

SYDNEY CARDIOVASCULAR CENTRE PRIVACY POLICY

PART A – PURPOSE AND CONTEXT

- 1.0 Sydney Cardiovascular Centre is committed to ensuring the privacy and confidentiality of all personal information affiliated with the Sydney Cardiovascular Centre's business undertakings.
- 1.1 Sydney Cardiovascular Centre follows the terms and conditions of privacy and confidentiality in accordance with the Australian Privacy Principles (**APPs**) as per schedule 1 of the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* (Cth), forming part of the *Privacy Act 1988* ('the Act').
- 1.2 The purpose of this Privacy Policy is to clearly communicate how Sydney Cardiovascular Centre collects and manages personal information.
- 1.3 The point of contact regarding any queries regarding this policy is [Amelia Mahavir
Email: amelia.mahavir@scvc.com.au. Phone: 02 8197 0022].

PART B – AUSTRALIAN PRIVACY PRINCIPLES

- 2.0 As a private sector health service provider and under permitted health situations, Sydney Cardiovascular Centre is required to comply with the APPs as prescribed under the Act.
- 2.1 The APPs regulate how Sydney Cardiovascular Centre may collect, use, disclose and store personal information and how individuals, including Sydney Cardiovascular Centre's patients may:
- a. address breaches of the APPs by Sydney Cardiovascular Centre;
 - b. access their own personal information; and,
 - c. correct their own personal information.
- 2.2 In order to provide patients with adequate health care services, Sydney Cardiovascular Centre will need to collect and use personal information. It is important to be aware that if the patient provides incomplete or inaccurate information or the patient withholds personal health information Sydney Cardiovascular Centre may not be able to provide the patient with the services they are requesting.
- 2.3 In this Privacy Policy, common terms and definitions include:
- **"personal information"** as defined by the *Privacy Act 1988 (Cth)*. Meaning *"information or an opinion including information or an opinion forming part of a database, 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"; and,

- **"health information"** as defined by the *Privacy Act 1988 (Cth)*. This is a particular subset of "personal information" and means:
 - (a) Information or opinion about the health or disability (at any time i.e. past, present or future) of an individual that can be classified as personal information;
 - (b) Information or opinion about an individual's expressed wishes about the future provision of health services that can be classified as personal information;
 - (c) Information or opinion about health service provided, or to be provided, to an individual, that can be classified as personal information;
 - (d) Other personal information collected to provide, or in providing, a health service;
 - (e) Other personal information about an individual collected in connection with the donation, or intended donation, by the individual of his or her body parts, organs or body substances; or
 - (f) Genetic information about an individual in a form that is, or could be, predictive of the health of the individual or a genetic relative of the individual.

2.3.1 Personal information also includes '**sensitive information**' which is information including, but not limited to a patient's:

- race;
- religion;
- political opinions;
- sexual preferences; and or,
- health information.

2.3.2 Information deemed '**sensitive information**' attracts a higher privacy standard under the Act and is subject to additional mechanisms for the patient's protection.

PART C – TYPES OF PERSONAL INFORMATION

3.0 Sydney Cardiovascular Centre collects information from each individual patient that is necessary to provide the patient with adequate health care services.

3.1 This may include collecting information about a patient's health history, family history, ethnic background or current lifestyle to assist the health care team in diagnosing and treating a patient's condition.

PART D – COLLECTION & RETENTION

4.0 This information will in most circumstances be collected directly from the patient through but not limited to the following mediums:

- a) Sydney Cardiovascular Centre's Patient Information and Consent form;
- b) Any medical treatment or referral form; and or,
- c) face to face consultation.

4.1 In other instances, Sydney Cardiovascular Centre may need to collect personal information about a patient from a third party source. This may include:

- a. relatives; or,
- b. other health service providers.

4.2 This will only be conducted if the patient has provided consent for Sydney Cardiovascular Centre to collect his/her information from a third party source; or, where it is not reasonable or practical for Sydney Cardiovascular Centre to collect this information directly from the patient. This may include where:

- a. the patient's health is potentially at risk and his/her personal information is needed to provide them with emergency medical treatment.

4.3 Sydney Cardiovascular Centre endeavours to store and retain a patient's personal and health information in electronic format stored onto a domestic server.

PART E – PURPOSE OF COLLECTION, USE & DISCLOSURE

5.0 Sydney Cardiovascular Centre only uses your personal information for the purpose for which it was collected (primary purpose), unless:

- a. There is another purpose (secondary purpose) and that secondary purpose is directly related to the primary purpose, and you would reasonably expect, or Sydney Cardiovascular Centre has informed you, that your information will be used for that secondary purpose;
- b. You have given your consent for your personal information to be used for a secondary purpose; or
- c. Sydney Cardiovascular Centre is required or authorized by law to use your personal information for a secondary purpose (including for research and quality improvements)

For example, Sydney Cardiovascular Centre may use your personal information to:

- Provide health care services to you;
- Provide any ongoing health related services to you;
- Appropriately manage our business, such as assessing insurance requirements, conducting audits, and undertaking accreditation processes;
- Assist it in running our business, including quality assurance programs, billing, conducting research and training personnel;
- Effectively communicate with third parties, such as admitting hospitals, Medicare Australia and private health insurers.

i. *Health Professionals to provide treatment*

During the patient's treatment at Sydney Cardiovascular Centre he/she may be referred to alternative medical treatment/services (i.e. pathology or radiology) where Sydney Cardiovascular Centre's staff may consult with senior medical experts when determining a patient's diagnosis or treatment.

Sydney Cardiovascular Centre's staff may also refer the patient to other health service providers for further treatment during and following the patient's admission. These services include, but are not limited to:

- Rehabilitation and related post-admission care

These health professionals will be designated health service providers appointed to use the patient's health information as part of the process of providing treatment. Please note that this process will be conducted whilst maintaining the confidentiality and privacy of the patient's personal information.

Sydney Cardiovascular Centre may also disclose patient information:

- To our business associates and others for purposes directly related to the purpose for which the personal information is collected
- To our management and personnel
- To our professional advisors and other contractors (for example technical specialists)

ii. *Alternative Health services*

At any point a patient wishes to be treated by an alternative medical practitioner or health care service that requires access to his/her personal/health information Sydney Cardiovascular Centre requires written authorisation. This written authorisation is to state that the patient will be utilising alternative health services and that these health services have consented for a transfer of personal/health information.

iii. *Other Third Parties*

Sydney Cardiovascular Centre may provide the patient's personal information regarding a patient's treatment or condition to additional third parties. These third parties may include:

- parent(s);
- child/ren;
- other relatives;
- close personal friends;
- guardians; or,
- a person exercising a patient's power of attorney under an enduring power of attorney.

Where information is relevant or reasonable to be provided to third parties, written consent from the patient is required.

Additionally, the patient may at any time wish to disclose that no third parties as stated are to access or be informed about his/her personal information or circumstances.

iv. *Other Uses of Personal Information*

In order to provide the best possible environment to treat patients, Sydney Cardiovascular Centre may also use personal/health information where necessary for:

- activities such as quality assurance processes, accreditation, audits, risk and claims management, patient satisfaction surveys and staff education and training;
- invoicing, billing and account management;
- to liaise with a patient's health fund, Medicare or the Department of Veteran's Affairs, as necessary; and,
- the purpose of complying with any applicable laws – i.e. in response to a subpoena or compulsory reporting to State or Federal authorities.

5.1 If at any point or for any of the aforementioned reasons Sydney Cardiovascular Centre uses or discloses personal/health information not in accordance with the APPs, Sydney Cardiovascular Centre will provide written notice for the patient's consent for the use and/or disclosure.

PART F – ACCESS AND CHANGES TO PERSONAL INFORMATION

6.0 If an individual patient reasonably requests access to their personal information for the purposes of changing the information he/she must engage with the relevant practice manager.

6.1 The point of contact for patient access to personal information is:

Amelia Mahavir
02 8197 0022
amelia.mahavir@scvc.com.au

6.2 Once an individual patient requests access to his/her personal information Sydney Cardiovascular Centre will respond within a reasonable period of time to provide the information.

6.3 All personal information will be updated in accordance to any changes to a patient's personal circumstances brought to Sydney Cardiovascular Centre's attention. All changes to personal information will be subject to patient's consent and acknowledgement.

PART G – COMPLAINTS HANDLING

7.0 How an individual patient may complain about a breach of the Australian Privacy Principles, or a registered APP code (if any) that binds the entity, and how the entity will deal with such a complaint.

If you have a complaint about Sydney Cardiovascular Centre's information handling practices or consider we have breached your privacy, you can lodge a complaint with:

- a. The Practice Manager; or
- b. the Office of Australian Information Commissioner. Contact details can be found at www.oaic.gov.au

Sydney Cardiovascular Centre will deal and respond to your complaint in a fair and efficient manner

PART H – PERSONAL INFORMATION AND OVERSEAS RECIPIENTS

8.0 Use of Overseas Parties:

- (a) Sydney Cardiovascular Centre does not engage with any overseas entities, with which personal or health information would be transferred, appointed or disclosed.

PART I – DISPOSAL OF PERSONAL/HEALTH INFORMATION

9.0 If Sydney Cardiovascular Centre receives any unsolicited personal information that is not deemed appropriate for the permitted health situation, Sydney Cardiovascular Centre will reasonably de-identify and dispose of the information accordingly.

9.1 If Subject to applicable laws, Sydney Cardiovascular Centre may destroy records containing personal information when the record is no longer required by Sydney Cardiovascular Centre.

PART J – ACCESS TO POLICY

10.0 Sydney Cardiovascular Centre provides free copies of this Privacy Policy for patients and staff to access, which can be located:

- On Sydney Cardiovascular Center's Website
- In Sydney Cardiovascular Center's Practice Manual
- In hard copy available at the reception desk

PART K – REVIEW OF POLICY

11.1 Sydney Cardiovascular Centre in accordance with any legislative change will review the terms and conditions of this policy to ensure all content is both accurate and up to date. Please refer to our website which will contain the current privacy policy.