

## Confidentiality Policy

<b>Version</b>	1.0	<b>Date of Last Revision</b>	1/4/2025
<b>Approved by</b>	Craig Bradbrook	<b>Review Date</b>	1/4/2026

### 1. Purpose

At Heart and Vascular (**H&V**), we are committed to maintaining the confidentiality of sensitive information, including patient records, employee information, and organisational data. As a healthcare provider, we are bound by legal, ethical, and professional obligations to protect the privacy and confidentiality of individuals and information.

### 2. Scope

This policy applies to all employees, contractors, students, volunteers, and any other individuals who may access confidential information in the course of their work with H&V.

### 3. Definitions

'Confidential Information' includes but is not limited to:

- Personal health information (PHI) and medical records;
  - Examples include but are not limited to patient personal details, test results, medication history.
- Employee records and personal information;
  - Examples include but are not limited to employee bank account details, performance management documents, employment contracts.
- Financial, strategic, and business operations information; and
  - Examples include but are not limited to budget forecasts, business strategy documents, contract terms with suppliers.
- Any information labelled or understood to be confidential.
  - Examples include but are not limited to emails marked confidential, meeting minutes, unreleased policy drafts.

### 4. Legal Framework

This policy is guided by the following legislation and principles:

- *Privacy Act 1988* (Cth) and the Australian Privacy Principles (**APPs**);
- *Health Care Act 2008* (SA) or relevant state/territory legislation;

- *Fair Work Act 2009* (Cth); and
- Any applicable contracts, codes of conduct, and industry-specific requirements (e.g., AHPRA standards).

## 5. Confidentiality Principles

- All employees must treat all confidential information with the utmost care and discretion.
- Confidential information may only be accessed, used, or disclosed for legitimate work purposes.
- Confidential information must not be disclosed to any unauthorised person, inside or outside H&V, without proper authority or patient consent.
- Access to patient records must be limited to those directly involved in the provision of care or with a legitimate operational need.
- Employees must ensure that physical and digital records are securely stored.
- Discussions about patients, clients, or sensitive business matters must not occur in public or shared areas.

## 6. Confidentiality Obligations

Employees are required to:

- Report any actual or suspected breaches of confidentiality immediately to their manager.
- Continue to maintain confidentiality after leaving the organisation.
- Seek advice immediately from their line manager if they are unsure about the disclosure of confidential information.

## 7. Record Keeping and Storage

Confidential information must be stored:

- In locked cabinets (for physical files);
- On secure, password-protected systems (for digital records);
- In accordance with other H&V policies, including but not limited to Acceptable Use Policy, Data Breach Policy, and Privacy Policy.

## 8. Responsibilities

- Employees and contractors are responsible for complying with this policy.

- Managers and supervisors must ensure that their teams understand and follow confidentiality requirements.
- The Privacy Officer or appropriate delegate is responsible for monitoring compliance and managing breaches or complaints.

## **9. Data Breach**

For information regarding data breaches, please see the H&V Data Breach Policy.

## **10. Breach of this Policy**

A breach of this policy may result in disciplinary action, including termination of employment, and may also have legal consequences under the Privacy Act or other applicable legislation.

## **11. Related Documents and Legislation**

*Fair Work Act 2009 (Cth)*

*Privacy Act 1988 (Cth)*

## **12. Review of Policy**

This policy may be amended or withdrawn by H&V at our discretion and does not form part of your contract of employment.

This policy will be reviewed annually or following any material changes to relevant legislation. Updates will be approved by the General Manager (or delegate) and communicated to all staff.