

PRIVACY POLICY – Managing patient health information

Definitions

“Adelaide Unicare”	means Adelaide Unicare Pty Ltd as trustee for the Unihealth Research & Development Trust.
“APPs”	means the Australian Privacy Principles.
“Privacy Act”	means Privacy Act 1988 (Cth)
“Practices”	means any one or more of the following practices that are owned by Adelaide Unicare - Gawler Place Medical Practice, Highbury Family Practice Unit; Minlaton Medical Centre; North Haven Clinic; Unihealth Playford SuperClinic; and University Medical Practice.
“Staff”	means all employees, contractors, & healthcare providers at Adelaide Unicare Practices and students who attend Adelaide Unicare practices as part of their studies.

Purpose

The purpose of this policy document is to ensure patients who receive care from Adelaide Unicare Practices are comfortable in entrusting their personal information to the Practice.

This policy document provides information to patients as to how their personal information (which includes their health information) is collected and used within Adelaide Unicare Practices, and the circumstances in which we may disclose it to third parties.

Background and rationale

The Act & APPs provide a privacy protection framework that supports the rights and obligations of collecting, holding, using, accessing and correcting personal information. The APPs consist of 13 principle-based laws and apply equally to paper-based and digital environments. The APPs complement the long-standing general practice obligation to manage personal information in a regulated, open and transparent manner.

This policy document will guide Staff in meeting these legal obligations. It also discloses to patients how Adelaide Unicare collects & uses their personal information.

The policy document must be made available to patients upon request and at no charge. In addition a copy of this policy will be placed on Adelaide Unicare’s website in HTML format.

Practice procedure

Adelaide Unicare Practices will:

- Provide a copy of this policy to a patient upon request.
- Ensure Staff comply with the APPs and deal appropriately with inquiries or concerns.
- Take such steps as are reasonable in the circumstances to implement practices, procedures and systems to ensure compliance with the APPs and deal with inquiries or complaints.
- Collect personal information for the main purpose of managing a patient’s healthcare and for billing and receiving payments for services rendered.

Staff responsibility

Staff will take reasonable steps to ensure patients understand:-

- What patient information has been and is being collected.
- Why the information is being collected, and whether this is due to a legal requirement.
- How the information will be used or disclosed.
- Why and when a patient’s consent is necessary.
- The procedures for patients to access and correct information, and for responding to complaints of information breaches, including by providing a copy of this policy document.

Patient consent

Adelaide Unicare Practices will only use a patient’s consent for the purpose for which it was provided. Staff must seek additional consent from the patient if the personal information collected may be used for any other purpose.

Collection of information

Adelaide Unicare Practices need to collect personal information as an integral part of providing patients’ with clinical healthcare services. In the interests of providing high quality and continuity of healthcare this may require the sharing of such information with other healthcare providers who may comprise the patient’s medical healthcare team from time to time.

Collected personal information will include patients’:-

- Names, addresses and contact details.
- Medicare number &/or health insurance information (where required) (for identification and claiming purposes).
- Healthcare identifiers.
- Medical information including medical history, medications, allergies, adverse events, immunisations, social history, family history and risk factors.

A patient’s personal information may be held at our Practices in various forms including:

- As paper records.
- As electronic records.
- As visual records – for example x-rays, CT scans, videos and photos.
- As audio recordings.

Our procedures for collecting personal information are as follows:-

1. Staff collect patients’ personal, health and demographic information via registration when patients present to our Practices for the first time. Such information is usually obtained from details provided by patients when completing the Patient Information Form. Patients are encouraged to pay close attention to the collection statement included on this form & also the relevant statements about how such information is used and what patients can do if they have concerns about the way we manage their personal information.
2. During the course of providing medical services, our Practices’ healthcare providers will also collect further personal information.

Document	Privacy Policy	Effective Date:	22 nd October 2015	Version 1.2
Authorised by	Chief Executive Officer	Review Date:	22 nd October 2020	Page 2 of 5
Warning	This process is uncontrolled when printed. The current version of this document is available on Adelaide Unicare website.			

3. Personal information may also be collected from the patient’s guardian or responsible person (where practicable and necessary), or from any other healthcare provider who is involved in the patient’s health care.

The Practice holds all personal information securely, whether in electronic format, in protected information systems or in hard copy format in a secured environment.

Uses of personal information

Personal information will only be used for the purpose of providing medical services and for managing the billing and receipting processes associated with the cost of the patients’ healthcare unless otherwise consented to.

Disclosure of personal information

Unless otherwise consented to personal information will only be disclosed for the purposes outlined below.

Patients’ personal information will be disclosed for the purposes of providing medical services and for managing the billing and receipting processes associated with the cost of the patient’s healthcare unless otherwise consented to

Some disclosure may also occur to third parties engaged by or for our Practices for business purposes such as accreditation, research & education, risk management or for the provision of information technology services.

In the case of disclosure for research & education purposes, any personal information that is disclosed will be in a de-identified format unless otherwise consent to.

In addition such disclosure may occur for the purposes of updating patients’ centralised digital medical records as part of the PCEHR system or for the purposes of electronically requesting diagnostic tests or ordering prescriptions (eTP).

Third parties to whom such personal information is disclosed are also required to comply with this Privacy Policy.

In some cases there also may be a statutory requirement for our Practices to disclose personal information to third parties (for example, some diseases require mandatory notification). Where this is the case our Practices will inform the patient accordingly.

Our Practices will not disclose personal information to any third party other than as outlined above, without full disclosure to the patient or to the recipient, of the reason for the information transfer and with the full consent from the patient.

Our Practices will not disclose personal information to anyone outside Australia without need and without the patient’s consent.

There are however some exceptions to disclosure without a patient’s consent. These exceptions are where the information is:

- Required by law.
- 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 purposes of a confidential dispute resolution process.

Document	Privacy Policy	Effective Date:	22 nd October 2015	Version 1.2
Authorised by	Chief Executive Officer	Review Date:	22 nd October 2020	Page 3 of 5
Warning	This process is uncontrolled when printed. The current version of this document is available on Adelaide Unicare website.			

Our Practices will not use any personal information in relation to direct marketing to a patient without that patient’s express consent. Patients may opt-out of direct marketing at any time by notifying the Practice via a letter or email.

Our Practices evaluate any unsolicited personal information they may receive to decide if it should be kept, acted on or destroyed. In reaching such decision our staff will comply with the APPs.

Access & corrections and privacy concerns

We acknowledge that patients have a right to request access to their personal information that is held by us. Patients are encouraged to make this request in writing, and the Practice will respond within a reasonable time frame & no later than within 30 days of receiving such a request. Patients should note that in certain circumstances as set out in the APPs, we do have the right to refuse to give patients access to their personal information. In the event that we refuse to give patients such access then we will advise the patient of the reasons for such refusal

Where a patient wishes to be provided with a copy of their personal information, then such request should be provided in writing. The Practice has the right to charge a fee for providing a patient with a copy of their personal information providing such fee is reasonable and commensurate with the cost to the Practice in providing such information

The Practice will take reasonable steps to correct personal information where it is satisfied the personal information is not accurate or up to date.

If a patient feels that their personal information may be inaccurate and needs to be corrected or if they feel their personal information needs to be updated they should address their request in the first instance to the Practice Manager of the Practice. Practices’ contact details are given later on in this document.

From time to time, the Practice may ask patients to verify that the personal information held by the Practice is correct and up to date.

Privacy concerns & complaints

The Practice takes complaints and concerns about the privacy of patients’ personal information seriously. Patients should express any privacy concerns in writing to the manager of the Practice concerned. The Practice manager will then attempt to resolve it in accordance with our obligations under the Act and within a reasonable time frame & no later than within 30 days after the complaint is made to the Practice.

Practices’ contact details are given later on in this document.

If a patient feels that their complaint about the privacy of their personal information has not been adequately addressed by the Practice they are encouraged to refer the matter to the Federal Privacy Commissioner at:-

Office of the Australian Information Commissioner (OAIC)
GPO Box 5218
Sydney NSW 2001

Website: www.oaic.gov.au
Privacy hotline: 1300 363 922

Document	Privacy Policy	Effective Date:	22 nd October 2015	Version 1.2
Authorised by	Chief Executive Officer	Review Date:	22 nd October 2020	Page 4 of 5
Warning	This process is uncontrolled when printed. The current version of this document is available on Adelaide Unicare website.			

Practices' contact details

Gawler Place Medical Practice	phone 08 8212 7175	email – uhgawler@adelaide.edu.au
Highbury Family Practice Unit	phone 08 8263 9388	email – fpu@fpu.com.au
Minlaton Medical Centre	phone 08 8853 2001	email - minmc@adelaide.edu.au
North Haven Clinic	phone 08 8248 5858	email – nhc@internode.on.net
Unihealth Playford GP SuperClinic	phone 08 8254 4500	email - uhplayford@adelaide.edu.au
University Health Medical Practice	phone 08 8313 5050	email - unihealth@adelaide.edu.au

Changes to Privacy Policy

From time to time it may be necessary for Adelaide Unicare to review and revise its Privacy Policy. Adelaide Unicare reserves the right to change its Privacy Policy at any time, and it may notify patients about changes to its' Privacy Policy by posting an updated version of the policy document on its' websites.

Further Information

This Privacy Policy is designed to show how Adelaide Unicare aims to comply with the Privacy Act and the APPs. Persons who would like to know more about the Privacy Act and/or the APPs should contact the Office of the Australian Information Commissioner at:-

Phone	1300 363 992
Website	www.oaic.gov.au
Email	enquiries@oaic.gov.au
Write	GPO Box 5218, Sydney NSW 2001

Document	Privacy Policy	Effective Date:	22 nd October 2015	Version 1.2
Authorised by	Chief Executive Officer	Review Date:	22 nd October 2020	Page 5 of 5
Warning	This process is uncontrolled when printed. The current version of this document is available on Adelaide Unicare website.			