

Introduction

This Privacy Policy is to provide information to you on how your personal information (which includes your sensitive information, including your health information) is collected and used within our practice, The Digestive Health Centre (DANDENONG GASTROENTEROLOGY PTY LTD ACN 080 857 549 AS TRUSTEE FOR THE DG UNIT TRUST), and the circumstances in which we may share it with third parties.

Why and how your consent is necessary

When you register as a patient of a practitioner who consults from our practice, you provide consent for us (including our employees, agents, contractors and other representatives) to access and use your personal information so the independent practitioners consulting from our practice can provide you with the best possible healthcare. Only persons who need to see your personal information will have access to it. If we need to use your information for any other purposes, we will seek additional consent from you to do so.

Why do we collect, use, hold and share your personal information

Our practice will need to collect your personal information to facilitate the provision of healthcare services to you by the independent practitioners consulting from our practice. Our main purpose for collecting, using, holding and sharing your personal information is to facilitate the management of your health by those independent practitioners. 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 including emergency contact and next of kin;

demographic information, including gender, cultural background, and religious beliefs;

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;

concession card details; and

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.

Please be aware that Medicare rebates are only available where a Medicare card (and / or associated information) is available. As such your practitioner may require you to pay for your consults in full without this rebate if you choose to deal with us anonymously or under a pseudonym.

How do we collect your personal information

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

You may provide us with your personal information directly (for example, when you answer the questions in the Patient Portal or make an appointment with a practitioner consulting from our practice, our practice staff will collect your personal and demographic information via your registration);

The independent practitioners providing medical services may also collect further personal information from you which may be disclosed to us. Information can also be collected through My Health Record, e.g. via Shared Health Summary, Event Summary or through a Discharge Summary provided by a hospital or other healthcare service providers. See My Health Record Policy OSP-RM-038 ;

We may also collect your personal information when you contact us via our website, send us an email or SMS, telephone us, make an online appointment or communicate with us using social media; and

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. See Childsafe Policy OSP-CG-007;
- other involved healthcare providers, such as specialists, allied health professionals, hospitals, community health services and pathology and diagnostic imaging services; and / or
- your health fund, Medicare, or the Department of Veterans' Affairs (as necessary).

If your practitioner deems it in your best interest to discuss your clinical information with you, we will arrange for this to occur either in person, via telephone or via videoconference.

When, why and with whom do we USE AND share your personal information

We collect, use and disclose your personal information to facilitate the provision of medical services to patients of the independent practitioners consulting from our practice.

We may also share your personal information:

with other healthcare providers;

when it is required or authorised by law (e.g. court subpoenas, or where we are obliged to make a mandatory notification to a regulatory body);

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 where it is otherwise impractical to obtain your consent;

to assist in locating a missing person;

to establish, exercise or defend a claim;

to enable recording of your personal information on medical registers (e.g. the cancer registry);

to obtain your Individual Healthcare Identifier number to enable use of e-prescription. See Healthcare Identifiers Policy OSP-RM-035;

with our insurer or medical indemnity provider, quality assurance and accreditation bodies, for administrative purposes;

with your health insurance fund, Medicare and other organisations responsible for the financial aspects of your care;

for the purposes of confidential dispute resolution processes;

during the course of providing nursing support services;

for the purposes of uploading that information to your My Health Record (See My Health Record Policy OSP-RM-038), such as through the shared health summary or event summary; and / or

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 the Australian Privacy Principles (APPs) and this policy.

Only people who need to access your information will be able to do so. Other than in the course of facilitating the provision of 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. If you answer the questions in the Patient Portal whilst overseas, your personal information will travel across borders.

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 information

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

Our practice stores information as electronic records (including via cloud-based services), visual records (including photos) and archived paper records.

Our practice stores all personal information securely via the use of passwords, encrypted back-ups, confidentiality agreements for staff and secure cabinets.

All records will be retained until the later of seven (7) years from your last contact with the practice, or until you reach the age of twenty-five (25).

We take steps to destroy or de-identify information that we no longer require.

Our information Management policy OSP-RM-018 is designed to protect the servers from unauthorised access, data breaches, and other security threats. Our practice uses the following security measures to ensure the personal information which it holds is secured:

Antivirus software is installed on all servers and updated regularly.

Firewalls are configured to block unauthorised traffic.

Servers are placed on their own subnet.

Access to servers is restricted to authorised users.

Physical access to the servers are limited and security cameras installed around the building.

Servers are patched regularly to fix security vulnerabilities.

Backups are created regularly every hour onsite with daily offsite backups.

- 8.7 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 IIIR Form will be completed and reported to the Risk Management Committee & Board of Management.

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. Consumer Rights Policy OSP-CP-001

Our practice acknowledges patients may request access to their medical records. You can lodge this request either via email (info@digestivehealth.com.au) or telephone. Our practice will acknowledge your request within three (3) business days. We can post the requested information to your postal address, or we can email the information to you if you request it. If we are required to process a request for your records, we may charge for our reasonable costs incurred in complying with your request.

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@digestivehealth.com.au. There is no fee charged for making corrections to your personal information.

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 (including any breach of the APPs or any registered binding APP code) you may have in writing.

Complaints should be addressed to:

Name and Position: Chris Park, CEO

Address: 90 David Street, Dandenong VIC 3175

Email: chrisp@digestivehealth.com.au

We will respond with acknowledgement of your complaint within 24 hours. See Complaints Policy OSP-CP-004.

You may also contact the Victorian Health Commissioner. For further information, visit www.hcc.vic.gov.au or call

the office on 1300 582 113.

Privacy and our website

If you “like” or comment on our social media pages, we will have your social media name.

Our website uses 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 and pages you have accessed on our website and on third-party websites. You are not identifiable from such information. You can use the settings in your browser to control how your browser deals with cookies. However, in doing so, you may be unable to access certain pages or content on our website.

Our website may contain links to third-party websites. We are not responsible for the content or privacy practices of websites that are linked from our website.

Privacy statement review

This privacy policy will be reviewed annually to ensure it is in accordance with any changes that may occur.

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
9	16/12/2024	BOM Quality consultant W Adams	Updated MHR section including note relating to DHC not using breakglass function
10	15/01/2025	AVANT	Reviewed as part of website review and redesign. See archive folder for copy.
11	26/02/2025	BOM/DON/CEO	AVANT advice taken onboard and several changes made to make the policy more robust and concise.