

## Privacy Policy

As at 28/09/2022

### 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 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?

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).

### 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
- health fund details

### 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. Please be aware that should you choose to deal with us anonymously or under a pseudonym, you will be required to pay for consults in full and that no rebate will be payable through Medicare if you do not use the name on your Medicare card.

### 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 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 My Health Record, eg via Shared Health Summary, Event Summary or through a Discharge Summary.
3. We may also collect your personal information when you contact us via 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
  - your health fund, 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 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 eTP (electronic prescriptions), My Health Record (via Shared Health Summary, Event Summary).
- 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

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.

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.

Trinity Medical Centre provides aggregated, de-identified health data to the WA Primary Health Alliance for population health review purposes. This data contains no information that is identifiable to an individual patient and is sent securely with encryption.

## **How do we store and protect your personal information?**

Your personal information may be stored at our practice in various forms. Our practice stores information as electronic records, visual records (including photos) and archived paper records.

Our practice stores all personal information securely via the use of passwords, encrypted back-ups, confidentiality agreements for staff and secure cupboards.

## **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 the request in writing. The request can be emailed to [reception@trinitymedicalkalgoorlie.com.au](mailto:reception@trinitymedicalkalgoorlie.com.au). Our practice will acknowledge your request within 30 business days. We can post the requested information to your postal address, or we can email the information to you in accordance with our Email Policy.

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 [reception@trinitymedicalkalgoorlie.com.au](mailto:reception@trinitymedicalkalgoorlie.com.au).

## **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 should be addressed to the Practice Manager, 24 Piccadilly Street, Piccadilly WA 6430 or [keryn@trinitymedicalkagloorlie.com.au](mailto:keryn@trinitymedicalkagloorlie.com.au). Alternatively, you can call the practice on 9091 8707. We will respond with acknowledgement of your complaint within 3 business days and have your complaint fully investigated within 30 business days.

You may also contact the Office of the Australian 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.

## **Privacy and our website**

If you “like” or comment on our Facebook page, we will have your social media name. No information is collected via our website unless you explicitly provide it (eg your email address)

## **Data Breach**

In the event of a privacy breach, the practice will respond in accordance with our Data Breach Policy Plan.

## **Policy review statement**

This privacy policy will be reviewed annually to ensure it is in accordance with any changes that may occur.

## **The Practice will:**

- provide a copy of this policy upon request
- ensure staff comply with the APP and deal appropriately with inquiries or concerns
- take such steps as are reasonable in the circumstances to implement practices, procedures and systems to ensure compliance with the APP and deal with inquiries for complaints.
- collect personal information for the primary purpose of managing a patient’s healthcare and for financial claims and payments.

## **The Practice staff will take reasonable steps to ensure patients understand:**

- what information has been and is being collected
- why the information will be used or disclosed
- why and when their consent is necessary
- the Practice’s procedures for access and correction of information, and responding to complaints of information breaches, including this privacy policy.