

# Boardwalk Health Medical and Skin Centre Privacy Policy

Current as of: **November 2023**

**Next Review Date: November 2024**

## 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.

**Refer to patient registration forms.**

## 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.
- Photo ID (e.g., Driver's license)

## 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 registration.

2. During the course of providing medical services, we may collect further personal information.  
**This may be collected through electronic transfer of prescriptions (eTP), My Health Record, eg via Shared Health Summary, Event Summary, Pencat (de identified patient data) and Health Engine (online Booking)**
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.
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) Pencat (deidentified patient data)

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. Furthermore, the practice uses document automation technologies, particularly so that only the relevant medical information is included in referral letters.

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 our reception staff know if you do not want your information included.

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

Your personal information may be stored at our practice in various forms.

This practice stores information as paper records, electronic records, visual records (X-rays, CT scans and photos)

Our practice stores all personal information securely.

Personal health information is kept where only those with authorisation can access it, and is kept out of view of and unable to be accessed by the public (i.e. not left exposed on the reception desk, in the waiting room or other public areas; or left unattended in consulting or treatment rooms). To minimise this risk, automated screensavers are activated on all computer screens.

Members of the practice team have different levels of access to patient personal health information as appropriate to their roles and, to maintain security all computer hardware and software passwords are kept confidential and are not disclosed to others (refer to **Section 6.2 - Computer information security**).

Any information given to unauthorised persons will result in disciplinary action and possible dismissal. All staff members and contractors sign confidentiality agreements prior to commencement or work at our practice.

## 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 – please speak to reception staff to get you to fill out a **Personal Health Information Request Form** and our practice will respond within 30 days. Depending on the volume (more than 50 pages) a \$10.00 Admin Fee plus 10 cent per page will apply. If less than 50 pages, then only 10 cents per page will apply.

Information that requires posting will incur a \$30.00 admin fee plus 10 cent per page.

**Any information that is photocopied will incur a charge.**

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 **Practice Manager- [info@boardwalkhealth.com.au](mailto:info@boardwalkhealth.com.au) or hand in a letter addressed to Dr Wani or Practice Manager.**

## 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. Please email [info@boardwalkhealth.com.au](mailto:info@boardwalkhealth.com.au) or 9395 9402 **Please allow 30 days for your complaint to be assessed.**

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.

Office of Health Services Commissioner

Victoria- 1300 582 113

[www.health.vic.gov.au/hsc/index.htm](http://www.health.vic.gov.au/hsc/index.htm)

## Privacy and our website

Any personal information that comes via email is treated as confidential and is scanned into your file after it has been actioned by the Doctor. We do in some instances email documents via message porter where the attachments protected with encryption using password.

## Policy review statement

This privacy policy will be reviewed regularly to ensure it is in accordance with any changes that may occur. We won't routinely contact patients to notify of changes, but in the event of significant changes, we will use signage in our practice and website.

### **Disclaimer**

The *Privacy policy template for general practices* is intended for use as a guide of a general nature only and may or may not be relevant to particular practices or circumstances. The Royal Australian College of General Practitioners (RACGP) has used its best endeavours to ensure the template is adapted for general practice to address current and anticipated future privacy requirements. Persons adopting or implementing its procedures or recommendations should exercise their own independent skill or judgement, or seek appropriate professional advice. While the template is directed to general practice, it does not ensure compliance with any privacy laws, and cannot of itself guarantee discharge of the duty of care owed to patients. Accordingly, the RACGP disclaims all liability (including negligence) to any users of the information contained in this template for any loss or damage (consequential or otherwise), cost or expense incurred or arising by reason of reliance on the template in any manner.