

The Digestive Health Centre

Privacy Policy

Purpose

The Digestive Health Centre takes its obligations under the Victorian Health Records Act 2001 (version 049) (Health Privacy Principles) and the Commonwealth Privacy Act 1988 (Amdt 18/10/2023) seriously and would like to take all reasonable steps in order to comply and protect the privacy of the personal information that we hold. This policy sets out how we intend to do so.

Our [Information Management Policy OSP-RM-018](#) contains detailed information in relation to the responsibility, access, storage & disposal of all record held by the Digestive Health Centre.

Collection of Information

The Digestive Health Centre collects and holds personal health information from you so that we may properly assess, diagnose, treat and be proactive in your health care needs. All members of the professional team involved in your care will have access to your personal information.

This means we may use and disclose the information you provide in the following ways:

- Disclosures to others involved in your health care, including treating doctors, pathology services, radiology services and other specialists outside this centre. This may occur through referral to other doctors, for medical tests and in the reports or results returned to us following the referrals.
- Disclosure to enable recording on medical registers (eg the cancer registry).
- To obtain your IHI (Individual Healthcare Identifier) number to enable use of eprescription
- Administrative purposes in running our centre, including our insurer or medical indemnity provider, and quality assurance and accreditation bodies.
- Billing purposes, including providing information to your health insurance fund, the Health Insurance Commission (Medicare) and other organisations responsible for the financial aspects of your care.
- Assisting with training and education of other health professionals. In most cases we will obtain the information directly from you or your treating doctors.

Information Quality

Our goal is to ensure that your information is accurate, complete and up-to-date. To assist us with this, please contact us if any of the details you have provided change. Further, if you believe that the information we have about you is not accurate, complete or up-to-date, contact us and we will use all reasonable efforts to correct the information.

The introduction of the Patient Portal to collect patient information has improved the quality and completeness of data as:

- patient's fill in their own information and therefore the accuracy of the information is higher than that of manual transcribing
- spelling of names and other fields are more accurate as the patient knows their own details best
- instead of verbal information, the clinical history is captured via a structured set of questions with appropriate pre-set choices, and free text to ensure accurate and complete details are captured. As the questions and preset questions are specified by The Digestive Health Centre, the data captured is directly relevant to our information requirements.
- the patient is free to fill the forms at their leisure. It is therefore unlikely that time pressures would play a significant role in the quality of the data provided.

My Health Record (MHR)

Medical Wizard (patient software) is an approved partner provider for My Health Record. DHC is currently working inline with the timeline laid out in Advisory AS18/11 for implementation of MHR. Currently if our doctors wish to access a patients MHR they use their individual PRODA login. The doctor can only access a patients MHR once having obtained consent directly from the patient and or the patients specific security access code (if applicable)

Storage

We will take all reasonable steps to protect the security of the personal information that we hold. This includes appropriate measures to protect electronic materials and materials stored and generated in hard copy. All information is stored in accordance with our [Information Management Policy OSP-RM-018](#).

Access

Access will be provided in accordance with our [Consumer Rights Policy \(OSP-CP-001\)](#). If you require access to your personal information please contact this centre.

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Legal reasons why we collect personal information

Some information we collect is in order to comply with our legal obligations eg mandatory reporting or accreditation requirements.

What happens if you choose not to provide the information?

You are not obliged to give us your personal information. However, if you choose not to provide this centre with the personal detail (eg Medicare number, health insurance cover) we may not be able to provide you with the full range of our services.

Treatment of children

The rights of children to the privacy of their health information, based on the professional judgment of the doctor and consistent with law, might restrict access to the child's information by parents or guardians. See also Child Safe Policy OSP-CG-007

Data Security

The Digestive Health Centre has strict policies in relation to confidentiality of patient information and has sophisticated Information Management Systems in place, including firewalls, password protection, encryption and backup regimes, to protect information from misuse, interference, loss and from unauthorised access, modification or disclosure. Our Medical software and Patient Portal is hosted on Amazon Web Services infrastructure that is located in Sydney. Data is stored on this server and it is retrieved by The Digestive Health Centre. Data is not stored or transmitted beyond Australian borders. However, if a patient fills in the patient portal whilst overseas, the data would travel across borders. Login to the Patient Portal administration is allowed only by senior staff and Medical Wizard. Anyone without administration rights are not allowed access to the patient data. The log in is also validated via a secondary validation code sent to the Administrators phone. This is commonly known in the industry as two factor authentication.

Data Breaches

The Digestive Health Centre has an obligation to notify individuals whose personal information is involved in a data breach that is likely to result in serious harm. This notification will include recommendations about the steps individuals should take in response to the breach. The Australian information Commissioner will also be notified of eligible data breaches using the Notifiable Data Breach Scheme Form (found in our document library) and a IIR Form will be completed and reported to the Risk Management Committee & Board of Management.

Offshore Storage

The Digestive Health Centre does not have contracts with Offshore Cloud Providers for storage of data. As mentioned above in *Data Security*:

- Our Medical software and Patient Portal is hosted on Amazon Web Services infrastructure that is located in Sydney. Data is stored on this server and it is retrieved by The Digestive Health Centre. Data is not stored or transmitted beyond Australian borders. However, if a patient fills in the patient portal whilst overseas, the data would travel across borders.

Destruction of Health Information

All confidential waste with patient identifying information is disposed of by a Qualified Confidential Waste Contractor. Health records will be retained in accordance with our *Information Management Policy OSP-RM-018*.

Direct Marketing

If you provide us with your email address on our Registration form or online Patient Portal, in doing so you are consenting to receive emails from our Centre. All emails will contain an "Opt Out" or "Unsubscribe" option.

Complaints

If you have any complaints about our privacy practices or wish to make a complaint about how your personal information is managed please contact the Privacy Officer at this centre. All complaints will be dealt with fairly and as quickly as possible, in accordance with our *Consumer Complaints Policy (OSP-CP-004)*. A privacy complaint related to any concern or dispute that you have with our privacy practices as it relates to your personal information. This could include matters such as how personal information is collected, stored, used, disclosed or how access is provided. If you are dissatisfied with the outcome of our handling of your complaint you may contact the Victorian Health Services Commissioner or the Federal Privacy Commissioner.

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Version	Date	Author	Description
3	11/04/2014	IM	Updated to include APP's
4	24/08/2017	IM	Updated to include completion & storage of patient portal information
5	19/02/2018	IM & BDM	Added Data Breaches section in line with the NDB Scheme addition to the Privacy Act 1988
6	05/08/2020	BOM	Privacy Act 1988 with Amdt, Updated Data Security and offshore storage sections.
7	02/02/2022	BOM	Added to obtain your IHI (Individual Healthcare Identifier) number to enable use of eprescription. Added MHR section
8	15/03/2024	BOM/DON	Reviewed – date updated to 18/10/2023. Victorian Health Records Act 2001 - Version 049 added