

Privacy Policy

1 Introduction

This privacy policy is to provide information to our patient's, on how your personal information is collected and used within our practice, and the circumstances in which we may share it with third parties.

1.1 Company statement

1. Vakil Family Trust ("Pioneer Health Centre") is subject to the Privacy Act 1988 (Cth) (as from 21 December 2001). Pioneer Health Centre is also subject to similar State legislation operating in some States and Territories of Australia. This document sets out Pioneer Health Centre's privacy policy.

By attending this medical centre, you consent to your personal information being collected, stored and used in accordance with this Privacy policy.

1.1.1 Health service providers are independent

2. Pioneer Health Centre is in the business of providing exceptional clinical care for all those who require general practice and dental services. In conducting its business Pioneer Health Centre makes its premises available to health service providers.
3. The health service providers and Pioneer Health Centre are not partners and are not in an employee-employer relationship and therefore each health service provider, in providing health services and doing other things, is at all times an independent contractor and not doing so as the servant or agent or otherwise on behalf of Pioneer Health Centre.

1.1.2 Patient records

4. All patient records are the property of Pioneer Health Centre (and not the property of either the patient or the health service provider).

This requirement assists other health service providers in the medical centre in continuing the management of a patient's needs and healthcare.

2 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.

3 What type of personal information is collected and

The information we collect about you includes:

- names, date of birth, addresses, contact details
- contact details for your next of kin and emergency contact person
- 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

- details of concessional health entitlements (where applicable) for identification and claiming purposes □ healthcare identifiers
- private health insurance fund details.

3.1 How is it collected?

Commonly, this is collected by the administrative staff of the practice.

5. Other personal information, particularly health information, is collected by the independent health service providers in a medical centre and recorded on the patient records that belong to Pioneer Health Centre.

Sometimes health information is received, and placed on those patient records, from health service providers who are external to the medical centre. Examples of this are records of specialists or pathology reports.

4 Purposes of having your personal information

The importance of health service providers sharing personal information about a patient, during the provision of health services to that patient, is widely accepted by the community. Under this approach health service providers share necessary information to deliver optimum patient care. The use and disclosure of personal information is already bound by codes of practice of their professions e.g. health service providers.

6. Pioneer Health Centre's purpose in holding your personal information (including health information) is:

4.1 Provision of health services to you

- to enable that information to be available to those health service providers (whether in the medical centre or external to it) who need access to the information in order for such health service providers to provide health services to you; and

4.2 Administration

- to enable Pioneer Health Centre to charge, bill and collect fees, on behalf of health service providers, in respect of the health services those health service providers provide you; and
- to enable Pioneer Health Centre to charge, bill and collect fees from health service providers in respect of the non-health services Pioneer Health Centre provides to those health service providers; and
- to enable Pioneer Health Centre to gain an understanding of the types of health services, in general, that are needed by patients at large so that the health services available at a medical centre keep meeting patient needs; and
- to enable Pioneer Health Centre to implement management functions in respect of the medical centre, including service-monitoring, quality assurance activities, complaint handling, planning, evaluation and accreditation activities.

4.3 Regulatory purposes

- to fulfil all legal and other regulatory requirements of Pioneer Health Centre, including disclosure to a court or similar body, lawyers or insurers, where court or similar proceedings are on foot or anticipated ; and
- to hold patient records available for health service providers where they are required to maintain such records under legal and other regulatory requirements.

4.4 Supplying bulk de-identified health information

- to enable Pioneer Health Centre to provide third parties with a quantity of de-identified health information.
- Before any health information is provided to a third party it is de-identified, that is, the name and address of the patient and any other information that could otherwise allow an individual to be identified, is removed from the health information.

5 How do we store and protect your personal information?

Your personal information may be stored at our practice in various forms. These may include, but not limited to:

- paper records
 - electronic records,
 - as visual i.e. X-rays, CT scans, MRIs, videos and photos records
7. Pioneer Health Centre stores all personal information securely. For records in an electronic format, the information is protected by electronic information systems requiring passwords, and for paper records they are stored in a secured environment, with restricted access.
 8. Furthermore, all staff and health service providers sign confidentiality agreements, which clearly outline the protection measures in place for patient information, as well as code of conduct statements for their actions and behaviours.

6 Disclosure of personal information

9. Pioneer Health Centre will not disclose your personal information to any third party, except in the following circumstances:

- it is for the purpose of provision of health services to you, as described above; or
- it is for a regulatory purpose described above; or
- it is part of bulk de-identified health information, as described above; or □ it is otherwise required by law.

6.1 Sharing 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 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, through our participation in eHealth services i.e. Electronic Transfer of Prescriptions (eTP), MyHealth Record system (formerly known as PCEHR) e.g. via shared health summary, event summary.

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.

7 How can you access your personal information?

10. As a patient of Pioneer Health Centre, you have the right to request access to your personal information held by the practice, except in circumstances where access may be denied under the Privacy Act or other law.

Examples of these circumstances include:

- where providing access will pose an unreasonable impact on the privacy of another individual; or □ where your request for access is frivolous or vexatious; or
- where the information relates to existing or anticipated legal proceedings between Pioneer Health Centre and you, and the information would not be accessible by the process of discovery in those legal proceedings; or
- where providing access would be unlawful, would pose a threat to the life or health of an individual, may prejudice an investigation of possible unlawful activity, may prejudice enforcement of laws, or denying access is specifically authorised by law.

11. To make a request for your personal information, please contact the Privacy Officer of Pioneer Health Centre in writing.

12. Pioneer Health Centre will endeavour to acknowledge a request for access to personal information within 14 days and provide the information requested within 30 days.

If personal information is provided to you as the result of a request, you will be charged a fee for costs incurred in providing that information such as photocopying, the administration time involved in processing your request, and postage.

13. If access is denied, Pioneer Health Centre will provide you with reasons for its decision.

8 How can you correct your personal information?

Our practice aims to ensure that your personal information is accurate and up-to-date. Upon arrival at the practice, each visit our reception staff will ask you to verify the personal information held by the practice is correct.

14. Alternatively, if you believe that the personal information we hold about you is not accurate, complete or up-to-date, please notify as soon as possible. Provided Pioneer Health Centre agrees with you, Pioneer Health Centre will correct it.

15. In the case of health information, you allege is incorrect, Pioneer Health Centre will consult relevant health service providers about the matter. Furthermore, if Pioneer Health Centre does not agree with you, the practice will place a statement of what you allege is correct, where that information is kept and accessed.

9 Privacy and electronic communications

16. To ensure the security of your information and privacy, all documents emailed from Pioneer Health Centre will be password protected.

9.1 Website cookies

The practice does not collect any specific personal information via our website, or social media channels, however cookies may be used by your website browser.

A “cookie” is a small file sent from a web server to your computer whenever you visit a website.

Some cookies are strictly necessary in order to enable you to move around the website and use its features e.g. online bookings. However, other cookies help to improve the performance of the practice, providing a better user experience, as well as improved programs and services to you.

Cookies cannot contain viruses nor install spyware or malware on your computer.

9.2 Electronic access

This policy is available to view on our website, in addition to the physical copies available in the practice. It may also be published on our social media channels intermittently.

10 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.

11 Lodging a privacy related complaint

17. Pioneer Health Centre 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.

Alternatively, you may also contact the following government agencies:

- the NSW Health Care Complaints Commission - for further information visit www.hccc.nsw.gov.au or call 1800 043 159
- the Office of the Australian Information Commissioner - for further information visit www.oaic.gov.au or call 1300 336 002.

12 How to contact us

To request a copy of your information, or if you have any queries or complaints with regard to our collection, use or management of your personal information, please contact the practice in writing.

In person	Privacy Officer (Practice Manager) - Pioneer Health Centre 4/53-55 Pioneer Road Bellambi NSW 2518
By email	<i>Attention:</i> Privacy Officer (Practice Manager) pm@pioneerhc.com.au

13 Currency of this privacy policy

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

18. Pioneer Health Centre reserves the right to change this Privacy policy at any time. The varied policy terms will be made available to all patients at the reception counter of the medical centre. They will apply to each patient from the date that patient next visits the medical centre after the new policy was made available. You accept that by doing this, Pioneer Health Centre has provided you with sufficient notice of the variation and agree you will be provided with no separate notification.
19. This privacy policy was reviewed on 1 February 2024.