

Policy

Firle Medical Centre is committed to protecting the privacy of our patients within our practice. Information collected is kept strictly confidential and used only for the medical and health care of patients. This practice complies with Federal and State privacy regulations, as well as the standards set out in the RACGP Handbook for the Management of Health Information in Private Medical Practice.

Purpose

The purpose of this document is to outline how the Firle Medical Centre complies with its confidentiality and privacy obligations. This Privacy policy is readily available at the front desk in pamphlet form and upon request and on our web page.

To ensure patients who receive care from the practice are comfortable in entrusting their health information to the practice this policy provides information to patients as to how their personal information is collected and used within the practice and the circumstances in which we may disclose it to 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 certain aspects of 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.

Who is Firle Medical Centre?

Firle Medical Centre is a service company to the medical practitioners who provide services at our practice. We collect information for administrative and billing purposes and enable patients to be attended to by other practitioners in our practice. Patient information is shared between the practitioners who attend a patient. The Medical Centre has no influence on the care provided by your doctor.

Our Directors are Registered Medical Practitioners with unconditional licence to practice in Australia. All management decisions are made by a medical executive team in consultation with your doctor.

All employees of Firle Medical Centre are required to observe the obligations of confidentiality in the course of their employment and are required to sign Confidentiality Agreements.

Scope

This policy applies to all employees and patients of Firle Medical Centre.

Personal information collected will generally include: the patient's name, address, telephone number and Medicare number; health care fund; current medication or treatments used by the patient; previous and current medical history, including where clinically relevant a family medical history, and the name of any health service provider or medical specialist to whom the patient is referred, copies of any letters of referrals and copies of any reports back.

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. Those patients who refuse to provide our practice with their correct identity, with corresponding documents, will be required to pay for any and all consultations with the doctors of the practice. Any fees charged will not be able to be submitted to Medicare for a rebate

Practice procedure - Collection, use and disclosure

How do we collect your personal information?

In this practice, it is normal for all GPs to have unrestricted access to your medical records. If you have any concerns about this, please discuss them with your GP or practice staff. The medical record computer program can render your consultation details viewable only to the doctor who entered the data. This can be done in exceptional circumstances but is not recommended as the reduced accessibility will compromise continuity of care provided and approved transfer of your health information in the future will be hampered.

Firle Medical Centre (on behalf of) and the practitioners may collect personal information (including health information) regarding patients for the purpose of providing medical services and treatment to patients.

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

- When you make your first appointment, our practice staff will collect your personal and demographic information via your registration form.
- During the course of providing medical services, we may collect further personal information. This can include via receiving records from your previous practice, correspondence with other health providers and My Health Records (PCEHR) if consented.
- We may also collect your personal information when you make an online appointment
- 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: 1) your guardian or responsible person, other involved healthcare providers via correspondence letters such as specialists, allied health professionals, hospitals, community health services and pathology and diagnostic imaging services 2) your health fund, Medicare, or the Department of Veterans' Affairs (as necessary)

Please note we will not communicate medical information via normal e-mail as this is not secure.

When, why and with whom do we share your personal information?

GPs respect your right to decide how your personal information is used or shared. Personal information that identifies you will only be sent to other people with your consent, unless there are exceptional circumstances. Gaining your consent is the core principle used by this practice in using and sharing your information.

We sometimes share your personal information:

- in an unidentified manner with third parties who work with our practice for clinical purposes, such as accreditation agencies. This practice may use patient health information to assist in improving the quality of care we give to all our patients, by reviewing the treatments used in the practice. Your information held by the practice may be used in research projects to improve healthcare in the community. However, this information will not include any data that can identify you. We never allow third parties to remove any data or contact patients to participate in clinical trials without letters originating from the medical centre.
- with other healthcare providers within the organisation
- 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 (e.g. hospitalised patient when a doctor requests assistance to manage patient care)
- to assist police 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, e.g. through My Health Record (e.g. via Shared Health Summary, Event Summary).
- as required during the normal provision of medical services by your doctor. i.e. for referral to a medical specialist or other health service provider as part of patient care.

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.

We will not share your personal information with anyone outside Australia (unless under exceptional circumstances that are permitted by law) without your consent. In the event you are travelling outside of Australia and your records are requested to assist in your health needs whilst overseas, your records may be supplied with the correct authority.

Direct marketing

This practice does not engage in direct marketing at the time of printing of this document. If our policy changes, 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.

Use of SMS text messaging

This practice uses SMS text messaging for the following reasons.

- to remind patients of appointments for some doctors and medical staff (those who have long appointments e.g., psychologists, dieticians or those with long waiting lists)
- to advise if the doctor is sick
- as part of our emergency response plan if it is unsafe to attend the medical centre
- E - scripts, results notification and clinical reminders
- future uses may be considered if deemed suitable by the doctors (e.g. results notification or reminders)
- you can be removed from receiving SMS reminders at any time by speaking to reception.

How do we store and protect your personal information?

Your personal information may be stored at our practice in an electronic format. Any correspondence, received in an alternative method e.g. post, is then scanned into your personal records and the paper document is then shredded. X-rays, CT scans etc. are not held long term by the practice and are the responsibility of the patient. Documented photos are stored in your electronic records. Our practice stores all personal information securely. All electronic patient records, personal information, financial information etc. are securely stored using individual passwords, supported by confidentiality agreements for any staff and or contractors entering the premises. This system is maintained both within the practice, and via our IT consultants. Encrypted back-ups of all data is performed twice daily and held securely in the event of a fire to prevent data loss. Data is stored in accredited Australian servers bound by Australian privacy laws.

We keep health information for a minimum of 7 years from the date of last entry in the patient record (unless the patient is a child in which case the record will be kept until the patient attains or would have attained 25 years of age). The file is then made inactive.

Protection of your information in practice

Administration staff have only access to billing and demographic information. Whilst responsible for scanning and placing documents in your file, they are unable to open your clinical record or view it. Practice staff collect patient personal and demographic information at registration and at each visit. Patients are encouraged to pay attention to the registration form that they complete as a new patient. Our practice will take reasonable steps to correct your personal information where the information is not accurate or up to date. You will therefore be asked at each visit to update your demographic data which may include next of kin information.

Nursing and clinical staff can access your medical file for clinical purposes only. Nurses may contact you for clinical purposes and may ask you to identify yourself over the phone to ensure they are speaking to the correct person.

During the course of providing medical services the practice's healthcare practitioners will consequently collect further personal information.

Staff cannot disclose any information to any third party without that person's consent. (We sometimes cannot tell you your relatives results.)

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 and our practice will respond within a reasonable time, (generally within 30 days of receipt of the request).

For transfer of medical records, once the request has been considered, approved by the doctor, and signature checked with your recorded signature, a faxed patient summary will be sent as soon as possible. This is a detailed document summarising your medication, medical history, immunisations and social history. This is provided for free and is adequate for continuing your care. X-ray results and pathology results can be downloaded directly into your new practice's file. Correspondence from hospitals and specialists can be obtained directly from the providers. A complete electronic file or paper file can be printed and sent to your new clinic via registered mail. There will be a fee charged for the administration time and associated costs. When providing your patient file for legal reasons (to lawyers) we ask you to consider what processes they have in place to secure your privacy and who is going to read this file. It may be prudent to discuss this with your GP.

The patient may be asked to clarify the scope of the request for transfer of medical records or access by a third party. The material over which a doctor has copyright might be subject to conditions that prevent or restrict further copying or publication without the doctor's permission (e.g. certain specialist letters, care plan templates). We will endeavour transfer your files upon your request.

Patient Consent

The practice will only interpret and apply a patient's consent for the primary purpose for which it was provided. The Practice staff must seek additional consent from the patient if the personal information collected may be used for any other purpose.

Parents and guardians of children

To protect the rights of a child's privacy, access to a child's medical information may at times be restricted for parents and guardians. Release of information may be referred back to the treating doctor where there professional judgement and the law will be applied.

Complaints, questions or correcting information

Firle Medical Centre understands the importance of confidentiality and discretion with the way we manage and maintain the personal information of our patients. The Practice takes complaints and concerns about the privacy of patient's personal information seriously. Patients should express any privacy concerns in writing. The Practice will then attempt to resolve it in accordance with its complaint resolution process.

All administration staff of Firle medical Centre can be asked to correct any information held by us concerning patient's own demographic information. Changes to clinical information must be performed by a doctor at a consultation.

In the instance where you are dissatisfied with the level of service provided within the clinic or wish to correct any information held by us concerning your own information; or find out more about how we deal with personal information, we encourage you to discuss any concerns relating to the privacy of your information with administration staff (who will formalise your request via our dispute process) or your doctor.

Confidential concerns can be addressed to The Practice Manager Firle Medical Centre PO Box 1096 Firle SA 5070 All requests in writing will be responded to within 30 days of receipt.	If the complaint has not been resolved to your level of satisfaction all complaints should be directed to: The Federal Privacy Commissioner Level 8 Piccadilly Tower 133 Castlereagh Street Sydney NSW 2000 Privacy Hotline: 1300 363 992
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