Privacy Policy

Lighthouse General Practice
Shop 12, 72 Pine Street
Wynnum QLD 4178

Prepared by Kim Watkin
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Next Review Date March 2022

*PRIVACY POLICY IS OBTAINABLE BY ALL VIA THE LIGHTHOUSE GP WEBSITE*

Lighthouse General Practice Pty Limited ACN 643 629 878 trading as Lighthouse General Practice (“we” or “us”) recognises that your privacy is very important to you and we are committed to protecting your personal information in accordance with the Australian Privacy Principles under the Privacy Act 1988 (Cth) and in accordance with other applicable privacy laws. This policy applies to personal information we handle about patients to our clinics, visitors to our website www.lighthousegp.com.au, users of services we may from time to time provide and members of the public. It provides information about the personal information we collect and the ways in which we use that personal information. This document sets out our policies for managing your personal information and is referred to as our Privacy Policy.

In this Privacy Policy, “we” and “us” refers to Lighthouse General Practice and “you” refers to any individual about whom we collect personal information.

By accessing our website or using our services, you agree to be bound by the terms of this privacy policy.

**About Lighthouse General Practice**

Everything we do at Lighthouse GP aims to make your GP appointments a more positive experience. We offer early morning and weekend appointments so you can see a GP after hours.

Our experienced General Practitioners are committed to providing you with personalised healthcare and offer comprehensive health services for your whole family. Our affiliation with Allied Health Professionals means you may also save time and money if you’re in need of specialised services.

**What information does Lighthouse GP collect about you?**

***Patients and prospective patients***

When you enquire about our services or when you become a patient of Lighthouse GP, a record is made which includes personal information such as your name, address, date of birth, contact details and emergency contact details. Personal information collected about you to provide, or in providing, healthcare services is considered health information and is treated as sensitive information. Lighthouse GP may also collect other personal information about you which is considered sensitive information (such as information about your racial/ethnic origin) where this is relevant to the services we provide.

Generally, health information we collect about you includes:

* your previous and current medical history (including, where clinically relevant, a family medical history) and details of treatment and health services you have received
* medical practitioner consultation notes
* medications you take
* information about other healthcare professionals and health service providers who are involved in your care
* information about your healthcare preferences and wishes
* your attorney, guardian or other person responsible for your healthcare decisions

Lighthouse GP may also collect information relevant to administering your payment arrangements such as your banking details, your pension entitlements and any other relevant information. Where it is relevant to administering your payment arrangements, we will collect information such as your Medicare number, DVA, pension, student or health care card number and your entitlement to benefits. Where we have collected a government related identifier (such as your Medicare number), we will not adopt that identifier as our own identifier and we will only use or disclose that identifier as required or permitted by law.

Lighthouse GP will, where practicable, collect information directly from you (for example, when we have contact with you in person, over the phone or via the internet). This information may be collected by medical and non-medical staff.

However, we may also need to collect information from other sources such as treating specialists, radiologists, pathologists, hospitals, other health care providers, and the My health record system and other third parties including:

* other healthcare professionals and health service providers involved in your care
* government agencies responsible for administering relevant entitlements and benefits (such as Centrelink, Medicare, Department of Social Services, National Disability Insurance Agency, Department of Veterans Affairs, and other government agencies responsible for home care services)

We may also collect information about you from your family members, a carer, an attorney, a guardian or a person responsible for your healthcare decisions. If the personal information you provide to us is incomplete or inaccurate, we may be unable to provide you with the services you are seeking.

***Prospective employees/applicants***

We collect personal information when recruiting personnel, such as your name, contact details, qualifications and work history. Generally, we will collect this information directly from you. We may also collect personal information from third parties in ways which you would expect (for example, from recruitment agencies or referees you have nominated). Before offering you a position, we may collect additional details such as your tax file number, superannuation information and other information necessary to conduct police checks.

This Privacy Policy does not apply to Lighthouse GP’ employee records.

***Other individuals***

Lighthouse GP may collect information personal information about other individuals who are not patients of Lighthouse GP. This includes individual service providers and contractors to Lighthouse GP; other individuals who interact with Lighthouse GP on a commercial basis; and healthcare professionals who have referred patients to us or who are providing services to our patients. The kind of personal information we collect will depend on the capacity in which you are dealing with Lighthouse GP. Generally, it would include your name, contact details, professional details and information regarding our interactions and transactions with you.

**How does Lighthouse GP hold and protect your personal information?**

Lighthouse GP primarily collects and holds your personal information in paper /electronic form. Information held in electronic form is held securely on servers and computer systems. Certain information is collected and held in paper-based documents (such as administrative forms), which may be converted to electronic form and the original paper-based documents securely destroyed. Information which is retained in paper-based form is held securely at our premises or in archive facilities in Australia.

We maintain physical security over our paper and electronic data stores, such as locks and security systems onsite and offsite. We also maintain computer and network security; for example, we use firewalls (security measures for the Internet) and other security systems such as user identifiers and passwords to control access to our computer systems.

We cannot ensure the security of personal information which is left with you in your home. However, we will work with you to minimise the opportunity for other individuals to access your personal information.

**Why does Lighthouse GP collect your personal information?**

Lighthouse GP collects personal information about patients in order to assess and manage your needs when we are providing our services to you. For example, we collect information about your health to ensure that our services respond to your healthcare needs; to ensure that our services are consistent with other healthcare services you receive; and to minimise the need for you to provide the same information on multiple occasions.

Further information about the way in which Lighthouse GP uses and discloses your personal information is set out in the next section.

Providing accurate and complete information is important for the safety, quality and effectiveness of the services we provide. It is also important to ensure you receive the correct entitlements to benefits and funding for the services we provide. If you provide incomplete or inaccurate information, we may not be able to provide you with the services and treatment you seek. If you have any concerns about personal information we have asked you to provide, please let us know.

You have the option of not identifying yourself, or using a pseudonym, when dealing with Lighthouse GP (for example, when making a general enquiry). However, it is usually not practicable for Lighthouse GP to deal with you anonymously or pseudonymously on an ongoing basis (for example, as a patient of Lighthouse GP).

**How does Lighthouse GP use and disclose your personal information?**

There are circumstances where we may be permitted or required by law to disclose your personal information to third parties. For example, to Medicare, Police, insurers, solicitors, government regulatory bodies, tribunals, courts of law, hospitals, debt collection agents, the electronic transfer of prescriptions service or to the My health record system.

It may also be shared with other healthcare professionals involved in your care and other persons involved in your care.

Generally, this will only happen in ways you would reasonably expect or otherwise with your consent. For example, Lighthouse GP may disclose your personal information to your GP or to a medical specialist involved in your care; to a hospital or aged care facility if you are referred for respite or higher levels of care; or to other healthcare professionals who are involved in your care such as nurses, occupational therapists, pharmacists, physiotherapists, podiatrists, dentists and the ambulance service.

* In an emergency, we may provide personal information to other healthcare professionals and health services without your consent.

**Contractors and other service providers**

Lighthouse GP sometimes engages third parties to perform services on our behalf and we may use and disclose personal information to facilitate these arrangements. This may include specialist care services, allied health services, and general domestic and personal care services. We may also contract other organisations to perform services on our behalf, for example, to undertake customer satisfaction surveys, IT and practice supplier services.

Third parties to whom we have disclosed your personal information may contact you directly to let you know they have collected your personal information and to give you information about their privacy policies.

**Administration and management**

Lighthouse GP will also use and disclose your personal information for a range of administrative, management and operational purposes.

This includes:

* administering billing and payments and debt recovery
* liaising with, and reporting to, government agencies in the administration of particular funding programs
* administering subsidies and benefits to which you may be entitled from government agencies and other third-party payers (such as Centrelink, Medicare, Department of Social Services, Department of Veterans Affairs, and other government agencies responsible for primary care services)
* planning, managing, measuring and monitoring and evaluating our services
* safety and quality assurance and improvement activities
* statistical analysis and reporting
* training staff, contractors and other workers
* risk management and management of legal liabilities and claims (for example, liaising with insurers and legal representatives)
* responding to enquiries and complaints regarding services provided to patients
* obtaining advice from consultants and other professional advisers
* responding to subpoenas and other legal orders and obligations

**Does Lighthouse GP use or disclose your personal information for direct marketing?**

If you are a patient, we will only use or disclose your personal information for direct marketing purposes with your consent. If you do provide your consent to receive direct marketing communications, you can opt-out at any time by contacting us using the contact details below.

For other individuals, Lighthouse GP may use or disclose your personal information for the purpose of informing you about products or services, promotions or other opportunities that may interest you. If you do not want to receive direct marketing communications, you can opt-out at any time by contacting us using the contact details below.

**Does Lighthouse GP disclose your personal information overseas?**

Lighthouse GP does not typically or routinely disclose personal information to overseas recipients.

Unless we have your consent, or an exception under the Australian Privacy Principles applies, we will only disclose your personal information to overseas recipients where we have taken reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to your personal information. How can you access or seek correction of your personal information? Generally, if you would like further information about the care or services you have received from Lighthouse GP you may simply ask your nurse or carer. However, you have the right to request access to personal information Lighthouse GP holds about you at any time. To request access to your personal information, please contact us using the contact details below.

Where the person requesting access is an authorised representative of the person about whom the information relates (such as an attorney or guardian) we will ask the representative to provide evidence of their authority (such as a copy of an Enduring Power of Attorney) where we do not already hold that information.

In certain circumstances, your request to access your personal information may be declined in accordance with privacy laws (for example, where giving access would put you or another person at risk of harm).

Lighthouse GP will respond to your request to access within a reasonable period however, prior to disclosing any such information it will be necessary for you to satisfactorily verify your identify. If we decline your request for access, we will tell you the reasons for declining your request and inform you of your right to make a complaint. We may recover reasonable charges to provide you with access.

There are exceptional circumstances where access to or correction of your personal information may be refused by us such as where access would be unlawful. We will advise you of such circumstances should a circumstance arise.

We take reasonable steps to ensure that your personal information is accurate, up-to-date and complete. You can help us do this by letting us know if you notice errors or discrepancies in information we hold about you and also letting us know if any of your personal details change.

If you consider personal information we hold about you is inaccurate, out-of-date, incomplete or irrelevant, you have a right to request we correct the information. It is sometimes not possible for us to make changes to personal information we hold about you (such as your healthcare records). In that circumstance, you may be entitled to request that we associate a statement with your information and you may have a right to make a complaint.

**How long will Lighthouse GP hold your personal information?**

Lighthouse GP will hold your personal information until it is no longer needed. Generally, if you are a patient, your personal information will be held for a minimum of 7 years from the date of last entry in your record (in the case of children, the record is kept until the patient attains or would have attained 25 years of age). This complies with Lighthouse GPs’ legal requirements to maintain such records.

Information that is no longer needed will be securely destroyed or de-identified.

**How is your personal information handled on our websites?**

You may visit our website (such as www.lighthousegp.com.au) without identifying yourself. If you identify yourself (for example, by providing your contact details in an enquiry), any personal information you provide to Lighthouse GP will be managed in accordance with this Privacy Policy.

Lighthouse GP websites use cookies. A ‘cookie’ is a small file stored on your computer’s browser, which assists in managing customised settings of the website and delivering content. We collect certain information such as your device type, browser type, IP address, pages you accessed on our website and on third-party websites. You are not identifiable from such information. Lighthouse GP uses third-party services (such as Google Analytics) to undertake demographic analysis of visitors to our website. From time to time we may contact you for feedback and also for the purpose of reminding you of required appointments e.g. annual check-ups.

Users of our websites are encouraged to exercise care in sending personal information via the internet.

Our website may contain links to third-party websites. Lighthouse GP is not responsible for the content or privacy practices employed by websites that are linked from our website.

**How can you make a complaint about the handling of your personal information?**

You may contact Lighthouse GP at any time if you have any questions or concerns about this Privacy Policy or about the way in which your personal information has been handled. If you have a complaint about the privacy of your personal information (including complaints about our use of the My health record system), we request that you contact us in writing.

You may make a complaint about privacy to the Practice Manager at the contact details set out below.

The Practice Manager will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint. We will generally respond to your complaint within 14 days. If your complaint requires more detailed consideration or investigation, we will acknowledge receipt of your complaint within a week and endeavour to complete our investigation into your complaint promptly.

We may ask you to provide further information about your complaint and the outcome you are seeking. We will then typically gather relevant facts, locate and review relevant documents and speak with individuals involved.

In most cases, we will investigate and respond to a complaint within 30 days. If the matter is more complex or our investigation may take longer, we will let you know.

If you are not satisfied with our response to your complaint, you are entitled to make a complaint to the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992. Full contact details for the Office of the Australian Information Commissioner can be found online at www.oaic.gov.au.

**How are changes to this Privacy Policy made?**

This Privacy Policy may be reviewed or amended from time to time. You can access the most up to date copy of this policy by visiting our website (www.lighthousegp.com.au).

**How can you contact Lighthouse GP?**

The contact details for Lighthouse GP are:

*Mail and Street Address:*

The Practice Manager 12/72 Pine Street, Wynnum QLD 4178

*Email:*manager@lighthousegp.com.au

*Telephone:* (07) 3518 4178

This Privacy Policy was last updated in March 2021 and will be reviewed from time to time to take account of new laws and/or changes to our operations. Any information we hold about you will be governed by our current policy. We recommend that you periodically review this policy for any changes.