



Mornington
Medical Group

PRIVACY POLICIES

Approved September 2024

Created by RACGP

Morningson Medical Group Privacy Policy

Current as of: 1 September 2024

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 **Business Manager Lisa Chambers**.

- Phone: 5975 2633
- Email: info@morningsonmed.com.au
- Address: 258 Main Street Morningson VIC 3931

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.

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.

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?

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.

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.

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.

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.

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

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

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.

"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
- to assist in locating a missing person
- 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).

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 and/or your general practitioner 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.

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.

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.

We may provide de-identified data to other organisations 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.

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 Best Practice via Argus or Referral Net.

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.

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 may use an AI scribe tool 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. The practice AI scribe service is currently not in use.

If a product is utilised it:

- 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

The practice will only use data from our digital scribe service to provide healthcare to you.

Use of artificial intelligence (AI) scribes

The general practitioners who consult from Mornington Medical Group 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 and this is still under review by the practice.

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

GP's will 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.

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

The practice stores all personal information securely.

Personal information is securely stored and protected in electronic format, in protected information systems and in hard copy format in a secured environment. The practice has systems in place such as *passwords*, secure cabinets, and confidentiality agreements for staff, independent medical / allied health practitioners and contractors.

The practice has CCTV cameras and with recordings and storage located on-site. Staff can access these recording and the areas that have this in the practice e.g. waiting rooms, corridors 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.

Such requests from patients on accessing and correcting personal information need to be notified to their usual health practitioner.

The practice will respond to any requests to access or correct your personal information within a reasonable timeframe specific to practice processes. Fees may be charged for the costs of complying with this request.

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 via reception in person at the practice.

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 send requests to the privacy officer- Lisa Chambers (Manager)

Email: info@morningtonmed.com.au

Phone: 5975 2633

Address: 258 Main Street Mornington VIC 3931

The practice processes will notify you within 1-2 business days of receipt of the complaint and what the process will be moving forward.

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.

At Mornington Medical Group any personal information you share with us through the website, email, and social media, is handled securely and confidentially. This practice uses analytics and cookies.

14. 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 email or other means.

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