

Dr Grant Flanagan Privacy Policy

Reviewed and current as of: August 2024

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 Dr Flanagan 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 business processes (eg staff training).

Health information is classified as 'sensitive information' for the purposes of the Australian Privacy Principles (APP). Health information, which is often necessary to facilitate an accurate diagnosis, to provide appropriate treatment and to be proactive in patient health care, will only be collected with the consent of the patient or as otherwise permitted by law.

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 pathology results, medical history, medications, allergies, adverse events, immunisations, social history, family medical history, ethnic background, current lifestyle, activities, next of kin, emergency contact and risk factors and other information that may be relevant to your diagnosis, treatment or healthcare
- 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 form.
2. During the course of providing medical services, we may collect further personal information including through electronic means; as at August 2024, we do not use electronic Transfer of Prescription (eTP), My Health Record etc. but may do so if it helps your individual medical situation.

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, transcription services or information technology providers – these third parties are required to comply with APPs and this policy
- with other healthcare providers including other specialists, general practitioners/referring doctors, hospitals, pathologists, pharmacists, allied health professionals
- disclosure to an individual's close relatives and personal representatives, unless directed otherwise by the individual
- when it is required or authorised by law (eg mandatory reporting of child abuse, court subpoenas, some diseases require mandatory notification)
- conducting patient surveys (eg for the purpose of improving services)
- 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
- for billing, payment processing and debt recovery, reviewing the accuracy, upgrading and testing of patient medical record systems
- Where we engage service providers, such as providers of archival, auditing, accounting, legal, banking, payment, debt collection, delivery, data processing, document management, research, investigation, insurance, website or technology services
- 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 (eg via Shared Health Summary, Event Summary); as at June 2023 we do not participate in any of these eHealth services

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. These may include paper records, electronic records, visual records (X-rays, CT scans, videos and photos), audio recordings.

Our practice stores all personal information securely. Electronic information may be at our own premises and with the assistance of service providers who provide data storage, hosting and cloud computing services. We implement a range of measures to protect the security of that information. It is necessary for us to keep patient information for as long as required by law or is prudent having regard to administrative and medical requirements.

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 our practice address at Suite 7.8 Level 7, 32 Erin Street Richmond VIC 3121 and our practice will respond within a reasonable time, normally 30 days. A cost for complying with the request will be applicable, and a quote for the costs will be supplied upon 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 our practice manager at Suite 7.8 Level 7, 32 Erin Street Richmond VIC 3121 and you will need to be able to provide proof of identity.

There are some circumstances in which access is restricted, or where we may decide not to amend personal information in the manner requested, and, in these cases, reasons for denying access or not amending the personal information will be explained. If we decide not to make an individual's requested amendment, they may ask us to make a note of their request with the information.

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. The contact address is Suite 7.8 Level 7, 32 Erin Street Richmond VIC 3121, tel. (03) 9421 1717. A response time is normally 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 or call the OAIC on 1300 363 992.

Privacy and our website

You may also submit information via our online website. If a user visits any of our Websites to read, browse or download information, our system may record information such as the user's IP address, browser type, domain names, access times and referring website addresses. This information is used by us for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of our Websites.

We encourage individuals to review the privacy statements of third party websites they choose to access via links from our Websites so that they can understand how those third party websites collect, use and share your information. We is not responsible for the privacy statements on websites outside of our Websites.

Our Websites may use cookies to help identify and interact more effectively with users' devices. A cookie is a text file that is placed on a user's device by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. The cookie helps us to maintain the continuity of users' browsing sessions and remember their details and preferences for when they return.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of our Websites.

Our Websites may use Google services such as Google Analytics from time to time. For more about how Google collects and processes data, please see Google's privacy policy and their information at www.google.com/policies/privacy/partners/.

If you are considering sending us any other personal information through our Website or other electronic means, please be aware that the information may be insecure in transit, particularly where no encryption is used (e.g. email, standard HTTP). We are subject to laws requiring us to protect the security of personal information once it comes into our possession.

Policy review statement

This privacy policy will be reviewed regularly to ensure it is in accordance with any changes that may occur. A copy of our current policy is available upon request from our office at Suite 7.8 Level 7, 32 Erin Street Richmond VIC 3121, tel (03) 9421 1717.

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