

## Anglesea Medical privacy policy

Current as of: 1<sup>st</sup> July 2021

### 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.

Our patient registration form allows you to consent in writing to our use of information.

### 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, in-house clinical improvement and auditing, health promotion targeting).

### 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 may include accessing, with your permission, My Health Record and associated services for further

information. We are also mandated to access SafeScript for provision of substances that are high risk medicines to ensure safer clinical decisions.

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 (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 (including but not limited to Shared Health Summary, Event Summary, MBS item searches, Immunisation records, Discharge Summaries).

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. We are partnered with the University of Melbourne VicREN and Data for Decisions programs and may engage with research for various projects they undertake. We also share de-identified data with WestVic PHN as part of Quality

Improvement measures.

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

Your personal information may be stored at our practice in various forms, with all hard copy data being converted to digital data. Any hardcopy information we are required to keep is maintained in a secure environment. We do not store any hardcopy imaging. Our practice stores all personal information securely through the use of password protection, privacy and confidentiality agreements with the ability to audit access to all data. Off-site secure backups are provided by Vibe IT services.

## 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 in hard copy and our practice will respond within a reasonable time – usually within a month. There may be fees associated with provided information to cover the costs of providing the format requested (paper, digital).

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 our 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.

Please send this to:  
Practice Manager  
Privacy Review  
3 McMillan Street, Anglesea, 3231

We recommend using registered mail to ensure arrival.

We will respond to your letter to acknowledge receipt and will address the issue raised within 30 days unless there are significant legal issues to manage.

We encourage speaking with our Practice Manager directly in the first instance via phone on 03 4215 6700.

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](http://www.oaic.gov.au) or call the OAIC on 1300 363 992.

## Privacy and our website

angleseamedical.com.au is an online information website, consisting of information services, content, links and other internet resources.

When you visit our website, our Internet Service Provider/Hosting Provider will record your server address, domain name, the date and time of your visit to our site, the pages viewed and the information downloaded. The information is used for statistical and web site development purposes only.

The site uses cookies as a part of our interaction with your browser. A cookie is a small amount of information stored on your computer by our website. You can delete cookies from your hard drive at any time and further information on the use of cookies can be found at [www.cookiecentral.com/faq](http://www.cookiecentral.com/faq)

## The Personal Information we collect on you

The type of personal information that we collect from you will depend on how you use our website – essentially booking online is the only time personal information will be collected, other than as listed above. You can be certain that the information we receive about you will be treated as strictly confidential. Our website security is managed using SSL technology and HotDoc Online Pty Ltd handles all of our Online Bookings using secure technology as per their own privacy policy: <https://practices.hotdoc.com.au/privacy-policy/>

## Information is collected to help us:

- Fulfil your request
- Understand the number of hits the website receives
- Keep track of the domains from which the site is accessed
- Determine what our users are interested in
- Ensure that as far a practical, our website and applications are compatible with the browsers and operating systems used by most of our users
- Support strategic development

## The circumstances under which we disclose information about you

It is our policy not to sell or pass on any personal information that you may have provided to us unless we have your express consent to do so. An exception to this is where Anglesea Medical may be required by law to disclose certain information. We will preserve the contact of any email or secure message that you send us if we believe that we have a legal requirement to do so.

## Linking to and from this site

The existence of external links on our website shall not be construed as Anglesea Medical's endorsement, sponsorship, approval of, or affiliation with, another person unless the party providing the relevant link is authorised in writing to do so. If you access this site via an external link, you do so at your own risk. While information and third party information contained on this site has been presented with all due care, Anglesea Medical does not warrant or represent that the information or third party information will remain unchanged after the date of publication and is free from errors or omissions. It is your responsibility to make your own investigations, decisions and enquiries about the information retrieved from other internet sites.

## Policy review statement

This policy will be reviewed yearly or as needed, particularly if there are any changes that need to be implemented due to practice or legislative changes. We will notify the date of changes on our website and recommend checking on the website for updates.