



Radiology Group Privacy Policy

(encompassing Blacktown Medical Imaging, Carlingford Medical Imaging, High Street Medical Imaging and their satellite imaging sites)
Version1, June 2016

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Introduction

Radiology Group's three practices and associated satellite imaging sites (Blacktown Medical Imaging, Carlingford Medical Imaging, and High Street Medical Imaging, hereby referred to as "the practices") are committed to best practice in relation to the management of information we collect. This group has developed a policy to protect patient privacy in compliance with the Privacy Act 1988 (Cth) ('the Privacy Act').

Our policy is to inform you of:

- the kinds of information that we collect and hold
- how we collect and hold personal information
- the purposes for which we collect, hold, use and disclose personal information;
- how you may access your personal information and seek the correction of that information
- how you may complain about a breach of the Australian Privacy Principles, or a registered APP code (if any) that binds the practices, and how we will deal with such a complaint
- whether we are likely to disclose personal information to overseas recipients, and the countries in which such recipients are likely to be located if it is practicable to specify those countries in the policy



What kinds of personal information do we collect?

Patients

The type of information we may collect and hold from patients includes:

- Your name, gender, address, date of birth, and contact details
- Medicare number, DVA number, health care card and other government identifiers, although we will not use these for the purposes of identifying you in our practice
- Next of kin, or persons authorised to collect information on your behalf
- Other health information about you, including:
 - medical history relevant to your diagnostic imaging requests
 - other specialist reports and test results
 - your appointment and billing details
 - your wishes about future provision of health services
 - details about any feedback, suggestions or complaints

Referring Physicians, Practice Managers and Ancillary Staff

The type of information we may collect and hold from referring physicians, practice managers and ancillary staff includes:

- Name, address, telephone and fax numbers, email addresses, and other contact information
- Area of specialisation (if any)
- Medicare Provider numbers and billing information
- Employment history
- Information gathered by marketing staff during practice visits or phone interactions, which may include service preferences
- Details of web addresses and IT systems
- Details about feedback, suggestions or complaints

Current or Prospective Staff

The type of information we may collect and hold from current or prospective staff includes:

- Name, address, telephone numbers, email addresses, and other contact information
- Employment records, including any performance review records
- Current licence and registration records
- Curriculum Vitae/Resume



How do we collect your personal information?

The Radiology Group will generally collect personal information:

- from you directly when you provide your details to us. This might be via a face to face discussion, telephone conversation, email, or written registration form, or questionnaire
- from a person responsible for you
- from third parties where the Privacy Act or other law allows it - this may include, but is not limited to: your referring physician(s), other diagnostic centres, specialists, hospitals, Medicare, your health insurer, insurance agencies representing worker's compensation claims

In the majority of cases, the personal information our practices collect is solicited. On any occasion where unsolicited personal information is received, all guidelines regarding privacy found in this policy will still be maintained.

How do we hold your personal information?

Our staff are trained and required to respect and protect your privacy. We take reasonable steps to protect information held in electronic, digital, and hard copy paper based documents from misuse and loss and from unauthorised access, modification or disclosure. This includes:

- All Radiology Group staff sign confidentiality agreements
- Information you give us is entered and stored in our Radiology Information System, and medical images are stored on the Picture Archiving and Communication System (PACS). Both systems are password protected for security purposes.
- Sensitive hard-copy documents are kept in a lockable cabinet
- Sensitive soft-copy administrative documents are only accessible to Managing Directors and Senior Practice Manager on a secured drive
- All access to electronically shared patient information between the practices and referring physicians is password protected
- Our practice has document retention and destruction policies – Documents are kept in a secured, lockable location. Any documents to be discarded with identifying information are shredded prior to disposal. Discarded film images with patient information are secured and destroyed



Why do we collect, hold, use and disclose personal information?

In general, we collect, hold, use and disclose your personal information for the following purposes:

Patients

- to provide health services to you, including diagnostic and interventional procedures, for which you have given consent
- to communicate with you in relation to the health service being provided to you
- for consultations with your referring physicians, specialists, and other allied health professional involved in your healthcare, including obtaining second opinions, or referrals to another specialist imaging service for more appropriate imaging
- to obtain, analyse and discuss test results from diagnostic and pathology laboratories. If we are required to obtain this type of information, we will take reasonable steps to ensure that you are aware of the purposes for which the information will be used.
- for teaching purposes, case studies and multi-disciplinary clinical meetings in a de-identified format
- to comply with our legal obligations, including, but not limited to, mandatory notification of communicable diseases or mandatory reporting under applicable child protection legislation.
- to comply with legislative requirements for compliance and accreditation on the State and Federal levels, by providing information in both an identified and de-identified format
- to help us manage our accounts and administrative services, including billing, arrangements with health funds, pursuing unpaid accounts, management of our ITC systems
- for identification and insurance claiming
- To liaise with your health fund, worker's compensation claim manager, government and regulatory bodies such as Medicare, the Department of Veterans' Affairs and the Office of the Australian Information Commissioner (OAIC) (if you make a privacy complaint to the OAIC), as necessary.
- for handling of complaints, or any anticipated legal actions
- to our insurers, brokers, lawyers and other experts for the purposes of addressing liability indemnity arrangements or to obtain advices as to our legal or other obligations

In general, if your personal information is disclosed for any of these above purposes, the practices will not usually seek your consent. The Radiology Group will seek your written consent if your personal information is to be disclosed as de-identified information for the purposes of



marketing or research. If research is being undertaken, the practices will seek to ensure that you understand the benefits and risks of participating in the research, as well as disclosure of your information. You are not obliged to participate, and may rescind your agreement at any time during the research process.

Referring Physicians, Managers, and Ancillary Staff

- to ensure appropriate diagnostic imaging requests
- to provide consistent diagnostic imaging services to patients
- to interpret, diagnose, and communicate results to referring physicians
- to ensure services provided meet the needs of referring physicians
- to provide information on education and marketing to referring physicians

Patient rights to control the use and disclosure of personal information

The Radiology Group encourages patients to obtain their health information, particularly copies from their referring physician. This will ensure the results are obtained in a supportive situation, with a referring physician who is able to make a diagnosis and answer any questions a patient may have regarding their results.

The practices will respect the wishes of the patient who does not wish their report to be sent directly to the referring physician, and take reasonable steps to comply within the scope of the Privacy Act.

Maintaining accuracy of your personal information

The Radiology Group takes reasonable steps to ensure that your personal information is accurate, complete, and up to date by the following measures:

- Reconfirming all relevant personal information upon each attendance at the practice
- Staff undertaking training sessions to ensure correct procedures, and compliance with the Privacy Act
- Maintaining accreditation through the regulatory bodies which protect patient identity



How can you access and correct your personal information?

You have a right to seek access to, and correction of the personal information which we hold about you. The practices prefer that your personal information is taken to your referring physician for discussion with relevance to your total health management.

We may ask that you complete a *Collection of Personal Information* form before releasing your personal information to you, and ask for proof of identification (Photo ID preferred).

For details on how to access and correct your health record, please contact our practice as noted below under 'Contact Details'. We will normally respond to your request within 30 days.

On occasion, access may be refused in accordance with the Privacy Act in the below instances:

- The Radiology Group believes that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or safety
- That giving access would have an unreasonable impact on the privacy of other individuals
- The request for access is frivolous or vexatious
- The information relates to existing or anticipated legal proceedings between you and our company, and would not ordinarily be accessible by the discovery process in such proceedings
- Giving access would reveal our intentions in relation to negotiations with you in a way that would prejudice those negotiations
- Giving access would be unlawful
- Denying access is required or authorised by or under an Australian law or a court/tribunal order
- We have reason to suspect that unlawful activity, or misconduct of a serious nature relating to our functions or activities has been, is being or may be engaged in and giving access would be likely to prejudice the taking of appropriate action in relation to the matter
- Giving access would be likely to prejudice one or more enforcement related activities, conducted by, or on behalf of, an enforcement body; or
- Giving access would reveal internal evaluative information in connection with a commercially sensitive decision-making process



Anonymity and pseudonyms

The Radiology Group has determined that it is impractical to provide diagnostic imaging services to persons using a pseudonym or wishing to remain anonymous. This decision has been made on the following information:

- The risk of patient mismatching, including all diagnostic imaging results
- Accurate diagnosis and medical advice may be compromised
- An unacceptable risk to a patient's safety, breaching the standards set forth by the *Commission for Quality and Safety in Healthcare's Patient Identification Safety Standards*
- Risk of misinformation or breakdown of communication between the practices and referring physicians
- Risk of breakdown of common public health practices
- Inability of the patient to claim the imaging service under Medicare or Private Health Funds

Overseas disclosure

We may disclose your personal information to the following overseas recipients:

- overseas transcription services of your diagnostic imaging report
- anyone else to whom you authorise us to disclose it

In order to provide services to you, we may be required to disclose your personal information to overseas recipients. The countries in which overseas recipients of personal information are located include the Philippines.

Overseas recipients are bound by the Australian Privacy Act and we will also take reasonable steps to ensure that they comply with their privacy obligations.



Privacy and websites

The Radiology Group website at www.radiologygroup.com.au serves as an online point of information regarding our practices, our services, and how to contact us. No online appointments are available. Referring physicians are able to order replacement referral pads through a link on the [Referrers](#) page.

Our privately run Facebook page allows only public posting, and therefore no unauthorised collection of private information. In the case of a private message being sent, we can collect only the information made available on your public profile.

Updates to this Policy

This Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and other necessary developments. Updates will be publicised on the practice's website www.radiologygroup.com.au , and displayed at our reception desk.

Privacy related questions and complaints

If you have any questions about privacy-related issues or wish to complain about a breach of the Australian Privacy Principles or the handling of your personal information by us, you may lodge your complaint in writing to the Senior Practice Manager of the Radiology Group. We will normally respond to your request within 30 days.

Contact Details:

Senior Practice Manager

PO Box 605

Penrith NSW 2750

E: privacy@radiologygroup.com.au

T: (02) 4789 0009

If you are dissatisfied with our response, you may refer the matter to the OAIC:

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Fax: +61 2 9284 9666

Post: GPO Box 5218 Sydney NSW 2001

Website: www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint