

CBD Medical Practice privacy policy

Current as of: 01 May 2022

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 (eg 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 authorized by law to only deal with identified individuals.

The *Privacy Act* requires you to provide patients with the option of not identifying themselves, or of using a pseudonym, when dealing with you (APP 2) unless it is impracticable for you to do so. Information about this should appear in the practice privacy policy or collection notice.

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, we may collect further personal information.
Information can also be collected through electronic transfer of prescriptions (eTP), My Health Record, eg 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 (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 eTP, My Health Record (eg 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.

Our practice may use your personal information to improve the quality of the services we offer to our patients through research and analysis of our patient data.

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

How do we store and protect your personal information?

Your personal information may be stored at our practice in various forms, eg as paper records, electronic records, visual records (X-rays, CT scans, videos and photos), audio recordings.

Our practice stores all personal information securely, eg electronic format, in protected information systems or in hard copy format in a secured environment. We use of passwords, secure cabinets, confidentiality agreements for staff and contractors.

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 and email the request to us, and our practice will respond within 30 days. Fees may apply.

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 cbdreception@medicalpractice.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.

Practice Name: CBD Medical Practice
Phone No.: 02 9231 1000
Mailing address: G/F 70 Pitt St, SYDNEY NSW 2000
Contract: Maggie Zhao (privacy complaint officer)
Timeframe: 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.

Policy review statement

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

CBD Medical Practice social media policy

Current as of: 21/01/2023

Name of social media officer: Practice manager

Introduction

This policy provides guidance for members of the practice on using social media internally and externally. The policy helps identify and mitigate risks associated with social media use.

Definition

For the purposes of this policy, 'social media' is online social networks used to disseminate information through online interaction.

Purpose

Regardless of whether social media is used for business-related activity or for personal reasons, the following policy requirements apply to all GPs and practice staff of the practice. GPs and practice staff are legally responsible for their online activities, and if found to be in breach of this policy will include employment termination.

Use of practice social media accounts

The practice will appoint a staff member as a social media officer responsible for managing and monitoring the practice's social media accounts. All posts on the practice's social media website must be approved by this staff member. The practice reserves the right to remove any content at its own discretion.

The official social media site will be maintained by the practice manager or a marketing company assigned for this task.

Staff conduct on social media

When using the practice's social media, practice staff will not:

- post any material that
 - is unlawful, threatening, defamatory, pornographic, inflammatory, menacing or offensive
 - infringes or breaches another person's rights (including intellectual property rights) or privacy, or misuses the practice's or another person's confidential information (eg do not submit confidential information relating to our patients, personal information of staff, or information concerning the practice's business operations that have not been made public)
 - is materially damaging or could be materially damaging to the practice's reputation or image, or another individual
 - is in breach of any of the practice's policies or procedures
- use social media to send unsolicited commercial electronic messages, or solicit other users to buy or sell products or services or donate money
- impersonate another person or entity (eg by pretending to be someone else or another practice employee or other participant when you submit a contribution to social media) or by using another's registration identifier without permission
- tamper with, hinder the operation of, or make unauthorised changes to the social media sites
- knowingly transmit any virus or other disabling feature to or via the practice's social media account, or use in any email to a third party, or the social media site
- attempt to do or permit another person to do any of these things

- claim or imply that you are speaking on the practice's behalf, unless you are authorised to do so
- disclose any information that is confidential or proprietary to the practice, or to any third party that has disclosed information to the practice
- be defamatory, harassing or in violation of any other applicable law
- include confidential or copyrighted information (eg music, videos, text belonging to third parties)
- violate any other applicable policy of the practice.

Monitoring social media sites

The practice's social media channels are part of our customer service and should be monitored and dealt with regularly.

Minimum response time for enquires or complaint is 2 weeks.

Testimonials

The practice complies with AHPRA national law and takes reasonable steps to remove testimonials that advertise their health services (which may include comments about the practitioners themselves). The practice is not responsible for removing (or trying to have removed) unsolicited testimonials published on a third-party website or in social media accounts over which they do not have control.

Personal social media use

Staff are free to personally engage in social media outside of work hours, as long as their actions do not have the potential to bring the practice into disrepute. Employees may not represent personal views expressed as those of this practice.

Any social media posts by staff on their personal social media platforms must not reveal confidential information about the practice or a person who uses the practice (eg staff should not post information relating to patients or other staff, or information concerning the practice's business operations that have not been made public).

Staff should respect copyright, privacy, fair use, financial disclosure and other applicable laws when publishing on social media platforms.

[Practices requires staff to include a disclaimer if they identify themselves as a practice employee on any social media platforms – 'The views expressed in this post are mine and do not reflect the views of the practice/business/committees/boards of which I am a member'.

Breach of policy

All social media activities must be in line with this policy.

Policy review statement

this policy will be reviewed regularly to ensure it is up to date with changes in social media or relevant legislation. practice will notify the practice team in person during staff meeting when you amend this policy

