

# KEILOR DOWNS MEDI-CLINIC



## Keilor Downs Medi Clinic - Privacy Policy

### Introduction

The purpose of this privacy policy is to outline how Keilor Downs Medi-Clinic complies with confidentiality and privacy obligations. This document is also to provide information to you, the patient, on how your personal information (which includes your health information) is collected and used within the practice, and the circumstances in which we may share it with third parties. A high level of trust and confidentiality is required to ensure the confidence of the patients we serve.

### Why and when your consent is necessary

When you register as a patient of our practice, you provide consent for the 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?

The practice 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. We also use it for directly related business activities, such as financial claims and payments, practice audits and accreditation. Patients will be assured that their privacy will be protected when visiting the practice, the information collected and retained is correct and up to date and that they can access their information for review.

### What is the definition of a patient health record and what information is captured?

We collect personal and health related information for the primary purpose of providing comprehensive, ongoing, holistic medical care to individuals and families in accordance with accepted, high quality general medical practice. The minimum personal and health details we require to be able to provide you with safe medical care include your:

- Full name (As held by Medicare)
- Date of birth

- Residential address and postal address
- Contact phone numbers
- Current Medicare number (where available) for identification and claiming purposes
- DVA number
- Current Health Care Card or Pension Card number where appropriate
- Details of any allergies or suspected allergies
- Current drugs or treatments used by the patient
- Previous and current medical history, including where clinically relevant a family medical history
- 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

To assist us in providing you with the best possible care you will also be asked for information about:

- If you identify as Aboriginal or Torres Strait Islander
- Your Next of Kin &/or an emergency contact
- Lifestyle information such as nutrition, exercise, smoking & alcohol
- Cultural information such as languages spoken and country of origin

In addition, the Patient Health Record also includes the following information:

- Medical information including current and previous medical history, medications/drugs/treatments used by the patient, allergies, adverse events, immunisations, social history, family history and risk factors, name of any health service provide 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.

### How do we collect your personal information?

The practice may collect your personal information in several different ways. When you make your first appointment the practice staff will collect your personal and demographic information via your registration. During providing medical services, we may collect further personal information. 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 specialist, allied health professionals, hospital, community health services and pathology and diagnostic imaging services
- Health fund, Medicare, or the Department of Veterans' Affairs (as necessary)

How do we inform you about the practice's policies regarding the collection and management of your personal health information?

We inform you via:

- Brochures in the waiting area
- Patient information Sheet
- New Patient Forms – 'Consent to share information'
- Verbally if appropriate
- The Practice's website

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

We sometimes share your personal information:

- With third parties who work with the 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 (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 and 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 eTP, My Health Record

Only people who need to access your information will be able to do so. Other than when providing medical services, or as otherwise described in this policy, the 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.

The 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 not consent, you may opt out of direct marketing at any time by notifying the practice in writing.

How informed consent is obtained in real time via telehealth consultation?

When providing and documenting care during consultation services, patient verification (such as name, address and date of birth) and consent are required prior to conducting the consultation. The consultation is documented in the same complete and accurate way the practitioner would document a physical consultation.

The consulting practitioner will:

- Meet usual obligations to document consultations and usual obligations to maintain a patient health record containing current patient health information held by the practice.
- Obtain verbal informed consent from the patient to proceed with a telephone or video consultation as well as if any other person/third party is present during the consult and document this informed consent, whether the consultation was conducted via telephone or video and in the patient's health record.
- Document clinical findings, diagnosis, diagnostic investigations, procedures or medicines prescribed and documenting if any follow up is required.
- Document any technical malfunctions during the telephone or video consult (eg poor image or sound) that may have compromised the safety or quality of the consultation.

How do we store and protect your personal information?

Your personal information will be stored at our practice in an electronic form. The practice stores all personal information securely. Using encrypted data and security tools.

How can you access and correct your personal information at our practice and how do you obtain informed consent?

You have the right to request access to, and correction of, your personal information. The practice acknowledges patients may request access to their medical records. We require you to put this request in writing and the practice will respond within a reasonable time, usually 30 days.

The 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 the practice is correct and current. You may also request that we correct or update your information.

How do we use document automation technologies?

As we ensure that your privacy always remains our utmost concern, electronic documents generated by the practice such as referral, medical certificates, etc. utilise appropriate and secure document automation technologies.

The practice utilises a secure medical software, which has a word processing application to generate documents as and when required. This Word processing application has algorithms to automatically import strictly relevant medical information only, required for the patient and for the documentation.

The medical software has proper security authentication protocols with unique user credential which can only be accessed by authorised Practice staff according to their roles and responsibilities.

How can you lodge a privacy-related complaint, and how will the complaint be handled at the 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 the practice's resolution procedure.

Please address any concerns to the Practice Manager, Keilor Downs Medi Clinic, 1 Oslo Way, Keilor Downs, VIC, 3038. You can also share your concerns via email at [info@keilordownsmedi.com.au](mailto:info@keilordownsmedi.com.au)

These complaints will be handled in a timely manner, usually within 30 days.

You may also contact the Officer of the Australia Information Commissioner (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.

### **Policy Review Statement:**

This privacy policy will be reviewed annually to ensure it is in accordance with any changes that may occur and will be updated via our website ([www.keilordownsmedi.com.au](http://www.keilordownsmedi.com.au)) Additionally, it will be reviewed in line with any changes to State of Federal Privacy Laws, as and when required.

The policy was last reviewed on 27 June 2024. Scheduled date for next review is 27 June 2025.

### **Purpose**

This pamphlet explains how personal information about you and your health is recorded and managed in our practice. We also have a written privacy policy describing how we manage personal information. You can receive a copy of our policy free of charge upon request or access it via our practice website.

### **Personal information**

The 'personal information' we collect includes your name, date of birth, address/es, contact details, Medicare number, healthcare identifiers and health fund details. Medical information may include medical history and any care you may need. GPs need information about your past and present health in order to provide you with high-quality care.

Our practice follows the guidelines of the RACGP's Handbook for the management of health information in general practice, 3rd edition (the Handbook). The Handbook incorporates federal and state privacy legislation, and the Australian Privacy Principles, which requires that your personal information is kept private and secure.

### **Your medical records**

This practice takes steps to ensure that your medical records:

- are accurate, complete, well-organised and legible
- are up-to-date
- contain enough information to allow another GP to care for you
- contain a summary of your care
- can be used to remind you, with your permission, to return for follow up, check-ups and reviews.

If you are uncertain why information is being requested, please ask your GP or the practice staff.

If you wish to remain anonymous while accessing healthcare services, please talk to the practice staff.

### **Providing your information to other GPs**

In this practice, it is normal for all GPs to have access to your medical records. If you have any concerns about this, please discuss them with your GP or practice staff.

It is important that other people involved in your care, such as medical specialists and other healthcare professionals, are informed of the relevant parts of your medical history, so they can provide the best care for you. Your GP will let you know when this is necessary.

### **Providing your information to others**

GPs respect your right to decide how your personal information is used or shared. For example, this may be sharing your health information with specialist doctors. 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 guiding principle used by this practice in using and sharing your information.

Our practice will not share your personal health information with anyone else or another organisation unless:

- you have consented to this sharing, or
- they are legally obliged to disclose the information, in which case your GP will first discuss with you the information that she or he is legally obliged to disclose, or
- the information is necessary for you to obtain Medicare payments or other health insurance rebates, or
- there is an overriding public health and safety interest in the release of the information.

In the above cases, only information necessary to meet the requirements will be provided. Your health information will not ordinarily be sent overseas unless:

- you are informed and provide consent for this to occur, and
- the overseas country receiving the information has privacy laws that are very similar to the Australian Privacy Principles.

### **Using health information for quality improvement and research**

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 data that can identify you.

The information used for research, including the publication of research results, will not be in a form that would allow you to be identified, unless the research serves an important public interest. In such cases, identifiable medical records can be used for medical research without your consent under guidelines issued by the Australian Government. Before providing such identified information, your GP will discuss with you the information that she or he is obliged to disclose.

### **Security of information in the practice**

Australian privacy legislation applies to all personal health information recorded in electronic and paper records. All records must be kept secure to protect against unauthorised access. This practice complies with these requirements to protect your information.

### Access to your health information

You may ask practice staff about any aspect of your healthcare, including information contained in your record. You can request access to your medical record and any other information the practice records about you.

If you request access to your medical record, your GP will need to consider if there may be a risk of physical or mental harm to you or any other person that may result from disclosure of your health information. Your GP may need to remove any information that will affect the privacy of other individuals.

Sharing information is important for good communication between you and practice staff. Your GP is able to provide a full explanation of the health summary or medical record you are provided access to.

Depending on what is involved, you may be asked to contribute to the cost of providing the information.

### Direct marketing

This practice does not engage in direct marketing.

### Resolving concerns regarding the privacy of your health information

If you have any concerns regarding the privacy of your personal health information or the accuracy of the information held by the practice, you should discuss these with practice staff. Inaccurate information can be corrected or your concerns noted in your record. For legal reasons, the original notes will be retained.

#### Disclaimer:

This pamphlet template is intended for use as a guide only and may not be relevant to particular practices or circumstances. The Royal Australian College of General Practitioners used best endeavors to adapt the template to general practice's current and anticipates privacy requirements. Always use your own skill and judgement when implementing any such recommendations or procedures; The use of this template does not of itself guarantee compliance with privacy laws, nor discharge any owed duty. We suggest you seek appropriate advice.

According, the RACGP is not responsible to users for any reliance on this template or any information it contains, and users waive any such claim against the RACGP.

### Contacts

If you have questions or a complaint about the privacy of your personal information, please ask to speak to the privacy contact officer at the practice.

#### Further information on privacy legislation is available from:

**Office of the Australian Information Commissioner**  
1300 363 992  
[www.oaic.gov.au](http://www.oaic.gov.au)

**ACT Health Services Commissioner**  
02 6205 2222  
[www.hrc.act.gov.au/health](http://www.hrc.act.gov.au/health)

**Health and Disability Services Complaints Office**  
Western Australia – 1800 813 583  
[www.hadsco.wa.gov.au/home/index.cfm](http://www.hadsco.wa.gov.au/home/index.cfm)

**Information and Privacy Commission**  
New South Wales – 1800 472 679  
[www.ipc.nsw.gov.au/privacy/ipc\\_index.html](http://www.ipc.nsw.gov.au/privacy/ipc_index.html)

**Office of the Health Services Commissioner**  
Victoria – 1300 582 113  
[www.health.vic.gov.au/hsc/index.htm](http://www.health.vic.gov.au/hsc/index.htm)

**Office of the Information Commissioner**  
Northern Territory – 1800 005 610  
<https://infocomm.nt.gov.au>

**Office of the Information Commissioner**  
Queensland – 07 3234 7373  
[www.oic.qld.gov.au](http://www.oic.qld.gov.au)

**Ombudsman Tasmania**  
1800 001 170  
[www.ombudsman.tas.gov.au](http://www.ombudsman.tas.gov.au)

**Health and Community Services Complaints Commissioner (HCSCC)**  
South Australia – 08 8226 8666  
[www.hcsc.sa.gov.au](http://www.hcsc.sa.gov.au)

Revised: 17/11/2023

Next Review Date: 16/11/2024

S:\Clinic\ADMIN\Management\ACCREDITATION\ACCREDITATION 2024



*Keeping your  
personal  
information  
private in our  
practice*

### **Keilor Downs Medi Clinic**

1 Oslo Way, Keilor Downs 3038

**Ph:** 9364 1000 **Fax:** 9364 3900

**Email:** [info@keilordownsmedi.com.au](mailto:info@keilordownsmedi.com.au)

**Web:** <https://www.keilordownsmedi.com.au>