

Murdoch University Health: Medical Service Privacy Policy

Current as of: April 2021

Introduction: Relevant Policies and Laws

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 service, and the circumstances in which we may share it with third parties.

We collect use and store your personal and sensitive information in accordance with the Murdoch University Privacy Policy <http://www.murdoch.edu.au/Privacy/#unipolicy> and the additional provisions of this policy: referred to collectively as the 'Policy'. For the purposes of the Policy, if you are not a staff member or student of the University, we provide you with the same rights under the Policy as if you were a staff member or student.

How the Service stores and handles your Medicare number complies with the requirements of the *Health Identifiers Act 2010* (Cth).

The Freedom of Information Act 1992 (WA) provides you with rights to access your personal information and to correct it where you believe it is wrong.

Why and when your consent is necessary

When you register as a patient of our service, you provide consent for our GPs and service 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?

As a patient of our medical service we require you to provide us with your personal details and a full medical history, so that we may properly assess, diagnose, treat and be proactive in your health care needs. If you do not provide us with the necessary personal/ and or sensitive information we require, we will be unable to provide you with medical services and hence you will not be able to make use of the medical service.

We also use your personal information for directly related business activities, such as financial claims and payments, practice audits and accreditation, and business processes (eg staff training).

Where your personal information, as provided to us, changes over time, please inform us so that we maintain accurate records to assist you with your health care at all times. If any of the information we have collected or otherwise is wrong or incomplete, please inform us so that we may correct your records.

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; and
- health fund details.

Dealing with us anonymously

You may choose to interact with us anonymously or under a pseudonym. However, we may not be able to provide you with health services if you choose to take this course.

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 service 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 service participates in EHealth/electronic transfer of prescriptions (eTP). My Health Record information may be collected via Shared Health Summary, or Event Summary, and your consent will be obtained prior to using these services.
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 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:
 - other general medical practitioners and specialists;
 - other health professionals such as physiotherapists, psychologists, psychiatrists, pharmacists, nurses, dentists, etc;
 - hospital and day surgery facilities;
 - other clinical staff engaged by the Murdoch University Health Service, including Counselling Services where important;
 - your guardian or responsible person; and
 - your health fund, Medicare, or the Department of Veterans' Affairs (as necessary).

When, why and with whom do we share your personal information?

The Health Service Staff may use and disclose your personal and sensitive information for the following reasons:

- account keeping and billing purposes;
- to contact you via the Practice Reminder System;
- to facilitate your treatment within the Health Service;
- referral to a medical specialist or other health care provider;
- sending of specimens such as pap smears, blood samples, wound swabs, etc. for analysis;
- referral to a hospital for treatment and advice;
- advice on treatment options;
- day to day management of this service;
- quality assurance, service accreditation issues, and for complaint handling;
- to meet our obligations of notification to our insurers and medical defence organisations;
- to prevent or lessen a serious threat to your or another individual's life, health or safety;
- research or compilation of statistics relevant to public health or safety;
- where legally required to do so, such as providing records to a court, mandatory report of child abuse or the notification of certain communicable diseases;
- with third parties who work with our service for business purposes, such as accreditation agencies or information technology providers- these third parties are required to comply with APP's and this policy.
- 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 service 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 service 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 service 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. 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 service in various forms.

All of your personal health information recorded in electronic or paper records are kept securely to protect against unauthorised access.

To manage confidentiality, we have the following procedures in place:

- all staff are bound by their employment contracts to keep your information confidential;
- administration staff do not access your electronic clinical information, only demographic and accounting details are available to them;
- all paper records, visual records (X-rays, CT scans, photos), including your personal information are first stored in lockable cabinets behind the service reception. These are routinely scanned and then cross shredded in house;
- all lockable cabinets are locked when unattended, keys are only accessible by authorised service staff;
- all computers are password protected;
- all computers are protected by firewalls; and
- information sent electronically to the Health Insurance Commission is encrypted;

Our service stores all personal information securely.

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 at no charge.

Our service acknowledges that patients may request access to their medical records. We require you to put this request in writing to the Health Service Manager via medicalsevice@murdoch.edu.au and our service will respond within a reasonable time. Please allow 30 days for this to occur.

If you request access to your medical record, your GP will need to consider if there may be a risk of harm to you or any other person that may result from disclosure of your health information and how to overcome that risk. Your GP may need to remove any information that will affect the privacy of other individuals.

Our service 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 service 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 Health Service Manager, via medicalsevice@murdoch.edu.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. We will then attempt to resolve it in accordance with our resolution procedures.

If you wish to lodge a complaint about how your private information has been handled, please contact the

Health Service Privacy Officer via Building 418, Tavern Undercroft, 90 South Street, Murdoch 6150. Tel: 9360-2293 or at medicals@murdoch.edu.au. Complaints will be handled in accordance with the University's grievance and complaints procedures: the *Complaints Management Policy* available at

<https://goto.murdoch.edu.au/ComplaintsManagementPolicy> and to the University's grievance and complaints procedures at <http://goto.murdoch.edu.au/Complaints>.

We will inform you when your complaint has been received and an expected timeframe for resolution, please allow 30 days for this process to occur.

If your complaint concerns the handling of your Medicare number, you may contact the Office of the Australian Information Commissioner. Generally, the OIAC will require you give them time to respond before they will investigate. For further information visit <http://www.oaic.gov.au> or call the OAIC on 1300 363 992.

You may also wish to contact the WA health complaints office:

Health and Disability Services Complaints

Office Western Australia – 1800 813 583

<http://www.hadsco.wa.gov.au>

Policy review statement

This policy will be reviewed regularly to ensure it is in accordance with any changes that may occur. The policy will be available for download via the service website in its most current format.