

Introduction

The ANU Medical centre takes the privacy and security of personal health information very seriously. This privacy policy is to provide information to you, our member and 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 member or 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.

Why do we collect, use, hold and share your personal information?

Our practice will need to collect your personal information to provide healthcare services to you. 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).

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

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 the registration process.
2. During the course of providing medical services, we may collect further personal information through Electronic Transfer of Prescriptions.
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, the Department of Veteran's Affairs (as applicable) or other Government departments (as necessary).

Telehealth Consultations

The ANU Medical Centre supports the use of telehealth consultations to improve access to healthcare, particularly for patients who may face barriers to in-person visits. To ensure patient privacy and data security, the following principles apply to all telehealth services:

- **Consent and Transparency**

Patients must provide explicit consent before a telehealth consultation begins. This includes understanding the nature, benefits, limitations, and any costs associated with the service. Consent may be verbal or written and is documented in the patient's medical record.

- **Confidentiality and Secure Communication**

All telehealth consultations are conducted using secure, encrypted platforms to protect patient information. Practitioners are trained to uphold the same standards of confidentiality as in face-to-face consultations.

- **Appropriateness and Safety**

The suitability of telehealth is assessed on a case-by-case basis. If a patient's condition requires in-person care, appropriate follow-up will be arranged.

- **Documentation and Record Keeping**

Details of each telehealth consultation—including the mode of communication, consent, and clinical decisions—are recorded in the patient's medical record in accordance with RACGP guidelines. These records are stored securely and retained for at least seven years.

Who do we share your personal information with?

We may 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 Electronic Transfer of Prescriptions

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 that are permitted by law) without your consent.

Our practice will not use your personal information for marketing any of our, or our partners, 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.

Use of Document Automation in Referral Letters

To support efficient and accurate communication with other healthcare providers, our practice uses document automation technologies when generating referral letters. These systems are designed to include only the information that is clinically relevant to the referral purpose. Our healthcare providers review all automated content to ensure that only necessary and appropriate medical information is shared. This process helps maintain patient confidentiality and upholds our commitment to data minimisation and privacy.

How do we store and protect your personal information?

Your personal information may be stored at our practice in various formats. This may be in the form of electronic records, paper records, images (e.g. x-rays, CT scans, and photos) or audio recordings.

Our practice stores all personal information securely. Paper documents are securely stored, and once transferred to electronic format, the paper records are destroyed via a confidential waste service

Electronic records within the patient management system are password protected. All information is backed up daily to an offsite location. This information is encrypted. Additionally, all staff members are bound by confidentiality agreements regarding the dispensing of personal patient information.

How can you access and correct your personal information at our practice?

You have the right to request access to, and correct, your personal information.

Our practice acknowledges patients may request access to their medical records or request to transfer their records to another medical provider. We require you to put this request in writing and our practice will respond within 30 days. There is no charge for making the request, however the ANU medical clinic reserves the right to impose a reasonable administration fee to release the records. The fee must be paid before medical records can be released.

Our practice will take 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 by speaking to one of our Reception staff on (02) 61252211 or by visiting a clinic.

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. We will then attempt to resolve your concern in accordance with our resolution procedure. All privacy related complaints should be sent to our Practice manager via email medical.centre@anu.edu.au. Or alternatively complete a feedback form available at the front desk. All efforts will be made to address your concerns within 30 days.

Anonymous Communication

We understand that some patients may wish to provide feedback or raise concerns without disclosing their identity. To support this, our practice accepts anonymous communication for general feedback and privacy-related concerns. Patients may submit anonymous feedback via the feedback forms available at the front desk or through our website's contact form (where no identifying information is required). While we may be limited in our ability to investigate or respond to anonymous complaints, all feedback is reviewed and considered as part of our commitment to continuous improvement and patient privacy.

You may also contact the Office of the Australian Information Commissioner (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. Alternatively, you may wish to contact your state or territories Health Services Commissioner. In the ACT, you may also consider contacting the ACT Human Rights Commission by visiting <http://hrc.act.gov.au> or calling (02) 6205 2222.

Procedure review statement

This privacy procedure is reviewed regularly to ensure it is in accordance with any changes that may occur. ANU Staff and Students will be notified of any changes by posting a notice in clinic, updating the website and including a note in appointment reminders and Hotdoc.

Last reviewed:14 May 2025

Next scheduled review: May 2026