

# Doctors on Nicholson Privacy Policy

Last updated: 17th April 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 our 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. 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 directly related business activities, such as financial claims and payments, practice audits and accreditation, and business processes (e.g. staff training).

## 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
- health fund details.

## 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 and demographic information via your registration.
2. During the course of providing medical services, including face to face or via telehealth consult, we may collect further personal information. Information may also be collected through electronic transfer of prescriptions (eTP), My Health 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, 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, eTP, My Health Record (e.g. 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.

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

Your personal information may be stored at our practice in various forms. Our practice stores all personal information securely.

Medical records are stored electronically, visual records e.g. X-rays, CT scans, photos etc. are stored electronically or given to you where possible. All paper records, audio recordings, are also stored securely.

Your personal information is stored in an electronic format on our server located remotely. All practice personnel have access to different areas of our medical software in accordance with providing you with the best health and customer service. Non-clinical staff do not have access to your medical record. All practice personnel have signed confidentiality agreements. Access to computer software programs are by individual password known only to the users.

## 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 to us via emailing [hello@doctorsonnicholson.com.au](mailto:hello@doctorsonnicholson.com.au) and our practice will respond within a reasonable time and records will be made available to you within 30 days of your request. The cost incurred for these records will incur an administrative fee of \$25.

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 person at Doctors on Nicholson or in writing to reception staff via [hello@doctorsonnicholson.com.au](mailto:hello@doctorsonnicholson.com.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 to our Admin Manager, Lucy Nakata via email [admin@doctorsonnicholson.com.au](mailto:admin@doctorsonnicholson.com.au) or via direct mail to Doctors on Nicholson, 695-697 Nicholson Street, Carlton North VIC 3054. Your complaint will be acknowledged within 3 working days of it being received and a follow up plan discussed at that time depending on the necessary investigation.

You may also contact:

- Office of the Victorian Information Commissioner: <https://ovic.vic.gov.au/> or call on 1300 006 842
- Health Complaints Commissioner Victoria: <https://hcc.vic.gov.au/> or call on 1300 582 113
- Office of the Australian Information Commissioner: <https://www.oaic.gov.au/> or call on 1300 363 992

## Privacy and our website

At all times we try to only to collect the information we need for the particular function or activity we are carrying out.

The Doctors On Nicholson website, [www.doctorsonnicholson.com.au](http://www.doctorsonnicholson.com.au) is hosted in Australia and uses Google Analytics to collect data about your interaction with our website, the sole purpose of which is to improve your experience using our site.

We use social networking services such as Facebook and Instagram to communicate with the public about our work. When you communicate with us using these services we may collect your personal information, but we only use it to help us to communicate with you and the public. These social networking services will also handle your personal information for its own purposes. These services have their own privacy policies.

We also use the HotDoc platform for processing online appointment bookings and telehealth consults. The privacy policy for HotDoc can be found here: <https://www.hotdoc.com.au/practices/privacy-policy/>

## Policy review statement

This Privacy Policy is reviewed annually or if new rules are implemented. An up to date version is always available on our website or by request at Doctors on Nicholson.