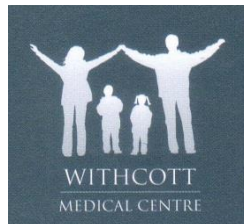


Withcott Medical Centre

4 Jones Road

Withcott Qld 4352



PRACTICE PRIVACY POLICY

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Table of Contents

1	Introduction	3
2	Why and when patient consent is necessary?	3
3	Why do we collect, use, hold and share your personal information?	3
4	What personal information do we collect?	3
5	Dealing with us anonymously	3
6	How do we collect your personal information?	4
7	When, why and with who do we share your personal information?	4
8	How do we store and protect your personal information?	5
9	How can you access and correct your personal information at our practice?	6
10	How can you lodge a privacy-related complaint, and how will the complaint be handled at our practice?	6
11	Privacy and Electronic Communication with the Practice (E-mail/ Social Media)	7
12	Policy review statement	7

1 Introduction

This privacy policy is to provide information for patients, on how their personal information (which includes health information) is collected and used within our practice and the circumstances in which this information may be shared with third parties.

2 Why and when patient 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 that 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.

3 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).

4 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; and
- healthcare identifiers.

5 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. However, it is important for you to understand that if this is the case, we cannot claim your benefits from Medicare, even if you hold a health care card or pension card. If this applies to you, please speak directly to your doctor during your consultation.

6 How do we collect your personal information?

Our practice may collect your personal information in several different ways.

- When you make your first appointment our practice staff will collect your personal and demographic information via your patient registration form.
- During the course of providing medical services, we may collect further personal information. This personal information is likely to come from third parties such as your previous practitioner, other allied health professionals or a hospital that you have previously attended.
- Information can also be collected through electronic transfer of prescriptions, My Health Record, eg via Shared Health Summary, event summary and other ehealth services.
- We may also collect your personal information when you visit our website, send us an email or sms, telephone us, communicate with us using social media or complete a pre-consultation questionnaire.
- 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).

7 When, why and with who do we share your personal information?

The Practice sometimes shares 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); and
- during the course of providing medical services, through ehealth services. Including but not limited to My Health Record (eg via Shared Health Summary), medical objects, smart

referrals, QML, Sullivan & Nicolaides, Qld Xray, Darling Downs Radiology, Exact Radiology, eRx. Our clinical software allows our clinical staff to select only the relevant clinical information to be shared electronically on each occasion.

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.

8 How do we store and protect your personal information?

Your personal information may be stored at our practice in various forms.

Our practice stores information as electronic records and visual records (X-rays, CT scans and photos).

Our practice stores all personal information securely.

Our practice stores and protects personal information securely in electronic format in a secure environment that complies with RACGP Computer Security Standards.

- All our systems are password protected, they are only accessible via individual password to those within the practice team who have appropriate levels of authorization.
- Computers have screensavers or other automated privacy protection devices enabled to prevent unauthorized access to computers.
- Servers are backed up, checked and serviced at frequent intervals, consistent with a documented business continuity plan.
- Back-up information is stored in a secure safe in the office. A second back up is stored off site consistent with the practice documented business continuity plan.
- Computers are protected by antivirus software that is installed and updated regularly by the practice IT technician.
- Computers connected to the internet are protected by appropriate hardware/software firewalls.
- The practice has a Practice Emergency (Non- Medical) Plan that has been developed, tested and documented to protect patients' health information in the event of an adverse incident, such as a system crash or power failure. This plan encompasses all critical areas of the practice's operations such as making appointments, billing patients and collecting patient health information. This plan is tested on a regular basis to ensure back up protocols work properly and that the practice can continue to operate in the event of a computer failure or power outage.

- Electronic data transmission of your health information from our practice is in a secure format.
- Patient information is further protected by confidentiality agreements signed by all staff and /or Contractors before they commence work on the premises.

9 How can you access and correct your personal information at our practice?

Accessing personal information

Patients have the right to request access to, and correction of, their personal information.

Our practice acknowledges patients may request access to their medical records. The Practice requires the request be made in writing (fax, email, letter) noting the patient's consent to release records. Our practice will respond within 30 days from receiving the request.

If a patient is requesting their full file a fee of \$50-\$150 will apply, depending on how extensive the file is. Our practice will not issue you with an account without first discussing the cost. Patients are requested to discuss this with our practice staff if they have any questions.

If the request is from a 3rd party practice or doctor for a health summary no fee will apply.

If the 3rd party practice or doctor requires copies of pathology, imaging, or specialist letters, we suggest they contact the providers directly for release of information.

If they still require the full patient file –payment as per above will need to be paid.

Correcting personal information

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 (fax, email, letter) or by completing an "Update my Details form".

10 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.

Complaints can be sent to:

manger@withcottmed.com.au or 4 Jones Road, Withcott QLD 4352

Contact telephone: 07 4630 3677

The Practice will endeavour to respond to complaints within 5 business days. Complaints

which are very involved may take longer to review. The patient will be kept informed throughout the process.

If more information on this procedure is required, patients are requested to speak with practice staff who can explain further. Patients may also complain anonymously if desired.

The practice views monitoring and reviewing complaints as an opportunity to improve the services at the practice and the standard of care of patients. This includes information about near misses, adverse events and all complaints.

You may also contact the OAIC (Office of the Australian Information Commissioner). Generally, the OAIC will require you to give them time to respond before they will investigate. For further information visit www.oaic.gov.au or call the OAIC on 1300 363 992. You could also contact your relevant state or territory health authorities/ombudsman by sending an email to oho.qld.gov.au or completing a complaints form on their website.

11 Privacy and Electronic Communication with the Practice

E-mail

This practice takes every precaution possible to ensure that patient's electronic communication with the practice remains private and confidential. However, it is important for patients to be aware of the risks associated with electronic communication, in that the information could be intercepted or read by someone other than the intended recipient. For this reason, where possible we do not transmit health information by email unless it can be encrypted or the patient provides consent to transmit in this format.

Website

Withcott Medical Centre does not collect personal health information on the website.

The Withcott Medical Centre website online booking systems makes use of HotDoc online appointments.

Hotdoc does not create or edit patient information, they intergrate with our practice software (Best Practice) in real-time to provide a service to the Practice. For more information on Hotdoc, please visit the Hotdoc privacy policy on their website.

12 Policy review statement

Our Privacy policy will be reviewed regularly to ensure it is in accordance with any changes that may occur. Patients can obtain the current copy of the privacy policy from our reception staff or on our website.