

# 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.

## 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.

## What are patient health records?

Information, held about a patient, in paper form or electronic form, which may include:

- contact and demographic information
- medical history
- notes on treatment
- observations
- correspondence
- investigations
- test results photographs
- prescription records
- medication charts
- insurance information
- legal information and reports
- work health and safety reports

## 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 (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.

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.
3. We may also collect your personal information when you visit our website, online registration forms, send us an email or SMS, telephone us, make an online appointment or communicate with us using social media.
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
  - your health fund, Medicare, or the Department of Veterans' Affairs (as necessary).

### Obtaining informed patient consent when disclosing health information.

Obtaining informed patient consent is a crucial step in the process of disclosing personal or health information to third parties. Patient consent ensures that the patient is fully aware of what information will be shared, with whom it will be shared, and the purpose for sharing it. It is an essential aspect of maintaining patient confidentiality and respecting their privacy rights.

By obtaining informed patient consent for real-time audio-visual recording, duplication, and storage of consultations, Shelley Hub Family Practice provide transparency,

respect patient autonomy, and maintain trust with their patients while using recorded consultations responsibly for medical purposes.

### When, why and with whom do we share your personal/health 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 (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.

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.

### How the Practice uses document automation technologies, particularly so that only the relevant medical information is included in referral letters?

The Practice uses document automation technologies to streamline and enhance the process of creating referral letters, ensuring that only the relevant medical information is included. Here's how the technology works:

- Automated Data Extraction: When a referral is initiated, the document automation system can automatically extract relevant patient information from the electronic health record (EHR) or electronic medical record (EMR). This

includes details such as the patient's name, age, medical history, current medications, and any relevant test results.

- **Predefined Templates:** The Practice sets up predefined referral letter templates that are customizable based on the patient's condition and the specialist or facility to which the referral is being made. These templates include placeholders for relevant medical information.
- **Automated Review and Approval:** After the initial automation process, the referral letter can be automatically reviewed by the referring healthcare provider to verify its accuracy and completeness. Any necessary edits can be made at this stage.
- **Secure Integration and Delivery:** Once finalized, the referral letter can be securely integrated with the referral management system and sent directly to the appropriate specialist or facility. The automation technology ensures that the letter is delivered promptly and efficiently.

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

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

Our practice stores all personal information securely through a dedicated IT provider using a remote server which meets the RACGP Computer Security Standards requirements.

All staff are required to complete confidentiality agreements upon commencement with Mead Medical including Independent Contractors.

### 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 30 days. A fee may apply for retrieval of these records depending on the nature and complexity of the records being requested.

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 Practice Manager, [pmsfhp@gmail.com](mailto:pmsfhp@gmail.com)

### 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. Complaints can be lodged in writing to the Practice Manager [pmsfhp@gmail.com](mailto:pmsfhp@gmail.com) A response will be sent within 30 days.

If you are unsatisfied with the outcome or wish to discuss your complaint with an external body you can contact:

Health and Disability Services Complaints Office (HaDSCO)

469 Wellington St, Perth WA 6000

(08) 6551 7600

### Policy review statement

This privacy policy will be reviewed regularly to ensure it is in accordance with any changes that may occur.

Any amendments to our Privacy Policy will be on display in the waiting room.

**This policy reviewed on 21/07/2023.**

### Disclaimer

*The Privacy policy template for general practices is intended for use as a guide of a general nature only and may or may not be relevant to particular practices or circumstances. The Royal Australian College of General Practitioners (RACGP) has used its best endeavours to ensure the template is adapted for general practice to address current and anticipated future privacy requirements. Persons adopting or implementing its procedures or recommendations should exercise their own independent skill or judgement, or seek appropriate professional advice. While the template is directed to general practice, it does not ensure compliance with any privacy laws, and cannot of itself guarantee discharge of the duty of care owed to patients. Accordingly, the RACGP disclaims all liability (including negligence) to any users of the information contained in this template for any loss or damage (consequential or otherwise), cost or expense incurred or arising by reason of reliance on the template in any manner*