

The Child Development Network (Child Development Network Pty Ltd) and visiting Clinicians Privacy Policy.

1. Introduction

The Child Development Network (Child Development Network Pty Ltd) and the Clinicians who consult from the Child Development Network (CDN) are committed to best practice in relation to the management of information we collect. This practice has developed a policy to protect patient/ client 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, which, as a service provider and/ or healthcare service, is likely to be 'health information' for the purposes of the Privacy Act;
- 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 and how we will deal with such a complaint;
- whether we are likely to disclose personal information to overseas recipients;

2. What kinds of personal information do we collect?

The type of information we may collect, and hold includes, **when applicable**:

- Your name, mailing and street address, date of birth, email and contact details
- Medicare number, DVA number and other government identifiers, although we will not use these for the purposes of identifying you in our practice
- Other health information about you, including if appropriate:
 - notes of your developmental concerns, symptoms or diagnosis and the treatment given to you
 - your specialist reports and test results
 - your appointment and billing details
 - your bank and credit card details
 - your prescriptions and other pharmaceutical purchases
 - your dental records
 - your genetic information
 - your healthcare identifier
 - your health fund details
 - any other information about your race, sexuality or religion, when collected by a health service provider
- any information that relates to you, that you provide to us directly through our website, email, written letters, and phone conversations.

3. How do we collect and hold personal information?

We 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, enquiry or complaint, registration form, online form, online enquiry through our website or email
- 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: other members of your treating team, diagnostic centres, specialists, hospitals, the My Health Record system, electronic prescription services, Medicare, your health insurer, the Pharmaceutical Benefits Scheme

We may also collect personal information from third parties, such as:

- Third party government agencies (like the Department of Veteran Affairs and Medicare)
- Private health insurers
- Solicitors, lawyers, and worker's compensation companies;
- Educators, schools, kindergartens, and other educational institutions; and
- Medical professionals (such as general practitioners, allied health professionals, specialists etc).

4. 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:

- to provide healthcare services to you
- to communicate with you in relation to the health service being provided to you
- to comply with our legal obligations, including, but not limited to, mandatory notification of communicable diseases, mandatory reporting under applicable child protection legislation or presentation of medical records if subpoenaed by a court
- to help us manage our accounts and administrative services, including billing, arrangements with health funds, pursuing unpaid accounts, management of our ITC systems
- for consultations with other doctors and allied health professional involved in your healthcare;
- to obtain, analyse and discuss test results from diagnostic and pathology laboratories
- for identification and insurance claiming
- If you have a My Health Record, to upload your personal information to, and download your personal information from, the My Health Record system.
- Information can also be disclosed through an electronic transfer of prescriptions service.
- to liaise with your health fund, government and regulatory bodies such as Medicare, the Department of Veteran's Affairs and the Office of the Australian Information Commissioner (OAIC) (if you make a privacy complaint to the OAIC), as necessary.
- Sending marketing and other communications to referring clinicians and other healthcare professionals, such as clinical updates, information about our services, events, and other news relevant to them or their practice; and
- Other purposes with your consent.

5. 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. There may be reasonable administration costs involved in providing such access, which we will inform you of as soon as practicable. In special circumstances, under the applicable provisions of privacy legislation dealing with access to documents, we may refuse a patient access to their records or request an appointment to be made with your Clinician to review records.

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

6. How do we hold your personal information?

Our staff are trained and required to respect and protect your privacy. We hold personal information electronically and in hard copy form, both at our own premises and with the assistance of service providers who provide data storage, hosting and cloud computing services. In all cases we implement a range of measures to protect the security of that personal information. We take reasonable steps to protect information held from misuse and loss and from unauthorised access, modification or disclosure. This includes:

- Holding your information securely in lockable cabinets
- Our practice has secure document retention and destruction procedures
- All CDN team members, contractors and visiting Clinicians sign confidentiality agreements
- Information in electronic format is protected information with use of passwords and firewalls

7. Security

We strive to ensure the security, integrity and privacy of personal information submitted to our sites, and we review and update our security measures considering current technologies. Unfortunately, no data transmission over the Internet can be guaranteed to be totally secure.

However, we will endeavour to take all reasonable steps to protect the personal information you may transmit to us or from our online products and services. Once we do receive your transmission, we will also make our best efforts to ensure its security on our systems.

In addition, our employees and the contractors who provide services related to our information systems are obliged to respect the confidentiality of any personal information held by us. However, we will not be held responsible for events arising from unauthorised access to your personal information.

8. Anonymity and pseudonyms

The Privacy Act provides that individuals must have the option of not identifying themselves, or of using a pseudonym, when dealing with our practice, except in certain circumstances, such as where it is impracticable for us to deal with you if you have not identified yourself. This may include but is not limited to, seeking a Medicare benefit or health insurer rebate and seeking or providing other medical services or information. For these reasons we believe it is impracticable to provide services to individuals not identifying themselves, or if using a pseudonym.

9. Overseas disclosure

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

- any practice or individual who assists us in providing services (such as where you have come from overseas and had your health record transferred from overseas or have treatment continuing from an overseas provider)
- an overseas transcription service to type consultation follow up letters
- anyone else to whom you authorise us to disclose it

10. 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. The most recent version of our Privacy Policy can be obtained from our website.

11. Privacy and websites

If you visit our website, we may record various technical information such as your IP address, browser type, domain names, access times and referring website addresses. We use this information to run our websites and for analytical purposes.

Our website may include links to other websites that are run by third parties. We are not responsible for how those third parties may collect, use and share your information. Please carefully review any privacy statements published on the third-party websites you visit.

Our websites may use cookies to help identify and interact more effectively with the access device you are using. A cookie is a text file that is placed on a user's device by a web page server. Cookies cannot be used to run programs or deliver viruses to your device. The cookies we use help us to maintain the continuity of your browsing sessions and remember your details and preferences for when you return.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of our websites. We may use Google services

such as Google Analytics to analyse usage of our websites from time to time. For more about how Google collects and processes data, please see Google's privacy policy and their information at www.google.com/policies/privacy/partners/.

12. Contact details for privacy related issues or complaints

If you have any questions or feedback about privacy-related issues, the management of your personal information, you would like to correct your personal information, you wish to opt out of receiving information from us, or you would like to make a complaint about a how we have handled your information or a breach of the Privacy Act, please address your complaint in writing to the Practice Manager (see below for details). We will normally respond to your request within 30 days.

Attn: The Practice Manager
Child Development Network
PO Box 1536
MILTON QLD 4064

Email: cdn@cd.net.au

Phone: (07) 3369 3369

Fax: (07) 3369 3370

The Child Development Network and the Clinicians who consult from CDN would appreciate the opportunity to address any concerns or complaint you may have. We hope that we will be able to resolve the matter directly with you without the need to involve third parties.

You may also contact the Office of the Australian Information Commissioner (OAIC). Generally, the OAIC will require you to give them time to respond before they will investigate. For further information or to refer a matter to the OAIC:

OAIC
GPO Box 5218
SYDNEY NSW 2001

Email: enquiries@oaic.gov.au

Phone: 1300 363 992

Fax: +61 2 9284 9666

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

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