

EST<sup>D</sup> 1972

# POINT LONSDALE

## MEDICAL GROUP

## 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.

### 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, 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).

## **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 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 My Health Record (e.g. via Shared Health 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.

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

Your personal information is stored at our practice as an electronic record. The management of all practice computers and servers comply with the *RACGP's computer and information security standards*, and we have a sound back up system and contingency plan to protect the practice from loss of data.

Our practice stores all personal information securely. It has systems in place to protect the privacy, security, quality and integrity of the personal health information held electronically. Members of the practice team have different levels of access to personal patient health information as appropriate to their roles and to maintain security all computer hardware and software passwords are kept confidential and are not disclosed to others.

Our general practitioners, clinical and allied health team members and all other staff and contractors associated with this practice have a responsibility to maintain the privacy of personal health information and sign a confidentiality agreement on induction.

## **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 complete a *Personal Health Information Request Form* which outlines the type of information being requested, and in what format you request to receive the information. Completion of this form ensures correct processing is undertaken and appropriate consent is obtained. Our practice will respond to your request within 30 days. To meet the costs associated with reviewing and preparing personal health information to be released to a patient, our practice charges a \$16.50 administrative fee.

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 [admin@plmg.com.au](mailto:admin@plmg.com.au)

## **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 within 30 days in an open and constructive manner.

### **Contact details:**

#### **Point Lonsdale Medical Group**

4 Nelson Road, PO Box 26, Point Lonsdale Victoria 3225

Ph: 03 52580888

Fax: 03 52582900

Email: [admin@plmg.com.au](mailto:admin@plmg.com.au)

Web: [www.pointlonsdalemedicalgroup.com.au](http://www.pointlonsdalemedicalgroup.com.au)

Complaints that relate to privacy issues or concerns that cannot be resolved internally are to be directed to:

**Victoria**

**Office of the Health Services Commissioner**

Telephone: 1300 582 113

Web: [www.hcc.vic.gov.au](http://www.hcc.vic.gov.au)

**Office of the Australian Information Commissioner**

Telephone: 1300 363 992

Postal Address: GPO Box 5218, Sydney NSW 2001

Web: [www.oaic.gov.au](http://www.oaic.gov.au)

Members of the public may make a notification to the Australian Health Practitioner Regulation Agency (AHPRA) - [www.ahpra.gov.au](http://www.ahpra.gov.au) - about the conduct, health or performance of a practitioner or the health of a student. Practitioners, employers and education providers are all mandated by law to report notifiable conduct relating to a registered practitioner or student to AHPRA.

**Privacy and our website**

Electronic transfers of information are governed by the same privacy principles regarding the use and disclosure of that information.

Our practice does not recommend the collection of personal information via electronic communication as patients health information should not be sent through unsecured channels.

Our practice uses secure message delivery between practices with compatible encryption processes to protect patient privacy.

**Policy review statement**

This practice has a designated privacy officer who implements and monitors adherence to all privacy legislation in this practice.

Our privacy policy and other policies and procedures associated with the management of personal health information are reviewed and updated for privacy items as required. National and Victorian privacy laws are referenced with any updates being noted and actioned. All updates are noted on our website and on the patient information privacy brochure located in reception.

Current as of 11<sup>th</sup> September 2019