# Kallista Medical Centre Privacy Policy

**Current as of:** **August 2023**

The objective of this privacy notice is to provide you, our patient, with clear information on how your personal information is collected and used within the practice. Occasionally we also need to share your personal information to involve others in your healthcare and this policy outlines when, how, and why we share your information.

### 1. Who can I contact about this policy?

For enquiries concerning this policy, you can contact the Practice Manager.

### 2. When and why is your consent necessary?

When you register as a patient of this practice, you provide consent for the GPs and practice staff to access and use your personal information to facilitate the delivery of healthcare. Access to your personal information is restricted to practice team members who require it for your care. If we ever use your personal information for purposes other than healthcare provision, we will obtain additional consent from you.

It is important to us that as our patient, you understand why we collect and use your personal information.

### 3. Why do we collect, use, store, and share your personal information?

The practice collects, uses, stores, and shares your personal information primarily to manage your health safely and effectively. This includes providing healthcare services, managing medical records, and ensuring accurate billing and payments. Additionally, we may utilise your information for internal quality and safety improvement processes such as practice audits, accreditation purposes, and staff training to maintain high-quality service standards.

### 4. What personal information is collected?

The information we will collect about you includes your:

- names, date of birth, addresses, contact details
- carer/emergency contact details
- medical information including medical history, medicines, allergies, and adverse reactions immunisations, social history, family history and risk factors
- Medicare number (where available) for identification and claiming purposes
- healthcare identifier numbers
- health fund details, if applicable.

### 5. Can you deal with us anonymously?

You can 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.

### 6. How is personal information collected?

The practice may collect your personal information in several different ways:

When you make your first appointment, the practice team will collect your personal and demographic information via your registration.

We may also collect your personal information when you visit our website, send us an email or SMS, telephone us, make an online appointment or payment, or communicate with us using social media, or online platforms.

In some circumstances, personal information may also be collected from other sources, including:

- Your guardian or responsible person, or your Emergency Contact as provided by you
- 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 (if relevant).
- While providing medical services, further personal information may be collected via:
    - electronic prescribing
    - My Health Record
    - MyMedicare registration
    - online booking and payment system.

Various types of images may be collected and used, including:

- **Photos and medical images:** These can be taken using personal devices for medical purposes, following the guidelines outlined in the RACGP Guide on using personal devices for medical images.

We will always comply with privacy obligations when collecting personal information from third-party sources. This includes ensuring transparency with patients, obtaining necessary consents, maintaining data accuracy, securing the information, and using it only for specified purposes.

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

We sometimes share your personal information:

- with third parties 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 (e.g. In referral letters)
- 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 it is a statutory requirement to share certain personal information (e.g. some diseases require mandatory notification)
- When it is provision of medical services, through electronic prescribing, My Health Record (e.g. via Shared Health Summary, Event Summary).

Only people who need to access your personal information will be able to do so. Other than 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 do not share your personal information with anyone outside Australia (unless under exceptional circumstances that are permitted by law) without your consent.

### 8. Will your information be used for marketing purposes?

The practice will not use your personal information for marketing any goods or services directly to you without your expressed consent. If you do consent, you may opt out of direct marketing at any time by notifying the practice in writing.

### 9. How is your information used to improve services?

The practice may use your personal information to improve the quality of the services offered to patients through research, analysis of patient data for quality improvement and for training activities with the practice team

We 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.

### 10. How are document automation technologies used?

Document automation is where systems use existing data to generate electronic documents relating to medical conditions and healthcare.

The practice uses document automation technologies to create documents such as referrals, which are sent to other healthcare providers. These documents contain only your relevant medical information.

These document automation technologies are used through our secure medical software Best Practice.

All users of the medical software have their own unique user credentials and password and can only access information that is relevant to their role in the practice team.

The practice complies with the Australian privacy legislation and APPs to protect your information.

All data, both electronic and paper are stored and managed in accordance with the Royal Australian College of General Practitioners Privacy and managing health information guidance.

### 11. How are Artificial Intelligence (AI) Scribes used?

Some Doctors may use an AI scribe tool to support GPs take notes during their consultations with you. The AI scribe uses an audio recording of your consultation to generate a clinical note for your health record. The Doctors using an AI scribe service will inform you about the service they are using and obtain your consent.

Any services being used:

- does not share information outside of Australia
- destroys the audio file once the transcription is complete.
- removes sensitive, personal identifying information as part of the transcription

The practice will only use data from any digital scribe service to provide healthcare to you.

### 12. How is your personal information stored and protected?

Your personal information may be stored in various forms such as paper records, electronic records, visual records and audio recordings.

The practice stores all personal information securely. Our practice stores all personal information securely and takes reasonable steps to protect personal information from misuse, interference and loss, unauthorized access, modifications or disclosure:

All electronic records are protected by IT security processes including firewalls, individual passwords, malware and anti-virus software, automatic log offs, log file/electronic audit trails, and encryption of data for transmission. Electronic data, including hard drives and external data storage devices are securely erased to ensure that data cannot be recovered or reconstructed after disposal.

All staff, independent practitioners and contractors are required to sign confidentiality agreements and receive training in the National Privacy Principals and our practice Privacy Policy.

Paper based records are stored in a securely locked, off-site environment and hard copy information is securely disposed of.

### 13. How can you access and correct your personal information at the practice?

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 in writing.

The practice will respond to any requests to access or correct your personal information within 30 days. Reasonable fees may apply for the costs of complying with your request.

The practice will take reasonable steps to correct your personal information where the information is not accurate or up to date. Sometimes, we will ask you to verify your personal information held by the practice is correct and current. You may request we correct or update your information. To do this please contact the Practice Manager or your Doctor.

### 14. 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. We will then attempt to resolve it in accordance with the resolution procedure. Please provide your request in writing addressed to The Practice Manager – Kallista Medical Centre, 1 Church Street, Kallista, Vic, 3793. A response will be provided within 14 days to discuss your concerns and attempt to solve the issue..

If you do not feel we have resolved your issue You may also contact the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner will require you to give them time to respond before they investigate. For further information visit **www.oaic.gov.au** or call the OAIC (Office of the Australian Information Commissioner) on 1300 363 992.

### 15. How is privacy on the website maintained?

We do not collect personal information via our website and our social media has comments disabled to protect patient privacy. We discourage regular contact via email and do not routinely provide our email address to patients, nor advertise it on our website or social media. Any information sent via email is either encrypted by our clinical software or password protected for security purposes, unless authorised by patient consent.

### 16. Policy review statement

Our privacy policy is regularly reviewed to ensure compliance with current obligations.

If any changes are made:

- They will be reflected on the website.
- Significant changes may be communicated directly to patients via email or other means.

Please check the policy periodically for updates. If you have any questions, feel free to contact us.