

## Privacy policy

To ensure that Core Healthcare Group protects customers and employees private information

---

### Customers

Core Healthcare Group respects the privacy of information obtained from our customers and we adhere to Australia's privacy legislation when dealing with customer information (The National Privacy Act 2001). The information collected may include contact details. This information is strictly confidential and will only be used for the purpose for which it was collected and no other purpose without the client's written authority.

Where activities are outsourced by Core Healthcare Group, these companies are contractually bound to the same privacy levels we commit to our customers. Customers may request access to or modify their information on Core Healthcare Group's database.

### Employees

Core Healthcare Group respects the privacy of your personal information and our commitment to you is demonstrated by utilising the same principles required by Australia's privacy legislation for dealing with customer information (The National Privacy Act 2001) in the way we deal with your private information. This information is strictly confidential and will only be used for the purpose for which it was collected and no other purpose without your written authority.

We will collect from you information including personal details, emergency contact details, and other information relating to your employment with us. We will also keep records of information obtained in the course of your employment, for example payroll records and appraisals.

This information is strictly confidential and is only available to those authorised to have access, such as your manager, other senior staff and those required to perform the administration activities. We undertake that the information we receive will be kept confidential and will not be passed on to another party without your express permission or unless we are required to by law.

Where activities are outsourced by Core Healthcare Group these companies are contractually bound to the same privacy levels we commit to you.

You may request access at any time to the information we hold about you and you may check its accuracy and request modifications.

### Discipline under this policy:

The management team at **Core Healthcare Group** has primary responsibility for interpreting the privacy policy. This includes counselling employees whose conduct is inappropriate.

The employee's supervisor or manager will counsel any employee whose use is not in line with this policy. Repeated violations or first violations of a serious nature could result in disciplinary action up to and including termination.

## Core Healthcare Group Privacy Policy Statement

### Protecting the privacy of patient information

In compliance with the Privacy Amendment (Private Sector) Act 2000, Core Healthcare Group has created a Privacy Policy that governs the handling of patient personal information.

Personal Information means information or an opinion (including database information) whether true or not and whether recorded in a material format or not, about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion. (P57 Guidelines on Privacy in the Private Health Sector, Office of the Federal Privacy Commissioner - October 2001).

### Privacy Policy

The Federal Privacy Act incorporates the Australian Privacy Principles (APPs) that set out the rules for the handling of personal information in the private health sector. In the interests of providing quality health care Core Healthcare Group has implemented a privacy policy that complies with the Privacy Act (1988) and the APPs (2014). Any further enquiries regarding this Policy should be directed to the Privacy Officer.

### Aim

This policy aims to explain clearly how personal information about patients and their health is recorded and managed by Core Healthcare Group. We will at all times abide by the Australian Privacy Principles as set out below:-

### Collection

It is necessary for us to collect personal information from patients and sometimes others associated with their health care in order to attend to their health needs and for associated administrative purposes. We will give patients a "Patient Registration Form" on their first visit. A copy of this privacy policy is available on request, and will be kept at reception at all of our Core Healthcare Group sites. Where possible and on request we must provide patients with a copy.

Use and Disclosure A patient's personal health information is used or disclosed for purposes directly relating to their health care and in ways that are consistent with a patient's expectations. In the interests of the highest quality and continuity of health care this may include sharing information with other health care providers who comprise a patient's health care team from time to time. This includes but is not limited to GP's, case managers, registrars and students, allied health professionals, management, stakeholders and support staff. The use of this data is determined by what is required for patient care. In general, a patient's health information will not be used for any other purposes without their consent. There are

circumstances when information has to be disclosed without patient consent, such as:

#### Emergency situations

By law, e.g. mandatory reporting of some communicable diseases it may be necessary to disclose information about a patient to fulfil a medical indemnity insurance obligation.

Provision of information to Medicare or private health funds if relevant for billing and medical rebate purposes.

There are also necessary purposes of collection for which information will be used beyond providing health care, such as professional accreditation, quality assessments, clinical auditing, billing, service monitoring activities, improving the administration of the practice and disclosure to a clinical supervisor.

#### Data Quality

All patient information held by the company relevant to the functions of providing health care will be maintained in a form that is accurate, complete and up to date.

#### Data Security

The storage, use, and where necessary, transfer of personal health information will be undertaken in a secure manner that protects patient privacy. It is necessary for the practice to keep patient information after a patient's last attendance for as long as is required by law (7 years or until a minor turns 25 years) or is prudent having regard to administrative requirements. Data will only be accessible to authorised personnel involved in patient care or administration of that care. Any data shared to go to a third party will be discussed with the patient involved and the patient's consent will be obtained and documented.

#### Openness

Core Healthcare Group has made this and other material available to patients on request to inform them of our policies on the management of personal information. On request Core Healthcare Group will generally let patients know what sort of personal information we hold and for what purposes and how we collect, hold, use and disclose that information.

#### Access and Correction

Patients may request access to their personal health information held by this practice or its transfer to another health provider. All requests for access to personal health information will need to be made in writing. Core Healthcare Group acknowledges the right of children and young people to privacy of their health information. Based on the professional judgement of the provider and consistent with the law it might be necessary at times to restrict access to personal health information by parents or guardians. A child of any age can request their personal information remain private and confidential to any party including parents or guardians. This request must be adhered to and it is illegal to share this information unless they are at harm to themselves or others. Core Healthcare Group encourages patients to ensure that information held is accurate and up to date and to amend any information that is inaccurate. A charge may be payable where the practice incurs a cost in providing access. This is for administrative costs such as photocopying, etc. Where access is restricted or denied, the reason for this will be explained to the patient by their treating provider and or the Privacy Officer.

### Identifiers

These are numbers or symbols that are used to identify patients with or without using a name e.g. Medicare or DVA numbers. Core Healthcare Group will limit the use of identifiers assigned by other agencies to those uses necessary to fulfil our obligations to those agencies e.g. Medicare claims.

### Anonymity

A patient has the right to be dealt with anonymously provided that this is lawful and practical however, in the health context this is unlikely to be practical and may in some circumstances impact of the quality of care and treatment. All requests of this nature are required to be referred to the Privacy Officer for clear instructions on how to manage.

### Trans border data flows

The individual's privacy is protected by federal privacy legislation and State privacy legislation. Core Healthcare Group does not send data or information to locations outside of Australia.

### Sensitive information

Health information is sensitive information for the purposes of the privacy legislation. This means that generally patients' consent will be sought to collect the information that is needed to make an accurate medical diagnosis, prescribe appropriate treatment and to be proactive in patient health care. We also have a "New Patient Registration" which sets out information on the collection, use and disclosure of your health information. This is given to patients at the first visit. Patients can request a copy at these will which must be supplied within an appropriate time. For further information, patients can speak to the Privacy Officer; which is the Group Operations Manager for the Organisation.

### Complaints

The best way to deal effectively with concerns and complaints is to communicate openly and respectfully to the patient. This often reduces the likelihood of the problem escalating and becoming more difficult to deal with. In addition to this all complaints need to be immediately and when practical to do so documented and directed to the Privacy Officer to resolve the matter. This Company recognises the right of patients to raise their concerns about privacy and confidentiality. Patients are asked to contact the Privacy Officer or their treating Provider if they have any concerns regarding the collection, use or disclosure of the personal health information. The Privacy Officer will endeavor to acknowledge any complaint within 2 working days of receiving it. Where possible a response to the patient's complaint will be provided within 14 days of the date we acknowledge your complaint. Where this is not possible due to the complexity of the complaint or other factors Core Healthcare Group will keep the patient informed in the process. If the patient is dissatisfied with any aspect of our Privacy Policy and your concerns are not dealt with to your satisfaction by the Privacy Officer and/or staff the matter will be escalated to the Managing Director.