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Pharmacy Programs and Operations (PPO)

Veterans' MATES
Standard operating procedure –
Client opt out

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Endorsement

This document been reviewed and approved by the people in this list. Evidence of the approvals is retained in TRIM.

Name	Title	Date	Role	Comments
Kylie S 47F	Director – PPO	18 Aug 2023	Approve	V1.0
Kyile	Director – PPO			V2.0 Sep – Oct process changes -PPO shared register no longer used; now IAU shared register
				-Further detail on stakeholder, corro mgmt.; reporting; Register -Noted pending procedure in red

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0	Useful supporting	Procedure needing	Identifying common or	Content used in	

high consequence

issues, and solutions.

communication or

documentation.

further detail or

emphasis.

Purpose

The purpose of this SOP is to detail the approved process for PPO managing client opt outs of the Veterans' MATES program and MATES data-related queries: in relation to broader action undertaken as part of DVA management of requests relating to Veterans' MATES use of data.

Info Law (privacy complaints) and IAU (information access requests) are the sections responsible for finalising and documenting their respective request types. PPO is responsible for forwarding them any correspondence received by PPO that may be relevant to their work types.



⚠ Veterans' MATES media campaign 2023

As of August 2023, DVA is managing a public media campaign around use of data in Veterans' MATES. Unless approved by senior leadership, no external communications are cleared for distribution outside of pre-approved format and process. For any queries, please contact your line manager.

Background

This SOP is the default process for actioning opt out requests, only for those staff approved to process.

All opt out requests are a 'full opt out' - of Veterans' MATES topic materials, Veterans' MATES research, and other third party research.

For the duration of the 2023 media campaign, assume any correspondence that might reasonably imply an opt out is an opt out request.

Note that requests that are explicitly only to change postal address are not considered an opt out request, and should be actioned per Veterans' MATES Process Document 222431091E.



(i) Routes

Opt out requests may be received by multiple routes. These include, but are not limited to:

- VetMATES@dva.gov.au inbox
- UniSA, through the MATES Secure Portal
- Other business areas: e.g. VAPAC, VAN, DVA General Enquiries, IAU, Info Law, D&I

For internal recording purposes, the date of receipt/date of effect is considered the date at which the request was first received by DVA: any business area.

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Opt out procedure

Complaints, PDMS processing

Where applicable, note CFMS and PDMS numbers in the Registers under step 1 below.

CFMS: Give very brief summary of action before submitting for validation. Example comment in General correspondence under step 2 'Comms templates'.

No Director approval needed. Record in PPO Complaints Register 23572539E. Note that potential privacy complaints should be forwarded to Info Law for review first.

Refer to PPO Complaint Management SOP 221140404E for details on complaints BAU.

PDMS: Action within the PDMS item. If approved correspondence is sent to client, attach a copy of the outbound email.

1. Register opt out

All client opt out requests received - and for the time being, general queries (non-opt out but MATES datarelated) - received by PPO and UniSA are recorded in one to two registers:



Registers

PPO: Veterans' MATES Client Opt Out Register 23904024E ('Opt Out Register') Section-specific – opt outs, and non-opt out MATES data-related (general queries)

DVA: 'MATES Privacy requests', GovTEAMS file: 'IAU - MATES' ('Shared Register') Shared across stakeholder business areas - all MATES action requests (including opt outs/general queries). Contact Brett \$ 47F IAU for access

Search for the client name/number before adding a new row, to avoid duplicate entries.

In the Opt Out Register:

- Update in real time as the principal document for opt out processing. Confirm client details on VIEW before any major processing action. Refer to Opt Out Register guide section for details.
- All opt outs and general queries as defined above are recorded here: the latter to compare with the Shared Register, and in case general queries are later converted to opt outs.

In the Shared Register:

Update as soon as possible after adding to the Opt Out Register, with consideration that there may be delays in processing due to business need.

s 22 - Out of scope

Info Law and IAU will maintain oversight and actioning of their request types, and pass on any opt out requests to PPO.

i Further information required?

The below addresses cases where it may be ambiguous whether/how to proceed.

- Confirm opt out?: Post-the current media campaign, PPO Program Manager suggests it should be reviewed whether to send correspondence at first point of contact to confirm if a request constitutes an opt out. Inbound telephony stakeholders have currently been advised to confirm with clients whether opt out is desired. For now: if an opt out is reasonably implied, action as an opt out.
- POI/PORO/consent: These may need to be established before proceeding: find General correspondence in step 2 Comms templates.

s 22 - Out of scope

If unsure how to proceed, contact your line manager.

Outbound - Opt out acknowledgement 2.

⚠ Outbound safety

Remain de-identified for all outbound correspondence to non-government addresses by changing your 'FROM' in an Outlook message to the 'VETMATES' address. Make sure your surname is not in your signature block.

To ensure de-identification works correctly, please confirm all staff sending opt out outbounds have been added as both OWNER and MEMBER of the following distribution groups:

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Group ownership/membership can be updated at https://mail.dvastaff.dva.gov.au/ecp/



Comms templates

General correspondence

231273537E [...] MATES opt out - Miscellaneous outbound

(includes template for opt out complete digital correspondence)

Opt out complete physical letter (both items sent as single outbound package)

23974779E Veterans' MATES opt out - Letter to client

231214443E Veterans' MATES Information Sheet - Opt Out

(opt out info sheet only if not already received a general info sheet)

General information sheet

231214442E Veterans' MATES Information Sheet

(attach to outbound if first corro to client is not opt out complete)

Please Cc VETMATES@dva.gov.au in all opt out related correspondence.

 Send correspondence to clients (by email, or else postal address) acknowledging receipt of opt out requests as soon as possible. This correspondence must follow approved wording – and for a physical letter, format – above.

With Director approval, subject to audit outcome and SES decision, the requirement to send client acknowledgement may be waived based on business capacity.

- If contacting client by email, confirm item was successfully sent and move to 'Opt out work ->
 Opt out outbound' folder in VETMATES mailbox.
- c. If you believe a client's request is not sufficiently answered by approved correspondence:
 - · note relevant additional information under 'Comments' in the Action Register
 - advise your line manager
 - await response before sending correspondence to client.

1 Information Sheet

During the 2023 media campaign, all clients communicating re: Veterans' MATES opt outs or data usage should be sent the most relevant copy of the Information Sheet above – i.e. an opt out sheet for opt out complete correspondence, and general sheet otherwise.

Action opt out

Records for actioning opt outs

Opt Out Table (blank template; update name with date sent to stakeholders)

23843787E MATES client opt out - DDMONTHYYYY

D&I Exclude List (section record of opt out work actioned by D&I + Services Australia)

21915010E Exclude List for Research

Once per week, any new opt out requests received are distributed to stakeholders in an Opt Out Table.

- UniSA: Add the week's Opt Out Table to the MATES Secure Portal <u>download folder</u>, alerting UniSA by (deidentified) email of outstanding opt out requests, and requesting they acknowledge when actioned.
- D&I: If correspondence indicates D&I have already added all clients who have requested opt
 outs to the D&I Exclude List, or have otherwise acknowledged receipt of all outstanding opt out
 requests: proceed.

If it cannot be confirmed that D&I are aware of all opt out requests:

Notify D&I of outstanding opt out requests, attaching the week's Opt Out Table.

When a client opts out:

- UniSA remove client information from their own records, past and present
- D&I exclude the client from future research information sharing (with D&I coordinating further action by Services Australia)
- PPO ensure these steps are completed in a timely manner.

UniSA's, D&I's and Services Australia's input is described as a 'tripartite definition' of opt out.

Confirm opt out actioned

One week after advising UniSA and D&I of new opt out requests, review the following.

- UniSA: If outstanding Opt Out Tables have not been acknowledged as actioned within a week, send a follow up email.
- b. D&I: When notice is received that the D&I Exclude List has been updated, or otherwise every week, the Opt Out register is checked against this list.
 - · Advise D&I if they are missing any items, attaching an Opt Out Table.
 - . If the Registers are missing items, action per BAU.
 - If unknown opt outs are identified in the Exclude List: contact D&I to request source documents and action per BAU, noting in the Register/s that NFA from D&I is required.
- c. If unreasonable delays in stakeholder action occur, contact your line manager.
- d. Once PPO confirm stakeholders have actioned their opt out work, review the Registers and confirm all fields are complete and correct. The opt outs are now considered complete for the purposes of communicating to clients.
 - There may be delays in D&I actioning opt outs for clients with Restricted Access records.

Outbound – Opt out complete

- a. When all prior steps are complete, send opt out complete correspondence to the client per step 2 Comms templates: also attaching the Veterans MATES Information Sheet - Opt Out if no information sheet has already been sent.
- If contacting client by email, confirm item was successfully sent and move to 'Opt out work ->
 Opt out outbound' folder in VETMATES mailbox.
- c. Note in Opt Out Register the date client was advised of opt out complete. Confirm record is complete and correct; note any final comments if required. <u>End process</u>.

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Guide - Opt Out Register

This section is used as a reference for how the Opt Out Register documents the workflow. Columns are detailed below in the order they appear. Note that 'MATES' in the document refers to the MATES contractor.

(i) Confirm client is not already on the Register before making a new entry.

The same client may be registered multiple times if substantial time has passed between request resolution and new corro, and this corro does not relate to any prior.

This will become more relevant when re-opt in procedure is formalised.

Column	Notes
UIN	If client restricted access and unable to obtain, enter 'RESTRICTED'; can still be processed by UniSA/D&I.
	Confirm active file number in VIEW; or the partner record based on veteran active file number if a partner.
File Number	Typos aren't uncommon and may require client search. Send POI corro if unable to identify with information available: example in <i>General correspondence</i> 231273537E. s 22 - Out of scope
	Check spelling (and if uncertain, capitalisation) in VIEW.
Last Name	Consider if useful to note alternate and middle name/s in 'Comments'.
First Name	Per above.
	'Registered' date in Secretary reporting.
Date initial corry received by DVA (any	If no visibility to earliest date of first DVA point of contact, use the earliest date; note this in 'Comments' and remove reference to correspondence date in outbound/s .
section)	If opt out corro date later than first DVA contact, use opt out corro date for 'Date initial corry received []', and note the earlier date in 'Comments'.
Opt out of	Currently two options: • 'MATES + 3rd party + research': process as opt out • 'NA (general query)' (green shaded box): non-opt out contact related to MATES data use/media campaign, recorded for IAU/Info Law reference and to note if further follow up needed.
Opt out of	Consider removing 'NA (general query)' functionality when IAU Register has processed all non-opt out corro.
	Consider possibility of other use cases post-media campaign: e.g. 'Only topic releases', where client remains in UniSA/external research but is opted out of MATES content.
	All stakeholders/business areas who were contacted on 'Date initial corry received by DVA (any section).'
Initial request route	If evidence of external contact prior to this date (e.g. to UniSA), note in 'Comments'.
	Please note CFMS and/or PDMS number where relevant, using bold text in cell.
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	Date at which the two stakeholders were sent source documents for that entry: discounting sending documents that originated from them. See 'Guide – Correspondence management'.
Date forwarded to Info	To reduce risk, send on the same day: if unavoidable, use the latter date.
Law + IAU	N.b. bulk action entries due to retroactive application of this record keeping standard: • [IAU Bulk action: info queries to date @ 5 Sep 23] IAU was sent all historical corro items received by PPO, relating to information use/access received, on/as at 5 Sep 2023.
	 [Info Law bulk action: all queries to date @ 12 Sep 23] Info Law was sent all historical corro items received by PPO, relating to MATES data/campaign, on/as at 12 September 2023.
Date client acknowledgem. sent	Date that step 2 'Outbound – Opt out acknowledgement' is completed. Input 'NA' when: not required (most non-opt outs) all acknowledgements suspended by leadership due to staff capacity outbounds suppressed based on individual circumstance. Also record 'Date info sheet sent' if General Info Sheet sent here.
MATES + D&I given request?	Record = Y at the same time 'Date D&I + MATES advised of opt out' is entered. Consider removing column and using only 'Date D&I + MATES advised of opt out'.
= NA for non-opt outs	s 22 - Out of scope
Date D&I + MATES advised of opt out	Date that step 3 'Action opt out' is completed. 'Actioned' date in Secretary reporting.
= NA for non-opt outs	To reduce risk, send on the same day: if unavoidable, use the latter date.

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Confirmed in D&I Exclude List? = NA for non-opt outs	Confirm client is in D&I Exclude List 21915010E and mark = Y.
Confirmed actioned by UniSA? = NA for non-opt outs	UniSA will provide case-by-case confirmation of opt out action in the Secure Portal Upload folder. Confirm and mark = Y. NA for non-opt outs.
Date PPO confirmed both stakeholders actioned = NA for non-opt outs	Date that step 4 'Confirm opt out actioned' is completed. I.e. the date PPO confirmed the previous two columns = Y. Date client is opted out by the tripartite definition in the audit doc: UniSA, D&I and Services Australia; and QA'd by PPO. N.b. bulk action entry due to retroactive application of this record keeping standard. [Bulk action: both confirmed as @ 7 Sep]: PPO confirm client tripartite opted out as at 7 Sep 2023.
Client/rep advised of action? = NA for non-opt outs	Record = Y at the same time 'Date client advised complete' is entered. Consider removing column and using only 'Date client advised complete'. (may still be some use in redundancy to reduce potential for overlooking input error?)
Date client advised complete = NA for non-opt outs	Date that step 5 'Outbound – Opt out complete' is completed. 'Complete' date in Secretary reporting. Also record 'Date info sheet sent' if Opt Out Info Sheet sent at this point.

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Date info sheet sent	Clients to receive 1x during 2023 media campaign. Either: General Info Sheet 231214442E attached to first outbound Opt Out Info Sheet 231214443E if first sent as part of 'Date client advised complete' outbound. Under normal conditions, PPO will not send an Information Sheet for a non-opt out client. This will be sent by the relevant business area.
Title	For correspondence. Note common titles (e.g. Mr, Mrs, Dr) if available. PPO Program Manager recommends not using rank title unless expressly requested by client: record correctness risk as many requests are from infrequent clients. Disregard historical entries.
Client contact dets	Email or home address; email preferred. For correspondence + POI/PORO. Find 'Further information required?' in step 1. Note here and in 'Comments' if contact should be to a representative or case manager , and/or if the client is deceased . If request comes from different email address than that on record, consider whether sufficient info was provided (e.g. DOB; File Number) to identify the client/rep.
Comments	Note any useful information outside of standard processing use cases. Examples: Client requests outcome that cannot be addressed as an opt out (PPO), information access request (IAU) or privacy complaint (Info Law) and associated communication (Information Sheet). Staff has identified the need for bespoke departmental response. Additional info to support identifying client at a later date. Pertinent comms quotations for nonstandard cases. Noting progress where further steps are needed (e.g. contacting stakeholders) to reach the next process stage. High risk factors in client conduct or communication, work complexity or time sensitivity. Highlight the cell in these cases, and remove highlighting when the risk has passed. Multiple contacts made/attempted (with dates). Cases already noted in this guide. (e.g. contact date complexities; representation/consent) A row will read as fully complete if all cells have entries. If there is post-processing required after a record is fully documented, or work outside of BAU is needed regardless of opt out progress, note outstanding action in 'Comments' red text for visibility. Remove this formatting when the work is completed. Consider also use of bold text to emphasise key words/phrases as per this table.

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Acronyms

BAU	Business as usual Staff to follow standard policies and procedure
CFMS	Client Feedback Management System Departmental records management software used to log feedback
Corro	Correspondence (written or verbal)
D&I	Data & Insights (formerly Statistical Services) Team responsible for managing departmental data infrastructure and complex data requests
Info Law	Information Law (PRIVACY.ENQUIRIES) Section responsible for privacy complaints
IAU	Information Access Unit (INFORMATION.ACCESS) Section responsible for information access requests
LEX	System used in processing and documenting legal requests; PPO have no access
(Veterans') MATES	Veterans' Medicines Advice and Therapeutics Education Service Quality use of medicines program, empowering veterans and families to improve their health and wellbeing
NFA	No further action (is required)
PDMS	Parliamentary Document Management System Whole of government workflow software for high level communications: e.g. in preparing Ministerial and Senior Executive correspondence
POI/PORO	Proof of identity; proof of record ownership
PPO	Pharmacy Programs & Operations
RFI	Request for further information
SOP	Standard Operating Procedure
UniSA	University of South Australia Contractor responsible for Veterans' MATES under the 2023-2027 contract period
VAN	Veterans' Access Network A departmental contact portal for resolving client queries
VAPAC	Veterans' Affairs Pharmaceutical Advisory Centre PPO operations call centre
VIEW	Veterans' Information Enquiry Window Legacy veteran CRM software; used in confirming client details throughout processing

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Standard Operating Procedure (SOP) –
Research Opt-Out List Management (Interim process)

Data & Insights Branch

Document Administration

Document Details	
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V1.2	31/05/2023	Anna	Include Veterans Mates in final distribution emai
V2.0	20/07/2023	Anna	Annual review - Update process for EDW inclusions and organisational realignment amendments

Background

Requirement

The purpose of this document is to articulate the process and hand-offs required between the Department of Veterans' Affairs (DVA) Data and Insights (D&I) Branch and the relevant teams in Corporate Legal Branch and Client Access and Rehabilitation (CARB) Branch when being advised of updates to the 'Research Opt-Out List' (the List).

This is an interim requirement only until new capability comes into play.

Overview

When a client commences formal interactions with DVA (usually through a claim), a client is presented with an overview of how their personal information is collected, used and disclosed by the department. One element of DVA's use and disclosure includes use and disclosure of personal information for public health purposes such as research and investigations, or to improve the wellbeing, treatment, services and outcomes for veterans.

Under the *Privacy Act 1988* and DVA's Privacy Policy, DVA clients can opt-out of having their personal information used or disclosed for research and other public health purposes.

As there is currently no automated capture of the 'opt-out' process, manual action is required by multiple teams to ensure these requests are carried out. It is intended that new capability to be built in Process Direct. This will facilitate better automated processing of new opt-out requests. As an interim action, the manual process of ensuring the exclusions are actioned will be managed by the Data & Insights Branch.

Scope of the Standard Operating Procedure

This document provides the operational detail to support undertaking, administering and reviewing the List. It is intended for the use of Data & Insights staff, noting that other parties may refer to this document as appropriate.

This document is not intended to describe the technical elements of the exclusion process, or to replace extant artefacts that outline related details.

Review of the Standard Operating Procedure

The review period is annually, commencing one year after the effective date of the SOP. An earlier review date is permitted where necessary (e.g. changes to legislation, changes to departmental policy and procedures, new contractual arrangements, or major changes to processes).

Material changes to the document require the review and endorsement of the nominated approvers.

Procedure

The procedure is separated into four parts to collect, communicate, action and embed updates to the List. It also outlines the teams impacted by each step.

- 1. Collect Client requests to opt-out.
- Communicate The request is communicated with relevant stakeholders.
- 3. Action The List is updated and shared with stakeholders.
- 4. Embed The exclusion process is embedded and the client's information will cease to be disclosed.

Collect - Client requests to opt-out

This section details the way a client may request to opt-out of the use or disclosure of their personal information for research purposes.

- Currently, a client may contact DVA via email usually through <u>Privacy.Enquiries@dva.gov.au</u> or <u>General.Enquiries@dva.gov.au</u> or via the MyService online form (generates an email). These channels are monitored by Information Law and Client Access teams respectively. The record of this interaction should be recorded in Communication History within Process Direct and then saved on the client's UIN in Content Manager (TRIM).
- A client may call DVA usually through VAN or the client's delegate. These channels are managed by Client
 Access or various teams in the Program Delivery or Client Benefits Divisions. Where a client is case
 managed, the case manager may also receive the call. The record of this interaction should be added to the
 Communication History within Process Direct.

Communicate - Request is forwarded to stakeholders

This section details the steps required to communicate a request has been received by a client.

Regardless of the incoming request channel, the incoming notification needs to be assessed and handled appropriately to ensure all actions in the request are being progressed.

The communication of the request should include the following fields:

Client UIN	Client File Number	Client Last Name	Client First Name/s	Restricted Client Flag (Y/N)	Effective Date
	Number	THE RESERVE OF THE PERSON NAMED IN	ivame/s	riag (1/1V)	

- Simple requests that only relate to a single activity (adding a client to the List) can be emailed to \$ 47E (monitored by the Data Products team).
- 2. Where a client request has more than one action, or wants additional advice on the management of the List, staff need to also include the relevant teams who are required to respond. Additional advice on the management of List or specific concerns regarding information privacy and/or security need to be sent to Privacy.Enquiries@dva.gov.au for specialist attention. The opt-out request should also be Cc'd to so the List can be updated.

Australian Government
Department of Veterans' Affairs

Action - Updating and escalating request

This section details the steps required to action the request to opt-out.

- 1. Once advice is received by \$ 47E the client's details will be added to the Master List (TRIM 21915010E).
- 2. Once the list has been updated and the 'Embed' process (describer below) has been complete, email the TRIM link to:
 - a. VAN Quality Improvement \$ 47E
 - i. VAN QI can reference the list for queries regarding update status.

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- c. Veterans Mates <u>VETMATES@dva.gov.au</u>
 - i. The Veterans Mates program team will advise the current supplier to remove the addition/s from any immediate activity.
- d. Data Products \$ 47E
 - i. Data Products should review any current data requests to ensure excluded clients are not part of any dataset being created.
- e. The delegate/case manager (where request has come from an individual staff member)
 - i. Can be assured that the request has been actioned and provide advice to the client.
- f. Only when Information Law is the referring party email Privacy.Enquiries@dva.gov.au
 - i. Information Law can then confirm action has been taken as requested.

Embed – Exclusions are complete

This section details the steps required to embed the List to enable future exclusions.

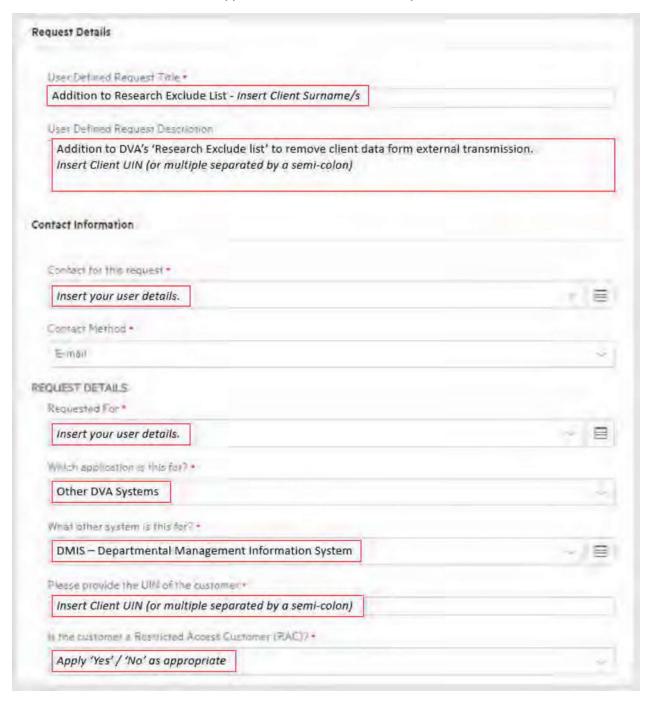
- 1. Create a Jira 'DATA' job to assign the below actions.
- 2. Data Products team will use the process outlined in TRIM/CM9 record 21915010E to amend the list. It utilises VBA code to create a .CSV file in two shared R: folders one for Services Australia to upload as part of the DMIS data exclusions and a second to upload to the EDW so the table can be linked to internal data requests. **Do not create a new record**, update the existing record only.
- 3. Log a MySupport job. Search for the 'DVA Core Business Applications faults and issues' request. Complete the fields as indicated in the below screen shots. Attach a copy of the updated Exclude List (not the TRIM link). Then click 'Submit'.

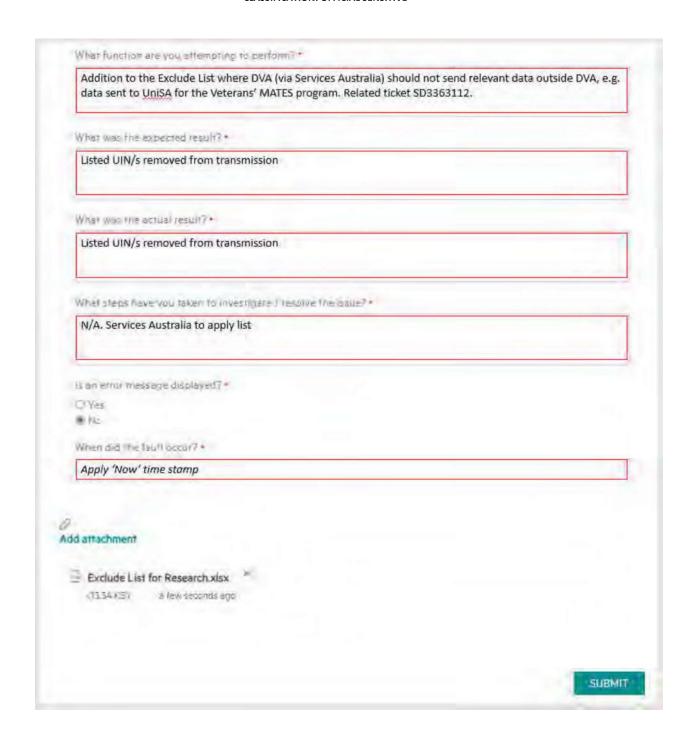
The process above is what facilitates the exclusion for the Veterans' MATES data feed.

4. As the MySupport will be recorded against your user name, record the Service Desk (SD) number in the Jira request so it can be used to escalate the request if not actioned within the required timeframe of 5 business days. If escalation is required, email the MySupport SD number to \$ 47E



Screen Shots – 'DVA Core Business Applications faults and issues' request form





5. This ends the embedding process.

Addressing Feedback and Questions

This section details the common questions relating to the Opt-out process or List.

- 1. Q. Can I opt-out of having my personal information shared with other government agencies (Commonwealth and State/Territory)?
 - A. You can only opt-out in circumstances where DVA requires your consent to disclose your personal information to another government agency. If DVA is required or authorised under an Australian law to share your personal information with a Commonwealth, State or Territory agency your opt-out will be of no effect. For example, this may include sharing personal information with Centrelink to ensure an overpayment isn't generated when your DVA payments commence; giving your information to Department of Defence to match against their client database to confirm your entitlements; or to comply with a court order.
- 2. Q. If my information has already been shared, can I have it retracted?
 - A. When DVA discloses your personal information it is not able to withdraw it. The date you advise DVA that you want to opt-out of having your personal information used and disclosed for research is the effective date your information will cease to be disclosed.
- 3. Q. What happens to my information once it has been shared?
 - A. In order for DVA to consider disclosing personal information for research, the research entity must consider if Ethics approval is required or if the requester should enter a Data Management Agreement with DVA. DVA generally share only limited amounts of personal information about an individual. For example, only information in relevant fields would be included in a dataset provided for research. Where practical, dependant on the research, DVA would usually only share de-identified information.
- 4. Q. What do I do if a client believes their information has been shared without consent?
 - A. If an individual considers that DVA has interfered with their privacy by acting in breach of the Australian Privacy Principles they can make a complaint to DVA or to the Office of the Australian Information Commissioner.

In the first instance, we recommend that individuals report their privacy complaint in writing to the department using the contact details below.

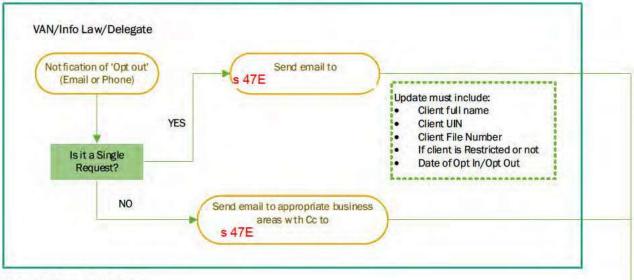
GPO Box 9998 BRISBANE QLD 4001

- 5. Q. How do I check if a client is already on the list?
 - A. Please review the Master List (TRIM 21915010E). Please allow at least 5 business days from the initial point of contact for the Master List to be manually updated. If the client's name appears, they are on the list. If they do not appear on the list, submit the request as outlined above. If the client advises they have already requested to opt-out, and it has been more than 5 business days, please forward proof of the earlier request to \$ 47E for the correct date of effect to be recorded. The Data & Insights team will investigate why action may not have taken place.

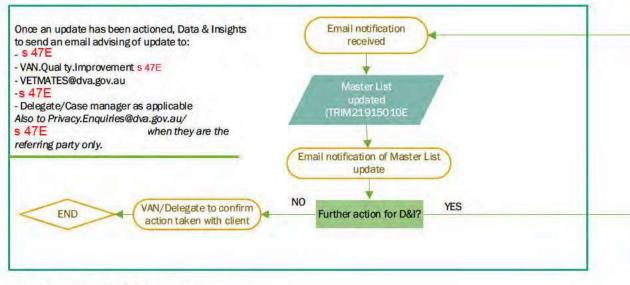


Process Overview

Step 1 and 2 - Collect and Communicate



Step 3 - Action



Step 4 - Embed - Data & Insights only

