



Privacy Policy

Current as of: 23/01/2024

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.

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. It may also be
3. We may also collect your personal information when send us an email or SMS, telephone us or make an online appointment.
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).

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.

How do we store and protect your personal information?

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

Our practice stores all personal information securely. Medical information is stored electronically within our Practice Management Software. This incorporates several layers of security (eg. Network logins, individual passwords, user access levels) and encryption within the software. Reports and results from third party providers are received electronically via download and stored for your GP to access- these are not readily available to our Administration/Nursing team to view. Radiology images are rarely received at the clinic but in the case that they are, these are accessed via a secure portal with access provided by the Radiology company. Where hardcopy films are received, the patient will be contacted to collect (film) or disc posted to patient. The discs cannot be viewed on using standard computer photo/imaging software.

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 using our 'Request to Access Personal Information' form and our practice will respond within a reasonable time. The clinic endeavours to have all requests completed as soon as possible however requests 30 days to receive and act on your request. There is no charge to a patient requesting access to/copies of their personal information where electronic copies are provided. There may be a small fee to cover the cost of materials required to produce copies (ie paper, ink, postage via registered mail).

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 Administration team via email (reception@hartnettclinic.com.au). The Administration team may request further information to confirm your identity or request you attend the clinic / update your information at your next consultation/visit to the clinic.

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.

You can contact the clinic via:

Ph: 03) 8760 0028

Email: pm@hartnettclinic.com.au

Post: 2 Hartnett Drive, Seaford VIC 3198

Please note that if making a complaint via telephone, you may be requested to provide written information about the event.

We kindly request 30 days to receive and investigate your complaint.

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. In Victoria, you may contact the OVIC (Office of the Victorian Information Commissioner) on 1300 006 842 or visit their website for more information (www.ovic.vic.gov.au).

Policy review statement

This policy is reviewed annually, as well as intermittently as major changes occur to privacy legislation or clinic policy. Patients will be notified of any changes or updates to this policy via the clinics website, social media, as well as on patient forms and signage/brochure/newsletter updates.

Disclaimer

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