Privacy Policy

Introduction

The purpose of this document is to outline how Good Health Greenhills (GHGH) complies with its confidentiality and privacy obligations. As an organisation, GHGH's principal concern is and always will be the health of patients who visit our practice. A high level of trust and confidentiality is required to ensure the confidence of the patients we serve.

Patients will be assured that:

* their privacy will be protected when visiting the Practice,
* the information collected and retained in our records is correct and up-to-date, and
* they can access their information for review.

Health information

GHGH recognises that the information we collect is often of a highly sensitive nature and as an organisation we have adopted the highest privacy compliance standards relevant to GHGH to ensure personal information is protected.

For administrative and billing purposes, and to enable the patients to be attended to by other medical practitioners at GHGH, patient information is shared between the medical practitioners and other health providers at the practice. GHGH and the medical practitioners may collect personal information regarding patients (including health information) for the purpose of providing medical services and treatment.

Personal information collected will generally include:

* the patient's name, address, telephone number and Medicare number( where available) for identification and billing purposes, allergies, adverse events, immunisations and risk factors,
* current drugs or treatments used by the patient,
* previous/current medical history, including, where clinically relevant, a family medical history, and
* the name of any health service provider or medical specialist to whom the patient is referred, copies of any letters of referrals and copies of any reports back,
* Health identifiers.

GHGH may access information:

* provided directly by the patient,
* provided on the patient's behalf with the patient's consent,
* from a health service provider who refers the patient to medical practitioners providing services at or from GHGH, or from health service providers to whom patients are referred.

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 by law to only deal with identified individuals (such as claiming Medicare benefits).

If you choose to deal with us anonymously or under a pseudonym please discuss this with our staff who will assist you.

How do we collect your personal information?

Our practice may collect your personal information in several different ways.

* When you make your first appointment our practice staff or our on line appointment app will collect your personal and demographic information via your registration.
* During the course of providing medical services, we may collect further personal information. Information can also be collected through electronic transfer of prescriptions (eTP), My Health Record via Shared Health Summary, Event Summary or Hospital Discharge Summary.
* We may also collect personal information when you visit our website, send us an email or SMS, telephone us, make an online appointment and communicate with us using social media.
* 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)

Use or disclosure of personal information

Personal information collected by GHGH may be used or disclosed:

* for the purpose advised to the patient at the time of collection of the information,
* as required for delivery of the health service to the patient,
* as required for the ordinary operation of our services (i.e. to refer the patient to a medical specialist or other health service provider).
* as required under compulsion of law, or
* where there is a serious and imminent threat to an individual's life, health, or safety; or a serious threat to public health or public safety.
* GHGH may use or disclose personal information for quality assurance, accreditation, training, billing, liaising with government offices regarding Medicare entitlements and payments and as may be required by the Practice’s insurers.

Accuracy of your information

GHGH is committed to ensuring your information is accurate and has processes in place to ensure that the accuracy of this information is maintained. If you believe that the personal information GHGH holds about you is inaccurate, please inform the Practice staff or doctor when next attending the practice.

From time to time we will ask you to verify that your personal information held by our practice is correct and current.

Electronic Transmission of Referrals

We may transmit patient referrals electronically to other healthcare providers or specialists as part of your ongoing care. These electronic referrals may include personal and health information relevant to your treatment.

We take all reasonable steps to ensure that such information is transmitted securely, in accordance with applicable privacy laws and industry best practices. This includes the use of secure messaging systems, encrypted email, or other approved platforms designed to protect patient confidentiality.

By continuing to receive care from our practice, you acknowledge and consent to the electronic transmission of your referral information when necessary for your treatment. If you have concerns about electronic communication or prefer an alternative method, please inform our staff.

Security of information collected

Other than as described in this Policy or permitted under privacy principles, GHGH uses its reasonable endeavours to ensure that identifying health information is not disclosed to any person unnecessarily or irresponsibly.

Due to the sensitive nature of the information collected by the practice to provide its services, extra precautions are taken to ensure the security of that information. Information may be stored electronically and / or in hard copy form. All electronically stored files are password-protected on several levels, and regular backups of data are performed.

GHGH requires its employees to observe obligations of confidentiality in the course of their employment with all staff/contractors signing Confidentiality Agreements.

How long are medical records kept?

GHGH keeps health information for a minimum of 7 years from the date of last entry in the patient records unless the patient is / was a child in which case the record must be kept until the patient attains or would have attained 25 years of age.

Accessing your information

On written request, you may have access to your medical record held by GHGH, except in circumstances where access may be denied under the 'Privacy Act' or other laws. For example, access can be denied when letting a patient see their records would pose a serious threat to the patient's life or health, or the life or health of someone else (such as a relative, the health service provider, staff or other patients).

The threat must be significant, for example where there is a serious risk the patient may cause self-harm or harm to another person if they saw the information. The threat can be a risk of danger to physical or mental health, but does not need to be imminent - it can be a serious threat that might occur sometime after access is granted.

Can I transfer my medical records to a new medical practitioner?

Patients have the right to attend a medical practitioner of their choice and are free to leave a practice and attend another if they wish.

How do I arrange this?

There is a professional obligation for a medical practitioner to provide a new treating medical practitioner with all of the information that they need to take over a patient's care.

This is usually done by asking the new medical practitioner to arrange for the transfer of records from the previous treating medical practitioner. A signed consent form completed by the patient should be sent to the practice. Patients can also present to the practice to sign relevant release of information forms so the transfer of information can take place.

When a patient requests that their health records be transferred to a medical practitioner outside GHGH, the medical practitioner has an obligation to provide a copy or summary of the patient health record in a timely manner to facilitate care of the patient.

For medico-legal reasons, our practice retains the original record and provides the new medical practitioner with a summary or a copy. If a summary of the patient's health record is provided to the new medical practitioner, a copy of the summary should be kept on file for record purposes.

Can the doctor charge for the handing over of medical records?

Some medical practitioners may charge a fee for handling and copying their records to cover the administrative costs involved. The previous medical practitioner may charge a fee for providing a summary, especially if a patient's medical history is long and/or complex.

Website privacy

GHGH's website contains links to other sites. Please be aware that GHGH is not responsible for the privacy practices of any linked sites. We encourage users who leave our site to read the privacy statements of each and every linked website that they choose to visit.   All links to external sites are provided for your convenience. The information, products and advertisements contained in the linked sites are neither approved nor endorsed by GHGH, and GHGH is not responsible for such information, products or advertisements.

Your privacy is important to us and we want you to feel comfortable visiting our website. Any personal information that patients give to us, including e-mail addresses, will be used only in the following ways:

* personal data given to us by you will be securely stored,
* we will not provide your personal data to any third party without your permission,
* we do not automatically collect your personal e-mail address simply because you visit our site,
* if we join with a third party to provide services and you sign up for those services, we will share your name and other contact information necessary for our partner to provide the services to you,
* if you view specific pages or download information from specific pages on our website, we will track and add the number of your visits to the aggregate number of visits by all users in order to better design our website,
* we may share aggregate demographic information with our affiliates. This is not linked to any personal information that can identify you or any other visitor to our web site.

By using GHGH's website, you consent to the collection and use of your personal information as detailed in this Privacy Policy. We will post any changes to this Privacy Policy on our website so that you are kept up to date with the type of information we collect and the ways in which we use it.

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 attempt to resolve your complaint in accordance with our complaint management policy. Your complaint will be acknowledged in writing and you will be advised of the outcome of the investigation of your complaint in writing within 30 days.

You may also contact the OAIC (Office of the Australian Information Commissioner). 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 1300 363 992. Alternatively you can contact the Information and Privacy Commission (NSW) [www.ipc.nsw.gov.au/privacy/ipc\_index.html](http://www.ipc.nsw.gov.au/privacy/ipc_index.html) or call 1800 472 679

Contact information

If you have any queries or complaints regarding your Privacy please contact:

The Privacy Officer/Manager
Good Health Greenhills
PO BOX 2516,
Greenhills, NSW 2323.

Changes to the Privacy Policy

GHGH has the right to change the Privacy Policy at any time. If there are updates to GHGH's Privacy Policy, we will address the changes promptly and update the revision date of this document.

Obtaining further information

If patients require more information regarding GHGH, its services and facilities, they can:

* ask a staff member,
* access GHGH's website, or
* take a copy of GHGH's 'Practice Information Sheet” located at the reception desk.

Disclaimer

While we make every effort to protect your privacy, we may need to disclose personal information when required by law where we have a good-faith belief that such action is necessary to comply with a current judicial proceeding, a court order or legal process served on our practice.

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