# Health First Medical Group 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.

## Who can I contact about this policy?

For enquires concerning this policy, you can contact the Practice Manager via *practicemanager@healthfirstballarat.com.au*

## 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. Access to your personal information is restricted to practice team members who require it for your care. If we ever use your personal information for purposes other than healthcare provision, we will obtain additional consent from you.

It is important to us that as our patient, you understand why we collect and use your personal information.

## Why do we collect, use, hold and share your personal information?

The practice collects, uses, stores, and shares your personal information primarily to manage your health safely and effectively. This includes providing healthcare services, managing medical records, and ensuring accurate billing and payments. Additionally, we may utilise your information for internal quality and safety improvement processes such as practice audits, accreditation purposes, and staff training to maintain high-quality service standards.

## 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 you medical services, we may collect further personal information.

   Information is also collected through electronic transfer of prescriptions (eTP), My Health Record, eg via Shared Health Summary, Event Summary, or online appointments.

   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).

4. Various types of images may be collected and used, including:

   - Photos and medical images: These can be taken using practice supplied devices for medical purposes.

## 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 (eg. In referral letters)
- with visiting medical educators and/or general practice supervisors from another practice for the purpose of registrar training.
- 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 the purpose of 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 electronic prescribing, My Health Record (eg via Shared Health Summary, Event Summary).
- Where the information is necessary for public health initiatives overseen by government agencies.

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.

## Will your information be used for marketing purposes?

The practice will not use your personal information for marketing any goods or services directly to you without your expressed consent. If you do consent, you may opt out of direct marketing at any time by notifying the practice in writing.

## How is your information used to improve services?

The practice may use your personal information to improve the quality of the services offered to patients through research, analysis of patient data for quality improvement and for training activities with the practice team

We may provide de-identified data to other organisations to improve population health outcomes. The information is secure, patients cannot be identified, and the information is stored within Australia. You can let reception staff know if you do not want your information included.

## How are document automation technologies used?

Document automation is where systems use existing data to generate electronic documents relating to medical conditions and healthcare.

The practice uses document automation technologies to create documents such as referrals, which are sent to other healthcare providers. These documents contain only your relevant medical information.

These document automation technologies are used through secure medical software Best Practice, Automed and Healthlink.

All users of the medical software have their own unique user credentials and password and can only access information that is relevant to their role in the practice team.

The practice complies with the Australian privacy legislation and APPs to protect your information.

All data, both electronic and paper are stored and managed in accordance with the Royal Australian College of General Practitioners Privacy and managing health information guidance.

## How are Artificial Intelligence (AI) Scribes used?

The practice uses an AI scribe tool to support GPs take notes during their consultations with you. The AI scribe uses an audio recording of your consultation to generate a clinical note for your health record. The practice AI scribe service is **Heidi and Maiscribe.**

**Heidi / Maiscribe:**

- does not share information outside of Australia
- destroys the audio file once the transcription is complete.
- removes sensitive, personal identifying information as part of the transcription

The practice will only use data from our digital scribe services to provide healthcare to you.

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

Your personal information may be stored at our practice in various forms:

- as paper records
- as electronic records
- as visual records – x-rays, CT scans, videos and photos

Our practice stores all personal information securely.

All paper records are stored in a locked cabinet with only authorised staff access. The majority of personal information is stored electronically and password protected. All staff sign confidentiality agreements as part of their terms of employment and have different levels of access to patient 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 you to put this request in writing by completing a Personal Health Information Request form available from our reception staff and our practice will respond within a reasonable time. Usually within a 30 day period, if a fee is payable you will be advised beforehand.

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 reception@healthfirstballarat.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. We will then attempt to resolve it in accordance with our resolution procedure.

Complaints can be emailed to reception@healthfirstballarat.com.au or mailed to:

The Practice Manager
Health First Medical Group
12 Doveton Street South
Ballarat, Vic 3350

All complaints will be acknowledged within 2 working days and patients will be informed as to a resolution within 30 days.

If you do not feel we have resolved your issue you may also contact the Health Complaints Commissioner (HCC) on 1300 582 113 or fill in a complaint form online at www.hcc.vic.gov.au.

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 electronic communication

At Health First Medical Group, any personal information you share with us through website, email, and social media, is handled securely and confidentially. This practice uses analytics and cookies.

Any personal information requested via email is only undertaken once written consent is obtained from the patient and authorisation received by their doctor. Patients are made aware of risks associated with the use of email communications, prior to releasing any information. Information is then sent by return email to minimise the risk of it being received by another person.

Our electronic SMS recall system is protected by a 3-point identity check before the message can be opened, and minimal patient information is given.

## Policy review statement

Our privacy policy is regularly reviewed to ensure compliance with current obligations.

If any changes are made:

- They will be reflected on the website.
- Significant changes may be communicated directly to patients via email or other means.

Please check the policy periodically for updates. If you have any questions, feel free to contact us.

*Reviewed: November 2024*