



# THE NATIONAL HPV VACCINATION PROGRAM REGISTER PRIVACY STATEMENT

## POLICY ON MANAGEMENT OF PERSONAL & HEALTH INFORMATION

Victorian Cytology Service (VCS) has been contracted by the Commonwealth to establish and manage the National HPV Vaccination Program Register (HPV Register) on the Commonwealth's behalf. The Register is required to be established under legislation passed in 2007.

The HPV Register is a confidential database that collects information (including sensitive personal and health information) about HPV vaccinations given in Australia.

The management and staff of VCS appreciate that sensitive personal and health information is held by the organisation. The organisation has strict confidentiality and privacy practices in place and all staff are required to abide by these. Any third party who may potentially have access to the Register will be required to sign a confidentiality statement.

All personal information is managed from the premises of VCS or its authorised subcontractors. In accordance with prudent business practice, backup tapes of the information system on which the HPV Register is located are stored in a secure facility off-site. Where any services associated with the HPV Register are subcontracted and the subcontractor may have access to personal information, VCS will ensure that the subcontractor is required to abide by strict privacy requirements in relation to that information.

### How personal information is collected?

Personal information held on the HPV Register is collected by VCS from the doctor or nurse who provided the vaccination (Immunisation Provider), unless a woman elects not to have her immunisation details recorded on the Register (see *Opt-off* process below). Information about HPV vaccinations given in schools will be provided by state and territory governments for inclusion on the Register

### What personal information is held?

VCS will only collect and hold personal information about an individual which is relevant or related to the performance of its role in maintaining the HPV Register.

The personal information held on the Register may include the name, date of birth, current addresses, contact telephone number, and Medicare Number of a person receiving a vaccination as well as the name, address and Medicare Provider Number of the health care practitioner who administered the vaccination, and the venue where the vaccination occurred.

In the case of children\*, the name of a parent or guardian may also be recorded.

A person of Aboriginal or Torres Strait Islander background may elect to have her indigenous status recorded on the Register.

The HPV Vaccination history is the only health information recorded on the Register. This information may include details about when and where the HPV vaccine was administered and what HPV vaccine was administered.

\* A child, for the purposes of the HPV Register is:

<14 yrs in NSW

<16 yrs in SA and NT

<18 yrs in other States and territories

### How personal information is used?

The personal and health information held about a person vaccinated on the HPV Register is used for the following purposes:

- i) Providing an Immunisation Completion Statement when the course of vaccinations is completed. This is provided to the person who was vaccinated unless they have elected to Opt-out of correspondence (see *Opt-out* process below).



- ii) Providing a person's HPV Immunisation History Statement. This is provided to individuals vaccinated through the schools program, unless they have elected to Opt-out of correspondence (see *Opt-out* process below).
- iii) Providing a vaccination Reminder Letter to individuals participating in the schools program when a vaccine dose is overdue, unless they have elected to Opt-out of correspondence (see *Opt-out* process below).
- iv) Providing Completion Reports to Medical Practitioners.
- v) Providing Overdue Dose Reports and Exception Dose Reports to school and community-based immunisation providers.
- vi) Providing access either by telephone or online (where access is granted) to Medical Practitioners and other immunisation providers to an individual's Immunisation Record
- vii) Providing information to Pap Test and Cervical Cancer Screening Registers operated by the States and Territories.
- viii) Information from the Register may be provided to researchers for ethically-approved health research. This will usually involve de-identified information, i.e. summary statistics that do not identify a person.

### **To whom is information disclosed?**

Personal information about an individual may be disclosed to the following parties:

- i) An individual's Immunisation Provider.
- ii) An individual's Medical Practitioner with her consent.
- iii) A representative of the individual (e.g. an authorised representative or lawyer), with her written consent.
- iv) In the case of children\*, to the parent or guardian of the child as recorded on the HPV Register
- v) The Department of Health & Ageing upon written request of the Secretary
- vi) Pap Test and Cervical Cancer Screening Registers operated by States and Territories.

### **Opting-Off the Register**

An individual, or in the case of a child\*, her parent/guardian, may elect **not** to have her personal and immunisation details recorded on the Register. This is referred to as *Opting-off* the Register.

To opt-off the Register you should indicate to your Immunisation Provider that your personal details are not to be forwarded to VCS for inclusion on the Register.

If you wish to have your personal information removed from the Register, you should make a request in writing to the Register's Medical Director. A form is available for this purpose (Register contact details below).

### **Opting-Out of correspondence**

A person, or in the case of a child\*, her parent/guardian, may elect **not** to receive any correspondence, such as completion statements or reminder letters, from the Register. This is referred to as *Opting-out* of correspondence. When a person opts-out of correspondence, personal details and vaccination history are still recorded on the Register and the usual correspondence to Immunisation Providers and Medical Practitioners will still occur. However, the person will not receive any of the correspondence described above.



To opt-out of correspondence, you need to advise us by telephone or by completing the relevant form (Register contact details below).

### **HOW A WOMAN OBTAINS ACCESS TO HER OWN PERSONAL INFORMATION**

The Register will provide a person with access to her own personal and health information at no cost.

The following section describes how a person should proceed.

- i) A request for access to personal information may be in writing or by telephone (subject to rules around release of personal information), a form is available for this purpose (contact details below).
- ii) The person should provide sufficient identification so that the authenticity of the request can be assessed by Registry staff.

The Register will endeavour to respond to any request for access within 10 working days of receipt of the request.

### **HOW TO MAKE A COMPLAINT REGARDING YOUR PRIVACY?**

If you wish to make a complaint about the Register's activities with regard to your privacy then this should be done in writing to the Register, or to the Privacy Commissioner.

#### **Contact details for the Register are:**

Postal Address: The Medical Director  
NHVPR  
PO Box 310  
East Melbourne Victoria 8002

Web Address: [www.hpvregister.org.au](http://www.hpvregister.org.au)

HPV Register Contact Centre: 1800 478 734

#### **The Federal Privacy Commissioner can be contacted at:**

Web Address: [www.privacy.gov.au](http://www.privacy.gov.au)

Email: [privacy@privacy.gov.au](mailto:privacy@privacy.gov.au)

Postal Address: Office of the Privacy Commissioner  
GPO Box 5218  
Sydney NSW 2001