

# Tuggeranong Square Medical Practice

1/341 Reed Street South, Greenway

## Privacy Policy

Current as of: **20/6/2016**

### 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 that 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.

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).

### Personal information we collect

The information we will collect about you includes:

- Names, date of birth, addresses, contact details, ethnicity and emergency contacts.
- 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 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 authorized by law to only deal with identified individuals.

### How 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), MyHealth Record/PCEHR system, eg via Shared Health Summary, Event Summary. We may also collect your personal information when you telephone us or make an online appointment.

3. 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).

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## Who 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. Consent forms available at practice and on our website [www.tsmp.com.au](http://www.tsmp.com.au).

We will not share your personal information with anyone outside Australia (unless under exceptional circumstances that is 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 we store and protect your personal information.

Your personal information may be stored at our practice as electronic records, and paper records. Our practice stores all personal information securely. Passwords are required for all computer access and access levels are controlled by the administrator. Archived files are kept in lockable storage. Confidentiality agreements are signed by all staff and contractors.

Staff will ensure that patients, visitors and other health care providers do not have unauthorised 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 they may be accessed by unauthorised persons.

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 unauthorised viewing of personal health information. Through the use of, for example, password-protected screen-savers, staff will ensure that computers left unattended cannot be accessed by unauthorised persons.

Doctor's and staff will ensure that personal health information held in the practice is secured against loss or alteration of data. This includes adherence to national encryption protocols. Manual medical records and other papers containing personal health information will be filed promptly after each patient contact. Staff will ensure that manual and electronic records, computers, other electronic devices and filing areas are secured at the end of each day and that the building is locked when leaving.

The data on the computer system will be backed up daily and a duplicate backup tape/cartridge given to the nominated staff member for storage off site. Backups should be routinely tested to ensure daily duplication processes are valid and retrievable.

Doctors, practice staff and contractors will protect personal health information against unauthorised 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.

## How you can access and correct your personal information at our TSMP

Our practice acknowledges patients may request access to their medical records. Under privacy legislation provisions all patients have the right to access their health information stored at the practice. The treating doctor will provide an up to date and accurate summary of their health information on request, an appointment is required with the doctor to obtain this information. The treating doctor will consider all requests made by a patient for access to their medical record. In doing so, the doctor will need to consider the risk of any physical or mental harm resulting from the disclosure of health information. If the Doctor is satisfied that the patient may safely obtain the record then he/she will either show the patient the record, or arrange for provision of a photocopy, and explain the contents to the patient. Information provided to the doctor by a medical specialist may be given verbally to the patient by the treating doctor; copies of these letters must be requested from the author of the letter. Fees may apply for copies of records; patient will be notified of any fees to be charged prior to records being copied.

This practice will alter personal health information at the request of the patient when the request for alteration is straightforward (e.g. amending an address or telephone number). With most requests to alter or correct information, the General Practitioner will annotate the patient's record to indicate the nature of the request and whether the GP agrees with it. For legal reasons, the doctor will not alter or erase the original entry.

## Requests for personal health information and medical records by other medical practices

Access to accurate and up to date information about the patient by a new treating GP is integral to the GP providing high quality health care. Patients requiring their records to be transferred to another Medical Practice need to provide their request in writing along with a photocopy of their photo ID. A fee is charged to transfer records, patients will be informed of the fee to be paid and payment will be requested prior to records being transferred. Patients who do not know which Medical Practice they will be going to may also request their file in writing fees will apply and be given to patient when the request is received.

All fees charged are in accordance with recommendations from the AMA.

## How long we retain your records

It is the policy of TSMP that individual patient medical records are 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.

## Staff Training

Practice training and induction procedures for medical practitioners and staff should ensure that medical practitioners and staff demonstrate understanding of this policy. Ongoing education and training processes in the practice will ensure that skills and competence in the implementation of the privacy policy and related issues are maintained and updated.

## 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. Complaints can be addressed to the Practice Manager, Tuggeranong Square Medical Practice, 1/341 Reed Street South, Greenway. Your concerns will be investigated and the manager will report back to you within 30 days.

Should you feel your concerns are not adequately addressed you may direct your complaint to the Community and Health Services Complaints Commissioner, Level 9 Eclipse House, 197 London Circuit, Canberra City (PO Box 977 Civic Square ACT 2601) or telephone 02 62052222.

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 336 002.

## Policy review statement

This privacy policy will be reviewed regularly to ensure it is in accordance with any changes that may occur. An updated policy will be available at the practice and on our website. [www.tsmp.com.au](http://www.tsmp.com.au)