Palin Street Family Practice Privacy Policy

January 2025

The objective of this privacy notice is to provide you, our patient, with clear information on how your personal information is collected and used within the practice. Occasionally we also need to share your personal information to involve others in your healthcare and this policy outlines when, how, and why we share your information.

1. Who can I contact about this policy?

For enquiries concerning this policy, you can contact the Practice by phone during office hours Mon-Fri Ph: 9319 1577 or via email: reception@psfp.com.au

2. When and why is your consent necessary?

When you register as a patient of this practice, you provide consent for the GPs and practice staff to access and use your personal information to facilitate the delivery of 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.

3. Why do we collect, use, store, 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.

4. What personal information is collected?

The information we will collect about you includes your:

- names, date of birth, addresses, contact details
- medical information including medical history, medicines, allergies, and adverse reactions immunisations, social history, family history and risk factors
- Medicare number (where available) for identification and claiming purposes
- healthcare identifier numbers
- health fund details.

5. Can you deal with us anonymously?

You can 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.

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Dealing with general practices anonymously

The Privacy Act requires patients to be provided with the option of not identifying themselves, or of using a pseudonym, when dealing with a practice unless it is impracticable to do so. Information about this should appear in the practice privacy policy or collection notice.

The Privacy Act 1988 requires practices to consider whether it is practical to give patients the option of not identifying themselves, or using a pseudonym. However, practices do not have to deal with patients anonymously or pseudonymously. The OAIC website provides further information in this topic here.

6. How is personal information collected?

The practice may collect your personal information in several different ways:

When you make your first appointment, the practice team will collect your personal and demographic information via your registration.

We may also collect your personal information when you send us an email, telephone us, make an online appointment, or communicate with us using social media.

In some circumstances, personal information may also be collected from other sources, including:

- 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 (if relevant).
- While providing medical services, further personal information may be collected via:
    - electronic prescribing
    - My Health Record
    - online appointments.
- **Photos and medical images:** These can be taken using personal devices for medical purposes, following the guidelines outlined in our guide on using personal devices for medical images.

We will always comply with privacy obligations when collection personal information from third-party sources. This includes transparency with patients, obtaining necessary consents, maintaining data accuracy, securing the information, and using it only for specified purposes.

7. When, why and with whom do we share your personal information?

We sometimes share your personal information:

- with third parties 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 (e.g. In referral letters)

- 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 it is a statutory requirement to share certain personal information (e.g. some diseases require mandatory notification)
- When it is provision of medical services, through electronic prescribing, My Health Record (e.g. via Shared Health Summary, Event Summary).

Only people who need to access your personal information will be able to do so. Other than providing medical services or as otherwise described in this policy, the practice will not share personal information with any third party without your consent.

We do not share your personal information with anyone outside Australia (unless under exceptional circumstances that are permitted by law) without your consent.

We will always comply with privacy obligations when collection personal information from third-party sources. This includes transparency with patients, obtaining necessary consents, maintaining data accuracy, securing the information, and using it only for specified purposes.

8. 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.

9. 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.



Definitions of de-identified and personal information

The RACGP Three key principles for the secondary use of general practice data by third parties defines de-identification as: the removing or altering information that identifies an individual or is likely to do so. Where information has been appropriately de-identified, it is no longer considered 'personal information' and can therefore be used or shared in ways that might not otherwise be permitted under the Privacy Act 1988 (Cwlth). A general practice can therefore lawfully share de-identified patient data without specific or express patient consent.

When personal information (i.e., data has not been de-identified) is requested by a third party, specific patient consent is usually needed, and the requesting entity will need to meet the requirements of a human research ethics committee.

10. 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 our secure medical software, Best Practice.

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.

11. How are Artificial Intelligence (AI) Scribes used?

Some doctors in this practice use an AI scribe tool to support taking 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 products we are currently using are not directly linked to our medical software with the exception of Lyrebird.
- They are set to destroy the audio file once the transcription is complete
- They remove sensitive, personal identifying information as part of the transcription

The practice will only use data from our digital scribe service to provide healthcare to you. You will be asked to consent each and every time the AI scribe tool is utilised in your consultation. Further information regarding the use of AI programs can be provided on request.

12. How is your personal information stored and protected?

Your personal information is mainly stored as electronic records through our medical software Best Practice. Other ways your information may be stored is visual records (e.g X-rays, CT scans and clinical images).

The practice stores all personal information securely.

Electronic records stored through our medical software Best Practice can only be accessed by the relevant practice team member and are all protected via team members passwords unique to them.

Staff members and contractors have read and signed our confidentiality agreement to not breach our privacy policy.

13. How can you access and correct your personal information at the practice?

You have the right to request access to, and correction of, your personal information.

The practice acknowledges patients may request access to their medical records.

Patients wanting copies of their own records for personal use must put a request in writing and complete a medical information release form. Their doctor will sign off on the release if deemed safe to release and the receptionist will prepare the records in the format the patient has requested. Admin fees will apply, min $20 but depending on size fee may increase to reflect consumables used and time taken.

If records are being picked up ID must be sighted and scanned into the patient file.

Requests from other surgeries must be a written request including the patients current address, DOB and signature.

Their previous Doctor will sign off on the request and the receptionist will inform the patient of the admin fee. Once paid the records will be sent electronically, encrypted with password or posted via registered post.

The practice will respond to any requests to access or correct your personal information as soon as it is reasonable. Within a week unless unpredicted circumstances arise.

The practice will take reasonable steps to correct your personal information where the information is not accurate or up to date. Sometimes, we will ask you to verify your personal information held by the practice is correct and current. You may request we correct or update your information. To do this please contact via email reception@psfp.com.au

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

We take complaints and concerns regarding privacy seriously. You should express any privacy concerns you may have. We will then attempt to resolve it in accordance with the resolution procedure.

Reception: reception@psfp.com.au (monitored daily)

Ph: 9319 1577 Mon- Fri 8:30am-5:00pm

Manager: office@psfp.com.au (monitored Mon, Tues, Thurs)

If you do not feel we have resolved your issue You may also contact the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner will require you to give them time to respond before they investigate. For further information visit **www.oaic.gov.au** or call the OAIC (Office of the Australian Information Commissioner) on 1300 363 992.

Perth Office: www.oic.wa.gov.au/en-au

15. How is privacy on the website maintained?

At Palin Street any personal information you share with us through email is handled securely and confidentially. This practice uses analytics and cookies.

16. 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.