



PRIVACY POLICY

PART A

Purpose and Context

GPs on Curzon is committed to ensuring the privacy and confidentiality of all personal information affiliated with GPs on Curzon's business undertakings.

GPs on Curzon follows the terms and conditions of privacy and confidentiality in accordance with the Australian Privacy Principles (APPs) as per schedule 1 of the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth), forming part of the Privacy Act 1988 ('the Act').

The purpose of this Privacy Policy is to clearly communicate how GPs on Curzon collects and manages personal information.

The point of contact regarding any queries regarding this policy is

Practice Manager
GPs on Curzon
P 07 4633 9000
E info@curzonmedical.com.au

PART B

Australian Privacy Principles

As a private sector health service provider and under permitted health situations, GPs on Curzon is required to comply with the APPs as prescribed under the Act.

The APPs regulate how GPs on Curzon may collect, use, disclose and store personal information and how individuals, including GPs on Curzon's patients may:

- ▶ address breaches of the APPs by GPs on Curzon.
- ▶ access their own personal information; and,
- ▶ correct their own personal information.

In order to provide patients with adequate health care services, GPs on Curzon will need to collect and use personal information. It is important to be aware that if the patient provides incomplete or inaccurate information or the patient withholds personal health information, GPs on Curzon may not be able to provide the patient with the services they are requesting.

In this Privacy Policy, common terms and definitions include

"personal information ¹¹ as defined by the Privacy Act 1988 (Cth). Meaning "information or an opinion including information or an opinion forming part of a database, whether true or not, and whether recorded in a material format or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion" and,

"health information ¹¹ as defined by the Privacy Act 1988 (Cth). This is a particular subset of "personal information" and means:

- ▶ information or opinion about the health or disability (at any time ie. past, present or future) of an individual that can be classified as personal information;
- ▶ information or opinion about an individual's expressed wishes about the future provision of health services that can be classified as personal information;
- ▶ information or opinion about health services provided, or to be provided, to an individual, that can be classified as personal information;
- ▶ Other personal information collected to provide, or in providing, a health service;
- ▶ other personal information about an individual collected in connection with the donation, or intended donation by the individual of his or her body parts, organs or body substances; or,
- ▶ genetic information about an individual in a form that is, or could be, predictive of the health of the individual or a genetic relative of the individual.

Personal information also includes '**sensitive information**' which is information including, but not limited to a patient's:

- ▶ race;
- ▶ religion
- ▶ political opinions;
- ▶ sexual preference; and or, health information.

Information deemed 'sensitive information' attracts a higher privacy standard under the Act and is subject to additional mechanisms for the patient's protection.

PART C

Types of Personal Information

GPs on Curzon collect information from each individual patient that is necessary to provide the patient with adequate health care services.

This may include collecting information about a patient's health history, family history, ethnic background or current lifestyle to assist the health care team

in diagnosing and treating a patient's condition.

PART D

Collection and Retention

This information will in most circumstances be collected directly from the patient through but not limited to the following medium:

- ▶ GPs On Curzon patient consent form;
- ▶ Medical treatment form, and or,
- ▶ Face to face consultation
- ▶ Telehealth consultations

In other instances, GPs on Curzon may need to collect personal information about a patient from a third party source. This may include;

- ▶ relatives; or,
- ▶ other health service providers.

This will only be conducted if the patient has provided consent for GPs on Curzon to collect his/her information from a third party source; or, where it is not reasonable or practical for GPs on Curzon to collect this information directly from the patient. This may include where:

The patient's health is potentially at risk and his/her personal information is needed to provide them with emergency medical treatment.

GPs on Curzon endeavours to store and retain a patient's personal and health information in (hard copy on site; transferred electronically onto a domestic server).

PART E

Purpose of Collection, Use and Disclosure

GPs on Curzon uses a patient's personal information for the purpose(s) they have provided the information for unless one of the following applies:

- ▶ the patient has consented for GPs on Curzon to use his/her information for an alternative or additional purpose;
- ▶ the disclosure of the patient's information by GPs on Curzon is reasonably necessary for the enforcement of criminal law or a law imposing a penalty or sanction, or for the protection of public revenue;
- ▶ the disclosure of the patient's information by GPs on Curzon will prevent or lessen a serious and imminent threat to somebody's life or health; or,

GPs on Curzon is required or authorised by law to disclose the patient's information

for another purpose.

i. Health Professionals to provide treatment

During the patient's treatment at GPs on Curzon, he/she may be referred to alternative medical treatment/service (eg. Pathology or Radiology) where GPs on Curzon's staff may consult with senior medical experts when determining a patient's diagnosis or treatment.

GPs on Curzon staff may also refer the patient to other health service providers for further treatment during and following the patients admission. These services include, but are not limited to:

- ▶ Physiotherapy; or,
- ▶ Occupational Therapy; or,
- ▶ Psychology and Counselling Services; or,
- ▶ Exercise Physiology; or,
- ▶ Outpatient or community health services.

These health professionals will be designated health service providers appointed to use the patient's health information as part of the process of providing treatment. Please note that this process will be conducted whilst maintaining the confidentiality and privacy of the patient's personal information.

ii. Alternative Health Services

At any point a patient wishes to be treated by an alternative medical practitioner or health care service that requires access to his/her personal/health information, GPs on Curzon requires written authorisation. This written authorisation is to state that the patient will be utilising alternative health services and that these health services have consented for a transfer of personal/health information.

iii. Other Third Parties

GPs on Curzon may provide the patient's personal information regarding a patient's treatment or condition to additional third parties. These third parties may include:

- ▶ parent/s;
- ▶ child/ren;
- ▶ other relatives;
- ▶ close personal friends; guardians; or,
- ▶ a person exercising a patient's power of attorney under an enduring power of attorney.

Where information is relevant or reasonable to be provided to third parties,

written or documented verbal consent from the patient is required.

Additionally, the patient may at any time wish to disclose that no third parties as stated are to access or be informed about his/her personal information or circumstances.

iv. Other Uses of Personal Information

In order to provide the best possible environment to treat patients, GPs on Curzon may also use personal/health information where necessary for:

- ▶ activities such as quality assurance processes, accreditation, audits, risk and claims management, patient satisfaction surveys and staff education and training;
- ▶ invoicing, billing and account management;
- ▶ to liaise with a patient's health fund, Medicare or the Department of Veteran's Affairs, as necessary; and,
- ▶ the purpose of complying with any applicable laws - ie. in response to a subpoena or compulsory reporting to State or Federal authorities.

If at any point or for any of the aforementioned reasons GPs on Curzon uses or discloses personal/health information in accordance with the APPs, GPs on Curzon will provide written notice for the patient's consent for the use and/or disclosure.

PART F

Access and Changes to Personal Information

If an individual patient reasonably requests access to their personal information for the purposes of changing the information, he/she must engage with the practice manager.

The point of contact for patient access to personal information is:

Practice Manager
GPs on Curzon
P 07 4633 9000
E info@curzonmedical.com.au
Monday - Friday

Once an individual patient requests access to his/her personal information, GPs on Curzon will respond within a reasonable period of time to provide the information.

All personal information will be updated in accordance to any changes to a patient's personal circumstances brought to GPs on Curzon's attention. All changes to personal information will be subject to a patient's consent and acknowledgement.

If an individual requests access to his/her personal information GPs on Curzon will

charge \$25. Please note that this fee is associated with administrative costs only.

PART G

Complaints Handling

An individual patient may complain about a breach of the APPs by contacting

Practice Manager
GPs on Curzon
P 07 4633 9000
E info@curzonmedical.com.au
Monday - Friday

OR

Medical Director
GPs on Curzon
Dr Rachael Gray
P 07 4633 9000
E info@curzonmedical.com.au

OR

Office of the Australian Information Commissioner
GPO Box 5218
SYDNEY NSW 2001
P 1300 363 992
E enquiries@oaic.gov.au

PART H

Personal Information and Overseas Recipients

Use of overseas parties:

GPs on Curzon does not engage with any overseas entities, with which personal or health information would be transferred, appointed or disclosed.

PART I

Disposal of Personal/ Health Information

If GPs on Curzon receives any personal information that is not deemed appropriate for the permitted health situation, GPs on Curzon will reasonably de-identify and dispose of the information accordingly.

If GPs on Curzon holds any personal or health information that is no longer deemed relevant or appropriate for the permitted health situation, GPs on

Curzon will reasonably de-identify and dispose of the information accordingly.

PART J

Access to Policy

GPs on Curzon provides free copies of this Privacy Policy for patients and staff, which can be accessed by contacting

Practice Manager
GPs on Curzon
P 07 4633 9000
E info@curzonmedical.com.au
Monday - Friday

OR

GPs on Curzon Policy and Procedures Manual on Practice Hub

Hard copies of GPs on Curzon's Privacy Policy will be provided upon request.

PART K

On line Services

This Section applies to our websites at www.gpsoncurzon.com.au and to our other online services including our apps, email communications, social media and Telehealth services. If you use our online services our system may record information such as the date and time of your interaction, the pages accessed, and any information downloaded. This information is used for statistical reporting and website administration and maintenance purposes. We may also record device identifiers and device location data through our online services where available. We also collect other information regarding location including information you provide through using our online services and IP address. Location information is used in accordance with this Privacy Policy for purposes including to verify your eligibility to use our services and optimize and customize our Online Services and platform for your location.

PART L

Review of Policy

GPs on Curzon, in accordance with any legislative change, will review the terms and conditions of this policy to ensure all content is both accurate and up to date.

Notification of any additional review(s) or alteration(s) to this policy will be provided to patients and staff within 4 weeks notice.

The next review is due in July 2024.
