

Family First Medical Centre Privacy Policy

Current as of: **01/10/2020**

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 at 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.

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.
Information can also be collected through electronic transfer of prescriptions (eTP), My Health Record, eg via Shared Health Summary, Event Summary. You will need to specify if your practice participates in any of these eHealth services.
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.
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 – when requested please do so by contacting insurance companies, superannuation funds or travel insurance agencies.
- 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)
- during the course of providing medical services, through eTP, My Health Record (eg via Shared Health Summary, Event Summary) – when requested please do so by contacting Government Agencies such as the Office of the Health Ombudsman or Australian Health Practitioner Regulation Agency (Ahpra).

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 or unless directed by the Office of the Health Ombudsman or Australian Health Practitioner Regulation Agency (Ahpra).

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.

Our practice may use your personal information to improve the quality of the services we offer to our patients through research and analysis of our patient data.

We may provide de-identified data to other organisations to improve population health outcomes. The information is secure, patients cannot be identified and the information is stored within Australia. You can let our reception staff know if you do not want your information included.

How do we store and protect your personal information?

Your personal information may be stored at our practice in various forms, including paper records, electronic records and visual records ie. X-rays, CT scans, videos and photos.

Our practice stores all personal information securely as per The Royal Australian Collage of General Practitioners (RACGP) standards. Electronic format in protected information systems and or hard copy is in secure environment. All paper copies once scanned to patient file, is destroyed in a secure environment. Our practice has very stringent confidentiality procedures in place by using: passwords, confidential agreements for staff, contracts, secure cabinets etc.

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 when transferring to your new treating provider. We require you to put this request in writing by filling out a "Request for Medical Records transfer form" and our practice will action within 7 working days. Fees are **\$25.00 for a disk** copy of medical records (assuming your new medical centre accepts XML/HTML format). For paper copies called "hard copies" it is **\$40.00 for records within the last 2 years** and **\$60.00 for a complete file**, please note **printed copies are only available if your new medical centre is not disk compatible**. We do enforce this in the interest presenting waste with printing unnecessarily, as some files can be 500 - 700 pages long and this is also problematic for your new treating practice as their staff will then need to scan this into your new patient file.

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 admin team at Family First Medical Centre or via email to: mail@familyfirstmedicalcentre.com.au.

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 feel free to talk to your Doctor, Practice Manager or a staff member about any problems you have with our services.

You may also contact the Office of the Australian 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 or call the OAIC on 1300 363 992. Or you can contact the Office of the Health Ombudsman on 133 646 or visit <https://www.oho.qld.gov.au/>.

Privacy and our website

Our practice may collect personal information via our website or interact with patients digitally through social media (Facebook, Google, Instagram etc) and emails that come through to our email address at mail@familyfirstmedicalcentre.com.au. We also may collect personal information that come through our online booking system "Appointuit" whereby patients can register, update contact information, book, cancel and change medical appointments.

Policy review statement

Our practice is constantly updating; therefore, we regularly review our privacy policy to ensure it is in accordance with any changes. The privacy policy up to date copy can always be found on our website.

Disclaimer

The *Privacy policy template for general practices* is intended for use as a guide of a general nature only and may or may not be relevant to particular practices or circumstances. The Royal Australian College of General Practitioners (RACGP) has used its best endeavours to ensure the template is adapted for general practice to address current and anticipated future privacy requirements. Persons adopting or implementing its procedures or recommendations should exercise their own independent skill or judgement, or seek appropriate professional advice. While the template is directed to general practice, it does not ensure compliance with any privacy laws, and cannot of itself guarantee discharge of the duty of care owed to patients. Accordingly, the RACGP disclaims all liability (including negligence) to any users of the information contained in this template for any loss or damage (consequential or otherwise), cost or expense incurred or arising by reason of reliance on the template in any manner.