

6.1.2 Policy and Procedure Manual - Privacy Policy

Introduction

We are committed to protecting the privacy of client information and to handling clients' personal information in a responsible manner in accordance with the Privacy Act 1988 (Commonwealth), the Privacy Amendment (Enhancing Privacy Protection) Act 2012, the Australian Privacy Principles and relevant State and Territory privacy legislation (referred to as privacy legislation).

This Privacy Policy explains how we collect, use and disclose your personal information, how you may access that information and how you may seek the correction of any information. It also explains how you may make a complaint about a breach of privacy legislation.

From time to time we may make changes to our policy, processes and systems in relation to how we handle your personal information. We will update this Privacy Policy to reflect any changes. Those changes will be available on our website and in the practice.

Collection

We collect information that is necessary and relevant to provide you with health care and treatment, and manage our health centre. This information may include your name, address, date of birth, gender, health information, family history, credit card and direct debit details and contact details. This information may be stored on our computer health records system and/or in hand written health records.

Wherever practicable we will only collect information from you personally. However, we may also need to collect information from other sources such as treating specialists, radiologists, pathologists, hospitals and other health care providers.

We collect information in various ways, such as over the phone or in writing, in person in the centre and outreach locations or over the internet if you transact with us online. This information may be collected by medical and non-medical staff.

In emergency situations we may also need to collect information from your relatives or friends.

We may be required by law to retain health records for certain periods of time depending on your age at the time we provide services.

The collection statement informs clients about how their health information will be used including other organisations to which the centre may disclose client health information and any law that requires the particular information to be collected. Client consent to the handling and sharing of client health information should be provided at an early stage in the process of clinical care and clients should be made aware of the collection statement when giving consent to share health information. De-identified health and demographic data is collated and used for reporting to assist with service delivery plans and funding and does not identify any individual.

In general, quality improvement or clinical audit activities for the purpose of seeking to improve the delivery of a particular treatment or service would be considered a directly related secondary purpose for information use or disclosure so that LWCHC does not need to seek specific consent for this use of clients' health information. (Refer Section 8 Accreditation and Continuous Improvement)

We inform our clients about our centre's policies regarding the collection and management of their personal health information via:

- A sign in the reception area
- Brochures in the waiting area

- Practice Information sheet
- New patient 'Consent Form'
- Verbally
- Our websites www.lwchc.org.au and www.womenpartners.org.au

A copy of LWCHC privacy policy is located in the policy and procedure manual on the organisation's computer system/shared files, in hard copy in the manager's office and on the website. It is also available to clients on request.

LWCHC features the approved collection statement on the 'New Client' intake form.

'Leichhardt Women's Community Health Centre (LWCHC), located at 55 Thornley Street Leichhardt (Tel. 9560 3011) collects your personal details and health information to ensure we deliver the best possible healthcare service. LWCHC adheres to the NSW Health Records and Information Privacy Act 2002, the National Privacy Principles and our own strict standards. During your time at LWCHC your health information will only be used to assist your care (eg. with your verbal permission health information may be shared if you are being referred to another practitioner) and as you may reasonably expect for the centre's internal quality assurance and statistical purposes (which will not identify you in any way). Failure to provide accurate and comprehensive information could negatively affect your healthcare. You are entitled to access your health information at any stage by contacting the centre. If you have any concerns regarding your privacy, please contact the centre manager.'

Prior to a client signing consent to the release of their health information clients are made aware they can request a full copy of our privacy policy and collection statement.

Use and Disclosure

We will treat your personal information as strictly private and confidential. We will only use or disclose it for purposes directly related to your care and treatment, or in ways that you would reasonably expect that we may use it for your ongoing care and treatment. For example, the disclosure of blood test results to your specialist or requests for x-rays.

There are circumstances where we may be permitted or required by law to disclose your personal information to third parties. For example, to Medicare, Police, insurers, solicitors, government regulatory bodies, tribunals, courts of law, hospitals, or debt collection agents. We may also from time to time provide statistical data to third parties for research purposes.

We may disclose information about you to outside contractors to carry out activities on our behalf, such as an IT service provider, solicitor or debt collection agent. We impose security and confidentiality requirements on how they handle your personal information. Outside contractors are required not to use information about you for any purpose except for those activities we have asked them to perform.

Data Quality and Security

We will take reasonable steps to ensure that your personal information is accurate, complete, up to date and relevant. For this purpose our staff may ask you to confirm that your contact details are correct when you attend the centre. We request that you let us know if any of the information we hold about you is incorrect or out of date.

Personal information that we hold is protected by:

- ▶ securing our premises;
- ▶ placing passwords and varying access levels on databases to limit access and protect electronic information from unauthorised interference, access, modification and disclosure; and
- ▶ providing locked cabinets and rooms for the storage of physical records.

Corrections

If you believe that the information we have about you is not accurate, complete or up-to-date, we ask that you contact us in writing (see details below). We will not delete health records but you may ask to have a correction entered.

Access

You are entitled to request access to your health records. We request that you put your request in writing and we will respond to it within a reasonable time.

There may be a fee for the administrative costs of retrieving and providing you with copies of your health records.

We may deny access to your health records in certain circumstances permitted by law, for example, if disclosure may cause a serious threat to your health or safety. We will always tell you why access is denied and the options you have to respond to our decision.

Complaints

If you have a complaint about the privacy of your personal information, we request that you contact us in writing. Upon receipt of a complaint we will consider the details and attempt to resolve it in accordance with our complaints handling procedures.

If you are dissatisfied with our handling of a complaint or the outcome you may make an application to the Australian Information Commissioner or the Privacy Commissioner in your State or Territory.

Overseas Transfer of Data

We will not transfer your personal information to an overseas recipient unless we have your consent or we are required to do so by law.

Contact

Please direct any queries, complaints, or requests for access to health records to:
Roxanne McMurray, Manager
Leichhardt Women's Community Health Centre
PO Box 240 Leichhardt NSW 2040 or manager@lwchc.org.au