

Jema Clinic privacy policy

Initial :1/2/2019

Review:1/2/2023

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.

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 that need to see your personal information will have access to it. If we need to use your information for anything else, 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 (eg 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. 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

Jema Clinic

Shop 6/133 Lennox Street, Maryborough, QLD 4650

P.O. Box 304, Maryborough, QLD 4650

Phone: (07) 4120 5555 **Fax:** (07) 4122 2490 **Email:** reception@jemacclinic.com.au

- 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).

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 (eg 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 (eg some diseases require mandatory notification)
- During the course of providing medical services, through eTP, My Health Record (eg 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.

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 such as:

- Electronic Records
- Visual Records (X-rays, Ct scans, videos and photos)

Our practice stores all personal information securely.

- All patient records are kept in electronic format which is password protected individualized to each staff member who has access
- Transfers of medical records to other clinics are done through a secure network (Medical Objects). If this is unavailable records are sent by registered post or emailed with password protection.
- All hard copy paperwork/records are put through an industrial shredder (confetti sized).
- Data Room access is limited to management, IT contractors and selected staff. Kept under lock and key.
- On employment to Jema Clinic staff and contractors sign a confidentiality agreement.

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

We encourage you to contact us if you have a query regarding your personal information. You may request an amendment to your personal information if you consider that it contains inaccurate, incorrect or incomplete information.

You have a right to request access to any information we hold about you. If you make a request to access personal information that you are entitled to access, we will provide you suitable means of accessing it. We will not charge you for making the request. In circumstances where you request we provide a copy of your personal information to you, we may charge you a fee to cover our reasonable costs for complying with the request for access.

There may be instances where we cannot grant you access to some of the information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others. If that is the case, we will provide you with a written explanation of those reasons.

You can contact our Practice Manager, Mosun Ogiji with any queries

Phone: (07) 4120 5555
Email: manager@jemaclinic.com.au
Post: Jema Clinic

Shop 6
133 Lennox Street
Maryborough QLD 4650

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

If you have a complaint about how we have dealt with your personal information or believe we have breached your privacy, please contact us on the details below so that we may investigate it. We will deal with your complaint fairly and confidentially. On receipt of your complaint we will contact you within 10 business days to confirm what investigation action will occur. We will then communicate the outcome to you in writing and invite a response to our conclusion about the complaint. If we receive a response from you, we will also assess it and advise if we have changed our view.

If you are unsatisfied with our response, you may make refer the complaint to the Office of the Australian Information Commissioner (<http://www.oaic.gov.au/>).

Practice Manager – Mosun Ogiji
Phone: (07) 4120 5555
Email: manager@jemaclinic.com.au
Post:
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Privacy and our website

The existence of external links on our websites shall not be construed as Jema Clinic's endorsement, sponsorship, approval of, or affiliation with, another person unless the party providing the relevant link is authorised in writing to do so.

If you access this site via an external link, you do so at your own risk. While information and third party information contained on this site has been presented with all due care, Jema Clinic does not warrant or represent that the information or the third party information, will remain unchanged after the date of publication and is free from errors or omissions. It is your responsibility to make own investigations, decisions and enquiries about the information retrieved from other internet sites.

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Appointment bookings online

Appointment bookings on line is located on the Practice's SSL page

Jema Clinic has an agreement with an external provider AutoMed, Hotdocs and Healthengine. The patient application does not have direct contact to Jema Clinic and only connects to external providers via cloud servers. All communication between the external providers cloud server and Jema Clinic is encrypted using 128bit SSL encryption. Health Engine only handles data relating to the patient appointment and no other sensitive patient records are used or stored on the Health Engine system.

Policy review statement

We may alter this Privacy Policy following any legislative change or upon a review of our information handling processes.

The current version of our Privacy Policy is available from:

- www.jemaclinic.com.au
- By contacting reception on (07) 4120 5555
- Our practice, located at: 6/133 Lennox Street, Comet Place, Maryborough QLD 4650



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Jema Clinic social media policy

Initial: 1/2/2019

Current: 1/2/2023

Name of social media officer: Michael Olumide

Introduction

This policy provides guidance for members of the practice on using social media internally and externally. The policy helps identify and mitigate risks associated with social media use.

Definition

For the purposes of this policy, 'social media' is online social networks used to disseminate information through online interaction.

Purpose

Regardless of whether social media is used for business-related activity or for personal reasons, the following policy requirements apply to all GPs and practice staff of the practice. GPs and practice staff are legally responsible for their online activities, and if found to be in breach of this policy consequences may include or written warning or employment termination for serious breaches.

Use of practice social media accounts

The practice will appoint a staff member as a social media officer responsible for managing and monitoring the practice's social media accounts. All posts on the practice's social media website must be approved by this staff member. The practice reserves the right to remove any content at its own discretion.

Staff conduct on social media

When using the practice's social media, practice staff will not:

- post any material that
 - is unlawful, threatening, defamatory, pornographic, inflammatory, menacing or offensive
 - infringes or breaches another person's rights (including intellectual property rights) or privacy, or misuses the practice's or another person's confidential information (eg do not submit confidential information relating to our patients, personal information of staff, or information concerning the practice's business operations that have not been made public)
 - is materially damaging or could be materially damaging to the practice's reputation or image, or another individual
 - is in breach of any of the practice's policies or procedures

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- use social media to send unsolicited commercial electronic messages, or solicit other users to buy or sell products or services or donate money
- impersonate another person or entity (e.g. by pretending to be someone else or another practice employee or other participant when you submit a contribution to social media) or by using another's registration identifier without permission
- tamper with, hinder the operation of, or make unauthorized changes to the social media sites
- knowingly transmit any virus or other disabling feature to or via the practice's social media account, or use in any email to a third party, or the social media site
- attempt to do or permit another person to do any of these things
 - claim or imply that you are speaking on the practice's behalf, unless you are authorised to do so
 - disclose any information that is confidential or proprietary to the practice, or to any third party that has disclosed information to the practice
- be defamatory, harassing or in violation of any other applicable law
- include confidential or copyrighted information (eg music, videos, text belonging to third parties)
- Violate any other applicable policy of the practice.

Monitoring social media sites

The practice's social media channels are part of our customer service and should be monitored and dealt with regularly.

Testimonials

The practice complies with AHPRA national law and takes reasonable steps to remove testimonials that advertise their health services (which may include comments about the practitioners themselves). The practice is not responsible for removing (or trying to have removed) unsolicited testimonials published on a third-party website or in social media accounts over which they do not have control.

Personal social media use

Staff are free to personally engage in social media outside of work hours, as long as their actions do not have the potential to bring the practice into disrepute. Employees may not represent personal views expressed as those of this practice.

Any social media posts by staff on their personal social media platforms must not reveal confidential information about the practice or a person who uses the practice (eg staff should not post information relating to patients or other staff, or information concerning the practice's business operations that have not been made public).

Staff should respect copyright, privacy, fair use, financial disclosure and other applicable laws when publishing on social media platforms. Staff are required to include a disclaimer if they identify themselves as a practice employee on any social media platforms – for

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example, 'The views expressed in this post are mine and do not reflect the views of the practice/business/committees/boards of which I am a member'.

Breach of policy

All social media activities must be in line with this policy.

Policy review statement

This policy will be reviewed regularly to ensure it is up to date with changes in social media or relevant legislation. Staff will be notified in staff meetings of any changes or amendments.



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Jema Clinic Acceptable email use policy template

5. Use of email by employees of Jema Clinic is permitted and encouraged where such use supports the goals and objectives of the business.
6. However, Jema Clinic has a policy for the use of email whereby the employee must ensure that they:
- comply with current legislation
 - use email in an acceptable way
 - do not create unnecessary business risk to the company by their misuse of the internet

Unacceptable behaviour

7. The following behavior by an employee is considered unacceptable:
- use of company communications systems to set up personal businesses or send chain letters
 - forwarding of company confidential messages to external locations
 - distributing, disseminating or storing images, text or materials that might be considered indecent, pornographic, obscene or illegal
 - distributing, disseminating or storing images, text or materials that might be considered discriminatory, offensive or abusive, in that the context is a personal attack, sexist or racist, or might be considered as harassment
 - accessing copyrighted information in a way that violates the copyright
 - breaking into the company's or another organisation's system or unauthorised use of a password/mailbox
 - broadcasting unsolicited personal views on social, political, religious or other non-business related matters
 - transmitting unsolicited commercial or advertising material
 - undertaking deliberate activities that waste staff effort or networked resources
 - introducing any form of computer virus or malware into the corporate network

Monitoring

8. Jema Clinic accepts that the use of email is a valuable business tool. However, misuse of this facility can have a negative impact upon employee productivity and the reputation of the business.
9. In addition, all of the company's email resources are provided for business purposes. Therefore, the company maintains the right to examine any systems and inspect any data recorded in those systems.
10. In order to ensure compliance with this policy, the company also reserves the right to use monitoring software in order to check upon the use and content of emails. Such monitoring is for legitimate purposes only and will be undertaken in accordance with a procedure agreed with employees.

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Sanctions

11. Where it is believed that an employee has failed to comply with this policy, they will face the company's disciplinary procedure. If the employee is found to have breached the policy, they will face a disciplinary penalty ranging from a verbal warning to dismissal. The actual penalty applied will depend on factors such as the seriousness of the breach and the employee's disciplinary record.

Agreement

12. All company employees, contractors or temporary staff who have been granted the right to use the company's email services are required to sign this agreement confirming their understanding and acceptance of this policy.

Patient Related Emails

Email/electronic requests are handled by the practice manager for follow up with the GPs. Patients are advised that this facility is for incoming enquiries only as their confidentiality may be compromised. This also applies to information by fax unless we are assured that the information will be sent directly to a secure fax.

Patients are able to obtain advice or information related to their care by electronic means where the GP determines that a face-to-face consultation is unnecessary. Electronic communication includes email and fax.

Patients requesting medical records or personal information to be emailed, are required to complete and sign a request of medical records and our practice email consent form. This outlines that the patient acknowledges that emailing personal information is not a secure form of messaging and do so at their own risk. Once the patient has signed, the form is scanned into the patient's health record.

Communication with patients via electronic means is conducted with appropriate regard to the privacy laws relating to health information and confidentiality of the patient's health information. Staff using email or other forms of electronic messaging should be aware that it is not possible to guarantee that electronic communications will be private. All personal health information or sensitive information sent by email must be securely encrypted. When an email message is sent or received in the course of a person's duties, that message is a business communication and therefore constitutes an official record.

Staff members should be aware that electronic communications could, depending on the technology, be forwarded, intercepted, printed and/or stored by others. As such staff have full accountability for emails sent in their name or held in their mailbox and are expected to utilise this communication tool in an acceptable manner which includes (but is not limited to):

- limiting the exchange of personal emails
- refraining from responding to unsolicited or

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unwanted emails deleting hoaxes or chain emails
not opening email attachments from
unknown senders virus checking all email
attachments
maintaining appropriate language within e-
communications ensuring any personal
opinions are clearly indicated as such
encrypting confidential information

Our practice reserves the right to check individual email as a precaution to fraud, viruses, workplace harassment or breaches of confidence by employees. Inappropriate use of the email facility will be fully investigated and may be grounds for dismissal.



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