

KON-TIKI MEDICAL CENTRE

55 Plaza Parade

Maroochydore

Privacy Policy

Current as of: **04/11/2024**



Note the policy should be reviewed annually or when there are any significant changes to the way a practice operates, or legislative changes occur.



Meeting your privacy obligations

Use of this template does not guarantee compliance with the Privacy Act. It is intended as a guide of a general nature only. The content of this template includes general statements, which practices may need to amend to ensure the policy accurately reflects the way an individual practice operates and meets its privacy obligations. Practices using this template should seek appropriate legal or other professional advice if they have specific concerns or privacy needs not covered in this template.

The objective of this privacy notice is to provide you, our patient, with clear information on how your personal information is collected and used within the practice. Occasionally we also need to share your personal information to involve others in your healthcare and this policy outlines when, how, and why we share your information.

1. Who can I contact about this policy?

For enquiries concerning this policy, you can contact

Dr Dhara Contractor on 1800010999 or admin@kontikimedical.com.au

2. When and why is your consent necessary?

When you register as a patient of this practice, you provide consent for the GPs and practice staff to access and use your personal information to facilitate the delivery of healthcare. Access to your personal information is restricted to practice team members who require it for your care. If we ever use your personal information for purposes other than healthcare provision, we will obtain additional consent from you.

It is important to us that as our patient, you understand why we collect and use your personal information.

KON-TIKI MEDICAL CENTRE

55 Plaza Parade

Maroochydore



Ensure the practice patient registration form, or other processes, include a section for obtaining consent for the use of personal information. It is also important to create a culture with the practice team in relation to obtaining explicit consent for any non-healthcare-related use of patient information, such as seeking specific consent for direct marketing of the practice services.

3. Why do we collect, use, store, and share your personal information?

The practice collects, uses, stores, and shares your personal information primarily to manage your health safely and effectively. This includes providing healthcare services, managing medical records, and ensuring accurate billing and payments. Additionally, we may utilise your information for internal quality and safety improvement processes such as practice audits, accreditation purposes, and staff training to maintain high-quality service standards.



Ensure the practice team are aware of the various purposes for which patient information may be collected, used, held, and shared. Maintain transparency with patients regarding the reasons for collecting and utilising their personal information to build trust and confidence in the practice.

4. What personal information is collected?

The information we will collect about you includes your:

- names, date of birth, addresses, contact details
- medical information including medical history, medicines, allergies, and adverse reactions immunisations, social history, family history and risk factors
- Medicare number (where available) for identification and claiming purposes
- healthcare identifier numbers
- health fund details.

5. Can you deal with us anonymously?

Usually, not possible to maintain continuity of care with anonymous identity. ID check required for safety of medical care provided and for the privacy and confidentiality maintenance of each individual patient.

You can 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.

KON-TIKI MEDICAL CENTRE

55 Plaza Parade

Maroochydore



Ensure that patients are informed of their right to deal with the practice anonymously or under a pseudonym. Make provisions to accommodate anonymous or pseudonymous interactions unless impracticable.



Dealing with general practices anonymously

The Privacy Act requires patients to be provided with the option of not identifying themselves, or of using a pseudonym, when dealing with a practice unless it is impracticable to do so. Information about this should appear in the practice privacy policy or collection notice.

The Privacy Act 1988 requires practices to consider whether it is practical to give patients the option of not identifying themselves, or using a pseudonym. However, practices do not have to deal with patients anonymously or pseudonymously. The OAIC website provides further information in this topic [here](#).

6. How is personal information collected?

The practice may collect your personal information in several different ways:

When you make your first appointment, the practice team will collect your personal and demographic information via your registration.



Ensure that a collection statement is attached to/within the patient registration form to inform patients about the information being collected and its purpose.

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.



KON-TIKI MEDICAL CENTRE

55 Plaza Parade

Maroochydore

Assess whether these methods of collecting personal information apply and amend the statement accordingly. Specify the participation status of your practice in digital health services such as the use of online appointment technology of the My Health Record for transparency.

In some circumstances, personal information may also be collected from other sources, including:

- 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, or the Department of Veterans' Affairs (if relevant).
- While providing medical services, further personal information may be collected via:
 - electronic prescribing
 - My Health Record
 - online appointments.



Assess whether these methods of collecting personal information apply and amend the list accordingly. Specify the participation status of your practice in digital health services such as the use of online appointment technology or the My Health Record for transparency.

Various types of images may be collected and used, including:

- **CCTV footage:** Collected from our premises for security and safety purpose.



If there is CCTV in the practice you may want to place signs in the waiting rooms and other areas where footage is captured.

- **Photos and medical images:** These can be taken using personal devices for medical purposes, following the guidelines outlined in our guide on using personal devices for medical images.



Using personal devices for medical images

KON-TIKI MEDICAL CENTRE

55 Plaza Parade

Maroochydore

The guidelines on using personal devices for medical images should align with Australian privacy obligations, particularly the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth). The RACGP resource [Using personal mobile devices for clinical photos](#) provides further information on the considerations required when taking clinical photos on a personal mobile device that belongs to a clinician and is used outside of the workplace.



Compliance with privacy obligations

To comply with Australian privacy obligations when collecting personal information from third-party sources, you must understand and adhere to the **Privacy Act 1988** and the **Australian Privacy Principles (APPs)** this includes:

- verifying third-party compliance
- ensuring informed consent
- collecting only necessary data
- maintaining data accuracy
- updating your privacy policy and notifying patients of these updates as required
- protecting data with strong security measures
- facilitating individuals' rights to their data
- providing regular education and training for the practice team on privacy practices.

To ensure compliance, you can include the following line in the privacy policy:

"We will always comply with privacy obligations when collecting personal information from third-party sources. This includes ensuring transparency with patients, obtaining necessary consents, maintaining data accuracy, securing the information, and using it only for specified purposes."

7. When, why and with whom do we share your personal information?

We sometimes share your personal information:

- with third parties for business purposes, such as accreditation agencies or information technology providers – these third parties are required to comply with APPs and this policy
- with other healthcare providers (e.g. In referral letters)
- 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

KON-TIKI MEDICAL CENTRE

55 Plaza Parade

Maroochydore

- to assist in locating a missing person, subpoena
- to establish, exercise or defend an equitable claim
- for the purpose of confidential dispute resolution process
- When it is a statutory requirement to share certain personal information (e.g. some diseases require mandatory notification)
- When it is provision of medical services, through electronic prescribing, My Health Record (e.g. via Shared Health Summary, Event Summary).



You will need to specify if the practice uses any of the above digital health tools. Are there any other usual disclosures specific to the practice which you should include here?

Only people who need to access your personal information will be able to do so. Other than providing medical services or as otherwise described in this policy, the practice will not share personal information with any third party without your consent.

We do not share your personal information with anyone outside Australia (unless under exceptional circumstances that are permitted by law) without your consent.



Alternatively, if the practice is likely to share personal information outside of Australia, clearly set out where it is likely to make those disclosures if it is practicable to do so, e.g., if an overseas transcription service is used you will need to make your patients aware of this. If information is not being sent overseas, state this clearly.

8. Will your information be used for marketing purposes?

The practice will not use your personal information for marketing any goods or services directly to you without your expressed consent. If you do consent, you may opt out of direct marketing at any time by notifying the practice in writing.



The Medical Board of Australia has requirements for advertising a regulated health service. If your practice is intending to provide direct marketing for patients please review the guidelines [here](#).

KON-TIKI MEDICAL CENTRE

55 Plaza Parade

Maroochydore

9. How is your information used to improve services?

The practice may use your personal information to improve the quality of the services offered to patients through research, analysis of patient data for quality improvement and for training activities with the practice team.

DE-IDENTIFIED data for improving quality of care of medical conditions and patient outcomes.

We may provide de-identified data to other organisations (Australian Department of Health, at request) to improve population health outcomes. The information is secure, patients cannot be identified, and the information is stored within Australia. You can let reception staff know if you do not want your information included.



Definitions of de-identified and personal information

The [RACGP Three key principles for the secondary use of general practice data by third parties](#) defines de-identification as: the removing or altering information that identifies an individual or is likely to do so. Where information has been appropriately de-identified, it is no longer considered 'personal information' and can therefore be used or shared in ways that might not otherwise be permitted under the Privacy Act 1988 (Cwlth). A general practice can therefore lawfully share de-identified patient data without specific or express patient consent.

When personal information (i.e., data has not been de-identified) is requested by a third party, specific patient consent is usually needed, and the requesting entity will need to meet the requirements of a human research ethics committee.

Use of de-identified patient data

If the practice routinely provides patient health information to other organisations for secondary use the practice should make patients aware that this is occurring by including this information as part of the privacy policy. Practices should give patients assurances and advice on their rights and how their data is protected and must state the practice's approach to collection of healthcare information for primary and secondary purposes. Whilst patient consent for sharing de-identified practice data is not a legal requirement, it is good practice to have a procedure for ensuring patients who do not consent to secondary use of data are removed from any data extraction process. Most data extraction tools have this functionality.

10. How are document automation technologies used?

Document automation is where systems use existing data to generate electronic documents relating to medical conditions and healthcare.

The practice uses document automation technologies to create documents such as referrals, which are sent to other healthcare providers. These documents contain only your relevant medical information.

These document automation technologies are used through secure medical software **Medical Director Clinical**.

All users of the medical software have their own unique user credentials and password and can only access information that is relevant to their role in the practice team.

The practice complies with the Australian privacy legislation and APPs to protect your information.

KON-TIKI MEDICAL CENTRE

55 Plaza Parade

Maroochydore

All data, both electronic and paper are stored and managed in accordance with the Royal Australian College of General Practitioners [Privacy and managing health information guidance](#).

11. How are Artificial Intelligence (AI) Scribes used?

The practice currently Does Not use any AI scribe tool.



If you do not use an AI scribe service this section can be removed

If you do use an AI scribe service, you will need to delete the relevant information in the list above to accurately reflect how your AI scribe service manages patient data.



Use of artificial intelligence (AI) scribes

It is important practices understand the new and relatively high potential risks when considering the use of commercially available artificial intelligence (AI) scribes. Practices and GPs choosing to deploy AI scribes need to consider the implications both when selecting and using these tools.

The RACGP guidance on [Artificial Intelligence \(AI\) Scribes](#) provides more information on AI scribes.

GP's should also give individual patients the option to opt out of the use of AI scribes when required.

12. How is your personal information stored and protected?

Your personal information may be stored in various forms.



Specify the ways in which the practice stores information, such as paper records, electronic records, visual records (e.g., X-rays, CT scans, videos, and photos), and audio recordings.

KON-TIKI MEDICAL CENTRE

55 Plaza Parade

Maroochydore

The practice stores all personal information securely. All files are password protected.

Server Cabinets and Confidential waste bins, all physically locked.

CCTV cameras are in the corridors and the waiting areas for safety and surveillance. Not in the consult rooms.



Explain how personal information is securely stored and protected, such as electronic format, in protected information systems or in hard copy format in a secured environment.



Provide examples like passwords, secure cabinets, and confidentiality agreements for staff and contractors. However, avoid providing details that would jeopardize the effectiveness of your security measures.



Add CCTV information e.g., our practice has this, and provide details of recordings and storage and access store these recording and the areas that have this in the practice e.g., excluding consulting and treatments rooms and including car park entry etc.

13. How can you access and correct your personal information at the practice?

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

The practice acknowledges patients may request access to their medical records. Please note the patient information page on the website has further elaborate information on accessing health records.

Kon-Tiki Medial Centre follows the right to Information Act 2009 (QLD) procedures for RIO.

The practice will respond to any requests to access or correct your personal information within **25 business working days**.

The practice will take reasonable steps to correct your personal information where the information is not accurate or up to date. Sometimes, we will ask you to verify your personal information held by the practice is correct and current. You may request we correct or update your information. To do this please contact – admin@kontikimedical.com.au

KON-TIKI MEDICAL CENTRE

55 Plaza Parade

Maroochydore

14. How can you lodge a privacy-related complaint, and how will the complaint be handled at the practice?

We take complaints and concerns regarding privacy seriously. You should express any privacy concerns you may have. We will then attempt to resolve it in accordance with the resolution procedure.

Please write your complaint to : admin@kontikimedical.com.au

Or

Send post to : Kon-Tiki Medical Centre , 55 Plaza Parade < Maroochydore QLD 4575

We will endeavour to process the complaint and reply within 5-7 working days.

If you do not feel we have resolved your issue You may also contact the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner will require you to give them time to respond before they investigate. For further information visit www.oaic.gov.au or call the OAIC (Office of the Australian Information Commissioner) on 1300 363 992.

15. Policy review statement

Our privacy policy is regularly reviewed to ensure compliance with current obligations.

If any changes are made:

- They will be reflected on the website.
- Significant changes may be communicated directly to patients via information boards in the practice premises (waiting area, reception area, in consult rooms and broadcasted via sms systems).

Please check the policy periodically for updates. If you have any questions, feel free to contact us.