
STATEMENT

Masonic Care Tasmania Inc. (**MCT**)'s purpose 'enriching lives and communities' and vision 'a world where people are supported to live life as they choose' encourages a culture of inclusion and respect for those who choose to live life with us. This document has been developed to provide support to our consumers that will help exercise their choice and independence and to respect their privacy.

POLICY STATEMENT

MCT understands the importance of protecting the privacy of an individual's Personal Information (including health information) and is committed to respecting the privacy rights of all our aged care and senior living residents and clients, their next-of-kin and advocates (**Representatives**), and other organisations that we deal with.

This policy sets out how we aim to protect the privacy of your Personal Information, your rights in relation to your Personal Information managed by us and the way we collect, use and disclose your Personal Information in accordance with the Australian Privacy Principles under the Privacy Act, the Aged Care Act and in accordance with other applicable privacy laws.

PURPOSE

The purpose of this Policy is to:

- ensure Personal Information is managed in an open and transparent way;
- protect the privacy of Personal Information including health information of clients, residents and staff;
- provide for the fair collection and handling of Personal Information;
- ensure that Personal Information we collect is used and disclosed for legally permitted purposes only;
- regulate the access to and correction of Personal Information; and
- ensure the confidentiality of Personal Information through appropriate storage and security.

WHAT INFORMATION DO WE COLLECT?

Clients and residents receiving aged care

- When you become a client or resident, a record is made which includes Personal Information, Sensitive Information or Health Information such as:
 - your name, date of birth and contact details;
 - your photograph, including clinical photographs of you or parts of your body (such as photographs of wounds);
 - the name and contact details of your guardian or other person responsible for decisions about your care;
 - the name and contact details of your partner, family members or close friends who are involved in your care;
 - your medical history and details of health services you have received and medications you take;
 - health information including assessment of you care needs, treatment and your care plan;

- information about other healthcare professionals and health service providers who are involved in your care;
 - information about your preferences and wishes for your care (including care at the end of your life);
 - if you choose to tell us, information about your religion, ethnicity, culture and the languages you speak. We may also collect information about your sexual orientation or gender identity. We collect this information to provide you with care which respects your identity and maintains your connection to your community; and
 - records of our interactions with you such as letters, emails and notes.
- We may collect information such as your banking details, your pension entitlements, and information regarding your income and assets. Where it is relevant to administering your payment arrangements, we will collect information such as your Medicare number, health care card number and your entitlement to government benefits. We use this information to arrange payment for your accommodation and/or care.
 - Security or surveillance cameras (CCTV) are installed in shared/common areas of some of our aged care facilities for the safety and security of residents, staff and visitors. Security cameras record images which can be reviewed if there is a safety incident. Unless images are kept because of a safety incident, they are deleted after a maximum of thirty (30) days (*facility and site dependent*).
 - In consideration of the privacy and dignity of all of our residents, MCT does not place recording devices such as security or surveillance cameras in residents' rooms or private spaces. MCT's General Manager Operations is available to discuss any concerns, requests or questions with residents and family members.
 - Where possible, we will collect information directly from you. This is not always possible, and we may also collect Personal Information about you from:
 - your family members, your guardian or a person responsible for decisions about your care
 - your GP and other healthcare professionals involved in your care
 - other aged care facilities or service providers
 - the Aged Care Assessment Team or Regional Assessment Service which assessed your need for care
 - government agencies (such as Centrelink, Medicare, Department of Health, National Disability Insurance Agency and Department of Veterans Affairs).
 - If you have made an enquiry about becoming a client or resident, we may collect any of the information above, if relevant to help us answer your enquiry. If your enquiry is simple and general, we will only collect limited information. If you have taken steps toward becoming a client or resident, we will collect more detailed information.

Residents of retirement villages

- When you become a resident of one of our retirement villages, a record is made which includes Personal Information such as:
 - your name, date of birth and contact details
 - your banking or payment details

- the name and contact details of emergency contacts, family members or people you authorise to act on your behalf.
- Where you also receive home care from us the section above ('Clients and residents receiving aged care') will also apply to you.
- Security or surveillance cameras (CCTV) are installed in shared/common areas of some of our retirement villages for the safety and security of residents, staff and visitors. Security cameras record images which can be reviewed if there is a safety incident. Unless images are kept because of a safety incident, they are deleted after a maximum of thirty (30) days (*facility and site dependent*).
- If you have made an enquiry about becoming a resident, we may collect any of the information above, if relevant to help us answer your enquiry. If your enquiry is simple and general, we will only collect limited information. If you have taken steps toward becoming resident, we will collect more detailed information.

Prospective employees / job applicants

- We collect Personal Information when recruiting personnel, such as your name, contact details, qualifications, profession or occupation and work history. Generally, we will collect this information directly from you.
- We may also collect Personal Information from third parties in ways which you would expect (for example, from recruitment agencies or referees you have nominated).
- Before offering you a position, we may collect additional details such as information on medical conditions and pre-existing injuries that could affect your work and/or are relevant to you working safely, and other information necessary to conduct police checks and other pre-employment screening checks including information you provide to us to verify your identity (e.g. a driver licence or passport) or to verify your right to work in Australia.
- This Privacy Policy does not apply to MCT's employee records as handling of employee records is covered under different legislation and is exempt from privacy laws if directly related to your current or former employment relationship with MCT.

Volunteers

- Personal Information collected and held by us in relation to our volunteers will be managed in accordance with this Policy and the Privacy Act.
- We collect the following information about you and use it to assess your application to volunteer at an MCT facility:
 - your contact details including address, postcode, telephone and email address;
 - demographic information about you, including age, date of birth, and gender;
 - your qualifications and experience;
 - police check;
 - information contained in references obtained from third parties; and

- other information you (or third parties you nominate as referees) provide to us in connection with your application.

Suppliers

- If you are entering into a supply or service provider relationship with us, we may collect information about you and your employees, officers and representatives as part of our onboarding processes. During the term of our relationship, we will also collect information that we consider is necessary to manage the service arrangement, such as contact names and addresses, police check information and up-to-date flu vaccinations (if relevant). We will use this information to comply with, and manage, our contractual and legal requirements.

Other individuals

- We may collect Personal Information about other individuals who are not our clients or residents. This includes:
 - individual service providers and contractors to MCT;
 - individuals who interact with us on a commercial basis;
 - volunteers who work with us on a charitable or compassionate basis; and/or
 - healthcare professionals who have referred clients to us or who are providing services to our clients and residents.
- The kinds of Personal Information we collect will depend on the capacity in which you are dealing with us. Generally, it would include your name, contact details, professional details and information regarding our interactions and transactions with you.

Visitors to our website

- We generally collect information that we obtain about you in the course of your interaction with our website including your internet protocol (IP) address, the date and time of your visit to our website, the pages you have accessed, the links on which you have clicked and the type of browser that you were using; and aggregated statistical data which is information relating to your use of our website and our services, such as traffic flow and demographics.
- We will not collect any Personal Information about users of our website except when they knowingly provide it or as otherwise described below.

WHY DO WE COLLECT YOUR PERSONAL INFORMATION?

We collect Personal Information about clients and residents for the purpose of providing you with the agreed services.

- For example, we may collect your Personal Information:
 - to deliver care and services according to your needs and preferences;
 - to align our care and services with other healthcare services you receive;
 - to minimise the need for you to provide the same information on multiple occasions;
 - to determine your eligibility for benefits and funding under the Aged Care Act or other legislation relating to the services you may receive.

Providing accurate and complete information is important for the safety, quality and effectiveness of the care and services we provide. It is also important to support you to receive the correct entitlements to benefits and funding for the services we provide. If you provide incomplete or inaccurate information, we may not be able to provide you with the care and services you need. If you have any concerns about the Personal Information we have asked you to provide, please let us know.

HOW IS YOUR INFORMATION USED

We use the information we collect about you to provide services to you and to your Representatives on your behalf, and for our other business functions and activities, which may include the following:

- to process applications for residency;
- for billing and invoicing purposes;
- to develop and deliver appropriate care plans;
- to make referrals to medical and health practitioners;
- to keep you up to date with information about the support and services we offer;
- to develop products and services better suited to our residents' and clients' needs;
- to identify you;
- to meet our obligations under applicable laws;
- to improve our services;
- to determine the level of funding you may be entitled to receive;
- to provide relevant information to government agencies and regulatory authorities;
- to provide newsletters, social publications or other information we believe may be of interest to you;
- to locate you and your visitors in the event of an emergency;
- to manage and administer any account you may hold with us; and/or
- to provide you with promotional or marketing material about services of our related entities.

Other people involved in your care

If you are a client or resident receiving aged care, your Personal Information will usually be shared with care staff and other people involved in your care. Generally, this will only happen in ways you would reasonably expect or otherwise with your consent. For example, we may disclose your Personal Information to:

- your GP or medical specialists involved in your care;
- your guardian(s), nominated family member(s) or other legally authorised person(s);
- a person who has been nominated in writing by you;
- a hospital or aged care facility you are transferred to;
- other healthcare professionals who are involved in your care such as nurses, occupational therapists, pharmacists, physiotherapists, podiatrists, dentists and the ambulance service; and/or
- chaplains and pastoral care workers, where pastoral visits are part of your care.

Once you have provided your consent, you are able to withdraw it at any time by contacting us. However please understand that by withdrawing your consent, we may not be able to provide you with the services you require.

In an emergency, we may provide Personal Information to other healthcare professionals and health services without your consent.

Contractors and other service providers

We sometimes engage contractors and service providers to perform services on our behalf and we may use and disclose your Personal Information to facilitate these arrangements. This may include specialist care services, allied health services, and domestic and personal care services.

These contractors and service providers may contact you directly to let you know they have collected your Personal Information and to give you information about their privacy policies.

Administration and management

We will also use and disclose your Personal Information to administer and manage our services. This includes:

- billing, collecting payments and debt recovery;
- collecting subsidies and benefits to which you may be entitled from government agencies and other third-party payers (such as Centrelink, Medicare, Department of Health, National Disability Insurance Agency and Department of Veterans Affairs);
- maintaining accreditation of our services (including sharing information with the Aged Care Quality and Safety Commission and the Department of Health);
- planning, managing, monitoring and evaluating our services;
- safety, quality assurance and improvement;
- statistical analysis and reporting;
- training staff, contractors and other workers;
- risk management and managing legal liabilities and claims (for example, liaising with insurers and legal representatives);
- making mandatory reports (such as reports about suspected abuse or foodborne illness or infectious diseases such as an influenza outbreak);
- responding to enquiries and complaints regarding services provided to clients and residents (including responding to the Aged Care Quality and Safety Commission or the Office of Fair Trading in Tasmania);
- obtaining advice from consultants and other professional advisers; and/or
- responding to subpoenas and other legal orders and obligations.

We may collect and use your information for other purposes not listed above. If we do so, we will make it known to you at the time we collect or use your information unless otherwise set out in this Privacy Policy.

If you choose not to provide your information to us for the purposes set out in this Privacy Policy, we may not be able to:

- undertake certain activities for you;
- provide you with requested information, products or services; or
- provide you with the right level of care for your circumstances.

DISCLOSURE OF YOUR INFORMATION

We do not disclose your information other than as set out in this Privacy Policy without your permission, unless the disclosure is:

- in accordance with this Privacy Policy or any agreement you enter into with us; or
- required or authorised by law, including without limitation the APP under the Privacy Act, the Aged Care Act, and applicable State laws regarding health or information records.

We may disclose your Personal Information to allied health professionals who assist us in providing care and services, medical practitioners, external health agencies such as the ambulance service, hospitals, the Australian Department of Social Services, the Aged Care Quality and Safety Commission, Medicare and relevant organisation or Government Departments as necessary to carry out the purposes for which the information was collected.

We may not use or disclose Personal Information for a purpose other than the primary purpose of collection, unless:

- the secondary purpose is related to the primary purpose and you would reasonably expect disclosure of the information for the secondary purpose;
- you have consented;
- the information is health information and the collection, use or disclosure is necessary for research, the compilation or analysis of statistics, relevant to public health or public safety, it is impractical to obtain consent, the use or disclosure is conducted within the privacy principles and guidelines and we reasonably believe that the recipient will not disclose the health information;
- we believe on reasonable grounds that the disclosure is necessary to prevent or lessen a serious and imminent threat to an individual's life, health or safety or a serious threat to public health or public safety;
- we have reason to suspect unlawful activity and use or disclose the Personal Information as part of our investigation of the matter or in reporting our concerns to relevant persons or authorities;
- we reasonably believe that the use or disclosure is reasonably necessary to allow an enforcement body to enforce laws, protect the public revenue, prevent seriously improper conduct or prepare or conduct legal proceedings; or
- the use or disclosure is otherwise required or authorised by law.

In an emergency situation, if you are required to be transferred to hospital we may release medical information about you (in accordance with the Privacy Act and other applicable legislation) to hospital staff in order to facilitate your care.

Your financial information will not be disclosed to health professionals but may be disclosed to the Commonwealth Government or its agencies for funding and accreditation purposes.

We may also disclose your health information to an immediate family member where it is necessary to provide appropriate care, unless you or your Authorised Representative have expressly indicated that you do not wish your information to be discussed with a particular person.

DISCLOSURE TO AN AUTHORISED REPRESENTATIVE

We may disclose health information about a resident or client to an Authorised Representative if:

- the resident or client is incapable of giving consent or communicating consent;
- the service manager is satisfied that either the disclosure is necessary to provide appropriate care or treatment or is made for compassionate reasons or is necessary for the purposes of undertaking a quality review of our services (and the disclosure is limited to the extent reasonable and necessary for this purpose); and
- the disclosure is not contrary to any wish previously expressed by the resident or client of which the service manager is aware, or of which the service manager could reasonably be expected to be aware and the disclosure is limited to the extent reasonable and necessary for providing care or treatment.

DOES MCT USE OR DISCLOSE YOUR PERSONAL INFORMATION FOR DIRECT MARKETING?

- If you are a client, we will only use or disclose your Personal Information for direct marketing purposes with your consent. We will provide this information to you by post, email, telephone and/or text message, using the details you have provided.
- For other individuals, we may use or disclose your Personal Information for the purpose of informing you about products or services that may interest you. You can discontinue ('opt out') of receiving direct marketing communications at any time by following the opt-out instructions in the communications or contacting us using the contact details at the end of this document.

DOES MCT DISCLOSE YOUR PERSONAL INFORMATION OVERSEAS?

MCT does not operate overseas and will generally hold all personal information in Australia. Where MCT uses third party service providers to store personal information, we will require the service provider to store that personal information in Australia, or where that is not possible, we will ensure that appropriate data handling and security arrangements are in place.

We will only disclose your Personal Information overseas:

- if we have your consent;
- if we have taken reasonable steps to ensure that the recipient will comply with the Australian Privacy Principles; or
- an exception under the Australian Privacy Principles applies.

SECURITY OF YOUR PERSONAL INFORMATION

We take all reasonable steps to ensure that the Personal Information we hold is protected against misuse, loss, unauthorised access, modification or disclosure. We hold Personal Information in both hard copy and electronic forms in secure databases on secure premises and in secure cloud based technology, accessible only by our authorised staff.

We use physical security and other measures to protect your Personal Information. Paper records are generally stored securely at our facilities, home care service offices, support offices, or head office. Archived paper records are stored at an external storage facility in Australia.

Electronic records are held securely on servers and computer systems located in Australia and managed by us or contracted third parties. We keep such systems and network secure by using physically secure servers, firewalls, user identifiers and passwords to control access.

Our staff are bound by a formal code of conduct. We train and supervise our staff and volunteers to ensure your information is treated with respect and kept confidential in accordance with privacy laws which apply to us.

For clients who receive care at home, documents recording your Personal Information may be left with you in your home (such as your care plan or care records). We cannot ensure the security of Personal Information which is left with you in your home. However, we will work with you to minimise the opportunity for other individuals to access your Personal Information.

Contractors working on our behalf are required to:

- comply with the APP;
- have up-to-date virus protection software and firewalls installed on any device used to access documents containing Personal Information or Health Information;
- notify us of any actual or potential breaches of security; and
- indemnify us in relation to any loss suffered by a breach.

We will, as soon as practicable and in accordance with the law, destroy or de-identify any Personal Information that is no longer required for our functions.

HOW WE DEAL WITH UNSOLICITED INFORMATION

If you send us your Personal Information when we don't ask for it (unsolicited Personal Information) we will determine whether or not the information is relevant to one or more of our functions. If the information is not relevant to what we do, we may destroy or de-identify the Personal Information if it is lawful and reasonable to do so.

ACCESSING AND UPDATING YOUR INFORMATION

MCT takes all reasonable steps to ensure that any information we collect, hold and use is accurate, complete and up-to-date.

- If you are a resident at one of our aged care facilities and have questions about your care or the Personal Information we hold about you, we encourage you to ask the Facility Manager.
- If you are a home care client and have questions about your care or the services you receive or the Personal Information we hold about you, we encourage you to ask the Community Care Team Leader or General Manager Operations.

To assist us, we ask that you provide true, accurate, current and complete information about yourself as requested. We also ask that you let us know if information about you changes and properly update the

information you have provided to us to keep it true, accurate, current and complete. You may also ask us to amend our records. It is sometimes not possible for us to make requested changes to Personal Information we hold about you (such as your care records).

You are entitled to access the information that we hold about you. If you request access to your information, we ask that you make this request in writing and that you include a description of the information you require and whether you want to view it in person or if you want to be provided with a copy of the records. In ordinary circumstances we will give you full access to your information.

However, there may be some legal or administrative reasons to deny access. If we refuse your request to access your information, we will provide you with reasons for the refusal.

MCT will respond to your request within a reasonable time. This may depend on the amount or type of information requested, the ease of accessing/collating the information, and available resources to perform the work. Your request will normally be processed within 30 days. MCT reserves the right to charge a fee to cover the costs of fulfilling large or complex requests such as staff costs, accessing offsite storage, or the costs of photocopying, printing or scanning documents. Any fees will be explained prior to actioning your request, and will be reasonable having regard to the actual costs incurred by MCT in providing access.

We only provide information held by MCT. Where the information is held by other parties, for example medical practitioners, this must be requested independently.

DECLINING ACCESS

Where the person requesting access is an Authorised Representative (such as next-of-kin, an attorney or guardian) we will ask the representative to provide evidence of their authority where we do not already hold that information or if we may not hold up-to-date information. We may also ask for additional information so that we can understand if their authority includes accessing a resident or client's Personal Information at the time the request is made. Not all guardians or people given power of attorney have these powers.

If we are unsatisfied with the individual's identity or access is requested from an unauthorised party, we can decline access to the information.

We can also decline access to information if:

- there is a serious threat to life or health of any individual;
- the privacy of others may be affected;
- the request is frivolous or vexatious;
- the information relates to existing or anticipated legal proceedings; or
- the access would be unlawful.

We will provide in writing the reasons for declining access to the requested information.

HOW LONG DOES MCT HOLD YOUR PERSONAL INFORMATION?

MCT is required by the applicable State and Territory legislation regarding health records to keep your health records for a minimum of seven (7) years from the date of the last entry in your record. Generally, if you are a client or resident receiving aged care, your information will be held for 7 years from the date

of the last entry in your record. Information that is no longer needed will be securely destroyed or de-identified.

PRIVACY DATA BREACHES

In the event that your Personal Information is lost, stolen or subject to unauthorised access or disclosure, MCT will adhere to its obligations under the Privacy Act in relation to any required notifications to the Office of the Australian Information Commissioner and to those people whose Personal Information has been lost, stolen or subject to authorised access or disclosure. Under the Notifiable Data Breaches scheme, MCT must inform you if a data breach is likely to cause you serious harm and include recommendations about the steps we will take in response to the data breach.

HOW IS YOUR PERSONAL INFORMATION HANDLED ON OUR WEBSITE?

You may visit our website (www.masoniccaretas.com.au/) without identifying yourself. If you identify yourself (for example, by providing your contact details in an enquiry), any Personal Information you provide to MCT will be managed in accordance with this Privacy Policy.

Any information that is collected via our website or which is held on our computer systems is protected by safeguards including physical, technical (firewalls, SSL encryption etc.) and procedural methods.

MCT's website uses cookies. A 'cookie' is a small file which is placed on your computer or device when you visit our website. Cookies allow us to recognise your computer or device and are required to enable our website to function correctly.

When you visit our website, we use cookies to collect certain information such as your device type, browser type and IP address. Cookies can also collect information about your behaviour online, including the websites you visit. In general, this information will only identify your device and will not identify you personally.

We may also place cookies (called 'persistent' cookies) on your computer or device. We use, and third-parties use, these cookies to display personalised advertisements (or 'targeted' advertisements) on websites you visit or social media platforms you use. For example, if you visit our website you may see advertisements for SCC on other websites you visit. Advertisers can use these cookies to build up a profile of your behaviour online (including websites you visit).

We also use cookies to allow our service providers – such as Google Analytics – to monitor and analyse how users interact with our website. Details about how Google uses information is available at <http://policies.google.com/technologies/partner-sites>.

You can change the settings on your computer or device to disable cookies (or certain kinds of cookies). This may affect how our website, and other websites you visit, function.

MCT PRIVACY OFFICER

We have appointed a Privacy Officer to manage and administer all matters relating to protecting the privacy of your Personal Information.

The Privacy Officer can be contacted if any relevant person wishes to obtain more information about any aspect of this Policy or about the way in which we operate to protect the privacy of individual's Personal Information.

WHAT TO DO IF YOU HAVE A QUESTION, PROBLEM OR COMPLAINT ABOUT OUR USE OF YOUR PERSONAL INFORMATION OR THIS PRIVACY POLICY

If you:

- have a query or concern about this Privacy Policy or our information handling processes;
- wish to make a complaint in relation to a breach of your privacy;
- would like to access your information held by us; or
- would like to correct or update your information held by us,

please contact:

- the Manager of your care home (or the home affiliated with your senior living accommodation); or
- our MCT Privacy Officer in any of the following ways:
 - by phone on (03) 6345 7109;
 - by facsimile on (03) 6345 7191; or
 - by email at privacy@mctas.org.au.

We will respond to your queries and complaints within a reasonable period of time and we will record your query or complaint on our system.

Where we receive a complaint or a concern regarding a suspected breach of privacy, our Privacy Officer will follow up on your complaint. We may ask to speak with you directly in the course of investigating, amending or rectifying information or the concern you have raised. We will also notify you of the outcome of an investigation within a reasonable period of time.

If you are not satisfied with our response, or you think we may have breached the Australian privacy laws, you have a right to make a complaint to the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992. Full contact details can be found online at www.oaic.gov.au. (Complaints may also be made directly to the Aged Care Quality and Safety Commission either online at <https://www.agedcarequality.gov.au/> or by telephone to 1800 951 822.)

HOW ARE CHANGES TO THIS PRIVACY POLICY MADE?

We may amend this privacy policy from time to time, with or without notice to you. The latest version may be found on our website at www.masoniccasetas.com.au/.

DEFINITIONS

Aged Care Act means the *Aged Care Act 1997 (Cth)*;

APP means the Australian Privacy Principles;

Authorised Representative means a parent, a child or sibling, a spouse, a relative, a member of the resident or client's household, a guardian, an enduring power of attorney, a person who has an intimate

personal relationship with the resident or client, or a person nominated by the resident or client to be contacted in case of emergency, provided they are at least 18 years of age;

Health Information means:

- (a) information or an opinion about:
 - i. the health or a disability (at any time) of an individual;
 - ii. an individual's expressed wishes about the future provision of health services to him or her; or
 - iii. a health service provided, or to be provided, to an individual that is also Personal Information; or
- (b) other Personal Information collected to provide, or in providing, a health service;
- (c) other Personal Information about an individual collected in connection with the donation, or intended donation, by the individual of his or her body parts, organs or body substances; or
- (d) genetic information about an individual in a form that is, or could be, predictive of the health of the individual or a genetic relative of the individual;

Notifiable Data Breach means the notifiable data breach scheme established by the Privacy Amendment (Notifiable Data Breaches) Act 1997;

Personal Information means information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable;

Privacy Act means the *Privacy Act 1988 (Cth)*;

Sensitive Information is information or an opinion about a person's race, ethnicity, political opinions, association or membership, religious or philosophical beliefs, membership of professional or trade association or trade unions, sexual orientation or preference, criminal record, Health Information, genetic or biometric information.

POLICY DETAILS

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|---|-------------------------|
| Policy Name | Privacy Policy |
| Policy Number | PL No. 2020/0059 |
| Policy Author | Executive Officer |
| Portfolio Executive Director | Chief Executive Officer |
| Version | 1 |
| Supersedes | Nil |
| Related to Aged Care Quality Standards | 1-3(f); 8-2; 8-3(c) |
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| Date of Next Review | 10 July 2023 |