



## Southern Cochlear Implant Programme Privacy Statement

This privacy statement explains how Southern Cochlear Implant Programme (**SCIP**) manages the information we collect about our patients. It explains what information we collect, why we need it, how we will use it and who we might need to share it with.

We may update this privacy statement from time to time, to reflect changes to privacy law or our operations. This privacy statement was last updated in **May 2021**.

### We are part of a holistic health service

We deliver a full spectrum of cochlear implant services to children and adults with hearing loss. We are a multi-disciplinary organisation, with audiologists, speech therapists, paediatric and adult habilitationists, and ENT specialists, all of whom may have a role in your treatment. This means we may be involved with your care for a long time, and perhaps for your lifetime.

We also form an important part of the wider, holistic services delivered by several public and private sector agencies, including implant manufacturers, GPs, hospitals, government departments and schools. These services rely on the sharing of accurate health information to ensure that our patients get the care they really need, when they need it.

With such an important and long-term role in your treatment, we know that you need to trust us to take good care of your health information. We are committed to ensuring that you understand how we use and share your health information and that we always operate in accordance with the law and the expectations of our patients and their whānau/family.

### We collect information from you and from others

We need to collect and create health information so we can deliver health services, but we always ensure that we keep this information to a minimum. If you have any concerns about providing us with information, talk to us about it and we can help you understand why we need it.

We collect health information **from you directly**, for example when you interact with us during appointments or contact us through our website. We receive health information **from your healthcare provider** when they refer you to us for implant services. We may also collect health information about you **from other third parties** where required and usually with your authorisation, such as your whānau, your authorised representative, or other healthcare providers.

We also **create** health information about you when we are delivering health services, such as carrying out need's assessments, making diagnoses or treatment decisions, or communicating with you or other healthcare providers about your care.

### Information we collect or create about you to deliver services

We may collect or create the following health information about you:

- **General information** – your name, contact details (address, email and phone number), NHI number, date of birth, gender, ethnicity and residency status, employment status, school details, and your whānau/family details
- **Other provider information** – your primary healthcare provider, the healthcare provider who referred you to us, and other health professionals involved in your care
- **Quality of life information** – information about the ways your hearing loss has impacted you, that you provide during an appointment or in a Quality of Life questionnaire
- **Relevant medical history** – including medical conditions, mental health issues, medications, consultation notes, or previous diagnoses
- **Health information we create about you** – including assessment reports, diagnoses, treatment plans and implant performance information
- **Interaction information** – communications with you, the healthcare provider who referred you, other healthcare providers or your whanau/family
- **Payment information** – bills, payment records and credit card details

### **Information we collect about you when you visit our website**

We use cookies (text files that are placed on your hard disk by our web server) to manage the way you can interact with our website. For example:

- If you leave a comment on our site, you may opt-in to saving your name, email address and website in cookies. These are for your convenience, so that you do not have to fill in your details again later.
- If you have an account and log on, we will set a temporary cookie to determine if your browser accepts cookies. We will also use cookies to save your login information and your screen display choices.

You have the ability to accept or decline cookies. Most browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of our website.

Our website may contain links to websites, or embedded content from websites, operated by third parties. We have no control over the privacy practices of these third parties, so we would recommend that you read the privacy statements of those third parties before using their websites or services.

### **We use your information to deliver health services**

In order to deliver effective cochlear implant services, we must use and share the health information we collect about you. We make sure that your information is used and shared only for the purposes of your treatment, or to manage our relationships with other relevant healthcare providers or funding agencies. We may also use information for medical research or statistical analysis purposes, but we anonymise it first.

### **How we use your information**

We will use your health information to:

- understand your needs, and diagnose and treat your hearing loss
- deliver the health services you need
- communicate with you or your whānau/family about your treatment
- communicate with your referring healthcare provider about your treatment
- keep you and others safe
- meet our reporting requirements, including to our funding organisations (such as the Ministry of Health)
- work with the Ministry of Education, and your school (where relevant), to deliver speech therapy services
- conduct medical research, teaching and statistical analysis (with anonymised information)

## When we share your information

The health system depends on responsible and legitimate sharing of health information to ensure that health providers have the information they need to provide the right care and treatment to their patients. We think it is important that you have no surprises about the way your information may be shared.

We may disclose health information about you to:

- the **healthcare provider who referred you to us**, such as your GP, ENT specialist, or audiologist. If you have self-referred, we will still share information with your GP or specialist
- **other healthcare providers with a legitimate role in your ongoing care**, such as other ENT specialists, audiologists or speech therapists
- **your carer, guardian, authorised representative or whānau/family**, where you have authorised this or in accordance with the law or accepted medical practice
- **implant manufacturers**, to allow them to configure implants or perform other services as part of their role in your treatment
- **your school**, if you are a school-age child, where necessary to ensure your successful treatment
- **the Ministry of Health or other government departments**, as part of statistical reporting or medical research activities, in aggregated and anonymised format
- **ACC or other health insurers**, where your treatment is being funded by these organisations
- **the National Travel Assistance Scheme and accommodation providers**, where required to facilitate your attendance at appointments
- **our trusted service providers**, including data storage providers
- **government, regulatory or law enforcement agencies**, where required or permitted by law (such as Police, Oranga Tamariki and the Health and Disability Commissioner)
- **other third parties** where you have given us your permission to do so

We may need to communicate with organisations outside New Zealand, such as implant manufacturers or ENT specialists (where we require a second opinion). If these organisations are not located in Australia or the EU (which have comparable privacy laws in place), we will take steps to ensure that recipients of your information protect it to the standards required by New Zealand law.

## We take good care of your information

We are required by law to retain health information about our patients for at least 10 years after the last contact we have had with you. We store all the health information we hold on a secure data storage platform located on our premises. We also use the Microsoft Office 365 suite of cloud-based products to manage the delivery of our health services and run our processes. All paper records we collect or create are scanned and uploaded to our secure platform, and paper records we no longer need to access are archived in secure offsite and/or onsite storage.

We take all reasonable steps to protect the health information we hold from loss, misuse or unauthorised access, modification or disclosure. For example, we restrict access to health information to our staff on a 'need to know' basis, and we ensure that staff who need to deliver services offsite access the information they need via secure remote access to our systems, rather than carrying paper records.

## **You have privacy rights**

You have important rights in relation to your information, and we respect these. To make a privacy request, update your information, or tell us about any concerns, please:

- call us on: 0800 500 405
- email us at: [reception@scip.co.nz](mailto:reception@scip.co.nz) (Attention: Privacy Officer)
- write to us at: Attention: Privacy Officer, Southern Cochlear Implant Programme, Block 1, Milford Chambers, St George's Hospital, 249 Papanui Road, Christchurch 8014

## **You can access or correct your information**

You have the right to ask us for a copy of the information we hold about you, or to ask us to correct it if you think it is wrong. We will never charge you for making a request.

### *Help us identify you*

We will need to verify your identity before releasing or correcting your information, such as by sighting a copy of your driver's licence or birth certificate. If you ask someone (like your carer or a family member) to make a request on your behalf, we will need to see written authorisation from you and we may give you a call to check if we are unsure. Please understand that all these steps are intended to protect your privacy.

### *Tell us as much as you can about your request*

We have request forms to help you make your request. If you would like a form, let us know using the contact details above. If you prefer to send us a letter, please include the following details:

- your full name (and any other names you have been known by)
- your date of birth
- your NHI number if you know it
- the information you are requesting
- contact details in case we need to check anything
- proof of identity
- anything else that may assist us to deal with your request.

*We will be as open as we can with you*

We will always seek to be open with you about the personal and health information we hold about you, particularly if we have created it. We will only withhold information from you for limited reasons and will explain this to you if we do. We will respond to your request as soon as we can, and no later than 20 working days after we receive it.

Likewise, we will correct information you think is inaccurate (such as your contact details) but may need to refuse a correction request if we think the information is accurate (such as our medical opinions). If we refuse a correction request, we will invite you to give us a statement of correction, which we will attach to the information you dispute.

### **You can tell us if you have concerns about your information**

If you have any concerns about the way we have collected, used or shared your health information, or you think we have refused a request for information without a good reason, then please let us know using the contact details above and we will try our best to resolve them.

If we cannot resolve your concerns, you can also make a complaint to the Office of the Privacy Commissioner by:

- completing an online complaint form at [www.privacy.org.nz](http://www.privacy.org.nz)
- writing to the Office of the Privacy Commissioner, PO Box 10-094, The Terrace, Wellington 6143