

## **Hand Hygiene Australia Privacy Policy**

It is important to us at Hand Hygiene Australia that we protect your privacy and manage your personal information with respect. We are committed to doing this in a way that is consistent with our obligations under the Privacy Act 1988 (Privacy Act) and the Australian Privacy Principles (APPs). This document describes how we achieve this goal.

In general, we collect your personal information directly from you when you deal with us by telephone, letter, e-mail, fax, face-to-face or through our website. We only collect, hold and disclose personal information where it is reasonably necessary for, or directly related to, our functions or activities. To learn more about these activities, our team, and our governance, please see information available elsewhere on our [website](#).

### **Website**

When you visit our website, our server makes a record of your visit and logs the following information for statistical purposes or systems administration purposes:

- your server address
- your top level domain name (for example .com, .gov, .au, .uk etc)
- the date and time of your visit to the site
- the pages you accessed and documents downloaded
- the previous site you have visited
- the type of browser you are using.

This information is also collected when you visit our learning management system. No attempt will be made to identify users or their browsing activities, except in the unlikely event of an investigation where a law enforcement agency may exercise a warrant to inspect the logs. We will only record your e-mail address if you send us a message.

### **Helpdesk and other direct contact**

If you contact us directly via email, letter, telephone, fax, or other medium, your personal information will only be used or disclosed for the purpose for which you have provided it. We will not use or disclose your information for any other purpose without your consent. For example, we will record your name and email address or postal address in order to respond to your query, but we will not add it to a mailing list without your consent.

You should note that there are inherent risks associated with using the Internet as a transmission medium in that when you send information over the Internet it might be possible for other people to see what you are sending. If this is of concern to you, then you should use other methods of communication.

Alternatively you may wish to deal with us anonymously. We will endeavor to address anonymous requests if it is practicable to do so.

## **Hand Hygiene Compliance Application (HHCApp)**

### ***Your information***

To register as a HHCApp user, we ask you to provide personal information including:

- your name
- your email address
- your workplace
- your role in hand hygiene auditing and promotion

We collect this and other relevant information so that we can establish a unique account for you. This in turn allows you access to the appropriate data and functionality. In addition, we send emails to HHCApp users with information that we consider to be important for your appropriate use of HHCApp and functioning of the National Hand Hygiene Initiative. This usually occurs via an e-bulletin following each audit period (three times per year) but may occasionally require an email message at other times.

You can access and correct your registration information in HHCApp by logging-in and clicking on your name in the top right hand corner (next to the logout button). Alternatively, contact us directly.

### ***Audit data***

The hand hygiene audit data that is entered into HHCApp is accessible by nominated administrators in your organisation and appropriate users within the healthcare system. For example, if you collect hand hygiene compliance data at a public hospital, this information will be accessible to the hand hygiene coordinator at your hospital (Organisation Administrator), as well as the appropriate infection control or quality staff at the health service to which the hospital belongs (Region Administrator). This data would also be accessible to the Jurisdictional Hand Hygiene Coordinator in your jurisdiction (Jurisdictional Administrator). Please visit the 'Contact Us' section of our website to see who the jurisdictional coordinators are.

If you collect hand hygiene compliance data at a private healthcare facility, this information will be accessible to the hand hygiene coordinator at your facility (Organisation Administrator), as well as the appropriate infection control or quality staff at the governing body to which the facility belongs (Organisation Group Administrator).

Users at these administrative levels are governed by their own privacy policies, but are likely to use this data for quality improvement and as a quality indicator. For example, each Australian jurisdiction submits their own jurisdictional data to the National Health Performance Agency for publication on the [MyHospitals](#) website.

We may use this data where it is reasonably necessary for, or directly related to, our functions or activities. However, the data will not be presented in an identifiable form without consent. For example, we present aggregate national data on our website and at educational sessions or conferences. We may also perform analyses to monitor the progress of hand hygiene promotion, identify risk factors for non-compliance, or other quality assurance and research purposes.

## **Hand hygiene auditor training**

When registering to participate in workshops organised by Hand Hygiene Australia, we ask for your name, contact details (email address and telephone), profession, dietary requirements, hand hygiene role at your organisation, and details about your organisation. This information is gathered to facilitate organisation of our workshops and to ensure that attendees are allocated to the correct workshop.

Following hand hygiene auditor training, either by Hand Hygiene Australia, your jurisdictional hand hygiene coordinator, or by a local Gold Standard Auditor, your name and details of your training will be recorded on our Hand Hygiene Auditor Register along with details of your training. This information is collected as part of validation of data submitted for the purposes of the National Hand Hygiene Initiative. Hand Hygiene Australia is occasionally contacted by Organisation Administrators to verify that individuals within their organisation are appropriately trained to collect data for the NHHI. Where we have documented records for the individual concerned, we will reply stating that we are able to confirm that they are appropriately trained. Otherwise we will reply that we are unable to confirm that the individual is appropriately trained.

## **Learning management system**

To register as a user of our learning management system, we ask you to provide personal information including:

- your name
- your email address (optional)
- your profession and workplace
- your employee number
- your professional registration number (optional)

We collect this information in order to establish a unique account for you and to facilitate the reporting needs of your organisation. Your account allows you to access your learning records at any time. For example, you can log in to your account to download certificates of course completion. In addition, if you link yourself with a specific organisation during self-registration (or subsequently), then the nominated administrator(s) at your organisation can access your personal information and learning records. As described for HHCApp, other administrators at regional, jurisdictional and national level will also have access to your records. This is done, in accordance with the National Hand Hygiene Initiative, to develop an effective education and credentialing system to improve knowledge about hand hygiene and infection control.

It is also possible for you to register as a user without affiliating your record with an organisation. In this case, your information is accessible to us, but not to organisation administrators.

You can access and correct your registration information at any time by logging in, or alternatively, you can contact us directly.

We may use your data where it is reasonably necessary for, or directly related to, our functions or activities. For example, we present aggregate reports on the number of people that have completed our learning modules. However, the data will not be presented in an identifiable form without consent.

## **Quality and security of personal information**

We will take reasonable steps in relation to matters within our control to ensure that personal information is accurate, current, complete and relevant. We will also ensure that personal information is reasonably protected from misuse, interference, loss and from unauthorized access, modification or disclosure.

We store personal information using both physical and electronic filing systems as well as secure computer servers. We employ a range of physical and electronic security measures to protect personal information from misuse and loss and from unauthorised access, modification or disclosure. These measures include restricted physical access to our offices; security firewalls and computer user identifiers and passwords.

We will destroy or de-identify personal information if it is no longer needed for any purposes and if we are not required by an Australian law to retain it.

## **Disclosure to overseas recipients**

Our server is held in Australia and is maintained by the Australian Commission for Safety and Quality in Healthcare. It is unlikely that we will disclose personal information to an overseas recipient. However, if we do, we will take all steps that are reasonable in the circumstances to ensure that this recipient complies with this privacy policy.

## **Accessing and correcting your personal information**

You can access the personal information that we hold about you and can ask us to correct that information. In the case of HHCAApp and our learning management system, you can do this by logging in to your account. Otherwise, please contact us directly using the information provided on the Contact Us page of this website.

## **Further information or complaints**

Should you wish to contact us about any privacy inquiry or complaint, please contact the National Project Manager on (03) 9496 3587 or write to:

National Project Manager  
Hand Hygiene Australia  
c/- Infectious Diseases Dept.,  
Austin Health  
PO Box 5555  
Heidelberg 3084  
Victoria, Australia.

## **Changes**

Hand Hygiene Australia reserves the right to update this Privacy Policy at any time. The most current version of this policy is available at <http://www.hha.org.au>