

Privacy Policy

Putting health in mind



Black Dog
Institute

Purpose

The Black Dog Institute recognises and values the importance of protecting the privacy of our stakeholders, collaborators, partners, customers, research participants, clients, prospective clients, patients, prospective patients, relevant health service providers, donors, fundraisers, suppliers and other third parties (**‘Individuals’**).

The Black Dog Institute is a Medical Research Institute and a global leader in translational mental health research. We harness the latest technology and other tools to quickly turn our world-class research findings into clinical services, education and ehealth products that improve the lives of people with mental illness and the wider community. To enable us to fulfill our responsibilities relating to research, education and training, clinical and ehealth services and population health approaches, fundraising, marketing and development, or to otherwise carry out our functions (including, for example, hiring new employees or dealing with suppliers or contractors) (**‘Operational Purposes’**), we may need to collect a broad range of personal information from individuals. Black Dog Institute is committed to handling personal information (including health and other sensitive information) in accordance with applicable laws, including the Australian Privacy Principles set out in the *Privacy Act 1988 (Cth)*.

In the course of providing services or in connection with the Operational Purposes, we may collect personal information, either directly or indirectly. This Privacy Policy individuals of why and how we collect, hold, use and disclose their personal information.

Scope

The policy applies to all members of the Board and other officials of Black Dog Institute who seek to fulfil our operational purposes.

For the purpose of this policy, other officials include:

- employees, including casuals
- contractors
- higher degree research students.

Policy statement

This Privacy Policy is divided into a number of sections and includes information on how we manage personal information as well as providing answers to commonly asked questions.

What is personal information?

Definitions of ‘personal information’ differ around the world. In Australia, the collection, storage, use and disclosure of ‘personal information’ is regulated by the *Privacy Act 1988 (Cth)* (the “**Act**”). The Act defines ‘personal information’ as:

...information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable

The definition of 'personal information' is therefore extremely broad, but good examples would include a person's full name and address.

Schedule 1 of the Act also sets out thirteen Australian Privacy Principles (the '**APPs**') which comprehensively cover the protection of personal information. Black Dog Institute will always collect, hold, use and disclose personal information in accordance with the Act, the APPs and this Privacy Policy.

Why do we need to collect personal information?

We collect personal information reasonably necessary for one or more of our functions or activities in connection with the Operational Purposes. This personal information may include sensitive information, and in some instances such as where individuals receive clinical or ehealth services, may include health information. Individuals may decide to provide personal information to Black Dog Institute for a range of different reasons. By way of example they may wish to:

- (a) participate in a research project;
- (b) donate money to Black Dog Institute;
- (c) fundraise for Black Dog Institute;
- (d) collaborate with Black Dog Institute;
- (e) attend an event or course run by Black Dog Institute;
- (f) attend a Black Dog Institute clinic;
- (g) register to use a Black Dog Institute e-health service or product;
- (h) receive communications from Black Dog Institute;
- (i) apply for employment at, or volunteer for, Black Dog Institute;
- (j) provide services to Black Dog Institute; or
- (k) connect with us via social media.

While it is possible for individuals to interact with us under a pseudonym in some cases, in certain scenarios it may be necessary for us to collect certain personal information from them. We will not collect more personal information than we reasonably need to in connection with the Operational Purposes or to otherwise deal with our third parties.

Black Dog Institute may collect personal information regarding a child from the parent or other 'responsible person' associated with that child in some instances, such as where the child receives clinical services or participates in research. At times, Black Dog Institute may also collect personal information regarding an adult from another 'responsible person' associated with that adult. We require that individuals do not provide personal information about a child or another person to Black Dog Institute unless they are authorised by law to do so. Individuals must be over 15 years of age to provide Black Dog Institute with personal information. If they are under 15 years of age, their parent or other 'responsible person' will need to provide their personal information to us on their behalf.

How do we collect personal information?

We may collect personal information from individuals in person, in writing, by telephone, through our website and by other electronic communication channels. We may also collect this personal information through our staff and through our contracted agents and other service providers. Wherever practicable, we will collect personal information from individuals directly.

We may from time to time need to obtain personal information from others, for instance where individuals are receiving clinical services, to ensure that we are fully informed in relation to the issues that we need to address.

We also collect personal information through events and activities that we hold or are involved in, such as seminars, workshops, promotional events, fundraising and other activities.

The kinds of personal information we collect will depend on the purposes for which individuals interact with Black Dog Institute. The personal information we may collect from individuals may include:

- full name and prefix (e.g. Mr or Mrs)
- address
- phone number
- email address, so that we can authenticate them electronically and administer their account
- date of birth
- gender
- social network contact and publicly available details
- employer
- country or state of residence
- medical history including, where relevant, a family medical history
- credit card details and other information which will allow us to process their transaction
- other demographic information

Individuals may not be able to deal with or interact with Black Dog Institute if they do not provide us with a minimum of personal information.

We may, at times, collect information on publicly maintained records, if that collection is reasonably necessary for Black Dog Institute's legitimate functions or activities.

We may from time to time collect 'sensitive' information and health information from individuals. Where we do so, we will do so in accordance with applicable laws.

How do we use or hold personal information?

We use and hold individuals' personal information to facilitate the Operational Purposes, as well as our general operational, technical and administrative purposes. We may from time to time share the personal information we collect with any of our relevant third parties, including our partners, suppliers, collaborators, advisers and business associates. We would only share personal information with third parties where it is necessary in undertaking those activities that our third parties have agreed to be involved.

Where individuals participate in research or a clinical study, we may use their personal information (including sensitive information or health information) to create articles, reports, papers, presentations or other outputs. We will not, without consent, publish personal information in any form, unless it has been presented in aggregated form, is anonymised or de-identified.

To keep individuals up to date with our services, publications and other resources, we may place them on a communications list, including mail, telephone and/or email. At any time, if an individual no longer wishes to receive this information, they may let us know and we will remove their details from the contact list.

Communications

Where individuals register to receive a service or to otherwise engage with Black Dog Institute, they may opt-in to Black Dog Institute sending advertising, fundraising and other direct marketing material to them.

Individuals may opt-out of the provision of direct marketing materials by using the functional unsubscribe option or by contacting us.

How and when do we disclose your personal information?

Where necessary, we will disclose an individual's personal information to our third party suppliers, partners, collaborators, contractors or others in order to facilitate the Operational Purposes.

Either Black Dog Institute or our Providers may disclose an individual's personal information where it is reasonable to do so or where we are authorised or required to do so by applicable law.

Black Dog Institute may disclose personal information to trusted third parties engaged to assist us with services including data processing, data analysis, information technology services and support, fundraising, website maintenance/development, printing, record archiving, data mailing and market research and medical consultants who provide medical services.

We do not typically or routinely disclose personal information to overseas recipients. Unless consent has been given, or an exception under the Australian Privacy Principles applies, we will only disclose personal information to overseas recipients where reasonable steps have been taken to ensure the overseas recipient does not breach the Australian Privacy Principles in relation to our third parties' personal information.

All research and clinical trials undertaken at Black Dog Institute are approved by an external Human Research Ethics Committee. All research is undertaken in accordance with the terms and conditions specified by the relevant Human Research Ethics Committee, and the principles specified in the National Health and Medical Research Council and the Australian Research Council's Australian Code for the Responsible Conduct of Research 2007 (the Australian Code). Research participants enrolled in trials or research will be given further information detailing how their personal information (including health information) will be handled by Black Dog Institute, including circumstances where personal information may be disclosed.

All patient information collected by the Black Dog Clinic is held securely in our Electronic Medical Record. Patient information is released to third parties only at the express and written consent of the patient (subject to the requirements of Australian and NSW statutes and the common law). For patients under 18 the consent of both the patient and parent or guardian is sought. For patients aged 14 and under the written consent of a parent or guardian is considered sufficient. Patients under 18 are required to attend their first appointment at the Black Dog Clinic with a parent or guardian however patients aged 15 and over will generally have the same rights to confidentiality of their personal information as adults, subject to the requirements of Australian and NSW Statute and the common law.

The Black Dog Clinic provides services for young people including adolescents and on occasion children younger than 13. There will be times therefore when clinic staff are required to report concerns to the department of Family and Community Services under the Children and Young Persons' Care and Protection Act 1998. It is the professional and legal responsibility of all clinicians in NSW to promote the health, safety, welfare and well-being of children and young people and to work collaboratively in the shared system of child protection in NSW. These responsibilities apply whether staff are providing services directly to children and young people, or to adults who are parents or carers or who are pregnant.

Security

We take reasonable steps to prevent the personal information we hold about individuals from misuse, interference or loss, and from unauthorised access, modification or disclosure. Our security measures meet industry standards and individuals can feel confident in our processes. These may include access control procedures, network firewalls, encryption and physical security. Although we will endeavour to protect all personal information we hold, we are unable to guarantee that any information transmitted to us over the internet is 100% secure.

Quality of your personal information

We will take reasonable steps to ensure that the personal information we hold, use and disclose is accurate, up to date and complete. However, we will not necessarily take any administrative steps to verify the accuracy or completeness of the information individuals provide to us (or a third party) at the time of collection (for example, if they make a mistake when typing in their details or choose to use a pseudonym).

If an individual suspects or believes that the personal information we have is not accurate, complete or up to date, they may contact us at the details below and we will respond to their request within a reasonable period. When responding, we will take reasonable steps to correct that information and to ensure that it remains accurate, complete and up to date in the future. If for some reason we are unable to correct personal information, we will provide

that individual with our reasons and further options for complaint. We will not ordinarily charge people for requesting the correction of their personal information.

Access to personal information

Individuals are entitled to access the personal information we hold about them, on request, subject to a limited number of exceptions. If for some reason we are unable to provide them with access to their personal information, we will provide them with our reasons as well as their further options for complaint. If we did not collect personal information directly from an individual, it may be more practical for us to pass their access request on to the relevant third party who did collect that information from them.

Individuals may make an access request via the contact details below and we will respond to their request within a reasonable period. We will not ordinarily charge our individuals for gaining access to their personal information.

How long will we keep personal information?

We retain personal information after we have used the personal information for the purposes for which we collected or received it. The duration that we keep your personal information for will be influenced by the nature of that information, and any applicable regulatory requirements. For instance, the minimum recommended period for retention of research data is five years from the date of publication. However, in any particular case, the period for which research data should be retained is determined by the specific type of research. The Australian Code requires for most clinical trials, retaining research data for 15 years or more may be necessary. Financial transaction records are kept for a minimum period of seven years.

For all types of personal information, when no longer required, Black Dog Institute will use its best endeavours to ensure that all such information will be deleted or destroyed in a secure manner and in a reasonable timeframe.

Our interaction with you via the internet and social media

We may display advertisements on our website. We may add cookies to users' browsers and use web beacons and measurement software and tools on our websites to enable us to serve ads based on prior visits to the website. Cookies are small files that a website can store on a user's computer and are used for keeping the 'state of a user session' i.e. remembering who they are from a page requesting information through to supplying it.

If individuals prefer not to have cookies collected, they can disable this option in their browser settings. However, in doing so, they may be unable to access certain pages or content on our website.

When individuals look at our website, our Internet Service Provider may make a record of their visit and logs the following information for statistical purposes only - the user's server address, the user's top level domain name (for example .com, .gov, .au, etc), the date and time of the visit to the site, the pages accessed and documents downloaded, the previous site visited, and the type of browser used.

How to contact us or make a complaint

If a person would like to contact us, including to ask a question, request removal from our communications or make a complaint, we may be reached at the details below:

Address: Privacy Compliance
Black Dog Institute
Hospital Road
Prince of Wales Hospital
Randwick NSW 2031
Australia

Email: privacy@blackdog.org.au

Telephone: +61 2 9382 4530

If an individual is unhappy with our response to their complaint, they have the right to make a complaint to the Office of the Australian Information Commissioner (OAIC). Details of how to contact the OAIC are provided on its website at www.oaic.gov.au.

General

We may modify or amend the provisions of this Privacy Policy from time to time. We will take reasonable steps to bring any such modifications or amendments to our third parties attention.

Individuals can find more information about privacy and the protection of your Personal Information on the website of the OAIC at www.oaic.gov.au.

We use Google Analytics to analyse the audience statistics of our website to improve our content. No personal information is collect by Google Analytics.

Relevant legislation

Policy: [Privacy Act \(1988\)](#)
Australian Privacy Principles
[National Health and Medical Research Council and the Australian Research Council's Australian Code for the Responsible Conduct of Research \(2007\)](#)
[Children and Young Persons' Care and Protection Act \(1998\)](#)