



OXFORD VILLAGE MEDICAL CENTRE

PRIVACY POLICY

Current as of: **AUGUST 2018**

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 disclose to third parties.

This practice is committed to maintaining the confidentiality of your personal health information. Your medical record is a confidential document and it is the policy of this practice to maintain the security of your personal health information at all times.

Following the requirements of the Australian Privacy Principles (APPs), our privacy protection framework supports the rights and obligations of collecting, holding, using, accessing and correcting personal information. The APP consists of 13 principle-based laws and apply equally to paper based and digital environments. The APP complement the long standing general practice obligation to manage personal information in a regulated, open and transparent manner.

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 (eg staff training).

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 identification and claiming purposes
- healthcare identifiers
- health fund details.

Dealing with us anonymously

Australian Privacy Principles state 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. Other than a medical emergency, our Practice Manager will advise whether it is impractical for you to deal with us anonymously, and if deemed so, provide you the location of the next nearest clinic for medical care.

How do we collect your personal information?

Our practice will collect your personal information:

1. When you make your first appointment our practice staff will collect your personal and demographic information via your registration.
2. During the course of providing medical services, we may collect further personal information. Information can also be collected through Electronic Transfer of Prescriptions (eTP) and the MyHealth Record/PCEHR system.
3. We may also collect your personal information when you visit our website, send us an email or telephone us.
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 Veteran's Affairs (as necessary).

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
- 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 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?

Your personal information may be stored at our practice in various forms. These include:

- paper records
- electronic records
- visuals (X-Rays, CT scans, clinical photos)

Our practice stores all personal information securely:

- paper files are protected by staff at all times

- all staff are bound by a Confidentiality Agreement
- paper files are shredded after it has been scanned into your electronic record
- all users have passwords to protect electronic records

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 either complete a Medical Record Access Form or put this request in writing addressed to the Practice Manager and our practice will respond within a reasonable time (usually within 30 days). You may be asked to attend a consultation with one of our doctors to discuss the information contained in your medical record.

An administration fee/printing charge may apply for this service which is not Medicare claimable. You will be advised of the charge at the time. The charges are dependent on the size of the file,

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.

Photo ID is required in order to collect any patient information from reception. If a third party such as a friend or a family member comes in to collect something on your behalf please make sure you let our receptionists know the name of that person. . If clinical information is involved, we will require a written authority from you. This is to ensure we have been given your consent to release the information to that person in line with privacy regulations.

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.

Letters should be addressed to:

**The Practice Manager
Oxford Village Medical Centre
Shop 18, 63 Oxford Street
Darlinghurst NSW 2010.**

Alternatively you can email the Practice Manager: ovmcdarlinghurst@gmail.com or to the Medical Director: complaint@doctor.com.

The Practice will respond to your enquiry, generally within 7 days.

You may also contact the Office of the Australian Information Commissioner. For further information visit www.oaic.gov.au or call the OAIC on 1300 336 002.

Health Care Complaints Commission (HCCC). For further information, please call 1800 043 159 or visit <http://www.hccc.nsw.gov.au> . A complaint must be in writing. You can lodge a complaint online or download a complaint form. Alternatively you can write a letter and send it to the Commission via mail, email or fax.

The Commissioner
Health Care Complaints Commission
Locked Mail Bag 18
STRAWBERRY HILLS NSW 2012

Australian Health Practitioner Regulation Authority (AHPRA). For further information, please call 1300419495 or visit <http://www.ahpra.gov.au>. AHPRA encourages all complaints to be submitted via their online website. Alternatively, you may download and complete a PDF form via their website and post the form to:

AHPRA
G.P.O. Box 9958
Sydney NSW 2000

Phone Policy

Our Practice may contact you via telephone calls, text messages and/or email to confirm or notify you of any changes to your scheduled appointment, recalls requiring urgent attention and health promotion reminders (optional).

While telephone calls and text messages are generated using a secure facility and they are transmitted over a public network onto a personal telephone and as such may not be secure. However, the practice will not transmit any information which would enable an individual patient to be uniquely identified.

It is a Practice policy that no consultation will be conducted via telephone. The doctors will not usually discuss results over electronic communication as we cannot guarantee confidentiality. There may be exceptional circumstances, however this is at the discretion of the doctor.

Email Policy

It is a Practice policy that no consultation will be conducted via email. The doctors will not usually discuss results over electronic communication as we cannot guarantee confidentiality. There may be exceptional circumstances, however this is at the discretion of the doctor and must be communicated and agreed upon at the time of face-to-face consultation.

Electronic communication is generally used only for correspondence of a non-sensitive nature. And while reasonable efforts are made to provide security via email communication users should be aware that there are inherent risks in the transmission of information across the Internet and as such may not be secure.

When patients request for sensitive information via email, a request and consent form is sent to the patient for completion. This form requires the patient to specify the information required, provide a copy of photo identification, advises fees may be payable for the services and notes the risks in the transmission of information over the internet including breaches.

Following the completion and return of this form, the GP will review the request, and if approved, the information will be collated and sent via reply mail (or email address noted on form if different) to ensure it is sent to the intended recipient.

Website Policy

We do not collect or use any personal information on visitors to our website, through the use of "cookies" or other software or hardware techniques. We look at the number of hits the website receives and keep track of the pages you accessed and the documents downloaded from the website.

If you log onto the website and read or download information our Internet Service Provider/Hosting Provider, will record your server address, domain name, the date and time of your visit to our website, the pages viewed and the information downloaded. This information is used for statistical and website development purposes only.

Policy review statement

The Practice Privacy Policy is reviewed annually to ensure it is in accordance with any changes that may occur and remains applicable to current practice procedure and legal requirements.

Contact

If you wish to complain to us regarding a breach of privacy, access your information held by us, correct any of your information held by us or find out more about how we handle personal information we can be contacted through email: ovmcdarlinghurst@gmail.com or via mail:

**The Practice Manager
Oxford Village Medical Centre
Shop 18, 63 Oxford Street
Darlinghurst NSW 2010**
