

Privacy Policy

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Table of Contents

1. Purpose	2
2. Introduction	2
3. Definitions	2
4. Principles.....	2
5. Policy statement	3
5.1 Collection of Information.....	3
5.2 Storage of Information.....	4
5.3 Sharing Information	4
5.4 Requesting Personal Information	4
5.5 Internet, Social Media and Emails.....	5
5.6 Phone Calls	5
5.7 Privacy of the QDHP Offices	5
5.8 Concerns and Complaints.....	5
5.9 Periodic Changes to our Privacy Policy.....	5
6. Related policies, documents and legislation.....	6
6.1 Policies	6
6.2 Documents	6
6.3 References including Legislation	6
7. Authorisation.....	6

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1. Purpose

QDHP is a not-for-profit charitable organisation which is committed to doctors' health and wellbeing. The QDHP Privacy Policy establishes the organisation's commitment to comply with the Australian Privacy Principles, as set out in the Privacy Act 1988 (Cth). The policy will provide a guideline for all persons associated with QDHP, particularly Board Directors, employees, contractors and volunteers, to ensure the privacy and confidentiality of QDHP clients.

2. Introduction

QDHP's ability to effectively deliver doctors' health services with appropriate confidentiality is directly dependent on the ability of its Board Directors, employees, contractors and volunteers to manage different kinds of sensitive information responsibly. Consequently, QDHP places the utmost importance on the confidentiality and privacy of clients, while operating within the legal and regulatory framework that governs our core business.

3. Definitions

The terms relevant to this privacy policy reflect the requirements of the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

While the definition of privacy and confidentiality may be distinct, when it comes to health information, QDHP treats all information in a confidential and private manner, and therefore this policy covers both privacy and confidentiality issues together.

4. Principles

The maintenance of privacy and confidentiality of health information and all identifying information is a key responsibility in all health organisations. QDHP only collects personal information to provide a service to that individual, such as follow-up with the client, or for the business activities directly related to QDHP, such as financial claims and payments, practice audits, accreditation and business processes.

QDHP recognises the essential right of individuals to have their information administered in ways that they would reasonably expect – protected on one hand, and made accessible to them on the other. These privacy values are reflected in and supported by the core values and philosophies.

QDHP further recognises the importance of maintaining privacy and confidentiality of details related to other stakeholders who engage with our service, including information related to members of the Doctors' Health Advisory Service (Queensland) (DHAS(Q)) Management Committee, the Helpline On-Call Panel and other stakeholders.

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5. Policy statement

QDHP receives a range of personal information for the purposes of optimal service delivery and sound human resources management practices.

QDHP will place appropriate, lawful restrictions on accessing personal information, and ensure that all associated persons understand the importance of, and consistently apply, these restrictions. QDHP recognises that Australian privacy law limits the use of personal information for direct marketing of goods and services. QDHP does not provide personal details to other organisations such as mailing lists, or for other purposes without individual consent. QDHP may use contact information for direct individual communications as required, and to inform stakeholders about updates, publications, functions and events. If individuals or organisations no longer wish to receive some or all of this material, they are welcome to contact us at admin@qdhp.org.au.

The confidentiality and privacy of QDHP clients is of utmost concern to the organisation. The expectation of confidentiality and privacy is the same as that which is afforded to patients in a doctor-patient relationship. There will be rare lawful instances where client confidentiality may be breached, in accordance with relevant state and federal legislation (for example, a court subpoena, or a mandatory report to the Health Ombudsman).

Providers of care to QDHP clients (Medical Director, On-Call Panel and external providers) are cognisant of the fact that the medical community is small in Queensland, so must ensure the client's explicit consent before seeking or making referrals. No information relating to clients will be discussed without their permission. All persons should avoid using any identifiers in public spaces, including names, specialties or practice locations.

In summary, QDHP will:

- Collect only information which the organisation requires for its primary function;
- Ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered;
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- Store any personal information securely, protecting it from unauthorised access; and
- Provide stakeholders with access to their own information, upon request, and allow the right to seek its correction.

5.1 Collection of Information

Information that may be collected depends upon the purpose and engagement of that stakeholder or client with the service.

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In general, QDHP only holds the contact information provided directly to the organisation to enable the delivery of a service or engagement with the stakeholders. General stakeholder information may include business address and telephone number, personal address and telephone number, post office box details, information about their occupations, credit card and transactional information, personal details such as date of birth and other personal information such as dietary preferences. Client health information is kept in a de-identified format unless an individual provides specific consent to the contrary. In this situation, QDHP may collect: names, date of birth, addresses, contact details, demographic information and medical information, including: medical history, medications, allergies, adverse events, immunisations, social history, family history and risk factors.

QDHP acknowledges that from time to time, people may choose to interact with our organisation anonymously or under a pseudonym. While QDHP will make all reasonable efforts to respect that choice, complete anonymity cannot be guaranteed and in some circumstances it may be unlawful to do so.

5.2 Storage of Information

QDHP conforms with the Australian Privacy Principles and Privacy Act (1988) by ensuring that all personal information is stored securely. All electronically stored information has password protection, and physical documents are stored in a locked cabinet. Only those who need to access the file to enable service delivery will be able to access this information. The Document Management Policy and Procedure outlines QDHP's standard processes for securely managing confidential documents.

5.3 Sharing Information

QDHP will only share personal information with third parties such as other health care providers with the client's consent. QDHP will only share information without consent when required or authorised by law or statutory requirement (e.g. court subpoena or a mandatory report). At no time will personal information be used for marketing goods or services without express consent.

QDHP will not send personal information about an individual outside Australia without obtaining the consent of the individual, or otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

5.4 Requesting Personal Information

QDHP acknowledges that individuals may request access to their personal records. If individuals wish to access such a record, then this request must be made in writing, and QDHP will undertake to respond within a reasonable timeframe of 30 days. If requested in writing, QDHP will take all reasonable steps to correct any personal information that is not accurate or up-to-date.

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5.5 Internet, Social Media and Emails

QDHP cannot ensure the security of all information transmitted to us over the internet, and clients do so at their own risk. Privacy of clients is always our priority in our communications, internally or externally, including emails. Social media is not used for personal communication with QDHP clients.

Our website may contain links to other websites. These links are provided for convenience only, and links to third party websites do not constitute sponsorship, approval or endorsement of these websites. We are not responsible for the privacy practices of these other websites, and recommend that users be aware, when leaving the QDHP website, as this privacy policy applies solely to information collected by QDHP.

5.6 Phone Calls

Staff or volunteers making calls or answering the QDHP office phones should always confirm who they are talking to prior to confidential discussions. Phone calls are made in quiet, private locations.

5.7 Privacy of the QDHP Offices

The QDHP offices are located in Hunstanton, 88 L'Estrange Terrance, Kelvin Grove QLD 4059. Discussions regarding sensitive information, in person or using telecommunications, are always conducted in a manner that protects the client's privacy. The office is always secured when unattended.

5.8 Concerns and Complaints

All concerns and complains regarding privacy are taken seriously. Concerns or complaints should be expressed in writing and forwarded to admin@dhq.org.au. QDHP will attempt to resolve the matter in a timely manner, and will respond within 30 days regarding how this matter is being progressed. If the concerns have not been satisfactorily addressed, a meeting will be arranged to discuss further. After this process, complaints can be referred to the Office of the Australian Information Commissioner via:

Email: enquiries@oaic.gov.au Tel: 1300 363 992 Fax: +61 2 9284 9666

5.9 Periodic Changes to our Privacy Policy

QDHP plans to ensure this privacy policy remains current and it is therefore subject to change. QDHP will modify this policy at different times with such modifications being effective immediately when available on our website. Interested parties are encouraged to review our privacy policy periodically.

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6. Related policies, documents and legislation

This policy has been developed with respect to the following policies, documents and legislation.

6.1 Policies

- QDHP Code of Conduct
- Social Media Policy
- Communication Policy
- Board Charter

6.2 Documents

- Managing Privacy Procedure

6.3 References including Legislation

- Privacy Act 1988 (Cth)
- Australian Privacy Principles
- AHPRA (2014). Good Medical Practice: A Code of Conduct for Doctors in Australia. Section 3.4 Confidentiality & Privacy. Retrieved from <http://www.medicalboard.gov.au/Codes-Guidelines-Policies/Code-of-conduct.aspx>

7. Authorisation

This policy is available via the online QDHP Policies and Procedures Manual. If this policy is marked as “Approved” it certifies that the policy has been through all necessary procedures and is now in force.

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