

# Glenmount Medical Clinic Privacy Policy

Reviewed by Practice Manger

Version 4 Effective Date May 2024

Next Review Date: May 2025

## 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). We may also use medical automation technologies such as Polar and Hotdoc in order to improve the quality of care we provide our patients.

## 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.

## Definition of a Patient Health Record

Information about a patient in paper or electronic form which may include:

Contact and demographic information • medical history • notes on treatment • observations • correspondence • investigations • test results photographs • prescription records • medication charts • insurance information • legal information and reports • work health and safety reports

## 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 authorized 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. Please note that we also participate in the following eHealth services: electronic transfer of prescriptions (eTP) and My Health Record, eg via *Shared Health Summary*, and *Event Summary*
3. We may also collect your personal information when you visit our website- to make an online appointment via Hotdoc, send us an email or SMS or when you telephone us.
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 other healthcare providers
- 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.
- 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*) and Healthlink for e referrals to hospitals.
- To ensure privacy when the practice uses documentation automation technologies for referral letters within the clinical software only essential and relevant medical or personal information is included after discussion with the GP
- We DO NOT record, duplicate or store real-time audio/visual recordings

Only people who need to access your information will be able to do so, this includes GP's, receptionists, allied health and medical receptionists working at the clinic. 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.

Third party organisations such as those who work with our practice for quality assurance, research, professional development as well as business and educational purposes require consent from you to access your personal information. These may include accreditation agencies, information technology providers, medical/nursing students, approved research groups and other clinicians, all of whom are required to comply with APPs and this policy.

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.

If you wish to transfer your medical records to other healthcare providers, a request can be made to reception and can be actioned upon the completion of a transfer form. Please note that this may incur a fee.

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

Your personal information and results are stored electronically at our practice. This may be in the form of your electronic patient record, paper records, pathology results, imaging results (such as X-rays or CTs) This data is kept in our password protected information systems. **All the information is backed up daily to our digital drives which are based offsite at a secure location.** Backups are routinely tested to ensure daily duplication processes are valid and retrievable. At no stage will any information be used for the purpose of direct marketing. Confidentiality agreements for staff and contractors are also in place. Please note that your records are retained for the RACGP prescribed minimum of 7 years after your last point of contact with the clinic. After this point, they will be destroyed.

## 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 and our practice will respond within a reasonable time. Please allow 30 days for the practice to process this request. You will not be charged for making a request however if results are required to be printed or photocopied, an administration fee will be charged

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 at [info@glenmountmedical.com](mailto:info@glenmountmedical.com)

## 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. If you have any privacy concerns, complaints can be passed on to your doctor or reception staff either verbally or in writing, who will then pass it on to the practice manager. We will then attempt to resolve it in accordance with our resolution procedure within 30 days.

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.

Alternatively you can contact the health complaints commissioner via phone on [1300 582 113](tel:1300582113) or online at <https://hcc.vic.gov.au/make-complaint>; see <https://hcc.vic.gov.au/contact> for more details.

## Policy review statement

A copy of this privacy policy is also available on the Glenmount Medical Clinic website. This privacy policy is reviewed regularly to ensure it is in accordance with any changes that may occur. Glenmount Medical also endeavors to notify our patients wherever possible when amendments are made to this policy.