

# Adelaide City General Practice Privacy Policy

Current as of: March 2019

## 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).

## 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. If you do choose to deal with us anonymously you will be responsible for payment of the full account at the time of the consultation.

## 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, or update existing details. Information can also be collected through electronic transfer of prescriptions (eTP), My Health Record, eg via Shared Health Summary, Event Summary.
3. 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 (eg specialists and allied health) to whom you have been referred
- 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
- 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).

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. 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, which can include:

- electronic records,
- paper records,
- visual records (x-rays, CT scans, videos and photos)

Our practice stores all personal information securely. Electronic records and some visual records are stored on individual password protected clinical software that is accessed via our practice server where each staff member has an individual login. Records are only accessible by GPs, nurses and senior administration staff. Paper records and some visual records are stored in a secure, locked environment which is alarmed when premises are unattended.

All staff and contractors at Adelaide City General Practice have signed confidentiality agreements.

## 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 to our administration team and our practice will respond within 30 days. If you request to access your medical record, your GP will need to consider if there may be a risk of physical or mental harm to you or any other person that may result from disclosure of your health information. Your GP may need to remove any information that will affect the privacy of other individuals. In some situations there may be legal reasons that prevent the doctor from allowing you to access your medical records. In this case you will be advised of the reason.

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 to the administration staff.

Our preferred method of transferring medical records is via a Release of Medical Information request from the practice that you will be attending – this must be signed by yourself and the requesting doctor. We will then release the records via fax, post, or secure electronic transfer to the practice directly. At present we only charge for this service in limited circumstances (eg. A large paper file to be sent through the post). You will be informed if a fee applies to your request.

## Privacy and research or studies.

On occasion we do take part in clinical trials / research studies which involve the use of identified patient data. Such studies have ethics approval. Patient information will not be included in any research project using data which may identify the patient unless that patient provides informed consent for their personal health information to be released for that specific project.

## 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 call us on (08) 8410 1322 if you wish to make a complaint, or alternately you can write to us at: Level 2 / 29 King William Street, Adelaide, SA, 5000.

You may also contact the Health and Community Services Complaints Commissioner on 1800 232 007, or at [www.hcsc.sa.gov.au](http://www.hcsc.sa.gov.au).

## Privacy and electronic communication

Communication with patients via electronic means is conducted with appropriate regard to privacy. We obtain patient consent to send SMS reminders and recalls to patients. Wherever possible we refrain from communicating with patients and other healthcare professionals via email. . In exceptional circumstances the practice will advise patients verbally or via email the risks that electronic communication is not secure and that the information could be intercepted or read by someone other than the intended recipient before obtaining explicit consent from the patient to send information by email.

## Policy review statement

This policy will be reviewed regularly to ensure it is in accordance with any changes that may occur. Our privacy brochure and our practice information brochure will be updated and links to these will be updated on our website.