

# Richlands General Practice Privacy Policy

Current as of: 29/08/2024

## 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.

## 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. Our new patient form includes information regarding why we collect personal information from patients including advising our clinic may use deidentified information/patient detail for practice quality improvement and research that may be used. Patients are advised on this form that if at any time they would like to withdraw consent, they are able to do so by notifying the practice in writing.

## 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, quality improvement 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.

The nature of general practice and the provision of healthcare do not easily accommodate the notions of anonymity and pseudonymity. Medical histories are required and identities need to be confirmed before a GP can make a diagnosis or prescribe medications. GPs are obliged by law to report communicable diseases and child abuse. These circumstances should be explained to the patient.

A patient may experience detriment in their treatment if they choose to remain anonymous. This should also be explained to the patient.

Where practical, offering the option of anonymity and pseudonymity should be integrated into usual practice.

## Situations in which it is possible to be anonymous or pseudonymous:

Patients may choose to receive services anonymously if, for example, sensitive issues arise or they feel they may be at risk, such as in domestic violence situations or difficult relationships. In these circumstances, the use of an alias or 'disguised identity' may be the most appropriate approach.

Provision of basic information or on issues such as quitting smoking or mental health during telephone encounter.

Situations in which it is not possible to be anonymous or pseudonymous and why.

- Communicable diseases – not alerting public health may result in community outbreak and harm to others
- Causing harm to others such as child abuse, domestic abuse – legal requirement and safety of the abused may be at risk
- Inhibit diagnosis, treatment, prescribing on medication – not having treatment, diagnosis or management of a condition may result in harm to patient.
- Impracticable for billing purposes through Medicare etc.

## 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, Australian Immunisation Register, Medicare Australia

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
- 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), Australian Immunisation Register.

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.

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, allied health professionals, and third parties for research purposes to improve population health outcomes a written consent is taken from you if we do so. 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.

Our practice provides Brisbane South Public Health unit de-identified practice data quarterly. This data does not include your name, date of birth, address, contact details or personal details such as consultation notes. The data collected may involve de-identified pathology results, vaccine administered or not, record of allergies, smoking and alcohol for examples. As our patient you have every right to advise our clinic if you do not want the de-identified information collected by Brisbane South Public health unit. The information collected assists our clinic in understanding areas that we can improve the quality of administration or clinical aspects of your care.

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

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

Using our electronic clinical management software, records such as pathology results, X-rays, CT scans, photos, correspondence, referrals are stored securely. Your personal information can only be accessed by staff members with software login details.

Our practice stores all personal information securely. Our practice utilises an electronic clinical management software that can only be accessed by staff members with secure login. Areas of files are restricted to clinical staff only. All correspondence received in "hard copy" are scanned into your file and then shredded. The hard copy files are stored in a lockable draw at reception until they are scanned and shredded. All staff members have signed confidentiality agreements and are held to the highest standard of privacy and confidentiality.

## 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 via email or hard copy letter and our practice will respond within a reasonable time. The request will be completed at a maximum of 30 days. The cost involved with accessing the doctor's record of your health depends on the size of the file and may cost up to \$30.00 to cover administration expenses.

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 email; [reception@richlandsgeneralpractice.com.au](mailto:reception@richlandsgeneralpractice.com.au) or provided to administration staff.

## 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. Contact our clinic on (07) 2103 5858 or email; [reception@richlandsgeneralpractice.com.au](mailto:reception@richlandsgeneralpractice.com.au) or mailed to Shop 6, 144 Pine Road, Richlands, QLD,

4077. Your request will be completed within 30 days of receipt. Your correspondence will be forwarded to our practice manager for management and follow up.

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. The Queensland Office of the Information Commissioner receives privacy complaints under the Information Privacy Act 2009 (Qld) which covers the Queensland public sector. Queensland's Health Ombudsman can also receive and investigate complaints about health services and health service providers.

## Policy review statement

Richlands General Practice will review the Privacy Policy yearly or as required throughout the year to ensure it is in accordance with any changes that may occur. If changes are made you may be notified by the clinic via a notice board or poster in clinic.