# the glen superclinic

# **Privacy Policy**

## 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.

## **Purpose of Collection**

To gain sufficient information to provide for optimal management of each patient's health, care and wellbeing and to ensure practice is viable to continue treating patients.

## 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 including your name, date of birth, address, telephone numbers, emergency contacts, marital status, employer details, Medicare number, health insurance details, ethnicity, allergies and other sensitivities, past and current medical history, medications, family history, social history, medical procedures, diagnostic tests, results, referrals, reports from other health service providers, x-rays, progress notes, financial details related to billing, immunisations, Work Cover examinations – dates and amounts related to this data. Where possible, information is collected directly from the patient.

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# 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?

We will only collect health information from you, or about you from third parties with your consent or where you are a dependant under the age of 16 years, with the consent of an adult who may be a parent or guardian. The collection process will be fair, lawful and not unreasonably intrusive. 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.
- 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.
- In some circumstances personal information may also be collected from other sources or third party. 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 Australian Privacy Principles (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, e.g., My Health Record (e.g., via Shared Health Summary, Event Summary)
- to assist in research projects to improve healthcare in the community but we will ensure this information will not include data that can identify you

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 expressed consent.

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

Our Practice stores your personal information electronically - patient registration form, accounts form, Medicare, Health Insurance claim form, referral letter, medical record forms as per RACGP medical records, medication scripts written manually and via computer (Best Practice software), Immunisation forms - ACIR, Pap Smear Registry forms, S8 Drugs - internal booklet used to record usage, doctor's letters.

Your personal information whether recorded in electronic and paper records will be kept secure to protect against any misuse and unauthorised access. Our practice stores all personal information securely.

## 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 by completing a "Request for Personal Health Information" form and your identity verified before any personal information is released to you. Our practice will respond within 30 days from the date of request. An explanation will be provided to you if legislation prevents certain information from being disclosed to you. An administration fee will apply for the provision of this information to cover our costs. We will inform you of this fee at the time a request is made.

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.



# 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 addressed to the Practice Manager. We will then attempt to resolve it in accordance with our resolution procedure. Please address your complaint and concern to our Practice email address admin@theglensuperclinic.com.au.

Our Practice will respond with acknowledgement and reply within 30 days according to our complaint handling process.

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 or call the OAIC on 1300 363 992. Further information on privacy legislation may be obtained from Office of the Health Services Commissioner. Victoria on 1 300 582 113 or visit www.health.vic.gov.au.

#### If you use email to communicate with us

We understand that email is one of the most prevalent and convenient forms of communication, however we caution patients that there is an element of risk that the information could be read by someone other than the intended recipient.

For this reason, our practice will not send personal health information by email unless and until we have discussed the privacy risks of the use of unencrypted email, and you acknowledge that you are aware of this and consent and request the use of unencrypted email for communication.

#### **Policy review statement**

This Privacy Policy will be reviewed regularly to ensure it is in accordance with any changes that may occur and to ensure it remains applicable to our current practice procedure and legal requirements. Any update of our policy will be informed via our website or latest practice information sheet.

[This Privacy policy for general practices is adapted from the template provided by The Royal Australian College of General Practitioners (RACGP) and current as of Mar 2023]