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|  | <b>5-019P<br/>PRACTICE PRIVACY<br/>POLICY</b> |  |
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## 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 GP's, Allied Health Practitioners 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. This can be through electronic transfer of prescriptions, My Health Record, Australian Immunisation Register (AIR).
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.
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 health care 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, AIR or Medical Objects)

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 - [practice.manager@thehubmedicalcentre.net.au](mailto:practice.manager@thehubmedicalcentre.net.au)

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.

- Electronic records
- Paper records

Our practice stores all personal information securely.

- We use a secure electronic back up server
- Use accredited internet security, firewalls and encryption methods for secure storage

- All staff are required to use individual passwords
- All staff and contractors sign confidentiality agreements
- Secure storage areas such as filing cabinets and storage rooms that are locked

### 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. This can be via email or hand written letter notifying reception of your request. Our reception staff will then ask you to fill out and sign an 'Application and Consent for Medical Records Release Form". Our practice will then respond within 7 days, but can be up to 30 days depending on the details required. There may be photocopying charges for your request, and this can be confirmed with reception staff.

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 reception manager via email :

[reception@TheHubMedicalCentre.net.au](mailto:reception@TheHubMedicalCentre.net.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. You can contact our Complaints Manager through one of the following details:

#### How to make a complaint

If you wish to make a complaint about the way we have managed your Personal Information you may make that complaint verbally or in writing by setting out the details of your complaint to any of the following:

**(a) Our Privacy Officer**

**Email:** [reception@thehubmedicalcentre.net.au](mailto:reception@thehubmedicalcentre.net.au)

**Phone:** 07 5433 1500

**Address:** The Hub Medical Centre Pty Ltd, Shop 20 Cnr Buckley & Uhlmann Rds,  
Burpengary East, QLD 4505

**(b) The Practice Manager**

**Email:** [practice.manager@thehubmedicalcentre.net.au](mailto:practice.manager@thehubmedicalcentre.net.au)

**Phone:** 07 5433 1500

**Address:** The Hub Medical Centre Pty Ltd, Shop 20 Cnr Buckley & Uhlmann Rds, Burpengary East, QLD 4505

Alternatively, complaints may also be referred to a number of services as set out below:

- Australian Information Commissioner  
The Australian Information Commissioner receives complaints under the Act. Complaints can be made:

**In writing** using the OAIC Privacy Complaint Form:

[https://forms.business.gov.au/smartforms/servlet/SmartForm.html?formCode=APC\\_PC&tmFormVersion](https://forms.business.gov.au/smartforms/servlet/SmartForm.html?formCode=APC_PC&tmFormVersion)

or by addressing your own letter to the Australian Information Commissioner at the:

Office of the Australian Information Commissioner  
GPO Box 5288  
Sydney NSW 2001

- Aged Care Quality and Safety Commission  
**Online:** <https://www.agedcarequality.gov.au/making-complaint>  
**Letter: GPO Box 9819 QLD 4000**  
**By phone:** on 1800 951 822.  
Or if you need an interpreter you can phone the Translating and Interpretation Service on 131 450 and ask them to put you through to the Aged Care Quality and Safety Commission on 1800 951 822.
  - For hearing or speech impaired TTY users phone 1800 555 677 then ask for 1800 951 822.
  - For Speak and Listen users phone 1800 555 727 then ask for 1800 951 822.

If you need an interpreter you can phone the Translating and Interpretation Service on 131 450 and ask them to put you through to the Aged Care Quality and Safety Commission on 1800 951 822.

- For hearing or speech impaired TTY users phone 1800 555 677 then ask for 1800 951 822.
- For Speak and Listen users phone 1800 555 727 then ask for 1800 951 822.
- For Internet relay users connect to <https://internet-relay.nrscall.gov.au/>.  
Aged Care Quality and Safety Commission

## Privacy and our website

Personal information may be collected through our website booking system and through emails using analytics and cookies. These sites are very secure, private and confidential. Any details collected are for the surgery's use only, for purposes of new patient registration and making appointments online.

*This Privacy Policy will be reviewed regularly to ensure it is in accordance with any changes that may occur. You will be notified of changes to the Policy through our website, changes will also be displayed at reception.*