

# Privacy Policy

Current as at: 02.01.2020

## 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, and business processes (eg staff training).

Your health information may be used in quality improvement and clinical audit activities. Wherever possible, this information will be transmitted to third parties in a de-identified format. Identifiable personal information will only be given to a third-party with your consent.

## What personal information do we collect?

The information we will collect about you includes:

- 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
- health fund details.

## 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 will collect your personal information:

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, and deidentified information via the local primary health network as part of the Australian Government Quality Improvement Practice Incentive Program.

3. We may also collect your personal information when you visit our website, send us an email or SMS, telephone us, make an online appointment or communicate with us using social media.
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 Veteran's Affairs (as necessary).

## Who do we share your personal information with?

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 Electronic Transfer of Prescriptions (eTP), MyHealth Record/PCEHR system (eg via Shared Health Summary, Event Summary).
- Deidentified information may be sent to the local primary health network as a requirement of the Australian Government Quality Improvement Practice Incentive Program. Patients may choose to opt-out of this, and this will not affect the clinical care they receive

Only people that 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.

Our practice may use your personal information to improve the quality of the services we offer to our patients through research and analysis of our patient data.

We may provide de-identified data to other organisations to improve population health outcomes. The information is secure, patients cannot be identified and the information is stored within Australia. You can let our reception staff know if you do not want your information included. This will not affect your clinical care.

Our practice utilises *Best Practice* software which is programmed to automatically insert the relevant information to fulfil referrals to specialists and allied health professionals. The details are preloaded with the already established information eg. allergies, current medications, past medical history, patient contact details, to ensure that referrals are valid and compliant. The role is to establish multidisciplinary care to benefit the patient's health outcomes. Patients always have the opportunity to review such documents and discuss amendments if necessary.

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

Your personal information may be stored at our practice in various forms.

Most will be as electronic records. However radiographic images that cannot be scanned will be stored at our practice for up to 3 months, awaiting your collection. If it is not collected by you within 3 months, it will be appropriately destroyed.

Our practice stores all personal information securely.

Our electronic format is securely backed up by our servers onsite and offsite.

Confidentiality agreements are signed by all staff and contractors.

## 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. Please provide this to our receptionist, and our practice will respond within a reasonable time (up to 30 working days). A fee of minimum \$30 will apply for us to provide a hard copy of your records.

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 your personal information held by our practice is correct and up-to-date. You may also request that we correct or update your information, and you should make such requests in writing to our receptionist-either in person, or via phone.

## 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.

Please mail or bring in a letter to: North Ryde Medical Centre. Attn: Practice Manager, Shop 2, 199 Coxs Rd. North Ryde NSW 2113. Phone (02) 8999 3393, Fax (02) 9888 1998. We will aim for turnaround time of up to 30 days, where a written reply will be provided to address your complaint. Please write your reply address and contact phone number in your letter to facilitate this process.

You may also contact the 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 336 002.

## Policy review statement

We will review this privacy policy annually to ensure it is in accordance with any changes that may occur. We will post a notification on our website [www.northrydemedicalcentre.com.au](http://www.northrydemedicalcentre.com.au) for any future updates.

Next review is due on no later than 02.01.2021