


SERVICE ELEMENT	Administrative support, facility, and equipment management
PERFORMANCE INDICATOR	Information management
STANDARD	The organisation plans, implements and monitors processes to meet the information needs of clinical and management services, and those outside the organisation that require data and information from the organisation
NAME OF POLICY	Privacy policy

POLICY:

The policy of Highway Hospice is to establish procedures that implement the Protection of Personal Information Act requirements. At The Highway Hospice Association we are committed to protecting your privacy and to ensure that your personal information is collected and used lawfully, and transparently.

PROCEDURE TO ENSURE IMPLEMENTATION OF POLICY:

- The following procedures give expression to the correct use of personal information at Highway Hospice.
- About the organisation:
 - Short summary of who we are:
 - Highway Hospice is an NPO organisation registered with the NPO directorate (Department of Social Development) to provide Palliative Care to patients referred to us in the greater eThekweni municipal area;
- The information we collect:
 - What information we collect on a regular basis:
 - Information is collected from patients and their families.
 - Information is collected from staff and their families.
 - Information is collected from donors.
 - Limited information is collected from volunteers.
 - We have historic information that has been collected over many years.
 - This information is either being used operationally in the form of case files, transferred onto an electronic database (donor database as it is referred to), physically archived off site with our partners for such service, or the information is being destroyed as it is no longer needed and/or it is out of date.
- Definition of personal information:
 - A definition
 - information relating to an **identifiable, living, natural** person, and where it is applicable, an identifiable, existing **juristic** person, including, but not limited to:
 - information relating to the race, gender, sex, pregnancy, marital status, national, ethnic, or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language, and birth of the person.
 - information relating to the education or the medical, financial, criminal or employment history of the person.

Approved By			
Date of Approval	11/12/2024		
Date of Review	11/12/2029		

- any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier, or other particular assignment to the person
 - the biometric information of the person.
 - the personal opinions, views, or preferences of the person.
 - correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence.
 - the views or opinions of another individual about the person; and
 - the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.
- Why we collect the different types of information:
 - We collect donor and contact information mainly for the purposes of marketing our services and keeping stakeholders informed of our events.
 - We collect staff and volunteer information mainly for the purposes of keeping them informed about activities within the organisation and to satisfy the requirements of the Basic Conditions of Employment Act, SARS, occupational health and safety, and the Department of Labour.
 - We collect patient and related family information for the purposes of ensuring that they benefit appropriately from the services we provide. Patient information is classified as Special Personal Information, and related family information referred to by us as Contacts
 - All information collected is requested directly from you where you provide us with the personal information requested.
 - We will inform you what information is required and what information is optional (voluntary).
 - Please note that at the time of preparing this privacy notice our website does not make use of cookies.
 - How we use your information:
 - All information is used only for the purposes for which it was collected and agreed with by you. In addition, where necessary, your information may be retained for legal or research purposes:
 - Customer and Donor information is used as follows: For the purposes of marketing.
 - Staff/volunteer information is used as follows: Under labour law (very limited volunteer information is collected).
 - Patient information is used as follows: For the provision of care.
 - Contact information is used as follows: To facilitate patient care, and future marketing
 - Disclosure of information:
 - We may disclose your personal information where we have a duty or obligation in terms of law.
 - We may disclose your personal information where we believe it is necessary to protect our rights.
 - We may disclose your personal information where a legitimate request is made under the Provision of Access to Information Act (PAIA).
 - Staff personal information is disclosed to third party payroll administrators and a related agreement is in place to ensure that they comply with privacy requirements; Also disclosed to the Department of Labour and any other Government Department that requests such.
 - Information security:
 - We are legally obliged to provide adequate protection for the personal information that we hold and to stop unauthorised access to and the use of personal information.
 - We will, on an on-going basis, continue to review our security control measures and related processes to ensure that your personal information remains secure.
 - Our security policies cover the following:
 - Physical security – access to all hard copies of personal information is limited and secure.
 - Computer and network (electronic security) – computers are all password protected and rules about access are in place.
 - Access to personal information is restricted to those who need to have access and in most cases the collection of personal information is limited (except for patient details and staff details).
 - Cloud databases are encrypted, with additional security for Personally Identifiable Information (PII) to ISO27018 standard.
 - Secure communications
 - Clear directions on retention and destruction of records are in place and contracts are in place with outsourced destruction companies.

- The Disciplinary Rules and Regulations and Policy and Procedure on the Use of Electronic Communications are in place to respond to and investigate any breaches of this policy committed by employees.
 - No procedure is currently available where breaches are made external to the organisation.
- If and when we contract with third parties that requires them to have access to personal information, appropriate security, privacy, and confidentiality obligations are imposed on them.
- Your rights: Access to information:
 - You have a right to access the personal information that we hold about you.
 - In order to access your own personal information please contact the Information Officer, Linda Mary Webb (info@hospice.co.za) with clear details of the information you want to access.
 - We will require a copy of your Identity document in order to verify your identity before providing you with the requested personal information.
 - Please note that in order to access information that is not your own you will need to follow the requirements of the Promotion of Access to Information Act and submit the necessary documentation.
 - Please access our PAIA manual which you can find on our website, or a copy can be emailed to you.
- Your rights: Correction of information:
 - You have the right to request that your personal information held by us be updated, corrected, or deleted.
 - We will require a copy of your Identity document in order to verify your identity before we process such a request.
 - We do request that you keep your personal information up to date and accurate at all times.

Cross referencing with other policies:	Information management processes. Information plans
To whom does this policy apply:	All staff.
How are they to be made aware of this policy:	General awareness. In-service training at departmental level – focus on specifics to department;

Policy development and review				
When was this policy developed:		December 2024		
Why was this policy developed:		In response to the Protection of Personal Information Act		
Management or Executive meetings where this policy was approved:				
Scheduled date of review	Actual date of review	Responsibility	Changes made	Approved by (meeting) Signed by CEO
	24/12 11/12/24			