

Cardiff General Practice Privacy Policy

Current as of: 18/02/2021 – for review 18/02/2022

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 is a Medical Record (Patient File)

“Medical records” is a broad term, encompassing a range of data and information storage mediums containing patient information. Whether paper based or electronic, the term “medical records” applies to:

- Clinical Notes
- Investigations
- Letters from other doctors and healthcare providers
- photographs

The primary purpose of the medical record is to facilitate patient care and allow your GP or another practitioner to continue the management of your health.

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.

Information can also be collected through electronic transfer of prescriptions (eTP), My Health Record, eg via Shared Health Summary, 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.

3. 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).

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 (eg 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 eTP, My Health Record (eg 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 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.

Quality Improvement PIP Incentive:

Our practice participates in Quality Improvement activities to:

- Improve the health data collected to better understand your care and service needs.
- Identify where there are opportunities for better prevention.
- Planning how many doctors and nurses need to be on duty based on the practice's health data.

This means we routinely share de-identified data.

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 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.

If you do not want your de-identified data shared: That's okay – you can opt out of your health data being part of the PIP Quality Improvement Incentive. Speak to your GP about opting out on your next visit. If you would like more information – please ask our reception staff.

How do we store and protect your personal information?

Your personal information may be stored at our practice in various forms.

Generally all information is stored electronically in your patient file in our clinical software – paper correspondence received by post or fax is scanned into your patient record. If you have been attending the practice prior to 2007 we may hold a paper record as well. These are securely stored in the practice and can be accessed as needed.

Our practice stores all personal information securely.

Electronic information is protected by secure passwords with varying levels of access granted by customizable permissions. We have a physical fire-wall to prevent external access via the internet and anti-virus software in place. Our database is regularly backed up throughout the day.

All staff and contractors are bound by a confidentiality agreement.

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 recommend making an appointment with your GP to discuss accessing your medical record so that they may have the opportunity to explain aspects of the terminology used to ensure you understand it's meaning and provide you with the opportunity to ask questions in relation to the contents of your record.

Otherwise we require you to put this request in writing addressed to the Practice Manager and our practice will respond within a reasonable time – please note that we have up to 45 days to respond to requests for access as per section 27 of the Health Records and Information privacy Act 2002 (NSW) however will always aim to make a response within 14 business days (please note this is a response – not necessarily the material requested).

Your request will be assessed by the Practice Manager and depending on the size of the information requested you may be charged a fee to cover the cost of complying with 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 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**. We will then attempt to resolve it in accordance with our resolution procedure. Again we aim to respond as quickly as possible or at least within 30 days. You may address complaints to:

Private & Confidential - Att: Practice Manager

Cardiff General Practice

PO Box 165, CARDIFF NSW 2285

Or email: angela_kirkpatrick@cardiffgp.com.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.

Alternatively complaints can be made in writing to the:

Healthcare Complaints Commission - Locked Mail Bag 18, Strawberry Hills NSW 2012

Privacy and the internet

By contacting us via email you are acknowledging that any information passed between your email address and reception@cardiffgp.com.au is sent via an unencrypted network and are consenting to this method of communication.

Cardiff General Practice puts the security of the client at a high priority. Therefore, we have put efforts into ensuring that the message is error and virus-free. Unfortunately, full security of the email cannot be ensured as, despite our efforts, the data included in emails could be infected, intercepted, or corrupted. Therefore, the recipient should check the email for threats with proper software, as the sender does not accept liability for any damage inflicted by viewing the content of this email.

We do not collect any information via our website – if you make an online appointment please note this is done by directing you to the secure Appointuit platform therefore it is not our website collecting your information.

By contacting us via our FaceBook page you are consenting to this platform as a communication method and information shared via this platform is governed by FaceBook's privacy policy. We do not encourage patients to engage with us by social media in any way other than to view our broadcast information on health and medical topics and services. We do not collect data via Facebook.

Policy review statement

This privacy policy will be reviewed annually and updates will be communicated via our website: www.cardiffgp.com.au and a copy is posted in the waiting room.