

Vitality Healthcare Medical Centre Privacy Policy

Introduction

This privacy policy is to provide information to you, our 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 and how we handle any personal information processed through the use of emerging technologies, including Artificial Intelligence tools, to support your care.

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 or the doctors intend to use AI tools that process your health information beyond our secure practice systems, 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 your:

- 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.

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.

How do we collect your personal information?

Our practice may collect your personal information in several different ways.

1. When you make your first appointment our practice staff will collect your personal and demographic information via your registration.
2. During the course of providing medical services, we may collect further personal information.
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. Personal information may also be processed through secure AI tools used by our doctors during your consultation, solely for clinical and administrative purposes.
5. 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, or the Department of Veterans' Affairs (as necessary).
6. While providing medical services, further personal information may be collected via:
 - Electronic prescribing
 - My Health Record

- MyMedicare
- Online appointments

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

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

When, why and with whom do we share your 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 APPs 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 eTP, My Health Record (e.g. via Shared Health Summary, Event Summary).

Only people who 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.

We do not share your personal information with any external AI providers unless the AI tool is securely integrated within our approved clinical software and compliant with relevant privacy laws. Any such use will be limited, secure, and governed by strict data protection agreements.

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.

How do we store and protect your personal information?

Your personal information may be stored at our practice in various forms.

We only store information and records electronically. All paper documents will be scanned into the practice system and the true copy will be shredded and disposed safely.

Our practice stores all personal information securely. All electronic format is in protected information systems with the use of passwords. We have confidentiality agreements for staff and contractors in place as well.

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 express consent. If you do consent, you may opt out of direct marketing at any time by notifying the practice in writing.

How is your information used to improve services?

The practice may not use your personal information in any research but may use patient data for quality improvement and for training activities with the practice team to improve the quality of the services offered to patients.

We may provide de-identified data to other organisations to improve population health outcomes. If we provide this information to other organisations patients cannot be identified from the information we share, the information is secure and is stored within Australia. You can let reception staff know if you do not want your de-identified information included.

How are Artificial Intelligence (AI) Scribes used?

The contracted GPs may use an AI scribe tool (Lyrebird/Heidi) to support GPs take notes during their consultations with you. The AI scribe uses an audio recording of your consultation to generate a clinical note for your health record.

Lyrebird Health/Heidi:

- does not share information outside of Australia
- destroys the audio file once the transcription is complete.
- removes sensitive, personal identifying information as part of the transcription

How is AI used for administrative purposes?

Our practice may use Microsoft Copilot, which operates within our secure Microsoft 365 environment, to assist practice staff with general administrative tasks such as drafting correspondence, document formatting and scheduling.

Sensitive or identifiable patient health information is not entered into Copilot or any other administrative AI tool. Any administrative task involving identifiable patient information is handled through our approved clinical systems, in accordance with this policy.

Our practice does not currently use, and has no plans to use, automated decision-making systems that make or substantially assist decisions about your care, claims, or other matters that could significantly affect your rights or interests.

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

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

Our practice acknowledges patients may request access to their medical records. We require you to put this request in writing completing the medical record request form and our practice will respond within a reasonable time of 30 days. Also, a \$35 plus GST will be applied upon patients' request to have a copy of the medical record or having the medical record transferred to other medical practices.

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 that your personal information held by our practice is correct and current. You may also request that we correct or update your information, and you should make such requests in writing to info@vhcmedical.com.au.

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 it in accordance with our resolution procedure within 30 days.

Email: info@vhcmedical.com.au

Phone: 08 83592911

Fax: 08 83592466

You may also contact the 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 363 992.

Privacy and our website

Any personal information collected via our practice website or interactions with our patients digitally through social media or by email will be kept confidentially. We have taken precautions to minimize the risk of transmitting software viruses, but we advise patients to carry out their own virus checks on any attachment to this message. We cannot accept liability for any loss or damage caused by software viruses.

Policy review statement

This privacy policy will be reviewed regularly to ensure it is in accordance with any changes that may occur. Any amendments to our privacy policy will be displayed online at our website and on notice board at our practice.

Disclaimer

The *Privacy policy template for general practices* is intended for use as a guide of a general nature only and may or may not be relevant to particular practices or circumstances. The Royal Australian College of General Practitioners (RACGP) has used its best endeavours to ensure the template is adapted for general practice to address current and anticipated future privacy requirements. Persons adopting or implementing its procedures or recommendations should exercise their own independent skill or judgement, or seek appropriate professional advice. While the template is directed to general practice, it does not ensure compliance with any privacy laws, and cannot of itself guarantee discharge of the duty of care owed to patients. Accordingly, the RACGP disclaims all liability (including negligence) to any users of the information contained in this template for any loss or damage (consequential or otherwise), cost or expense incurred or arising by reason of reliance on the template in any manner.