

Privacy Policy

Current as of: 11 May 2018

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.

Our practice is committed to best practice in relation to the management of information we collect. This practice has developed a policy to protect patient privacy in compliance with the Privacy Act 1988 ('the Privacy Act').

Our policy is to inform you of:

- the kinds of information that we collect and hold, which, as a medical practice, is likely to be 'health information' for the purposes of the Privacy Act;
- how we collect and hold personal information;
- the purposes for which we collect, hold, use and disclose personal information;
- how you may access your personal information and seek the correction of that information;
- how you may complain about a breach of the Australian Privacy Principles and how we will deal with such a complaint;
- whether we are likely to disclose personal information to overseas recipients

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 main purpose for collecting, using, holding and sharing your personal information is to manage your health.

In general, we collect, hold, use and disclose your personal information for the following purposes:

- to provide health services to you
- to communicate with you in relation to the health service being provided to you
- to comply with our legal obligations, including, but not limited to, mandatory notification of communicable diseases or mandatory reporting under applicable child protection legislation.
- to help us manage our accounts and administrative services, including billing, arrangements with health funds,
- pursuing unpaid accounts, management of our ITC systems
- for consultations with other doctors and allied health professional involved in your healthcare;
- to obtain, analyse and discuss test results from diagnostic and pathology laboratories
- for identification and insurance claiming
- If you have a My Health Record, to upload your personal information to, and download your personal information from, the My Health Record system.
- Information can also be disclosed through an electronic transfer of prescriptions service (eTP - MediSecure).
- To liaise with your health fund, government and regulatory bodies such as Medicare, the Department of Veteran's Affairs and the Office of the Australian Information Commissioner (OAIC) (if you make a privacy complaint to the OAIC), as necessary.

What personal information do we collect?

The type of information we may collect and hold includes:

- Your name, address, date of birth, email and contact details
- Medicare number, DVA number and other government identifiers, although we will not use these for the purposes of identifying you in our practice
- Other health information about you, including:
 - notes of your symptoms or diagnosis and the treatment given to you
 - your specialist reports and test results
 - your appointment and billing details
 - your prescriptions and other pharmaceutical purchases
 - your healthcare identifier
 - any other information about your race, sexuality or religion, when collected by a health service provider.

How do we collect and hold personal information?

We will generally collect personal information:

- from you directly when you provide your details to us. This might be via a face to face discussion, telephone conversation, registration form or online form
- from a person responsible for you
- from third parties where the Privacy Act or other law allows it - this may include, but is not limited to: other members of your treating team, diagnostic centres, specialists, hospitals, the My Health Record system, electronic prescription services, Medicare, your health insurer, the Pharmaceutical Benefits Scheme

Anonymity and pseudonyms

The Privacy Act provides that individuals must have the option of not identifying themselves, or of using a pseudonym, when dealing with our practice, except in certain circumstances, such as where it is impracticable for us to deal with you if you have not identified yourself.

Overseas disclosure

We may disclose your personal information to the following overseas recipients:

- any practice or individual who assists us in providing services (such as where you have come from overseas and had your health record transferred from overseas or have treatment continuing from an overseas provider)
- overseas transcription services
- overseas based cloud storage
- anyone else to whom you authorise us to disclose it

How do we collect your personal information?

Our practice will collect your personal information:

- When you make your first appointment our practice staff will collect your personal and demographic information via our new patient registration form
- During the course of providing medical services, we may collect further personal information. The Alice Street General Practice utilises eHealth services such as the Electronic Transfer of Prescriptions (eTP - MediSecure) and the My Health Record system.
- We may also collect your personal information when you visit our website, send us an email, telephone us or make an online appointment.
- 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
 - 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 (e.g. 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 (e.g. some diseases require mandatory notification)
- during the course of providing medical services, through Electronic Transfer of Prescriptions (eTP - MediSecure), My Health Record system (e.g. via Shared Health Summary, Event Summary).

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.

How do we store and protect your personal information?

Your personal information may be stored at our practice in various forms e.g. as electronic records, paper records and visual records (X-rays, CT scans and photos).

Our practice stores all personal information securely. Due to the sensitive nature of the information collected by the Alice Street General Practice to provide its services, extra precautions are taken to ensure the security of that information. Information may be stored electronically and / or in hard copy form. All electronically stored files are password-protected on several levels, and regular backups of data are performed. Our practice has document retention and destruction policies in place.

The Alice Street General Practice requires its employees to observe obligations of confidentiality in the course of their employment with all staff/contractors signing Confidentiality Agreements.

Should a data breach occur, the practice has a protocol in place to notify affected individuals and the Office of the Australian Information Commissioner (OAIC) under the Notifiable Data Breach (NBD) Scheme.

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. Requests for a transfer of medical records from the Alice Street General Practice are charged a service fee of \$25. To release records, we require either a direct request from the patient's new treating doctor (including patient signature) or a signed request letter from the patient which includes 3 separate points of identification data (e.g. full name, address, date of birth, Medicare number). Our practice will respond within a 14 day timeframe to the request and the request will be processed and finalised within 30 days.

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 the personal information held by the practice to ensure all information is correct and up-to-date. You may also request that we correct or update your information. Such requests should be made in writing to the Practice Manager at the practice address – Alice Street General Practice, 6 Alice Street, Newtown, NSW, 2042.

Privacy and our website

The Alice Street General Practice is committed to safeguarding your privacy online. The Alice Street General Practice will not pass on your details to any third party unless you give us permission to do so. The Alice Street General Practice collects three kinds of information from visitors to our website www.alicestreetgp.com.au: registration information, feedback information and Website usage information, from session cookies and log files. (Neither session cookies or log files contain any personal information). By emailing the Alice Street General Practice your details or by entering your details in an online form, you allow the Alice Street General Practice to provide you with services and notifications. Every time you submit such personal information, the Alice Street General Practice will treat that information in accordance with this privacy policy.

The Alice Street General Practice will act in accordance with current legislation and aim to meet current Internet best practice. During the course of any visit to the Alice Street General Practice, the pages you see, along with the possibility of a cookie, are downloaded to your computer. The vast majority of Websites do this, as cookies provide the Website author certain benefits, for instance, like finding out whether the computer (and probably its user) has visited the Website before. This is done on second and future visits to the Website by checking to see, and finding, the cookie left there on the previous visit. If using cookies worries you then you should either set your browser preferences to reject cookies or leave the website.

Closed Circuit Television (CCTV)

The Alice Street General Practice has CCTV systems operating at our premises for the purposes of maintaining safety and security for our patients, visitors, staff and other attendees. Our CCTV system may collect and store personal information and the use of our CCTV will be in accordance with the Privacy Act. CCTV is only used to monitor public areas.

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 the complaint in accordance with our resolution procedure. Please address details of your privacy related complaint or concern to the Practice Principal at the practice address – Alice Street General Practice, 6 Alice Street, Newtown, NSW, 2042. Or phone the practice on 02 9550 6201 for a confidential discussion of your privacy related complaint or concern with the Practice Manager. The turnaround timeframe for complaint resolution is 30 days.

Complaints can also be registered via the following agencies:-

Office of the Australian Information Commissioner (OAIC). Generally the OAIC will require you to give them time to respond, before they will investigate.

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Fax: +61 2 9284 9666

Post: GPO Box 5218 Sydney NSW 2001

Website: www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint

NSW Government Health Care Complaints Commission -1800 043 159.

<http://www.hccc.nsw.gov.au/Complaints/>

NSW Ombudsman

Inquiries team – 9286 1000

<http://www.ombo.nsw.gov.au/complaints/complaint-form>

Policy review statement

This Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and other necessary developments. Updates will be publicised on the practice's website.