mounties care
Health Clinic Freshwater

Freshwater Health Clinic Privacy Policy

Current as of: 02/11/26

The practice manages personal and health information in accordance with the Privacy Act 1988 (Cth), including the Australian Privacy Principles (APPs), and the Health Records and Information Privacy Act 2002 (NSW), including the Health Privacy Principles (HPPs), as applicable ("Privacy Legislation"). The objective of this document is to provide you, our patient, with clear information on how your personal information is collected and used within the practice. Occasionally we also need to share your personal information to involve others in your healthcare and this policy outlines when, how, and why we share your information. If you choose not to provide us with certain personal or health information, we may not be able to provide you with appropriate healthcare or other requested services, or process Medicare, health fund or other claims on your behalf.

1. Who can I contact about this policy?

For enquiries concerning this policy, you can contact **the Practice Manager on 02 9050 2288 or email healthclinic.freshwater@mountiescare.com.au**

2. When and why is your consent necessary?

When you register as a patient of this practice, you provide consent for the GPs and practice staff to access and use your personal information to facilitate the delivery of healthcare. Access to your personal information is restricted to practice team members who require it for your care. If we ever use your personal information for purposes other than outlined in this document, we will obtain additional consent from you.

It is important to us that as our patient, you understand why we collect and use your personal information.

By acknowledging this Privacy Policy you consent to us collecting, holding, using, retaining and disclosing your personal information in the manners described below.

3. Why do we collect, use, store, and share your personal information?

The practice collects, uses, stores, and shares your personal information primarily to manage your health safely and effectively. This includes providing healthcare services, managing medical records, and ensuring accurate billing and payments. Additionally, we may utilise your information for internal quality and safety improvement processes such as practice audits, accreditation purposes, and staff training to maintain high-quality service standards.

4. What personal information is collected?

The information we will collect about you includes your:

- names, date of birth, addresses, contact details
- medical information including medical history, medicines, allergies, and adverse reactions immunisations, social history, family history and risk factors
- Medicare number (where available) for identification and claiming purposes

- healthcare identifier numbers
- health fund details.

5. Can you deal with us anonymously?

You can 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.

6. How is personal information collected?

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

When you make your first appointment, the practice team will collect your personal and demographic information via your registration.

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.

In some circumstances, personal information may also be collected from other sources, including:

- Your guardian or responsible person.
- 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 (if relevant).
- While providing medical services, further personal information may be collected via:
    - electronic prescribing
    - My Health Record
    - online appointments.

Various types of images may be collected and used, including:

- **CCTV footage:** Collected from our premises for security and safety purposes

We will always comply with privacy obligations when collecting personal information from third-party sources. This includes ensuring transparency with patients, obtaining necessary consents, maintaining data accuracy, securing the information, and using it only for specified purposes.

7. When, why and with whom do we share your personal information?

We sometimes share your personal information:

- with third parties for business purposes, such as accreditation agencies or information technology providers – these third parties are required to comply with the Privacy Legislation and this policy
- with other healthcare providers (e.g. In referral letters)
- when it is required or authorised by law (e.g. 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 it is a statutory requirement to share certain personal information (e.g. some diseases require mandatory notification)
- When it is provision of medical services, through electronic prescribing, My Health Record (e.g. via Shared Health Summary, Event Summary).

Only people who need to access your personal information will be able to do so. Other than providing medical services or as otherwise described in this policy, the practice will not share personal information with any third party without your consent.

We do not share your personal information with anyone outside Australia (unless under exceptional circumstances that are permitted by law) without your consent.

8. Will your information be used for marketing purposes?

The practice will not use your personal information for marketing any 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 the practice in writing.

9. How is your information used to improve services?

The practice may use your personal information to improve the quality of the services offered to patients through research, analysis of patient data for quality improvement and for training activities with the practice team.

We may provide de-identified data to other organisations to improve population health outcomes. If we provide this information to other organisations patients cannot be identified from the information we share, the information is secure and is stored within Australia. You can let reception staff know if you do not want your de-identified information included.

At times, general practices are approached by research teams to recruit eligible patients into specific studies which require access to identifiable information. You may be approached by a member of our practice team to participate in research. Researchers will not approach you directly without your express consent having been provided to the practice.

If you provide consent, you will then receive specific information on the research project and how your personal health information will be used, at which point you can decide to participate or not participate in the research project.

10. How are document automation technologies used?

Document automation is where systems use existing data to generate electronic documents relating to medical conditions and healthcare.

The practice uses document automation technologies to create documents such as referrals, which are sent to other healthcare providers. These documents contain only your relevant medical information.

These document automation technologies are used through secure medical software Best Practice.

All users of the medical software have their own unique user credentials and password and can only access information that is relevant to their role in the practice team.

The practice complies with the Privacy Legislation to protect your information.

All data, both electronic and paper, is stored and managed in accordance with the Royal Australian College of General Practitioners Privacy and managing health information guidance.

11. How are Artificial Intelligence (AI) Scribes used?

The practice uses an AI scribe tool to support GPs to take notes during their consultations with you. The AI scribe uses an audio recording of your consultation to generate a clinical note for your health record. The practice AI scribe service is **Lyrebird.**

Lyrebird:

- does not share information outside of Australia. All data is processed and stored in Australia.
- destroys the audio file once the transcription is complete. Audio recordings are never stored.
- removes sensitive, personal identifying information as part of the transcription.
- automatically deletes documents and notes from its system after one day (deletion can take up to 24 hours to complete). The clinical note saved to your health record is kept by the practice.

The practice will only use data from our digital scribe service to provide healthcare to you.

12. How is your personal information stored and protected?

Your personal information may be stored in various forms such as electronic records, visual records (e.g., X-rays, CT scans, videos, and photos), and audio recordings.

The practice stores all personal information securely. It is protected by passwords, in electronic format, in protected information systems.

13. How can you access and correct your personal information at the practice?

You have the right to request access to, and correction of, your personal information.

Access to your medical records

You have the right to request a copy of the personal and health information the practice holds about you.

How to make a request
You can ask for a copy of your records:

- in person at reception
- by email to healthclinic.freshwater@mountiescare.com.au
- by phone on (02) 9050 2288
- by post to Freshwater Health Clinic, Shop 5, 88 Evans St, Freshwater NSW 2096

Confirming your identity
To protect your privacy, we need to confirm your identity before releasing any records. Please provide your full name, address and date of birth, together with government-issued photo ID, such as a passport or driver licence.

- **In person:** we will take a copy of your photo ID for our records.
- **By email, phone or post:** please provide a certified copy of your photo ID.

What happens next

- Your records will be reviewed by one of our doctors before it is released. Access will only be refused or limited where permitted or required by law.
- We will provide your records within 30 days of receiving your request.
- We will provide your records in the format you ask for (for example, by secure email or as a printed copy) where this is reasonable.
- In some circumstances, the law allows us to withhold part of a record, for example where it contains another person's personal information. If this happens, we will explain why in writing and tell you how to make a complaint.

Fee
There is no charge for making a request. The fee for providing a copy of your medical records will be reasonable and as permitted by applicable legislation. Any fee is based on the time taken to prepare it. We will send you a written quote, and payment is required before your records are released.

Correcting your information
The practice will take reasonable steps to correct your personal information where it is not accurate or up to date. From time to time, we may ask you to confirm that the information we hold about you is correct and current. You can ask us to correct or update your information at any time by contacting the Practice Manager in person, by phone on (02) 9050 2288 or by email Healthclinic.freshwater@mountiescare.com.au. We will respond within 30 days, and there is no charge for correcting your information.

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

We take complaints and concerns about privacy seriously. Please put your concerns in writing and send them to:

The Practice Manager
Freshwater Health Clinic
Harbord Diggers, Shop 5, 88 Evans Street, Freshwater NSW 2096
Ph: (02) 9050 2288
Email: healthclinic.freshwater@mountiescare.com.au

If you would prefer to raise your concern in person or by phone, our Practice Manager will record the details for you.

We will acknowledge your complaint within 7 days of receiving it. We will investigate and respond to you in writing within 30 days. If we need more time, we will let you know why and when to expect our response.

If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner (OAIC). The OAIC generally requires you to give the practice 30 days to respond before it will investigate. For further information, visit www.oaic.gov.au or call 1300 363 992.

15. How is privacy on the website maintained?

At Freshwater Health Clinic, any personal information you share with us through website, email, and social media, is handled securely and confidentially. This practice uses analytics and cookies.

16. Policy review statement

Our privacy policy is regularly reviewed to ensure compliance with current obligations.

If any changes are made:

- They will be reflected on the website.
- Significant changes may be communicated directly to patients via email or other means.

Please check the policy periodically for updates. If you have any questions, feel free to contact us.