

# Privacy Policy

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## The Heights Medical Practice & HAIM Unit

31/05/2024

### 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.

Personal health information is defined as a detailed, confidential medical record compiled by a health professional, over a period of time, on a particular patient incorporating a history of past and present medical care.

### Why & 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 & 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. This could be through the use of My Health Record or the electronic transfer of prescriptions (eTP).
3. We may also collect your personal information when you visit our website, 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 & 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 eTP, My Health Record (e.g. 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.

If referral is required, the referring practitioner will explain the reason for the referral and only include relevant clinical information about the patient's condition for investigation, opinion, treatment, and management using document automation technology within our clinical software program.

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.

### Sharing your information with HNECCPHN

Your **de-identified** health information is routinely shared with the Hunter New Central Coast Primary Health Network (HNECCPHN) for the purpose of population health planning, quality improvement and clinical audit activities, and evaluation and research purposes. This de-identified data is received and stored by the HNECCPHN using secure, encrypted data extraction and transfer systems, and may be used for local and national research purposes in conjunction with third parties such as universities and other research centres. You can choose to opt-out of this program at any time with no impact on your care.

### What is de-identified data?

De-identified health information is data that has had all identifying information, such as name, date of birth and address removed so that the information cannot be linked to the person it came from. This means that your information can be used in projects that aim to improve the health of people across Australia but no-one will know which patient the information came from.

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

Our practice stores personal information in electronic form securely within our practices' electronic clinical software program. Physical records are transferred to your electronic record.

The maintenance of privacy requires that any information regarding individual patients, including staff members who may be patients, may not be disclosed either verbally, in writing, in electronic form, by copying within the practice or outside it, during or outside of work hours, except for strictly authorised use within the patient care context at the practice or as legally directed.

All patient information is considered private and confidential, even that which is seen or heard and therefore is not to be disclosed to family, friends, or others without the patient's approval or at the doctor's discretion. Any information given unauthorised personnel will result in disciplinary action and possible dismissal.

At the Heights Medical Practice, we securely store and protect personal information in electronic formats which is protected with secure usernames and passwords in accordance with the RACGP's Computer and Information Security Standards. Our staff all have set permissions in which they can access patient information. Any patient information that is sent to our practice via mail or fax, is scanned into the patient's electronic file that day, and if a hard copy is needed to be stored at our practice, will be locked in a secure cabinet.

Confidentiality agreements are also signed by all staff members.

### **How can you access & 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 our 'Patient Request for Access to Personal Information' form and our practice will respond within a 30-day timeframe. Identification is requested upon application of medical records to ensure a false application is not lodged. There is no charge for lodging a request for access, however an administration fee may 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 our Practice Manager. Please email [admin@theheightsmedicalpractice.com.au](mailto:admin@theheightsmedicalpractice.com.au) or inquiry at our administration desk for further information. Any inquiries and corrections to medical records will be attached to the patient's electronic record.

### **How can you lodge a privacy related complaint & 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. If you have any concerns regarding your privacy at our practice, please contact our Practice Manager at [admin@theheightsmedicalpractice.com.au](mailto:admin@theheightsmedicalpractice.com.au) or on 02 4941 8754. Please ensure you include your mailing address and a contact number and will be also respond within a 30-day timeframe.

You may also contact the Office of the Australia Information Commissioner (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.

### **Policy review statement**

This policy will be reviewed on or before 30/05/2025 to ensure it is in accordance with any changes that may occur. We will notify patients verbally and via our website when the policy has been amended.