

## PRIVACY POLICY

### 1. 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.

You may contact the practice manager or practice principal for enquiries concerning this policy.

### 2. National Privacy Principles

This practice is bound by the *Federal Privacy Act 1998* and National Privacy Principles (NPPs), and also complies with the *Victorian Health Records Act 2001*. This act gives individuals the right to know what information a private sector organisation holds about them, the right to access this information and also make corrections if they consider the data is incorrect.

- **NPP1:** Collection of personal information by an organisation
- **NPP2:** How an organisation may use and disclose personal information in its profession
- **NPP3:** Relates to the quality of the data held by an organisation
- **NPP4:** Organisations must take reasonable steps to make sure the personal information it holds is secure
- **NPP5:** Requires an organisation to be open about what personal information it holds and its policy on the management of personal information
- **NPP6:** Relates to access and correction of personal information held by an organisation about an individual, by that individual
- **NPP7:** The use of identifiers assigned by a Commonwealth agency
- **NPP8:** Individuals have the option of not identifying themselves when entering transactions with organisations
- **NPP9:** Regulates the transfer of personal information held by an organisation in Australia
- **NPP10:** Limits on when an organisation is permitted to collect sensitive information.

### 3. Definitions

‘Personal information’ means information or opinions about a person from which that person is reasonable identifiable. Personal information includes sensitive information.

‘Sensitive information’ includes information about a person’s belief, finances, associations or health

‘Health information’ means information or opinions about a person’s health. It includes information collected in connection with the delivery of health services.

### 4. Why and when your consent is necessary?

When you register as a patient of Allora Medical 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 other than outlined in this policy, we will seek additional consent from you.

Our practice requires your signature when registering as a patient and when requesting transfer of records.

By acknowledging this Privacy Policy you consent to us collecting, holding, using, retaining and disclosing your personal information in the manners described below.

## 5. Why do we collect, use, hold and share your personal information?

Allora Medical Practice collects, uses, stores, and shares your personal information to manage your health safely and effectively. This includes providing healthcare services, managing medical records, and ensuring accurate billings and payments. We also utilise your information for internal quality and safety improvement processes including practice audits and accreditation, and business processes (e.g. staff training) to maintain a high-quality standards.

## 6. What personal information do we collect?

The information we will collect about you includes, your:

- names, date of birth, addresses, contact details, marital status, employer details, ethnicity
- Next of kin and emergency contact details
- medical information including medical history, medications, allergies and other sensitivities, adverse events, immunisations, social history, family history and risk factors
- diagnostic tests, results, referrals, reports from other health service professionals/providers, x-rays, progress notes and work cover examinations
- Medicare number (where available) for identification and claiming purposes
- healthcare identifiers
- health fund details

## 7. 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 deal with identified individuals.

## 8. 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. Allora Medical Practice participates in the My Health Record system and a shared health summary can be uploaded with your consent.
3. We may also collect your personal information when you visit our website, send us an email, fax, SMS, telephone us or communicate with us using social media.
4. Photos and medical images can be taken using the practice iPad or personal devices for medical purposes, following the guidelines outlined in our guide on using personal devices for medical images.

5. 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 service and pathology and diagnostic imaging services
- your health fund, Medicare or the Department of Veteran's Affairs (as necessary)
- while providing medical services, further information may be collected via:
  - electronic prescribing
  - My Health Record
  - The Viewer (Qld Health)

9. 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 (e.g. in referral letters)
- 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 of 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 prescribing, My Health Records (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 written consent.

We will not share your personal information with anyone outside Australia (unless under exceptional circumstances that is permitted by law) without your consent.

Our practice will not use your personal information for marketing any of our goods or services without your consent. If you do consent, you may opt out of marketing at any time by notifying the practice in writing.

10. How is your information used to improve services?

The practice may use your personal information to improve the quality of the services offered to patients through research, analysis of patient data for quality improvement and for staff training.

We may provide de-identified data to other organisations to improve community health outcomes. If we provide this information patients cannot be identified from the information we share, the

information is secure and is stored within Australia. You can let our Admin Support if you do not want your de-identified information included.

At times, our practice can be approached by research teams to recruit eligible patients into specific studies which require access to identifiable information. This means that you could be approached by a team member to participate in research. We will not give researches your information without your written consent. If you provide consent, you will then receive specific information on the research project and how your personal health information will be used, at which you can make an informed decision to participate or not in the project.

#### 11. How are document automation technologies used?

Document automation is where we use computer systems and your existing data to automatically create electronic documents relating to medical conditions and healthcare.

The practice uses this technology to create documents such as referrals, which are sent to other healthcare providers. These documents contain only your relevant medical information.

These documents automation technologies are used through your medical software, Best Practice.

All users of the medical software have their own log in and password and can only access information that is relevant to their role in the practice team.

Allora Medical complies with the Australian privacy legislation and APPs to protect your information.

#### 12. Limiting Disclosure

Where health information must be disclosed to a third party, our practice considers what information is relevant for the proposed purpose. What information will be disclosed is discussed with patients beforehand and they are able to expect the disclosure of only the necessary subset of their health information, along with third party restrictions.

Prior to disclosing any health information our practice carefully examines its authority for disclosure and seeks advice where necessary.

Further information is available in the RACGP's resources on managing the use of our practice data, available at [www.racgp.org.au/your-practice/ehealth/data](http://www.racgp.org.au/your-practice/ehealth/data).

#### 13. How are Artificial Intelligence (AI) Scribes used?

At the time of this policy, Allora Medical does not use AI scribe tool at the practice and does not record any face to face, Telehealth or audio visual consultations.

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

Your personal information may be stored at our practice in various forms. Allora Medical Practice uses Electronic Records to store your personal information.

Our practice stores all personal information securely in electronic format, in protected information systems by unique usernames and passwords on a terminal server or if on occasion when information is supplied paper records and they cannot be scanned into the patients file, they are secured in a locked filing cabinet, or electronic copies are made and original disposed of on site. All staff and contractors of Allora Medical Practice are subject to confidentiality agreements.

All data, both electronic and paper are stored and managed in accordance with the RACGP Privacy and managing health information guidelines.

**15. 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 and our practice will respond within a reasonable time of 30 days. The practice accepts the request via a signed letter specifying what information from the records they are requesting and then the request is forwarded to the patient's doctor. An administrative fee may apply.

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 information, and you should make such request in writing to Mary-Ann Ryan, Practice Manager to 43 Herbert Street Allora.

**16. How is privacy on the website and social media maintained?**

At Allora Medical, any personal information you share with us through website, email and social media is handled securely and confidentially. This practice uses analytics and cookies.

**17. 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 feel free to ask for Mary-Ann Ryan, Practice Manager, alternatively phone 07 4666 3336 and postal address: 43 Herbert Street Allora 4362.

If you do not feel that the issues have been resolved, you may contact the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner will require you to give them time to respond before they investigate. For further information visit [www.oaic.gov.au](http://www.oaic.gov.au) or call the OAIC (Office of the Australian Information Commissioner) on 1300 363 992.

**18. Policy review statement**

This policy will be reviewed regularly to ensure it is in accordance with any changes that may occur. If any changes are made, they will be reflected on the website and significant changes may be communicated directly to patients via email or other means. Please check the policy periodically for updates.

For a copy of this policy, please speak with our Admin. Officers and they will be happy to print it for you. If you have any question, please feel free to contact us.