



ACT
Mental Health
Consumer Network

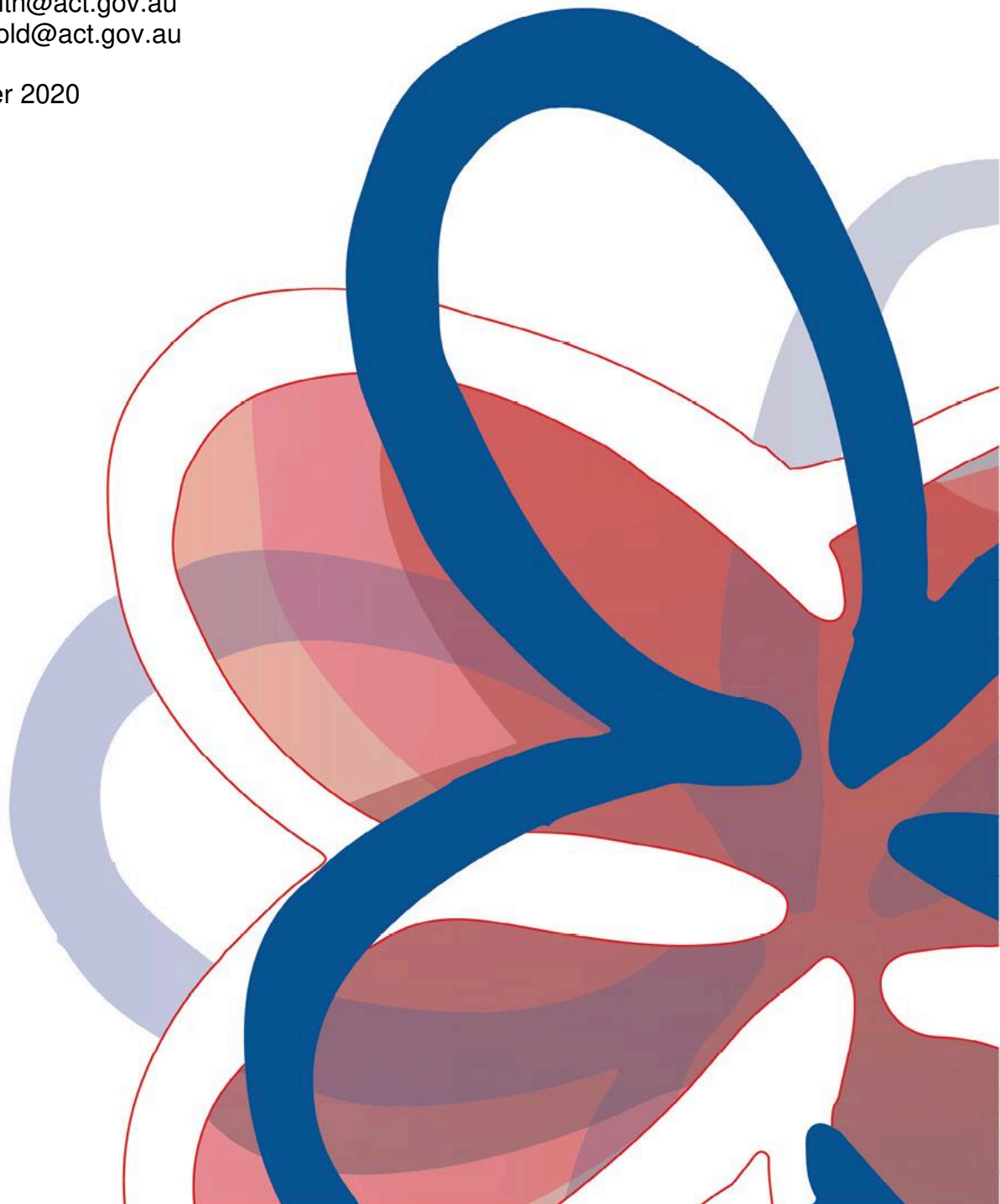
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Submission:

Canberra Health Services Consumer Privacy Handout

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Submission: Canberra Health Services Consumer Privacy Handout

This feedback has been prepared by the ACT Mental Health Consumer Network in response to an invitation from Canberra Health Services (CHS).

The Network is a consumer-led peak organisation representing the interests of mental health consumers in the ACT in policy and decision-making forums. The Network is committed to social justice and the inclusion of people with experience of mental illness. Run by consumers for consumers, our aim is to advocate for services and supports for mental health consumers which better enable them to live fuller, healthier and more valued lives in the community.

The Network held a consumer forum and additionally sought feedback via email from consumers in relation to the CHS Consumer Privacy Draft Handout. This document incorporates the feedback we received from these processes.

General comments

The Network welcomes the opportunity to contribute to the CHS Consumer Privacy draft Handout. The inclusion of consumer feedback provided in September 2020 to the overarching policy document the *Consumer Privacy Policy* is acknowledged and appreciated, and noted in this related draft Handout.

Consumers acknowledge that writing in plain language can be difficult, and some minor suggestions to the language and order of the document are suggested to assist the flow and clarity of the Handout.

More generally, the use of plain language in the handout is valued and the inclusion of an image suggested.

Language, document layout and accessibility

Recommendation 1: Rephrase the first paragraph

Consumers appreciate that this handout is written in plain language to ensure ease of understanding. The following change is suggested to the first paragraph:

1.1. Replace:

When you receive health care in hospital we will collect information about you. This will include things like your name and date of birth. This will help us

provide you with safe care that is right for you. We will use this information to identify you and to keep a record of the care we give you.

With:

When you receive health care in hospital we will collect your personal details to identify you, and keep a record of your care.

Recommendation 2: Order, layout and phrasing/corrections

- 2.1. *Delete:*
You have a right to expect
as not all of the points that follow actually follow on from the phrase.
- 2.2. This dot point may be better placed as the last paragraph as it is the place of storage:
The information we collect will be protected in line with the Health Records (Privacy and Access) Act 1997.
- 2.3. Ensure the correct usage of legislation as required by law:
Health Records (Privacy and Access) Act 1997 (ACT)
- 2.4. Insert a comma after 'dietitians and remove 'or'. The current punctuation stipulates that consumers will receive treatment from health professionals or students and support staff.
The information we collect will be shared with your treating team. This includes all the people at Canberra Health Services who are involved in your care, like doctors, nurses, physiotherapists, speech pathologists, social workers, dietitians, ~~or~~ students and support staff.
- 2.5. Move this to become the first point (currently the third dot point):
The information we collect will be kept in a personal health record. You can, with some exceptions, apply to access your own health record. This can be done via the ACT Health website, www.health.act.au/about-our-health-system/accessing-your-medical-records
- 2.6. Correct the link to the ACT Health Website as it currently does not go to a webpage when it is selected.

- 2.7. The following rewordings are suggested:
If you agree, the information we collect will be shared with your General Practitioner and any other community or private health care professionals you receive care from that you agree to share your information with. This may include carers that you want to nominate; and
- We will not share the information we collect with anyone else without your consent unless; we must share it to prevent harm to you or another person, or it is required by law.*
- 2.8. The following dot point is unclear and rewriting is suggested. Consumers were unable to provide suggested text as the intent of the existing text is unclear; the Network suggests the following as an example that could provide clarity:
If you feel like you are at risk of harm from yourself, other people or hospital equipment, we have ways to keep you safe. Please talk to one of our staff if you feel like you are at risk of harm.
- 2.9. Move this information earlier in the handout as it is more relevant early in the treatment process (currently the final dot point). Also note the correction of 'Advance Agreement':
If you have an Advanced Agreement, Advance Consent Direction, Nominated Person, or Advance Care Plan please let our staff know so we can make sure your treatment is what you want.
- 2.10. Finally on this recommendation, a suggestion was made that converting the dot point text to short paragraphs may support readability.

Recommendation 3: The handout should be available in multiple languages

Consumers recommend that the handout is made available in multiple languages. It is noted that in the Accessibility section there is a notation for people whose first language is not English, however, if they cannot read English they will not be able to understand this text.

Recommendation 4: The Accessibility section be larger

The Accessibility section of the handout is very small and should be in larger font, ideally to match the rest of the document.

Recommendation 5: This handout should be reviewed by the Consumer Handout Committee

The next draft should be reviewed by the Consumer Handout Committee prior to final draft. The Network would also like the opportunity to review the final draft.

Conclusion

The above recommendations are based on consumer feedback provided to enhance the draft document. The Network considers this an important document as part of ensuring consumers are aware of their rights and what to expect when receiving treatment and care. We look forward to reviewing the revised document once it has been prepared.