

# PRIVACY & PATIENT HEALTH INFORMATION MANAGEMENT POLICY

## 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.

At St George on Mermaid Beach Medical Centre, all GPs and practice staff ensure that patients can discuss issues relating to their health, and that the GP can record relevant personal health information, in a setting that provides visual privacy and protects against any conversation being overheard by a third party.

## 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.

Staff will not enter a consultation room during a consultation without knocking or otherwise communicating with the GP.

Staff, registrars, and students will not be present during the consultation without the prior permission of the patient.

## 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 (e.g. staff training).

## What personal information do we collect?

The information we will collect about you includes your:

- 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

## Dealing with us anonymously

As per Australian Privacy Principles (APPs), 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.

For more information, visit <https://www.oaic.gov.au/agencies-and-organisations/app-guidelines/chapter-2-app-2-anonymity-and-pseudonymity>

## How do we collect your personal information?

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

1. When you make your first appointment our practice staff will collect your clinical and demographic information via your registration.
2. During the course of providing medical services, we may collect further personal information. Eg. via My Health Record Shared Health Summaries, Event Summaries.
3. 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 communicate with us using social media.
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
  - Medicare, or the Department of Veterans' Affairs (as necessary).

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

We sometimes share your personal information:

- with third parties who work with our practice for business purposes, such as accreditation agencies and 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 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)
- while providing medical services, through My Health Record (e.g. via Shared Health Summary).

Only people who need to access your information will be able to do so. Other than while 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?

Our practice stores all personal information electronically on a password protected information system and backed up on an off-site cloud-based system which is highly secure and encrypted.

We value and are committed to protecting your privacy. All information about you at this practice is kept in the strictest confidence and we operate in accordance with the Privacy Act (1988). In our practice, computer

screens are positioned so that individuals cannot see information about other individuals, access to computerized patient information is strictly controlled with passwords and personal logins, and automatic screen savers. A confidentiality agreement is signed by all employees of St George on Mermaid Beach Medical Centre.

## 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.

This practice will alter personal health information at the request of the patient when the request for alteration is straightforward (eg. 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.

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 that your personal information held by our practice is correct and current. You may also request that we correct or update your information, and you should make such requests in writing to [info@stgmc.com.au](mailto:info@stgmc.com.au)

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.

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 30 days. There may be a release of records fee ranging anywhere from \$100 to \$500 depending on the complexity of the records. Patients cannot be charged for making the request, only for the cost of complying with the request.

## 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.

This can be done by emailing us at [info@stgmc.com.au](mailto:info@stgmc.com.au) or phoning us on 5568 0332. You may also submit a letter and address it to:

The Practice Manager  
St George on Mermaid Beach Medical Centre  
2506 Gold Coast Hwy  
Mermaid Waters QLD 4218

The Practice will respond to your complaint within 30 days.

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 363 992. You may also contact the Queensland Ombudsman on 3005 7000 or visit <https://www.ombudsman.qld.gov.au>

## Privacy and Our Website

[www.stgmc.com.au](http://www.stgmc.com.au) is an online information and reference website, consisting of services St George on Mermaid Beach Medical Centre provides alongside content and links that may be of importance to patients.

The existence of external links on our website shall not be construed as St George on Mermaid Beach Medical Centre endorsement, sponsorship, or affiliation. These are there for educational purposes ONLY.

If you access these sites, you do so at your own risk. While information and third-party information contained on these sites have been presented with all due care, St George on Mermaid Beach Medical Centre does not warrant or represent that the information or third-party information, will remain unchanged after the date of publication and is free from errors or omissions. It is your responsibility to make own investigations, decisions and enquiries about the information retrieved from other internet sites.

## Privacy and Appointment Bookings and Reminders

Appointment bookings can be done through our website [www.stgmc.com.au](http://www.stgmc.com.au)

St George on Mermaid Beach Medical Centre has an agreement with an external provider HotDoc. The latter does not have direct contact with our practice, only through our cloud server. All communication between HotDoc and St George on Mermaid Beach Medical Centre is highly encrypted. HotDoc only handles data relating to the patient appointment, such as mobile number, email, time and day of the appointment. No other sensitive patient records are used or stored on the HotDoc system. [www.hotdoc.com.au](http://www.hotdoc.com.au) provides Terms or Service for the HotDoc application.

## Privacy and BetterConsult Pre-Consultation Questionnaire

Our practice uses BetterConsult, a pre-consultation questionnaire that provides important information to your doctor about the reason for your upcoming appointment. BetterConsult helps you and your doctor get the most out of your consultation. BetterConsult uses industry-standard security; your information is only shared with your doctor and is completely secure and confidential. For more information, visit [au.betterconsult.com](http://au.betterconsult.com)

## Policy Review & Staff Training

This privacy policy will be reviewed regularly to ensure it is in accordance with any legislative and/or organizational that may occur.

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.

We will notify patients through the website when we amend this policy.