



Patient Privacy Policy

Introduction

Bronte Medical Centre is committed to protecting the privacy of patient information including the management of such information in accordance with the following State and Federal legislations:

- i. Privacy Act 1988 (Privacy Act)
- ii. Privacy Amendment (Notifiable Data Breaches) Act 2017
- iii. Health Records and Information Privacy Regulation 2012
- iv. The Health Records Information Privacy Act 2002 (HRIP Act)
- v. Health Administration Regulation 2010.

This Privacy Policy explains how Bronte Medical Centre collects, uses and discloses a patient's personal information; how a patient may access that information and how a patient may update their information. The policy also includes the processes for a patient to make a complaint pertaining to a breach in privacy.

This policy is current as of June 2022. On occasion, Bronte Medical Centre will make changes to its policies, processes and systems in relation to how Bronte Medical Centre manages personal information and in accordance to legislative directions which may be enforced. Changes to this policy will be available on the Bronte Medical Centre website and in the clinic.

Why and when a patient's consent is necessary

When a patient is registered with Bronte Medical Centre, the patient is required to give consent to provide personal information to the clinic to allow for Bronte Medical Centre medical and non-medical staff to access and use this personal information in order to provide best practice healthcare. At Bronte Medical Centre there are protocols in place to only allow those staff who require access to a patient's information to do so. However, if Bronte Medical Centre is required to use a patient's personal information for anything else, Bronte Medical Centre will seek additional consent from the patient to do so.

Collection

Bronte Medical Centre collects information which is necessary and relevant to provide best practice medical care and treatment, as well as manage the administrative processes in the clinic. This information may include the patient's name, address, date of birth, gender, health information, family history, and contact details. This information may be stored on Bronte Medical Centre's computer medical records system and/or in hand written medical records.

Wherever practicable, Bronte Medical Centre will only collect information from the patient directly. However, at times, Bronte Medical Centre may need to collect information from other sources such as treating specialists, radiologists, pathologists, hospitals and other health care providers.



Bronte Medical Centre collects information using various methods, which may include: over the phone, in writing, through Bronte Medical Centre's secured website or in person at the clinic. This information may be collected by medical and non-medical staff of Bronte Medical Centre.

In emergency situations Bronte Medical Centre may need to collect information from a patient's relatives or friends.

Bronte Medical Centre may be required by law to retain medical records for certain periods of time depending on the age of the patient at the time Bronte Medical Centre provide services.

Anonymity

The patient has the right to remain anonymous or under a pseudonym unless it is impracticable for Bronte Medical Centre to do so or unless Bronte Medical Centre is required or authorised by law to only deal with identified individuals.

Use and disclosure

Bronte Medical Centre will treat the patient's personal information as strictly private and confidential. Bronte Medical Centre will only use or disclose personal information for purposes directly related to the patient's care and treatment, or in ways that a patient would reasonably expect Bronte Medical Centre may use information for ongoing care and treatment. For example, the disclosure of blood test results to a specialist or requests for x-rays.

During the course of providing medical services, Bronte Medical Centre participates in the use of eHealth services such as eTP, My Health Record (eg via Shared Health Summary, Event summary), Australian Immunisation Register, in sharing your information.

There are circumstances where Bronte Medical Centre may be permitted or required by law to disclose a patient's personal information to third parties. For example: to Medicare; Police; insurers; solicitors; government regulatory bodies; tribunals; courts of law; hospitals; or debt collection agents. Bronte Medical Centre may provide statistical data to third parties for research purposes, as such this data is de-identified.

As Bronte Medical Centre's mission is to provide optimal best practice health care, Bronte Medical Centre may disclose information about a patient to outside contractors to carry out activities on Bronte Medical Centre's behalf, such as an IT service provider, solicitor or debt collection agent, and accreditation agencies. Bronte Medical Centre imposes security and confidentiality requirements on how a third party must handle patients' information. Outside contractors are required to not use a patient's information for any purpose except for those activities Bronte Medical Centre have asked them to perform and are required to comply with APPs and this policy.

Only persons and/or businesses who need to access to a patient's information will be able to do so. Other than in the course of providing medical services or as otherwise described in this policy, Bronte Medical Centre will not share personal information with any third party without consent.

Bronte Medical Centre will not share any patient's personal information with any persons or businesses outside of Australia (unless under exceptional circumstances which are permitted by law) without the consent of the patient.

Data quality and security

Bronte Medical Centre will take reasonable steps to ensure that a patient's personal information is accurate, complete, up to date and relevant. For this purpose, Bronte Medical Centre staff will ask the patient to confirm the contact details are correct at the time of consultation. Bronte Medical Centre requires patients to let the Bronte Medical Centre staff know if any of the information is incorrect or out of date. Bronte Medical Centre's patients' personal information is stored on the premises via electronic records, visual records (X-rays, CT scans, videos and photos), and paper records (Specialist or Other reports).

Personal information that Bronte Medical Centre holds is protected by:

- Secured premises
- Placing passwords and varying access levels on databases to limit access and protect electronic information from unauthorised interference, access, modification and disclosure
- Providing locked cabinets and rooms for the storage of physical records
- Complying with the Notifiable Data Breaches (NDB) Act 2017.

Corrections

If a patient believes that the information Bronte Medical Centre has is not accurate, complete or up-to-date, Bronte Medical Centre requires that the patient contact the clinic in writing (see details below).

Access

Bronte Medical Centre patients are entitled to request access to their medical records. Bronte Medical Centre requires a patient to request access in writing and Bronte Medical Centre will respond to the request within a reasonable time.

There may be a fee for the administrative costs of retrieving and providing copies of medical records.

Bronte Medical Centre may deny access to medical records in certain circumstances permitted by law, for example, if disclosure may cause a serious threat to the health or safety of a patient. Bronte Medical Centre will advise in writing of why access is denied and the options available to respond to the decision.

Complaints

Bronte Medical Centre manages complaints and concerns regarding privacy seriously and as such, Bronte Medical Centre requires a patient to advise in writing of the breach in privacy. Upon receipt of a complaint Bronte Medical Centre will consider the details and will work to resolve it in accordance with Bronte Medical Centre's complaints handling procedures.

In the instance of a patient not being satisfied with the management of the complaint or the outcome the patient may make an application to the Office of the Australian Information Commissioner (OAIC) on 1300 363 992 or the Privacy Commissioner in your State or Territory on 1800 472 679.



Overseas transfer of data

Bronte Medical Centre will not transfer a patient's personal information to an overseas recipient unless Bronte Medical Centre has consent or Bronte Medical Centre is required to do so by law.

Policy review statement

This policy is current as of June 2022. Bronte Medical Centre will review and make changes to its policies, processes and systems in relation to how Bronte Medical Centre manages personal information in accordance to legislative directions. Changes to this policy will be available on the Bronte Medical Centre website and in the clinic.

Contact

Please direct any queries, complaints, requests for access to medical records to:

The Clinic Manager,
Michelle Horswood
1/133-135 Macpherson Street
Bronte NSW