



## Privacy Policy

Current as of: 25<sup>th</sup> August 2022

### Introduction

This privacy policy is to provide information to you, our patient, on how your personal information (which includes your health information) is collected and used within our practice, and the circumstances in which we may share it with third parties.

### Why and when your consent is necessary

When you register as a patient of our practice, you provide consent for our GPs and practice staff to access and use your personal information so they can provide you with the best possible healthcare. Only staff who need to see your personal information will have access to it. If we need to use your information for anything else, we will seek additional consent from you to do this.

### Why do we collect, use, hold and share your personal information?

Our practice will need to collect your personal information to provide healthcare services to you. Our main purpose for collecting, using, holding and sharing your personal information is to manage your health. We also use it for directly related business activities, such as financial claims and payments, practice audits and accreditation, quality improvement activities, and business processes (eg staff training).

### What personal information do we collect?

The information we will collect about you includes your:

- names, date of birth, addresses, contact details
- medical information including medical history, medications, allergies, adverse events, immunisations, social history, family history and risk factors
- Medicare number (where available) for identification and claiming purposes
- healthcare identifiers
- DVA details (where available) for identification and claiming purposes

### Dealing with us anonymously

You have the right to deal with us anonymously or under a pseudonym unless it is impracticable for us to do so or unless we are required or authorised by law to only deal with identified individuals.

### How do we collect your personal information?

Our practice may collect your personal information in several different ways.

1. When you make your first appointment our practice staff will collect your personal and demographic information via your registration.
2. During the course of providing medical services, we may collect further personal information. Information can also be collected through electronic transfer of prescriptions (eTP), My Health Record, eg via Shared Health Summary, Event Summary.
3. We may also collect your personal information when/ if you telephone us or write/email to us. We will not collect your information via a website, or SMS, or communicate with you using social media as we do not

use any of forms of these communication for any patient communication.

4. In some circumstances personal information may also be collected from other sources. Often this is because it is not practical or reasonable to collect it from you directly. This may include information from:
- your guardian or responsible person
  - other involved healthcare providers, such as specialists, allied health professionals, hospitals, community health services and pathology and diagnostic imaging services
  - your health fund, Medicare, or the Department of Veterans' Affairs (as necessary).

## When, why and with whom do we share your personal information?

We sometimes share your personal information:

- with third parties who work with our practice for business purposes, such as accreditation agencies or information technology providers – these third parties are required to comply with APPs and this policy
- with other healthcare providers
- when it is required or authorised by law (eg court subpoenas)
- when it is necessary to lessen or prevent a serious threat to a patient's life, health or safety or public health or safety, or it is impractical to obtain the patient's consent
- to assist in locating a missing person
- to establish, exercise or defend an equitable claim
- for the purpose of confidential dispute resolution process
- when there is a statutory requirement to share certain personal information (eg some diseases require mandatory notification)
- during the course of providing medical services, through eTP, My Health Record (eg via Shared Health Summary, Event Summary).

Only people who need to access your information will be able to do so. Other than in the course of providing medical services or as otherwise described in this policy, our practice will not share personal information with any third party without your consent.

We will not share your personal information with anyone outside Australia (unless under exceptional circumstances that are permitted by law) without your consent.

Our practice will not use your personal information for marketing any of our goods or services directly to you without your express consent. If you do consent, you may opt out of direct marketing at any time by notifying our practice in writing.

## How do we store and protect your personal information?

Your personal information may be stored at our practice and is held in paper records and/or electronic records.

Our practice stores all personal information securely. All our paper records are held in a secure, locked storage room that only staff can access. The electronic records are stored in protected information systems with each practice team member having their own login and passwords. These are changed every 3 months. The levels of access are allocated according to the practice team members duties and role within the practice.

In the event that paper records need to be destroyed, we have a contract in place with Ezy Shredn Store for the safe and secure destruction of all confidential paperwork.

All staff sign a confidentiality agreement at the commencement of their employment and are fully aware that a breach of confidentiality may mean dismissal.

Our reception desks are set at a height and angle to ensure patient information cannot be seen, and fax machines are kept out of the reception area.

Our practice has a business continuity and information recovery plan to ensure there is no loss of information.

## How can you access and correct your personal information at our practice?

You have the right to request access to, and correction of, your personal information.

Our practice acknowledges patients may request access to their medical records. We require you to put this request in writing using your 3 identifiers (name, date of birth and address), and indicating whether the file needs to be electronic or in paper form and address it to your doctor and the practice. This request will be given to the doctor who will prepare the record for transfer (either electronically or in paper form). This will usually be finalized within 30 days. There is a cost of \$66.00 (inc GST) for the record. These are posted registered mail unless being collected by you.

Our practice will take reasonable steps to correct your personal information where the information is not accurate or up to date. From time to time we will ask you to verify that your personal information held by our practice is correct and current. You may also request that we correct or update your information, and you should make such requests in writing to the Practice Manager Louise Ahearn, 35 Elbow Street, West Kempsey.

## How can you lodge a privacy-related complaint, and how will the complaint be handled at our practice?

We take complaints and concerns regarding privacy seriously. You should express any privacy concerns you may have in writing. We will then attempt to resolve it in accordance with our resolution procedure.

Concerns should be addressed to Practice Manager, Louise Ahearn, 35 Elbow Street, West Kempsey NSW 2440. All concerns are initially assessed by Louise, but where necessary they will be escalated to the Associates for input and direction. Wherever possible the practice aims to have a resolution within 30 days.

If you are still dissatisfied you may also contact the Office of the Australian Information Commissioner (OAIC). Generally, the OAIC will require you to give them time to respond before they will investigate. For further information visit [www.oaic.gov.au](http://www.oaic.gov.au) or call the OAIC on 1300 363 992.

## Policy review statement

This privacy policy will be reviewed regularly to ensure it is in accordance with any changes that may occur. Statements are available at reception or on request.