



## **West Coast Rheumatology Privacy Policy**

### **1. Introduction**

Our practice is committed to best practice in relation to the management of information we collect. This practice has developed a policy to protect patient privacy in compliance with the Privacy Act 1988 (Cth) ('the Privacy Act'). Our policy is to inform you of:

- the kinds of information that we collect and hold, which, as a medical practice, is likely to be 'health information' for the purposes of the Privacy Act;
- how we collect and hold personal information;
- the purposes for which we collect, hold, use and disclose personal information;
- how you may access your personal information and seek the correction of that information;
- how you may complain about a breach of the Australian Privacy Principles and how we will deal with such a complaint;
- whether we are likely to disclose personal information to overseas recipients;

### **2. What kinds of personal information do we collect?**

The type of information we may collect and hold includes:

- Your name, address, date of birth, email and contact details
- Medicare number , DVA number and other government identifiers, although we will not use these for the purposes of identifying you in our practice
- Other health information about you, including:
  - notes of your symptoms or diagnosis and the treatment given to you
  - your specialist reports and test results
  - your appointment and billing details
  - your prescriptions and other pharmaceutical purchases



- your dental records
- your genetic information
- your healthcare identifier
- any other information about your race, sexuality or religion, when collected by a health service provider.

### **3. How do we collect and hold personal information?**

We will generally collect personal information:

- from you directly when you provide your details to us. This might be via a face to face discussion, telephone conversation, registration form or online form
- from a person responsible for you, such as your next of kin or legal guardian
- from third parties where the Privacy Act or other law allows it - this may include, but is not limited to: other members of your treating team, diagnostic centres, specialists, hospitals, the My Health Record system<sup>1</sup>, electronic prescription services, Medicare, your health insurer, the Pharmaceutical Benefits Scheme

### **4. Why do we collect, hold, use and disclose personal information?**

In general, we collect, hold, use and disclose your personal information for the following purposes:

- to provide health services to you
- to communicate with you in relation to the health service being provided to you
- to comply with our legal obligations, including, but not limited to, mandatory notification of communicable diseases or mandatory reporting under applicable child protection legislation.
- to help us manage our accounts and administrative services, including billing, arrangements with health funds, pursuing unpaid accounts, management of our ITC systems

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<sup>1</sup> See: <https://myhealthrecord.gov.au/internet/mhr/publishing.nsf/content/home>



- for consultations with other doctors and allied health professional involved in your healthcare; including keeping current nominated specialists up to date with healthcare developments
- to obtain, analyse and discuss test results from diagnostic and pathology laboratories
- for identification and insurance claiming
- If you have a My Health Record, to upload your personal information to, and download your personal information from, the My Health Record system.
- Information can also be disclosed through an electronic transfer of prescriptions service
- To liaise with your health fund, government and regulatory bodies such as Medicare, the Department of Veteran's Affairs and the Office of the Australian Information Commissioner (OAIC) (if you make a privacy complaint to the OAIC), as necessary

## **5. How can you access and correct your personal information?**

You have a right to seek access to, and correction of the personal information which we hold about you. There may be a fee associated with this to cover the cost of staff performing this duty, which will not be reimbursed by Medicare. Where the task is small, this fee may be waived at the discretion of West Coast Rheumatology. Prolonged administrative input is billed at a rate of \$75 per hour.

For details on how to access and correct your health record, please contact our practice as noted below under 'Contact Details':

We will normally respond to your request within 30 days.

## **6. How do we hold your personal information?**

Our staff are trained and required to respect and protect your privacy. We take reasonable steps to protect information held from misuse and loss and from unauthorised access, modification or disclosure. This includes:

- Holding your information in secure cloud storage, protected by two factor authentication, firewall, web filtering and anti-virus software. This server is



backed up daily. Passwords are changed regularly. The remote server conducts “penetration testing” regularly to detect security vulnerabilities.

- User logs are maintained at the server.
- No personal information should be kept onsite overnight. It will be stored on the server and returned to you on the same day – either by post or in person. Where this cannot be done, paper files will be shredded.
- Our staff sign confidentiality agreements

## 7. Privacy related questions and complaints

If you have any questions about privacy-related issues or wish to complain about a breach of the Australian Privacy Principles or the handling of your personal information by us, you may lodge your complaint in writing to (see below for details). We will normally respond to your request within 30 days.

If you are dissatisfied with our response, you may refer the matter to the OAIC:

**Phone:** 1300 363 992

**Email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

**Fax:** +61 2 9284 9666

**Post:** GPO Box 5218

Sydney NSW 2001

Website: <https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint>

## 8. Anonymity and pseudonyms

The Privacy Act provides that individuals must have the option of not identifying themselves, or of using a pseudonym, except in certain circumstances, such as where it is impracticable for us to deal with you if you have not identified yourself.

Unfortunately, in medical practice it is largely impracticable to deal with patients anonymously or via a pseudonym. The provision of medical services is likely to be impacted, and billing via Medicare or a health insurer where applicable is likely to be impracticable.

In some instances, a patient seeking certain treatments may be prepared to forego notifying their insurer or seeking a Medicare benefit and pay the practice direct. However, it becomes impossible to correctly identify that person over multiple visits, or to feed back to them the results of investigations. It is for this reason that we do not allow for use of



pseudonyms or anonymous attendance at West Coast Rheumatology, as it is impracticable to offer a Rheumatology service under such conditions.

### **9. Overseas disclosure.**

We may disclose your personal information to the following overseas recipients:

- any practice or individual who assists us in providing services (such as where you have come from overseas and had your health record transferred from overseas or have treatment continuing from an overseas provider) where you have provided written consent.
- anyone else to whom you provide written authorisation for us to disclose it

### **10. Updates to this Policy**

This Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and other necessary developments. Updates will be publicised on the practice's website.

### **11. Privacy and websites**

We do not collect any data from the West Coast Rheumatology website.

### **12. Contact details for privacy related issues**

If you have any questions or concerns related to how we manage your data, please email [admin@westcoastrheumatology.com](mailto:admin@westcoastrheumatology.com) outlining your concerns. We will respond within 30 days.