# **Privacy Policy**

Current as of 26/03/2024

#### 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).

## 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
- 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 may collect your personal information in several different ways.

- When you make your first appointment our practice staff will collect your personal and demographic information via your registration.
- During the course of providing medical services, we may collect further personal information. We utilise the following eHealth Services which information can also be collected through.
  - electronic transfer of prescriptions (eTP) via eRx Script Exchange
  - My Health Record, e.g., via Shared Health Summary and/or Event Summary.
- 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. Often this is because it is not
  practical or reasonable to collect it from you directly. This may include information from:
  - your quardian 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 (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 a 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 eTP, My Health Record (e.g., 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 engage a virtual reception service based in the Philippines, this service is subject to our strict privacy and IT security policies and procedures.

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.

We participate in the Australian Government Practice Incentives Program Quality Improvement Incentive Arrangement. This means your de-identified health data is part of a community-level PIP Quality Improvement Incentive Data Set. This data set is shared with your local Primary Health Network (PHN) and the national data custodian, the Australian Institute of Health and Welfare (AIHW). They produce reports to help your GP and other health providers understand how to improve care and services. Approved researchers and third parties might access the PIP Quality Improvement Incentive Data Set for secondary purposes. For example, a research purpose is to compare the care options for people with similar health concerns in different areas. The purpose must be in the interest of improving health outcomes for people. You can let our reception staff know if you do not want your information included.

# How do we store and protect your personal information?

Your personal information may be stored at our practice electronically and as paper records. We endeavour to be a paperless practice but encounter paper records, regularly in our processes. Kedron Wavell Medical Centre will take all reasonable steps to protect the security of the personal information we hold.

Our practice stores all personal information securely and we invest in the following forms of security:

- All electronically stored files are password protected on several levels and regular backups performed.
- All employees, contractors and Medical Practitioner Businesses working out of Kedron Wavell Medical Centre sign confidentiality agreements and are required to observe obligations of privacy and confidentiality.
- Hard copies of personal information are stored in secure filing areas with restricted access.
- All hard copies of personal information that are not required are shredded following our internal procedure
- Implement multiple levels of firewall and intrusion protection solutions to our network
- A managed approach to network access
- Regular testing to ensure the integrity and security of the network.

## 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 via email, post or in person and our practice will respond within a reasonable time (30 days). There is a fee associated with providing this information the cost of which will vary depending on the resources required to complete the request.

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 our practice manager at <a href="mailto:manager@kwmc.net.au">manager@kwmc.net.au</a>.

## 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. A response can be expected within 30 days.

Contact Details: Attention: Practice Manager

Address: 232 Gympie Road, Kedron QLD 4031 Email Address: manager@kwmc.net.au

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

Kedron Wavell Medical Centre strives to make our website as secure as possible. Despite our efforts, we cannot assure absolute security due to the inherent risks associated with using the internet. We are not liable for any harm or damage to a user's computer system, software, or data that may occur while accessing our site. We advise all users to implement robust security measures to safeguard against potential online threats.

# External links to other websites

Our website includes links to external sites to enhance our service and provide additional information. Please note that once one of these links is clicked and the user leaves the Kedron Wavell Medical Centre website, our privacy policy no longer applies. We encourage users to review the privacy policies of any external sites before browsing or interacting with them. Additionally, the recommendations or views expressed on these external websites do not necessarily represent those of Kedron Wavell Medical Centre.

### Policy review statement

Our privacy policy is reviewed annually. Notification of any change to our privacy policy will be via our website.