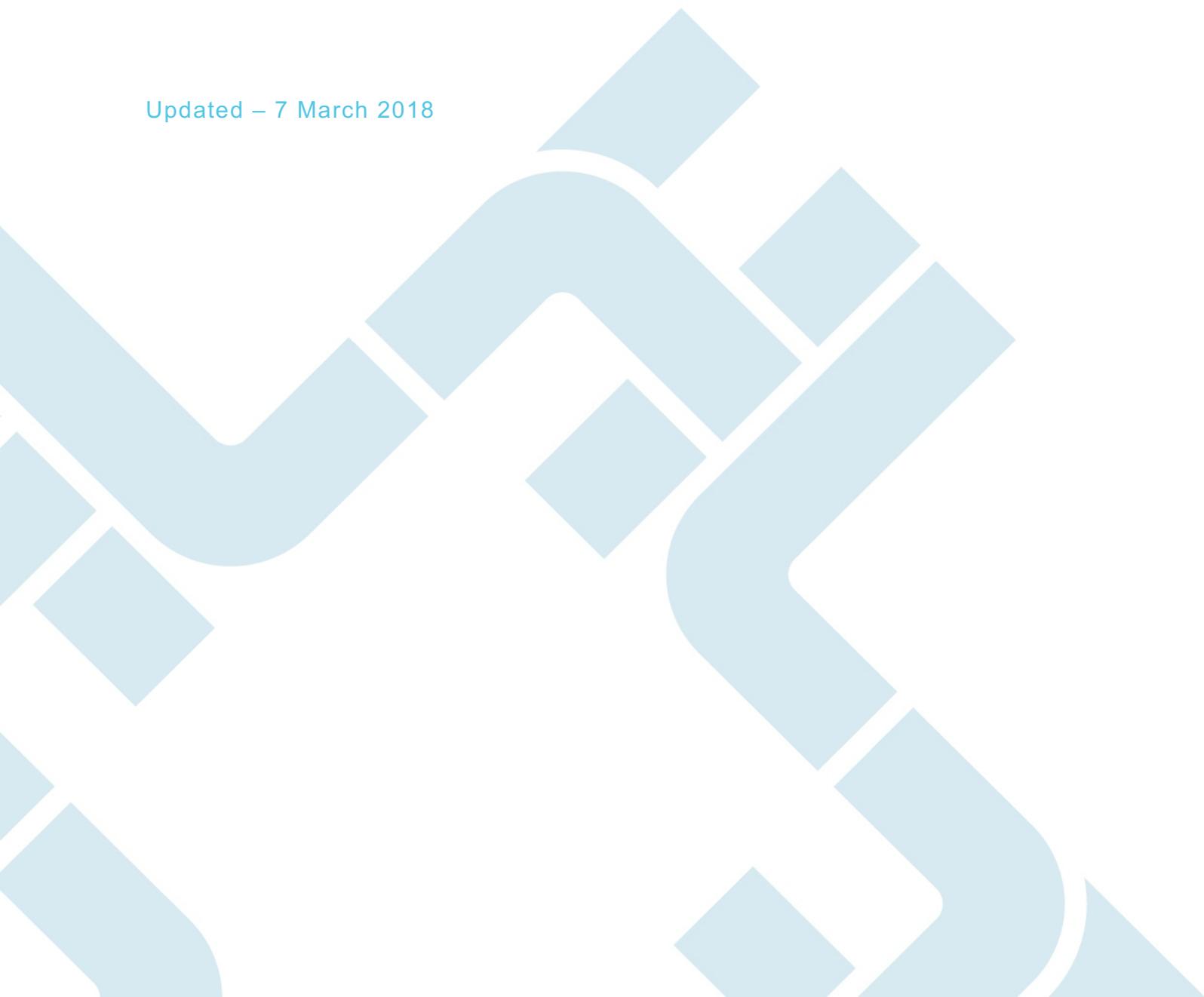


HealthLink Privacy Policy

Updated – 7 March 2018



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Author	Tom Bowden

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Introduction

HealthLink is a world leader in the provision of health sector information services. From its bases in Auckland, Sydney and Vancouver, HealthLink provides electronic communications services to more than 10,000 health sector organisations sited across New Zealand, Australia, the Pacific Islands and recently Canada. HealthLink has been operating in New Zealand since 1994 and in Australia since 1999. HealthLink commenced operation in Canada in 2010.

HealthLink provides a range of services, which include;

- Electronic messaging between healthcare providers
- Electronic claims processing systems
- Online referral and pathology ordering systems
- Disease Management Databases
- Access to Government provided patient databases
- Managed online security services
- Patient Portals

Every month HealthLink's systems handle more than six million items of patient information. The company is also responsible for the management and maintenance of a number of databases containing patient information.

It is noteworthy that all of the electronic messages sent across HealthLink's messaging systems are encrypted and digitally signed. This means that HealthLink staff cannot see the information within the messages.

On a daily basis HealthLink's staff based in New Zealand, Australia and Canada handle enquiries regarding computer system malfunctions. These enquiries at times necessitate staff looking into computer records and studying the composition of computer files which can contain personally identifiable information.

In order to ensure that patients' privacy is respected, all HealthLink employees are required to sign an undertaking that they will abide by the company's privacy policy.

Purpose

The primary purpose of the accompanying Privacy Policy is to describe the ways in which HealthLink's staff will manage all aspects of patient privacy. It covers HealthLink's efforts to meet the requirements of the New Zealand Health Information Privacy Code (1994), the Australian Privacy Act (1988) and the Canadian Privacy Act (1983).

This document is available to all of HealthLink's customers and is used by staff as the basis on which management decisions regarding privacy policy are made.

HealthLink Privacy Policy

Governance of Privacy Policy

HealthLink agrees to follow the directives and rulings of Government appointed bodies concerned with setting standards for privacy policy. HealthLink staff members are required to abide by this policy.

In New Zealand, The Health Information Privacy Code -1994 as updated in 2004 (HIPC) is the key document outlining how patient privacy must be managed. In Australia, The Privacy Act (1988), the Australian Privacy Principles updated in 2014 and set in place a similar privacy framework to that already in place in New Zealand. Both Australian and New Zealand's privacy laws are based upon the Canadian Privacy Act which was put in place in 1983.

HealthLink operates in accordance with the privacy laws of New Zealand, Australia and Canada.

HealthLink recognises that it is bound by the Privacy Amendment (Notifiable Data Breaches) Bill 2016 and expects to be bound by similar laws within New Zealand by the end of 2018

Privacy Policy Statement

HealthLink views New Zealand, Canadian and Australian privacy legislation as the cornerstone of its business. All HealthLink employees are required to demonstrate at all times that they understand that the privacy of individuals and their medical information is of paramount importance. HealthLink has a separate security policy which is designed to provide the technological and procedural safeguards that enable it to support its privacy policy. HealthLink understands that confidential information is valuable, can be highly sensitive and is protected by law. The intention of the law is to ensure that confidential information remains confidential; in essence that is, it will only be used as and when necessary to accomplish the resolution or purpose for which it was obtained.

Employee Training

All employees must undertake a privacy seminar upon joining the organisation and undertake refresher training every one to two years. All employees must sign the company's standard privacy declaration.

Employees are made aware that any deliberate, grossly negligent or incompetent breach of the company's privacy policy will result in instant dismissal and that they may be personally liable for any breaches of the company's accepted standards of care and discretion.

Securing Patient Information

HealthLink has the highest possible data security standards in place. These include:

- X.509 compliant digital certificates
- 256 bit encryption
- IPSEC Connections on all leased lines

Appointment of a Privacy Officer

- HealthLink's Privacy Officer is the company's Chief Executive Tom Bowden

Security Policies

- Personally identifiable health information is used to the minimum extent necessary for HealthLink and its staff to perform their functions.
- “Personally identifiable health information is only used when all other avenues are exhausted for HealthLink staff to resolve or investigate an issue. This means that;
 - a). HealthLink staff will only access confidential information for which it has a need to know; and
 - b). HealthLink will not in any way divulge, copy, release, sell, loan, review, alter or destroy any confidential information except as properly authorised within the scope of existing agreements; and
 - c). HealthLink will not misuse confidential information.
- Customers sending log-files electronically or via fax to HealthLink for trouble-shooting assistance are asked to erase any patient details before the information is faxed.
- All patient data is wiped from any computer, disk drive or other equipment before that equipment is sold or disposed of by any other means.
- Any electronic patient data used in the process of investigating and or resolving an issue is deleted after use.
- Any print-outs containing patient information are shredded after use.
- All customer information is treated confidentially as well.
- Any complaints about HealthLink’s handling of patient information will be treated with the highest priority and investigated immediately a complaint has been made.
- Careful adherence to these policies has ensured that there has never been a formal or informal complaint made about HealthLink’s handling of privacy.

New Zealand

Phone toll free: 0800 288 887

8.00am – 6.00 pm Monday-Friday
(AEST)

Australia

Phone toll free: 1800 125 036

8.00am – 6.00 pm Monday-Friday
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