

## Privacy Policy

CURRENT AS OF 17th JULY 2023

### **Introduction**

This privacy policy is to provide information to you, our patient, on how your personal information and your health information is collected and used within our practice, and the circumstances in which we may share it with third parties. The purpose of this Privacy Policy is to clearly communicate how Campbell Medical Practice collects and manages personal information.

### **What is a patient health record?**

Patient Records means records in any form or medium maintained by, or in the custody or control of, a health care provider relating to the health history, diagnosis, or condition of a patient, or relating to treatment provided or proposed to be provided to the patient.

### **What is the difference between personal information vs health information?**

Campbell Medical Practice collects and holds both personal information and health information.

Personal information includes an individual's name and address, signature, contact details, birth date, medical records and bank account details.

Health information includes information or opinions about the health or disability of an individual and a patient's wishes about future healthcare. It also includes information collected in connection with the provision of a health service (and therefore includes personal details such as names and addresses)

### **Why do we collect, use, hold and share your personal information?**

Our practice will need to collect your personal and health information to provide healthcare services to you. Our main purpose for collecting, using, holding and sharing your personal and health 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).

### **How do we collect your personal/health information?**

Our practice will collect your personal information:

- When you make your first appointment our practice staff will collect your personal and demographic information via your registration form.
- During the course of providing medical services, we will collect health information and may collect further personal information. We may also collect information through Electronic Transfer of Prescriptions (eTP) or MyHealth Record/PCEHR system,
- We may also collect your personal information when you visit our website, telephone us or make an online appointment.

In some circumstances health and/or personal information may also be collected from other sources. Often this is because it 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 Veteran's Affairs (as necessary).

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

Our practice has implemented a clinical information system that uses document automation technology to assist in our workflows and internal systems. Our selected medical software utilises document automation technologies so that documents drafted by us, such as referrals, contain only your relevant medical

information.

These document automation technologies are established through our secure medical software built-in word processor. The built-in word processor allows Campbell Medical Practice to set up automated, simple and computed variables. These automated variables are set up to strictly disclose only relevant medical information related to and required in the document selected.

Our medical software is user-unique password protected. Authorised access via individual passwords has been granted on a role-specific basis.

### **What personal information do we collect?**

The information we will collect about you includes:

- 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 claiming purposes
- Healthcare identifiers
- Health fund details.

### **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.

### **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.

### **Who do we share your personal information with?**

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
- For quality assessment purposes
- 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 Electronic Transfer of Prescriptions (eTP), MyHealth Record/PCEHR system (eg via Shared Health Summary, Event Summary).

Only people that 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 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.

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?**

Campbell Medical Practice complies with the Australian privacy legislation to protect your information. All data, both electronic and paper are stored and managed in accordance with the Royal Australian College of General Practitioners RACGP Computer and Information Security Standards.

All electronic data is stored on our local onsite (on premise) servers. We endeavour to make the systems as secure as possible by restricting access to IT systems through the use of user accounts, user permissions and software restrictions. All clinical software and database access is restricted by user roles and permissions which is allocated and updated by management. All devices at the medical centre are protected by an onsite security appliance (firewall) that continuously monitors and logs all traffic going in and out of the organisation.

#### **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 attention it to the Practice Manager and our practice will respond to your request within 30 days. You will not be charged for making a request however if results are required to be printed or photocopied, an administration fee will be charged. This fee is in line with the AMA rates and is charged at \$33 for 30 pages then \$1 for each page after. This fee is payable before medical records can be released. 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 your personal information held by our practice is correct and up-to-date. You may also request that we correct or update your information, and you should make such requests in writing to:

Practice Manager  
Campbell Medical Practice  
5/32 Blamey Place Campbell ACT 2612.

#### **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. We will endeavour to respond to all complaints within a reasonable time period, which will not be longer than 21 working days. Please address all complaints to:

Practice Manager  
Campbell Medical Practice  
5/32 Blamey Place, Campbell ACT 2612.

You may also contact the ACT Human Rights Commission. For further information visit [www.hrc.act.gov.au](http://www.hrc.act.gov.au) or call the HRC on 02 6205 2222.

#### **Policy review statement**

This Privacy Policy will be reviewed regularly to ensure remains applicable to current practice procedure and legal requirements. This policy will be reviewed and updated/amended in January 2024.