

## Privacy Policy

### 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 new 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 ('New Patient Registration Form'). 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. Real-time audio/visual recording and duplication and storage of a consultation (including those via telehealth and those conducted remotely) will also require patient consent.

### 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 (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 applicable) 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.

In a medical context, it could be dangerous for you to remain anonymous and it is not possible to claim Medicare and health insurance rebates without giving some identifying information.

### 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. The 'Health Information, Collection, Use and Disclosure - Patient Consent Form' is attached to the 'New Patient Registration Form'
2. During the course of providing medical services, we may collect further personal information.

Information can also be collected through electronic transfer of prescriptions (eTP), My Health Record, e.g. via Shared Health Summary, Event Summary through the eHealth services upon your consent

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. Medical and non-clinical staff may collect this information
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 (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.

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.

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

Your personal information may be stored at our practice in various forms such as:

- Computerised records, hard copy, visual records and/or electronic format

Our practice stores all personal information securely by:

- Securing our premises
- Placing passwords and varying access levels on databases to limit access and protect electronic information from unauthorised interference, access, modification and disclosure
- Full system backups and storage in a secure off site environment
- Computer security protection measures: hardware/software firewalls, antivirus software, screensavers and other automated privacy protection devices in accordance with the RACGP security guidelines
- Confidentially agreements with staff and contractors
- Documented and tested business continuity plan
- Electronic data transmissions are through the approved secure messaging software NEHTA, which ensures messages are encrypted by having the appropriate practice security certificates for the entire transmission process

This practice does not support or allow the use of insecure, electronic methods of transmission for correspondence containing identifiable clinical information including, but not limited to:

- General email
- Email secured with a non-NEHTA approved certificate
- Electronic faxing
- Unsecured web based forms

We discourage all patients to use general email to send personal information to the practice. Our outgoing email messages informs the receiver that third parties may illegally access emails that are not encoded.

Wangaratta Medical Centre uses secure messaging delivery via Medical Objects, HealthLink, and HIC online using practice and individually encrypted certificates.

## 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 – 30 days. There may be a fee for the administrative costs of retrieving and providing you with copies of your medical records.

We may deny access to your medical records in certain circumstances permitted by law, for example, if disclosure may cause a serious threat to your health or safety. We will always tell you why access is denied and the options you have to respond to our decision.

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 Business Manager at [reception@wangmed.com.au](mailto:reception@wangmed.com.au).

### **How do we use document automation technologies?**

As we ensure that your privacy always remains our utmost concern, Electronic Documents generated by our practice such as referrals, medical certificates, etc. utilise appropriate and secure document automation technologies.

Our Practice utilise a secure medical software, which has a word processing application to generate documents as and when required. This Word processing application has algorithms to automatically import strictly relevant medical information only, required for the patient and for the documentation.

The medical software has proper security authentication protocols with unique user credentials which can only be accessed by authorised Practice staff according to their roles and responsibilities.

### **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. Upon receipt, we will then attempt to resolve it in accordance with our resolution procedure. Please forward your complaint by any of the following means:

Post: Attention: Business Manager, 34 Green Street, Wangaratta Vic 3676

Email: [admin@wangmed.com.au](mailto:admin@wangmed.com.au) or phone: 03 57221500

We will respond to your complaint within a reasonable time – 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.

If you are dissatisfied with our handling of a complaint or the outcome, you may make an application to the Australian Information Commissioner or the Privacy Commissioner in your State or Territory.

### **Non-English Speakers**

If you require assistance with other languages you may call the Translating and Interpreting Service on 131 450 and ask for the Office of the Federal Privacy Commissioner on 1300 353 992. This is a free service.

### **Privacy and our website**

We endeavor to ensure our website is as secure as possible however, users need to be aware the World Wide Web is not a secure medium. The Wangaratta Medical Centre take no liability for any interference or damage to a user's computer system, software or data occurring in connection with our website.

We strongly recommend user's take appropriate measures to ensure their computer is protected against third party interference whilst on the web.

You accept that your use of this site includes your acceptance of this Privacy Policy and the Terms of

Use.

This privacy policy only addresses our use of Cookies and does not address the use of cookies by any third parties.

### **Cookies, Web Beacons, and Similar Technologies**

When you visit or interact with our sites, services, applications, tools and messaging, we and selected third parties may use cookies, web beacons, and other similar technologies for storing information to help provide you with a better, faster and safer user experience or to show you personalised advertising. Cookies are small text files that are automatically created by your browser and stored on your device when you use the Services.

When you enter a website using cookies you may be asked to fill out forms which may contain your personal information. Cookies do not contain any information that personally identifies you or access information stored on your computer.

If you do not want to accept our cookies, you can adjust your browser settings to decline cookies. You should note, however, that certain areas of the site may not operate properly if you decided not to accept cookies.

Security measures are set in place to prevent unauthorised access to our cookies and similar technologies.

### **Policy review statement**

This privacy policy will be reviewed regularly to ensure it is in accordance with changes that may occur. Any amendments to this policy will be reflected on the website, practice documentation and in the practice.