

Galston Medical Centre privacy policy

Current as of: 7/9/2023

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. Health information is defined as any personal information about your health or disability. It includes information or opinion about your illness, injury or disability.

Some examples of health information include:

- notes of your symptoms or diagnosis
- information about a health service you've had or will receive
- specialist reports and test results
- prescriptions and other pharmaceutical purchases
- dental records
- your genetic information
- your wishes about future health services
- your wishes about potential organ donation
- appointment and billing details
- any other personal information about you when a health service provider collects it.

We are committed to protecting the privacy of patient information and to handling your personal information in a responsible manner in accordance with the Privacy Act 1988 (Cth), the Privacy Amendment (Enhancing Privacy Protection) Act 2012, the Australian Privacy Principles and relevant State and Territory privacy legislation (referred to as privacy legislation). From February 2018, further amendments to the Privacy Act requires us to report eligible data breaches that are likely to cause serious harm.

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 (e.g. 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 for identification and claiming purposes
- healthcare identifiers

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 by through electronic transfer of prescriptions (Escripts), My Health Record (Shared Health Summary, Event Summary or information regarding vaccinations, prescriptions or results).
3. We may also collect your personal information when you telephone us, make an online appointment or communicate with us using our recall and reminder system. This practice does not support email as this is not a secure form of sending medical information.
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
 - 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 (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 (eg some diseases require mandatory notification)
- during the course of providing medical services, through electronic prescriptions, My Health Record (e.g. via Shared Health Summary, Event Summary)
- uploading vaccinations to the Australian Immunisation Register

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.

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.

[If your practice routinely provides patient health information to other organisations for secondary use your practice should make patients aware this is occurring by including this information as part of your privacy policy. Practices should provide patients with assurances and advice on their rights, and how their data is protected, and must clearly state the practice's approach to collection of healthcare information for primary

and secondary purposes. Whilst patient consent for sharing de-identified practice data is not a legal requirement, it is good practice to have a procedure for ensuring patients who do not consent to secondary use of data are removed from any data extraction process. Most data extraction tools have this functionality]

How do we store and protect your personal information?

Your personal information may be stored at our practice on our computer system and/or in hand written medical records.

Our practice stores all personal information securely by

- Securing our premises
- Placing password and varying access levels on databases to limit access and protect electronic information from unauthorised interference, access, modification and disclosure;
- Storing paper files in an area not accessible to unauthorised personnel

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 attention to the Practice manager and send to the address at the footer of the policy.

Our practice will respond within 30 days

There may be a fee for the administrative costs of retrieving and providing you with copies of your medical records.

We may deny access to your records in certain circumstances permitted by law, for example, if disclosure may cause a serious threat to yours or someone else's health or safety.

We will always tell you why access is denied and the options you have to respond to our decision.

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 31 Arcadia Road Galston NSW 2159.

Alternatively, we do have an “Update your details” form at Reception.

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 complaints resolution procedure.

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 or call the OAIC on 1300 363 992.

Privacy and our website

We currently do not collect any information via our website. We do not receive or disclose via email unless this is encrypted or there are no other alternatives due to security issues.

Policy review statement

This privacy policy will be reviewed annually to ensure it is in accordance with any changes that may occur. State how you will notify your patients when you amend this policy.

AUTHOR:	NICOLE- PRACTICE MANAGER
DATE OF ISSUE:	14/3/2022
DATE TESTED:	7/9/2023
DATE OF REVIEW:	7/9/2023
DATE OF NEXT REVIEW:	7/9/2024
VERSION NUMBER:	2