## **Southern Doctors Clinic (SDC) Privacy Policy**



#### Introduction

This privacy policy is to provide information to you, the patient, on how your personal information (which includes your health information) is collected and used within this clinic, and the circumstances in which it may be shared with third parties.

#### Why and when your consent is necessary

When you register as a patient of this clinic, you provide consent for GPs and clinic 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 your information is needed for anything else, additional consent will be sought from you to do this.

#### Why does SDC collect, use, hold and share your personal information?

This clinic will need to collect your personal information to provide healthcare services to you. The main purpose for collecting, using, holding, and sharing your personal information is to manage your health. It is also used for directly related business activities, such as financial claims and payments, clinic audits and accreditation, and business processes (e.g. staff training).

#### What personal information does SDC collect?

The information collected 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

#### Dealing with SDC anonymously

You have the right to deal with this clinic anonymously or under a pseudonym unless it is impracticable for SDC to do so or unless it is required or authorised by law to only deal with identified individuals.

#### How does SDC collect your personal information?

This clinic may collect your personal information in several different ways.

- 1. When you make your first appointment clinic staff will collect your personal and demographic information via your registration.
- 2. During the course of providing medical services, this clinic may collect further personal information through My Health Record e.g. via Shared Health Summaries and Event Summaries.
- 3. SDC may also collect your personal information when you visit the website, make an online appointment, or communicate with the clinic by telephone, email, SMS, or 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).

#### When, why and with whom does SDC share your personal information

We sometimes share your personal information:

- with third parties who work with this clinic 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 (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 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 in the course of providing medical services or as otherwise described in this policy, this clinic will not share personal information with any third party without your consent.

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

Your personal information will not be used for marketing 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 this clinic in writing.

SDC may use your personal information to improve the quality of the services offered to patients through research and analysis of patient data.

This clinic 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 reception staff know if you do not want your information included.

#### How does SDC store and protect your personal information?

Your personal information may be stored at this clinic in various forms.

as paper records

- as electronic records
- as visual x-rays, CT scans, videos, and photos
- as audio recordings.

This clinic stores all personal information securely. Personal information that we hold is protected by securing our premises, placing passwords, and varying access levels on databases to limit access and protect electronic information from unauthorised interference, access, modification, and disclosure.

#### **SDC will:**

- provide a copy of this policy upon request.
- ensure staff comply with the APP and deal appropriately with inquiries or concerns.
- take such steps as are reasonable in the circumstances to implement practices, procedures, and systems to ensure compliance with the APP and deal with inquiries or complaints.
- collect personal information for the primary purpose of managing a patient's healthcare and for financial claims and payments.

#### SDC staff will:

- take reasonable steps to ensure patients understand:
  - o what information has been and is being collected.
  - why the information is being collected, and whether this is due to a legal requirement.
  - o how the information will be used or disclosed.
  - o why and when their consent is necessary.
  - this clinic's procedures for access and correction of information, and responding to complaints of information breaches, including by providing this policy.

#### How can you access and correct your personal information at SDC?

You have the right to request access to, and correction of, your personal information.

SDC acknowledges patients may request access to their medical records. You are required to put this request in writing and this clinic will respond within a reasonable time.

This clinic will take reasonable steps to correct your personal information where the information is not accurate or up to date. From time to time, you will be asked to verify that your personal information held by this clinic is correct and current. You may also request that your information be corrected or updated, and you should make such requests in writing to the Practice Manager.

# How can you lodge a privacy-related complaint, and how will the complaint be handled at SDC?

Complaints and concerns regarding privacy are taken seriously. You should express any privacy concerns you may have in writing to the practice via email: practicemanager@sdccampsie.com.au or via telephone: (02) 9789 5955. This clinic will then attempt to resolve it in accordance with our Complaints Resolution Procedure.

You may also contact the Health Care Complaints Commission. Generally, the HCCC will require you to

give them time to respond before they will investigate. For further information visit <a href="https://www.hccc.nsw.gov.au">www.hccc.nsw.gov.au</a> or call the HCCC on 1800 043 159.

### Policy review statement

This privacy policy will be reviewed regularly to ensure it is in accordance with any changes that may occur.