

Doctors' Health SA Privacy Policy

Updated: January 2021

Approved: February 2021

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 Doctors' Health SA Limited (ABN: 16 145 204 039) 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. All staff employed by DHSA are contractually committed to adhere to strict confidentiality guidelines. 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 clinic activities, such as financial claims and payments, practice audits, accreditation and other quality improvement activities such as staff training.

What personal information do we collect?

The information we will collect about you includes your:

- names, date of birth, addresses, phone and email and emergency contact details
- medical information including medical history, medications, allergies, adverse events, immunisations, social history, family history and risk factors
- pathology and imaging test results
- medical correspondence between your health providers
- Medicare number (where available) for identification and claiming purposes
- healthcare identifiers
- health fund details.

Information we collect from you may be considered 'sensitive information'. We will only collect this information from you directly or from third parties with your consent unless otherwise authorised or required by law.

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 identifying demographic information via your registration.
2. During the course of providing medical services, we may collect further personal information for use with electronic transfer of prescriptions (eTP), My Health Record as well as use of deidentified for Quality improvement and research activities
3. We may also collect your personal information when you, 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 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 (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)
- 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. This information is de-identified to everyone other than your treating doctor and the Medical Director and only where necessary or in the absence of your treating doctor.

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 both electronic and hard copy formats.

Our practice stores all personal information securely. Electronic information is secured by password protected patient information systems as well as robust IT firewall and malware virus protection processes. Hard copy records are stored in secure authorised access areas only. Only your treating doctor and other authorised persons have access to all patient information. Authorised persons are bound by Confidentiality Agreements and receive regular Confidentiality training to uphold patient privacy.

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 email at reception@doctorshealthsa.com.au and our practice will respond within 30 days.

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 the clinic manager by email address reception@doctorshealthsa.com.au or mail to PO Box 7427, Hutt Street, Adelaide SA 5000.

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. If you would like to discuss your concerns with your treating doctor or the Clinic Manager, you can contact us during business hours on telephone (08) 82321250. You should also express any privacy concerns you may have in writing. We will then attempt to resolve it in accordance with our resolution procedure. All complaints should be addressed to The Clinic Manager at Doctors' Health SA, either via email amber.parham@doctorshealthsa.com.au or via mail to PO Box 7427, Hutt Street, Adelaide SA 5000. All complaints will be acknowledged in writing within 30 days at which time more details of our complaint's resolution process are provided.

You may also contact AHPRA (Australian Health Practitioners Regulatory Authority) www.ahpra.org.au or the office of the Australian Information Commissioner www.oaic.gov.au

Policy review statement

This privacy policy is reviewed regularly to ensure it is in accordance with any changes that may occur. Our Privacy Policy is accessible from our website www.doctorshealthsa.com.au. You can also request a copy of our Privacy Policy from staff when attending our service.