

# Loxley House Family Practice Privacy Policy

Current as of: 4<sup>th</sup> March 2020

## 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 Loxley House Family 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. 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 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:

- 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

## 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 will collect your personal information:

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 include Electronic Transfer of Prescriptions (eTP), MyHealth Record, e.g via Shared Health Summary, Event Summary
3. We may also collect your personal information when you visit our website, send us an email or SMS, telephone us or when making 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

- Medicare and or the Department of Veteran's Affairs (as necessary).

## Who do we share your personal information with?

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 Electronic Transfer of Prescriptions (eTP) and MyHealth Record system
- Only people that 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.

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

Your personal information is stored electronically at our practice.

Our practice stores all personal information securely. Our server is stored in a locked room. All programs are password protected and a confidentiality agreement is signed by each staff member.

## 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.

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

Our practice acknowledges patients may request access to their medical records. We require you to put this request in writing and our practice will respond within 30 days.

Depending on what is involved, you may be asked to contribute to the cost of providing the information.

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 your personal information held by our practice is correct and up-to-date. You may also request that we correct or update your information, and you should make such requests in writing to your doctor or the 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 address your letter to:

The Practice Manager  
Loxley House Family Practice  
PO Box 50  
BATHURST NSW 2795

The Practice will respond to your complaint within 30 days.

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 Office of the Australian Information Commissioner - OAIC on 1300 336 002.

Privacy and our website [www.loxley.com.au](http://www.loxley.com.au) is an online information and reference website, consisting of information services and content, links, search capabilities and other internet resources.

When you visit this website our Internet Service Provider/Hosting Provider, will record your server address, domain name, the date and time of your visit to our site, the pages viewed and the information downloaded. This information is used for statistical and web site development purposes only.

This site uses cookies as a part of our interaction with your browser. A cookie is a small amount of information stored on your computer by our website. You can delete cookies from your hard drive at anytime and further information on the use of cookies can be found at [www.cookiecentral.com/faq](http://www.cookiecentral.com/faq).

## The Personal information we collect on you:

The type of personal information that we collect from you will depend on how you use our website. You can be certain that the information we receive about you will be treated as strictly confidential.

### Information is collected to help us:

- fulfil your request
- understand the number of hits the website receives
- keep track of the domains from which this site is accessed
- determine what our users are interested in
- ensure as far as practical, that our websites and applications are compatible with the browsers and operating systems used by most of our users.
- Conduct patient satisfaction surveys
- Support strategic development

If you believe that any information that we hold about you is inaccurate or out of date, please contact us.

## The circumstances under which we disclose information about you:

It is our policy not to sell or pass on any personal information that you may have provided to us unless we have your express consent to do so. An exception to this is where Loxley House Family Practice may be required by law to disclose certain information.

We will preserve the contents of any email or secure message that you send us if we believe that we have a legal requirement to do so.

### Linking to and from this site:

The existence of external links on our websites shall not be construed as Loxley House Family Practice's the party providing the relevant link is authorised in writing to do so.

If you access this site via an external link, you do so at your own risk. While information and third party information contained on this site has been presented with all due care, Loxley House Family Practice does not warrant or represent that the information or the third party information, will remain unchanged after the date of publication and is free from errors or omissions. It is your responsibility to make own investigations, decisions and enquiries about the information retrieved from other internet sites.

## Appointment bookings online

Appointment bookings on line is located on the Practice's SSL page

Loxley House Family Practice has an agreement with an external provider Hotdoc. The patient application does not have direct contact to Loxley House Family Practice and only connects to Hotdoc's cloud servers. All communication between the Hotdoc cloud server and Loxley House Family Practice is encrypted using 128bit SSL encryption. Hotdoc only handles data relating to the patient appointment and no other sensitive patient records are used or stored on the Hotdoc system. <http://www.hotdoc.com.au> provides the Terms of Service for the Hotdoc application.

## Changes to this statement

From time to time, we may make changes to the Privacy and Disclaimer Policy. This may be in relation to changes in the law, best practice or changes in our services. These changes will be reflected in this statement, so you should check here from time to time.

## Other correspondence

### **Correspondence**

Electronic information (e.g. specialist letters and pathology) is transmitted over the public network in an encrypted format using secure messaging software.

Incoming mail is opened in the private administration office. Items for collection or postage are left in a secure area not in view of the public. Outgoing mail is personally delivered to Australia Post.

### **Facsimile**

Facsimile, printers and other electronic communication devices in the practice are located in areas that are only accessible to the practice team.

All faxes containing confidential information are sent to fax numbers after ensuring the recipient is the designated receiver.

Fax transmission reports are kept as evidence that the fax was sent.

The practice uses a fax disclaimer notice on outgoing faxes that affiliates with the practice. It states:

This facsimile transmission contains information, which is confidential. This information is intended for the named recipient only. If you are not the intended recipient, please be advised that any disclosure, copying, distribution, or use of the contents of this information is strictly prohibited, and that any misdirected or improperly received information must be returned to the Practice immediately. If you have received this facsimile in error, please telephone (02) 63317077.

### **Emails**

Emails are sent via various nodes and are at risk of being intercepted.

Patient information may only be sent via email if it is securely encrypted according to industry and best practice standards, unless the patient has formally consented to their health information being sent by unsecure email.

## **SMS**

The practice's clinical software and the Hotdoc system provides us the ability to contact patients via SMS.

SMS is used to remind patients of appointments, unexpected appointment changes (e.g. doctor sick) and if the patient consents, SMS is used to advise patients that test results have been received and if follow up is required.

Patients may opt-out of receiving SMS notifications.

## **Policy review statement**

The Practice reviews this policy regularly to ensure it is in accordance with any changes that may occur. Our website and practice waiting rooms display our privacy policy.

Current as at 4<sup>th</sup> March 2020

Note: Reference in this policy to; we, us, our, means employed staff and independent medical practitioners who work at Loxley House Family Practice.