

# Doncaster East Family Medical Centre (DEFMC)

## Privacy Policy

### 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
- Concession card 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, medical history and demographic information via our New Patient registration form
2. While providing medical services, we may collect further personal information such as records collected through electronic transfer such as My Health Record, e.g via Shared Health Summary, Event Summary
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
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
- with other healthcare providers. All letters and referrals will automatically include your full name, address, and date of birth. This is to ensure that the proper 3 points of identification can be used to make sure the other healthcare provider has the correct information to identify and contact you
- only information relevant to that healthcare provider for the care they will provide you will be supplied
- 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 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 (e.g. some diseases require mandatory notification)
- during the course of providing medical services through eScript, My Health Record (e.g. via Shared Health Summary, Event Summary)
- only people who need to access your information will be able to do so. Other than while 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 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 such as paper records (pre-2005) and electronic records. Our practice stores all personal information securely.

Personal information is stored in electronic format, in protected information systems. If hard copy format, they are stored in a locked, secured environment. All staff sign confidentiality agreements

Medical records are retained when they meet the following criteria:

- a patient that is under the age of 25
- any patient that has been seen in the last 7 years
- If a patient is deceased, keep the record for 10 years
- If a patient has a chronic disease or medico legal (Insurance, Workcover, TAC case) keep the record for 10 years (confirm medical status with appropriate Doctor)

If a medical record is outside of this criterion, it is destroyed. DEFMC destroy medical records securely using Shred-X secure shredding company, to preserve patient confidentiality. We also keep a register of all records that have been destroyed.

## 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 with your signed consent. Proof of identity may also be requested. Requests made on behalf of another person must be made in writing and must include with evidence of their authority to act on behalf of the other person.
- Our practice will respond within 45 days as per the guidelines set out by the Health Complaints Commissioner.
- This process may incur a fee, as set out by the Health Records Regulations 2012, which you will be notified of beforehand.
- 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 addressed to the Practice Manager.

## 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 addressed to:

Practice Manager

116 Blackburn Rd, Doncaster East VIC 3109

Tel: 03 9841-8798 Email: [admin@defmc.com.au](mailto:admin@defmc.com.au)

Alternatively, you can attend in person and ask reception staff to supply you with a Formal Complaints Form which will be promptly given to the Practice Manager.

We will then attempt to resolve it in accordance with our resolution procedure within 30 days.

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. Alternatively, you can contact The National Health Practitioner Ombudsman on 1300 795 265 or via [complaints@nhpo.gov.au](mailto:complaints@nhpo.gov.au)

## Privacy and our website

Please refrain from sending sensitive personal information to us via email unless the message is encrypted with a password which is sent in a separate email

## Policy review statement

This privacy policy will be reviewed regularly to ensure it is in accordance with any changes that may occur. We will provide a link on our website to the new policy