

PRIVACY POLICY



We recognise that your privacy is very important to you and we are committed to protecting your personal information in accordance with the Australian Privacy Principles under the Privacy Act 1988 (Cth) and in accordance with other applicable privacy laws. This Policy applies to personal information we collect and handle about individuals including patients who visit our clinics, visitors to our websites, users of services we may from time to time provide and members of the public. It provides information about the personal information we collect and the ways in which we use and disclose that personal information, our policies for managing personal

What information does Littlehampton Medical Centre collect about you?

When you become a patient of a GP consulting from Littlehampton Medical Centre, a record is made which includes personal information such as your name, address, date of birth, contact details and emergency contact details. Personal information collected about you to provide, or in providing, healthcare services is considered health information and is treated as sensitive information. We may also collect other personal information about you which is considered sensitive information (such as information about your racial / ethnic origin) where this is relevant to the services we provide to you. Your previous and current medical history (including, where clinically relevant, a family medical history) and details of treatment and health services you have received;

- medical practitioner consultation notes;
- medications you take;
- information about other healthcare professionals and health service providers who are involved in your care;
- information about your healthcare preferences and wishes;
- family contact information; and
- your attorney, guardian or other person responsible for your healthcare decisions.

We may also collect information relevant to administering your payment arrangements such as your banking details, your pension entitlements and any other relevant information. Where it is relevant to administering your payment arrangements, we will collect information such as your Medicare number, Department of Veterans' Affairs (DVA), pension or health care card number and your entitlement to benefits. Where we have collected a government related identifier (such as your Medicare number), we will not adopt that identifier as our own identifier and we will only use or disclose that identifier as required or permitted by law.

Your health information will be stored in a "patient health record" which is stored securely in our practice management system. The patient health record is a collection of your health information that is essential for your present and future care. Your patient health record contains sufficient information to identify you, as well as information relevant to your treatment including, for example:

- your medical history;
- any orders and results of any physical examinations or tests;
- information relating to allergies; and
- any other factors that may need special consideration.

Littlehampton Medical Centre, and GP's consulting from our clinics, do not conduct recorded telehealth (audio or visual) consultations. In the event your GP would like to record a consultation, the Doctor will obtain your consent before doing so.

How do we collect your personal information?

Littlehampton Medical Centre will, where practicable, collect information from you when:

- you register as a patient of a GP consulting from our practice and complete and submit documentation;
- you communicate with us via email, telephone, SMS, our websites or social media or make an online appointment;
- you interact with our websites;
- you communicate with staff or representatives during the course of us providing services to you (including information collected through electronic transfer of prescriptions (eTP), MyHealth Record / PCEHR system, for example via Shared Health Summary or Event Summary); and
- you otherwise deal with us in the course of our business.

However, we may also need to collect information from other sources such as your GP who consults at our clinic, treating specialists, radiologists, pathologists, hospitals, other health care providers, and the MyHealth record system and other third parties including:

- other healthcare professionals and health service providers involved in your care;
- government agencies responsible for administering relevant entitlements and benefits (such as Centrelink, Medicare, Department of Social Services, National Disability Insurance Agency, Department of Veterans Affairs, and other government agencies responsible for home care services); and
- credit reporting agencies.

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We may also collect information about you from your family members, a carer, an attorney, a guardian or a person responsible for your healthcare decisions. If the personal information you provide to us is incomplete or inaccurate, we may be unable to provide you with the services you are seeking.

How does Littlehampton Medical Centre hold and protect your personal information?

Littlehampton Medical Centre primarily collects and holds your personal information in electronic form. Information held in electronic form is held securely on servers and computer systems. Certain information is collected and held in paper-based documents (such as administrative forms), which may be converted to electronic form and the original paper-based documents securely destroyed. We maintain physical security over our paper, visual, audio and electronic data stores, such as locks and security systems onsite and offsite. We also maintain computer and network security; for example, we use firewalls (security measures for the Internet) and other security systems such as user identifiers and passwords to control access to our computer systems. We take reasonable steps to ensure that personal information we collect is accurate, up-to-date, complete and relevant, other than where it is only collected to provide advice in respect of a particular point in time, in which case we will seek to ensure it is accurate, complete and relevant as at that particular point in time;

- ensure that personal information we use or disclose is accurate, up-to-date, complete and relevant, having regard to the purposes for which personal information is used or disclosed;
- protect personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure; and
- destroy or de-identify personal information which we no longer need for the purposes for which it was collected, except where it is necessary under law or to retain it in order to maintain ongoing medical records for patients of our GPs.

Littlehampton Medical Centre, and GPs consulting from our clinics, sometimes use document automation technology which streamlines the process for a doctor to prepare certain documents (e.g., referral letters). The templates created that use that technology are regularly reviewed to ensure only relevant personal information and health information is included and released to a third party (eg specialists, pathology providers, etc.).

Why does collect, hold and use your personal information?

Littlehampton Medical Centre collects personal information about patients in order to assess and manage your needs when we are providing our services to you. We also collect your personal information to enable your GP to provide health care, treatment and associated services to you. For example, we collect information about your health to ensure that our services respond to your healthcare needs; to ensure that our services are consistent with other healthcare services you receive; and to minimise the need for you to provide the same information on multiple occasions.

Further information about the way in which we may use and disclose your personal information is set out in the next section.

Providing accurate and complete information is important for the safety, quality and effectiveness of the services we provide. It is also important to ensure you receive the correct entitlements to benefits and funding for the services we provide. If you provide incomplete or inaccurate information, we may not be able to provide you with the services and treatment you seek. If you have any concerns about personal information, we have asked you to provide, please let us know.

When you check in at your appointments, we will ask you to identify yourself using your name, email, address and/or date of birth. This is required to ensure we have your correct file as some patients share the same names and birthdays. You have the option of not identifying yourself, or using a pseudonym, when dealing with us (for example, when making a general enquiry). However, it is usually not practicable for Littlehampton Medical Centre to deal with you anonymously or pseudonymously on an ongoing basis (for example, as a patient of a GP consulting from our clinic).

How does Littlehampton Medical Centre use and disclose your personal information?

We use and disclose personal information about you so that we can perform our business activities and functions and to provide the best possible quality of service to you. We use and disclose your personal information for the following purposes:

- to provide you with requested services (including contacting you regarding appointments, issue reminders or arrange referrals);
- to provide medical services and treatment to you, and to enable you to be attended by medical practitioners or other allied health professionals at our clinics; and
- assist medical practitioners at our clinics to provide you with appropriate health care, treatment and services.

There are circumstances where we may be permitted or required by law to disclose your personal information to third parties. For example, to Medicare, Police, insurers, solicitors, government regulatory bodies, tribunals, courts of law, hospitals, debt collection agents, the electronic transfer of prescriptions service or to the MyHealth record system.

It may also be shared with other healthcare professionals involved in your care and other persons involved in your care. Generally, this will only happen in ways you would reasonably expect or otherwise with your consent. For example, we may disclose your personal information to your GP or to a medical specialist involved in your care; to a hospital or aged care facility if you are referred for respite or higher levels of care; or to other healthcare professionals who are involved in your care such as nurses, occupational therapists, pharmacists, physiotherapists, podiatrists, dentists and the ambulance service.

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In certain situations, and as permitted by law, we may provide collect, use or disclose personal information without your consent. These situations include:

- lessening or preventing a serious threat to the life, health or safety of an individual, or to public health and safety;
- taking appropriate action in relation to suspected unlawful activity or serious misconduct;
- assisting in locating a missing person;
- establishing, exercising or defending an equitable claim;
- for the purpose of a confidential dispute resolution process;
- when there is a statutory requirement to do so; or
- during the course of providing medical services through electronic transfer of prescriptions or the MyHealth Record / PCEHR system (i.e. Shared Health Summary, Event Summary).

Administration and Management

Littlehampton Medical Centre will also use and disclose your personal information in the ordinary course of our business including for a range of administrative, management and operational purposes.

This includes:

- administering billing, payments and debt recovery;
- liaising with, and reporting to, government agencies in the administration of particular funding programs;
- administering subsidies and benefits to which you may be entitled from government agencies and other third-party payers (such as Centrelink, Medicare, Department of Social Services, Department of Veterans Affairs, and other government agencies responsible for primary care services);
- planning, managing, measuring and monitoring and evaluating our services;
- safety and quality assurance and improvement activities;
- statistical analysis and reporting;
- training staff, contractors and other workers;
- risk management and management of legal liabilities and claims (for example, liaising with insurers and legal representatives);
- meeting our obligations of notification to our medical defence organisations or insurers;
- responding to your enquiries and complaints;
- updating our records and keeping your contact details up to date;
- obtaining advice from consultants and other professional advisers;
- responding to subpoenas and other legal orders and obligations; And
- otherwise complying with applicable laws.

If you are a patient of a GP consulting from a Littlehampton Medical Centre clinic, we require your updated contact details as a safety measure for important appointment reminders and recalls. No private healthcare information regarding your individual circumstances or test results will be disclosed in these communications.

Littlehampton Medical Centre does not provide your personal information to other organisations for their direct marketing.

How can you access or seek correction of your personal information?

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 this request in writing and our practice will respond within 30 days. Your GP may then allocate time to go through your information with you. This is recommended to ensure you have a clear understanding of the information you require.

The fee for the transfer of medical records to another clinic is \$35.00.

Where the person requesting access is an authorised representative of the person about whom the information relates (such as an attorney or guardian), we will ask the representative to provide evidence of their authority (such as a copy of an Enduring Power of Attorney) where we do not already hold that information.

In certain circumstances, your request to access your personal information may be declined in accordance with privacy laws (for example, where giving access would put you or another person at risk of harm).

How long will Littlehampton Medical Centre hold your personal information?

Littlehampton Medical Centre will hold your personal information until it is no longer needed. Generally, if you are a patient, your personal information will be held for a minimum of 7 years from the date of last entry in your record (in the case of children, the record is kept until the patient attains or would have attained 25 years of age).

Information that is no longer needed, or required to be held by law, will be securely destroyed or de-identified.

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How can you make a complaint about the handling of your personal information?

You may contact us at any time if you have any questions or concerns about this Policy or about the way in which your personal information has been handled including the collection, use, disposal or destruction of your personal information. If you have a complaint about the privacy of your personal information (including complaints about our use of the MyHealth record system), we request that you contact us in writing.

We will generally respond to your complaint within 24 hours. If your complaint requires more detailed consideration or investigation, we will acknowledge receipt of your complaint and endeavour to complete our investigation into your complaint promptly.

We may ask you to provide further information about your complaint and the outcome you are seeking. We will then typically gather relevant facts, locate and review relevant documents and speak with individuals involved.

If you are not satisfied with our response to your complaint, you are entitled to make a complaint to the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992. Full contact details for the Office of the Australian Information Commissioner can be found online at www.oaic.gov.au.

This Policy was last updated on 1st Oct June 2024. The next review date will be 1st Oct 22024.