



# Privacy and Information Management Procedure – Clinical Services

Version 1

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## Document Ownership and Authorisation for Changes:

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## Associated Documents:

Please see the following documents for further information:

Document Title	Document No	Version	Author
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## 1. Introduction

GP clinics at Belvidere Health Centre, GP Afterhours Armadale and the GP Antenatal Clinic, all fall under the Clinical Services Program of Arche Health Ltd. The Clinical Services program team is committed to ensuring your personal information is professionally managed in accordance with the Privacy Act 1988 and Australian Privacy Principles (APPs).

## 2. Purpose

The purpose of this privacy procedure is to provide information to you, our patient, on how your personal information (which includes your health information) is collected and used within the practices and the circumstances in which we share it with third parties.

## 3. Scope

This procedure is adopted as standard practice by all staff in the Clinical Services team.

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 telehealth consultations, we will seek additional consent from you to do this.

## 4. What personal information is collected and why

When you register as a patient, your doctor and/or their practice staff will need to collect your personal information to provide you with the best possible healthcare. Your health record contains systematic documentation of your clinical data, medical history and your healthcare provider's record of care and Medicare.

The collection of personal information is used for directly related business activities, such as financial claims and payments, practice audits, accreditation, and normal business processes.

As correct patient identification is essential for safe clinical care, you will be asked to provide three points of identification. The personal information we collect and hold generally includes:

- Your name, address, date of birth and contact details.
- Information about your health condition, medical history, social and family history, risk factors, medications, allergies, adverse events, immunizations, and treatment you may have already received.
- Medicare number or DVA number for identification and claiming purposes.
- Private health fund details.

## 5. How and why personal information is collected

Our practice may collect your personal information in several different ways:

- Via your registration when you book your first appointment.
- Through the My Health Record system via a Shared Health Summary
- 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.

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).

## 6. When why and with whom personal information is shared

Your personal information may be shared as follows with:

- Other healthcare providers
- Third parties who work with our practice for business purposes (such as IT providers and accreditation agencies)
- Statutory requirements to lawfully share certain personal information, such as mandatory notification of certain diseases.
- Court subpoenas required or authorized by law.
- When 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.

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.

Patient consent is also sought for participation in our health reminder systems and any research projects we may participate in. Patients are advised that any prior consent given can be withdrawn at any time.

The GP will refer to relevant legislation and the maturity of the patient before deciding whether the patient (in the case of a minor) can make decisions about the use and disclosure of information independently (i.e., without the consent of a parent or guardian). For example, for the patient to consent to treatment, the GP must be satisfied that the patient (a minor) is aware and able to understand the nature, consequences, and risks of the proposed treatment. This patient is then also able to make decisions on the use and disclosure of his or her health information.

We will not use your personal information for marketing any goods and services to you without your express consent. Where your consent has been given, you have the right to opt out at any time by notifying the practice in writing.

We will not share your personal information with anyone outside Australia (unless under exceptional circumstances that are permitted by law) without your consent.

## 7. Dealing with us anonymously

You have the right to deal with us anonymously or under a pseudonym unless it is impracticable or unlawful or it will be to your detriment. Communicating anonymously would be limited to a telephone conversation or email and would be of a general nature only, referencing health education or an advisory service.

## 8. How personal information is protected and stored.

Our practice stores all personal information securely and has strict protocols and policies to ensure your personal information is protected from misuse, loss, interference, or unauthorized access.

Your personal information is stored as follows:

- Electronic records are encrypted, and password protected.
- All staff and contractors sign confidentiality agreements prior to commencing work at the practice.

It is the policy of the practice that individual patient medical records be retained until the patient has reached the age of 25 or for a minimum of 7 years from the time of last contact, whichever is the longer.

No record will be destroyed at any time without the permission of the treating GP or of the authorized GP in the practice.

## 9. Security

- Medical practitioners, practice staff and contractors will protect personal health information against unauthorized access, modification or disclosure and misuse and loss while it is being stored or actively used for continued management of the patient's health care.
- Staff will ensure that patients, visitors, and other health care providers at the practice do not have unauthorized access to the medical record storage area or computers.
- Staff will ensure that records, pathology test results, and any other papers or electronic devices containing personal health information are not left where unauthorized persons may access them.
- Nonclinical staff will limit their access to personal health information to the minimum necessary for the performance of their duties.
- Fax, e-mail, and telephone messages will be treated with security equal to that applying to medical records.
- Computer screens will be positioned to prevent unauthorized viewing of personal health information. Using, for example, password-protected screensavers, staff will ensure that computers left unattended cannot be accessed by unauthorized persons.

## 10. Access to and correction of, personal information

Our practice will take reasonable steps to correct your personal information where the information is not accurate or up to date. We will ask you at different times, to verify your information held by our practice is correct and up to date. You have the right to access and correct personal information that we hold about you, in electronic or hard copy format.

If you wish to access or correct your personal information we request that you put it in writing and contact the Practice Manager, Liz Williams, tel: 08 6253 2100, or email: [l.williams@archehealth.com.au](mailto:l.williams@archehealth.com.au). Your request for access and/or correction will be processed within 30 days.

While we do not charge an application or processing fee, you may be charged administration, photocopying, or other fees to reasonably cover our costs in fulfilling your request.

## 11. Lodgement and handling of a privacy related complaint

If you have any concerns about your privacy or wish to make a complaint about a privacy breach, contact our Practice Manager, Liz Williams, tel: 08 6253 2100, or email [l.williams@archehealth.com.au](mailto:l.williams@archehealth.com.au)

You should provide us with sufficient details regarding your complaint together with any supporting information.

We will take steps to investigate the issue and will notify you in writing of the outcome within 30 days of the receipt date of the original written complaint.

If you are not satisfied with our response, you can contact us directly to discuss your further concerns or lodge a complaint with the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au) or by calling 1300 363 992.

## 12. Policy review statement

This privacy policy will be reviewed regularly to ensure it is in accordance with any changes that may occur. We will notify our patients of these changes via our website. A hard copy is available upon request.

## 13. References

RACGP Standards for General Practices, 5th Edition Core Standard 6.3

Privacy Act 1988. <https://www.legislation.gov.au/Series/C2004A03712>

Office of the Australian Information Commissioner Guide to health privacy v1 September 2019

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