

ELECTRA PARK MEDICAL CENTRE PRIVACY POLICY

Last Review: 07/08/2024

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.

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 available) for identification and claiming purposes
- healthcare identifiers (e.g. pension card details)

Dealing with us anonymously

Under the *Privacy Act 1998* you have the right to deal with use anonymously or under a pseudonym unless it is impractical for us to do so or unless we are required or authorised by law to only deal with identified individuals. At any time, you may contact the practice by phone or mail and choose to withhold your personal details.

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 form.
2. During the course of providing medical services, we may collect further personal information. This information may be collected through:
 - Electronic transfer of prescriptions (eTP).
 - My Health Record (e.g. shared health summary).
3. We may also collect your personal information when you visit our website, send us an email or SMS, telephone us or communication 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).
 - previous general practices medical centres you have attended (this will not be accessed without additional written consent from you).

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 Australian Privacy legislation 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 patients consent.
- to assist in locating a missing person.
- to establish, exercise or defend an equitable claim.
- for the purpose of confidential dispute resolution processes.
- 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 or My Health Record (e.g. Shared Health Summary uploads).

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.

Our practice will not use your personal information for marketing of any 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 your patient data.

We may provide de-identified data to other organisations to improve populations 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 don't want your information included.

To comply with Medicare Practice Incentives Program (PIP) our practice routinely has de-identified patient data extracted from our patient data base by POLAR who works in

conjunction with the Eastern Melbourne Primary Health Network. This data is used to inform quality improvement actions undertaken by the practice and to ensure compliance with the accreditation standards set out by the Royal Australian College of General Practitioners (RACGP). If you wish to have your data excluded from this process, please notify reception.

How do we store and protect your personal information?

Your personal information may be stored at our practice in various forms including electronic records and paper files. Our paper records are routinely scanned into our computerised record to ensure the preservation of important medical information in the case that the paper copy is lost (e.g. if there was a fire).

We will take reasonable steps to protect your personal information from misuse, loss, unauthorised access and modification or disclosure. We use commercially reasonable physical and administrative measures to protect personal information that we hold including password protection and SSL encryption for our emails. Secure cabinets for paper files, all paper copies of confidential information that are no longer required are shredded on site. All staff are required to sign a confidentiality agreement upon their commencement of employment with Electra Park Medical Centre.

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 (either physically sent the mail or by email) and our practice will respond within 30 days. A fee of twenty cents per black and white A4 page will apply to any printed record however electronic copies will be provided free of charge. The practice manager will contact you within 30 days of receiving your request to confirm your identity and verbally confirm your request.

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 the practice is correct and current (either verbally or by completion of our Patient Information Update Form). You may also request that we correct or update your information, you may do this in person at the practice or in writing by emailing Erin Pratt (**Practice Manager**) at reception@electrapark.com.au.

How can you lodge a privacy-related complain, 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 un writing and we will attempt to resolve them in accordance with our resolution procedure. If you wish to make a complaint directly to the practice, please write to or email us using the details below:

| Post | Email | Phone |
|---|---|---------------------------------|
| Erin Pratt Electra Park Medical Centre 154 High Street Rd Ashwood, VIC, 3147 | ATT: Erin Pratt admin@electrapark.com.au | ATT: Erin Pratt 03 9807 1311 |

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 OAIC on 1300 363 992.

In Victoria individuals may also make a complaint or enquiry with the Health Complaints Commissioner. The Health Complaints Commissioner deals with complaints and enquiries in relation to *The Privacy Act 1998*, *The Health Records Act 2001* and *The Health Records Regulations 2023*. The Health Complaints Commissioner asks that individuals contact their healthcare provider to resolve the issue before submitting a complaint. If you do wish to escalate a complaint to the Health Complaints Commissioner there is a form on their website: www.hcc.vic.gov.au or you can call them on 1300 582 113 .

Privacy and our website / social media

When you interact with our website or social media accounts, we, or our third-party service providers, may use cookies, web beacons (clear GIFs, web bugs) or similar technologies to track site visitor activity or collect site data. We may combine this data with the personal information we have collected. Examples of information that we may collect include technical information such as IP address and browser type, and information about your visit such as the products viewed or searched for, the country you are in, what you clicked on and what links you visited to get to or from our site. If we identify you with this information, any use or disclosure of that information will be in accordance with this privacy policy.

At times, our Site may contain links to third-party websites. Any access to and use of such websites is not governed by this privacy policy but is instead governed by the privacy policies of those third-party websites. We are not responsible for the information practices of such third-party websites.

Data Breach Notification Scheme

If we suspect a data breach has occurred, we will undertake an assessment in accordance with the Notifiable Data Breach Scheme. If we determine there has been an eligible data breach, we will notify you as soon as reasonably practicable.

If the breach relates to the My Health Records Act, we may disclose your personal information to the My Health Records System Operator under s 73A of that Act.

Policy Review

This privacy policy will be reviewed annually or as required and we may make changes from time to time. Any updated versions of this privacy policy will be made available at reception and posted on our website and social media accounts. You should check periodically to review our current privacy policy, which is effective as of the date listed on the cover page. Your continued use of our website or social media and services constitutes your acceptance and understanding of the privacy policy as in effect at the time of your use. If we make any changes to this privacy policy that materially affect our practices with regard to the personal information, we have previously collected from you, we will endeavour to provide you with notice in advance of such change by highlighting the change on our website, in our waiting room and where practical electronic messaging.