

# Mittagong Medical Centre: Privacy Policy

Current as of: 27/05/2024

## Introduction

This privacy policy is to provide information to you, our patient, on how your personal information (including your personal health record) is collected and used within our practice, and the circumstances in which we may share it with third parties. We keep electronic personal health records, which are a compilation of pertinent facts of a person's health history, made available instantly and securely to authorized users. This policy is written in accordance with the Australian Privacy Principles, available at:

<https://www.oaic.gov.au/privacy/australian-privacy-principles>

## 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.

## 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 patient registration form. From time to time you will also be asked to update this information for our records.
2. During the course of providing medical services, we may collect further personal information. For example, through electronic transfer of prescriptions (eTP) or participation in the My Health Record program.
3. We may also collect your personal information when you visit our website, send us an email, telephone us or make an online appointment via the HotDoc platform. The HotDoc Privacy Policy can be accessed via: <https://practices.hotdoc.com.au/privacy-policy/>
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 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
- 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, My Health Record (eg via Shared Health Summary, Event Summary).

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.

Our practice may use your personal information to improve the quality of the services we offer to our patients through research and analysis of our patient data.

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. More information can be found at:

<https://www.outcomehealth.org.au/services/polar/security/>

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

Your personal information will be stored at our practice in electronic or paper format.

Our practice stores all personal information securely. Electronic records are stored in security protected software which is back up remotely and that backup is stored offsite. Our team do not share passwords for any system which stores patient data. Paper records are securely locked and routinely reviewed for currency, after which time they are securely destroyed.

### 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 you to put this request in writing via a medical record request form available from administration. Our practice will respond within 30 days. A fee of \$40 including GST is associated with the production of medical records.

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 [admin@mmcentre.com.au](mailto:admin@mmcentre.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 to [practicemanager@mmcentre.com.au](mailto:practicemanager@mmcentre.com.au). You can also write to us at Mittagong Medical Centre, PO Box 255 Mittagong NSW 2575 or by phone on 02 4871 1500. We will then attempt to resolve your complaint within 30 days in accordance with our complaints resolution procedure.

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 can also lodge a complaint with the NSW Privacy



Commissioner via telephone on 1800 472 679 or via email to [ipcinfo@ipc.nsw.gov.au](mailto:ipcinfo@ipc.nsw.gov.au).

### Privacy and our website

In complying with the *Privacy Act 1988* and the *Privacy Amendment (Private Sector) Act 2000*, our practice provides this policy to users of our website about the collection, use and disclosure of personal information.

The website is continually monitored to ensure it is up to date.

### Privacy audit

Our practice conducts a privacy audit of the administration and patient management areas twice yearly using a pre-approved checklist to help support our compliance to the Australian Privacy Principles (APPs).

### Policy review statement

This privacy policy will be reviewed annually to ensure it is in accordance with any legislative or regulatory changes that may occur. Any changes will be announced via the patient information brochure and on the noticeboard in our waiting room.

**Next review date: May 2025**