

PRIVACY POLICY

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 is a patient health record?

A patient health record is a comprehensive compilation of a patient's health information, including personal details, medical history, diagnoses, treatments, medications, allergies, and test results. It is documented by healthcare providers to manage patient care, ensure legal protection, support quality improvement, and facilitate data exchange among healthcare professionals and the patient.

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 authorized 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 providing medical services, we may collect further personal information.
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).

How the practice uses document automation technologies, particularly so that the relevant medical information is included in referral letters?

My Health City uses document automation to automatically pull specific, relevant information from patient records into standardized templates for referral letters within our secure clinical software, like Best Practice. This ensures that only necessary details for the patient's treatment are included, enhancing privacy and security while streamlining the process for healthcare providers and adhering to [Royal Australian College of General Practitioners \(RACGP\)](#) standards.

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 (eg 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 confidential dispute resolution process
- When there is a statutory requirement to share certain personal information (eg some diseases require mandatory notification)
- During the course of providing medical services, through eTP, My Health Record (e.g. via Shared Health Summary, Event Summary). We use eHealth here at My HealthCity.

Only people who need to access your information will be able to do so. Other than while 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.

E.g. as paper records, electronic records we do not keep visual records such as X-rays, CT scans, videos and photos.

Real-time audio/visual recording and duplication and storage of a consultation, including those via telehealth and those conducted remotely, never occur without the patient's consent.

Our practice stores all personal information securely.

We store all personal information via a secure medical program that requires individual staff passwords and authorization to access information.

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 the patient's new health care provider to send patients with written permission to our clinic. Our practice will respond within a reasonable time with a health summary and a request for payment for the remaining chart, it is up to the patient if they would like to proceed and if so, payment is required.

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 writing to our Practice Manager.

Storing, retaining and disposing of medical records

My Health City takes all reasonable steps to protect the security of our patient's medical records.

The term 'medical record' refers to the collection of various health information held about a patient's medical history, care and treatment. It includes information contained in a patient's progress notes, correspondence between healthcare providers and with the patient, pathology and radiology images and reports, other test results, clinical images, medical certificates and assessments. It may also include medico-legal reports prepared by a treating doctor at the request of lawyers or insurers (but not those reports prepared as an independent expert witness as these are not records for a patient).

Storing medical records

All medical records, are stored in a manner that:

preserves the patient's confidentiality

protects against misuse or unauthorised access, disclosure or modification

prevents damage, loss or theft

allows reasonable access to ensure continuity of treatment.

All practical measures are in place for how our patients' medical records are stored and who has access to them.

Electronic medical records are backed up regularly and backed up offsite. Computers have antivirus software installed for security and backups are encrypted where possible, so they are protected from unauthorised access, for example through a cyber-

attack.

Hard copy records are stored in a locked filing cabinet in a secured dedicated room at the practice.

If a data breach does occur, My Health City is required to notify the patients affected and the Australian Information Commissioner.

Retaining medical records

My Health City keeps the complete medical record of an adult patient for at least seven years from “the date of last entry” in the record. This usually means the patient’s last consultation with our Medical Practice.

If the patient was under 18 years of age at the date of the last entry in the medical record, we must wait until that patient turns or would have turned 25 years old before we can dispose of the records.

Obstetric records, which often contain information about the baby and the mother, are kept for 25 years from the birth of the child.

Patient age at date of last entry	How long to keep the record
Infant (obstetric records)	For 25 years from child’s birth
Under 18	Until child turns / would have turned 25
18 and over	7 years from date of last entry

Other requirements to keep records

My Health City keeps all documents related to a claim under Medicare for at least two years from the date the service was provided.

Disposing of medical records

My Health City follows the guidelines set by the Australian privacy law – “to destroy or permanently de-identify information collected for a specific purpose when you no longer need it for that purpose”.

Records are destroyed securely to maintain the patient’s confidentiality and to protect

the records against misuse or unauthorised access, disclosure or modification, and damage, loss or theft.

My Health City has secure destruction bins on-site managed by specialist providers, for hard copy files or documents.

Once the documents are safely and securely shredded by the company, we are also provided with a certification that the records were destroyed securely.

For electronic records, the files are completely deleted or disposed of our devices appropriately by our IT service provider.

How can you lodge a privacy-related complaint, and how will the complaint be handled at our practice?

We take complaints and concerns regarding your 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 email our Practice Manager on practicemanager@myhealthcity.com.au or call the practice on 07 5514 1616.

Privacy and our website

At My Health City - In complying with the [Privacy and Other Legislation Amendment Bill 2024](#), our practice provides the following advice to users of our website about the collection, use and disclosure of personal information.

The website is accurate, kept up-to-date and complies with the [Australian Medical Association \(AMA\) Code of Ethics](#). The aim of this advice is to inform users of this site about:

- What personal information is being collected
- Who is collecting personal information
- How personal information is being used
- Access to personal information collected on this site
- Security of personal information collected on this site.

The policy is posted on the website and available for download.

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. 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.

3. 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).

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 with the other chosen practice which will forward it to us, and our practice will respond within a reasonable time frame. There is an admin fee which is charged for any complete medical record complying with the request.

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 writing to practicemanager@myhealthcity.com.au

Policy review statement

This privacy policy will be reviewed regularly to ensure it is in accordance with any changes that may occur.