

Privacy Policy

Alana Healthcare (“Alana”) is bound by the ***Health Records and Information Privacy Act 2002 No 71*** as well as other laws that impose specific obligations in regard to handling personal and health information that directly or indirectly identifies a person. The privacy policy and principles in this document are in accordance with these laws.

Alana is committed to protecting the privacy of personal and health information and this Privacy Policy represents this commitment.

The policy supports Alana’s need to collect information and the right of the individual to privacy. It ensures that Alana can collect personal and health information necessary for its functions, while recognising the right of individuals to have their information handled in ways that they would reasonably expect and in ways that protect the privacy of their personal and health information.

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 doctors, allied health and practice staff to access and use your personal information so they can provide you with 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?

Personal and health information is collected and used by Alana for the following purposes:

- to provide health services or to carry out health care functions
- to assist Alana and its employees to fulfil its duty of care to its patients
- to plan, fund, monitor and evaluate Alana’s services and functions
- to comply with good medical practice code of conduct, legislative requirements, and Australian Standards in the provision of health care
- to investigate incidents and/or defend any legal claims against Alana, or its directors, employees or contractors

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).

Alana has adopted the fifteen Health Privacy Principals (HPPs) as defined by the ***Health Records and Information Privacy Act 2002 No 71*** (<http://www.ipc.nsw.gov.au/hrip-act>) as the minimum standards in relation to handling personal and health information. In broad terms, this means that Alana will:

- collect only information which is required for a specified primary purpose
- make sure that the information collected is relevant, accurate, current and non-excessive
- ensure that the person supplying the information knows why the information is collected, how it is stored and how it will be handled
- use and disclose it only for the primary or a directly related purpose, or for another purpose with the person’s consent (unless otherwise required, permitted or authorised by law)
- store it securely, taking all measures to protect it from unauthorised access retain it for the period authorised by the Act, and take reasonable steps to permanently de-identify personal or health information when it is no longer needed
- provide people with access to their own personal information and permit people to seek corrections if necessary. This will usually be handled under the ***Freedom of Information Act 1982***. For services or information not covered by this Act, access will be available as prescribed by the ***Health Records and Information Privacy Act 2002 No 71*** and/or NSW privacy legislation.

In collecting personal and health information Alana will address the privacy issues relevant to their functions and only collect and use this information in accordance with the Health Privacy Principles.

Research: Alana will usually only use or disclose an individual's personal or health information for research, audit or the compilation of statistics with the individual's written consent. When research or the compilation of statistics which is in the public interest cannot be undertaken with de-identified information, and where it is impractical to seek the individual's consent, the research or compilation of statistics will be carried out in accordance with the National Statement on Ethical Conduct in Human Research (2007) (<https://www.nhmrc.gov.au/guidelines-publications/e72>) issued by the National Health and Medical Research Council (2007) and in accordance with the Health Services Commissioner guidelines.

What personal information do we collect?

The information we will collect about you includes:

- 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 will collect your personal information:

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.
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 Veteran's Affairs (as necessary).
 - MyHealth Record System
 - in emergency situations we may also need to collect information from your relatives or friends.

Use of AI Scribe Technology

To improve the accuracy and efficiency of consultations, we may use AI scribe technology to assist with note-taking during appointments. This technology is used securely and complies with Australian privacy laws, and it does not independently access patient records.

CCTV

Alana uses camera surveillance systems (commonly referred to as CCTV) for the purposes of maintaining safety and security of patients, staff, visitors and other attendees. Those CCTV systems may also collect and store personal information and Alana will comply with all privacy legislation in respect of storage of, use of and access to any such information.

Who do we share your personal information with?

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 Australian Privacy Principles and this policy
- with other healthcare providers
- 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 there is a statutory requirement to share certain personal information (e.g. some diseases require mandatory notification)
- during the course of providing medical services (e.g. through Electronic Transfer of Prescriptions (eTP), MyHealth Record/PCEHR system)
- when claiming Medicare or private health insurance rebates on your behalf.

Only people that 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 as 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:

- primarily as electronic records
- as paper records
- as visual records (x-rays, ultrasound, CT scans, MRI scans, surgical and procedural photographs and videos)

Our practice stores all personal information in an offsite secure data centre, with access via secure passwords. All access is traceable.

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. For Release of Information requests shall be made in writing via our Request for Release of

Information form. For Transfer of Records request shall be made in writing via our Authorisation for Disclosure of Medical Information form. Our practice will endeavor to respond within 30 days. For any requiring printing and posting there is an administrative charge of \$33.00 (for copy of medical record ≤ 33 page, incl. GST and mailing), each additional page is \$1.20 per page (incl. GST and mailing). Electronic transfer of records incurs no fee.

Our practice will takes 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 your personal information held by our practice is correct and up-to-date. You may also request that we correct or update your information, and you should make such requests in writing to the Practice Manager at carolyn@alanahealthcare.com.au.

Notifiable Data Breach

In accordance with The Privacy Act 1988, we will notify individuals affected by certain data breaches under the Notifiable Data Breaches (NDB) Scheme. If personal information held by Alana is lost or subject to unauthorised access or disclosure you will be notified in writing and provided with a recommendation of the steps you can take to reduce the risk of serious harm. We will also notify the Commissioner through a statement outlining the eligible data breach.

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, addressed to:

Carolyn Woodhead

General Manager

Alana Healthcare

By email to carolyn@alanahealthcare.com.au.

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

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 336 002.

Policy review statement

This privacy policy will be reviewed regularly to ensure it is in accordance with any legislative changes that may occur. You can view this policy at any stage by asking in person or in writing.