

# Privacy policy – Emergency SMS alerts

## Background

In the event of a public health or natural disaster emergency affecting primary health care in the Darling Downs West Moreton region, Darling Downs West Moreton PHN (the PHN) is implementing a clear and immediate communication strategy to ensure patient and health care worker safety as a priority.

This communication is especially important when an emergency impacts the ability to care for patients, including during an evacuation and / or event that prevents physical access to a healthcare location.

The PHN is therefore implementing a process by which general and other healthcare practitioners (“subscribers”) may volunteer to provide their personal mobile numbers so that they can be contacted during an emergency and / or disruptive event via the PHN’s existing SMS service, Telstra Desktop Messaging. In addition to alerting subscribers about an emergency, the SMS notification service will also be used to update subscribers on public health alerts (including notifiable diseases) as well as the activation of a Business Continuity Plan or other disruptions that may prevent them from performing business as usual, for example: ongoing network or power outages.

## Verification

No formal identity verification is required — only personal mobile phone numbers and names will be collected from individual subscribers and subsequently maintained by nominated information custodians responsible for maintaining the SMS notification system.

These information custodians may include:

- Member of the PHN senior leadership team
- Members of the communications team and/or
- Members of the PHN ICT team.

## Collection

The PHN is collecting subscriber personal mobile numbers to enable the PHN to distribute SMS notifications about emergencies and/or business disruptions with the intent of maintaining staff and patient safety and essential functions/activities. The PHN will collect subscriber names and personal mobile phone numbers, as personally volunteered by them via a subscription option. Sensitive information will not be collected.

Where relevant subscribers are no longer working in the region, there will be arrangements to delete their names and mobile telephone numbers from stored records. Third parties shall not provide or be requested to provide another practitioner’s personal contact details to an information custodian (or other staff member), except in the circumstances permitted under Australian Privacy Principle 6 and / or other provisions of the Privacy Act 1988.

The collection and maintenance of this information will be undertaken by the Communication team. ICT may also undertake this work, if required in the circumstances.

## Responsibilities

Prior to engaging in any information collection, all information custodians will be informed of their responsibilities under the Privacy Act 1988 and Australian Privacy Principles and be expected to comply with them accordingly.



The Communication team and / or ICT team will be responsible for entering and storing subscriber mobile phone numbers and names in the Telstra Desktop Messaging platform.

General practitioners and other health care staff will be invited to subscribe to the notification system via a jotform. The information provided will be directly entered into the SMS notification system.

## Use

Subscribers will receive notifications during an emergency and/or disruptive event via the PHN's existing SMS service, Telstra Desktop Messaging. In the event of an emergency affecting subscribers, the PHN will distribute SMS notifications to alert local subscribers of the event and what steps are being taken to maintain their (and patient) safety. In addition to alerting subscribers about an emergency, the SMS notification service will also be used to advise subscribers of the activation of a Business Continuity Plan or other disruptions that may prevent them from performing business as usual, for example: ongoing network or power outages. Ongoing updates will also be provided on the status of an event and what is being done to manage the impact on critical functions and to return to business as usual.

## Disclosure

With the exception of emergency services, the PHN has undertaken steps to ensure that this information will not be disclosed to any further class of internal / external parties not referenced above. The PHN will not disclose this information to overseas recipients.

## Information quality

Subscribers will be asked to provide their personal mobile phone numbers directly to those information custodians responsible for collecting this information via a subscription using Jotform. General practice and other healthcare staff will be reminded on a regular basis that they can subscribe to this system, also that they are able to unsubscribe at any time.

Custodians responsible for entering subscriber names and mobile phone numbers into the SMS notification system (communications team and/or ICT team) will only be expected to rely on the veracity of the information provided to them but will be responsible for ensuring to enter that information correctly.

Once the information has been collected it is entered into a central and secure folder that is individually accessible by relevant information custodians. This will provide one source of information and reduce the risk of numbers being incorrectly recorded via multiple forms of transmission ie verbal to email to SMS notification system.

## Security

The Telstra Desktop Messaging services requires two factor authentication (2FA). Further details about the security and privacy safeguards employed by the SMS notification system, refer to the Testra Desktop Messaging policy.

To prevent the unauthorised disclosure of any other person's personal information, PHN staff will not be able to view the information as entered into the active SMS notification system. The Communication team will not be responsible for coordinating the collection, storage or maintenance of this information or for any privacy breaches occurring in relation to this information.

## Retention and destruction

Subscribers who have provided their personal phone numbers for use by the SMS notification system for the purposes of being notified of public health, other emergencies and other business disruptions will be responsible for advising the





relevant information custodians - communications team and/or ICT- when they no longer wish to have their personal phone number and name stored in this format.

### **Access and correction**

To prevent the unauthorised disclosure of any other person's personal information, PHN staff will not be able to view the information once it is entered into the active SMS notification system.

### **Update requests**

Regular requests for subscribers to update the information stored in either the SMS notification system and/or other mediums used to record staff personal mobile numbers will be circulated by the Communication team. The Communication team and/or ICT will make amendments to this information in the SMS notification system. A form will be available to assist with this process.

