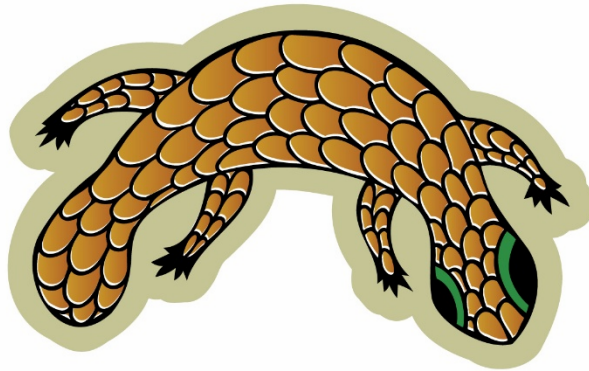




PORT LINCOLN ABORIGINAL HEALTH SERVICE LTD.

Privacy Policy for Clients

Port Lincoln Aboriginal Health Service (PLAHS)

Table of Contents

Purpose	3
Scope	3
Policy Statement	3
Why and when your consent is necessary.	3
Why do we collect, use, hold and share your personal information?	3
What personal information do we collect?	3
How does PLAHS collect your personal information?	4
When, why and with whom does PLAHS shares your personal information with?	4
How does PLAHS share your information	5
PLAHS will NOT share your personal information or images:	5
How PLAHS stores and protects your personal information.	5
Dealing with PLAHS anonymously:	5
How to access your personal information at PLAHS:	5
Related Documents	7
Accreditation Standards	7
RACGP	7
Australian Service Excellence Standards	7
Review and Amendment	8
Policy Development Notes	8

Purpose

This Privacy Policy is to provide information to you, our clients, on how your personal and health information is collected, stored and used at PLAHS, and the circumstances in which we may share it with third parties.

Scope

This policy applies to:

- All clients and community members who access services provided by PLAHS.
- All employees, contractors, students, volunteers, and Board members of PLAHS.
- All personal and sensitive information handled by PLAHS, in any form, including paper records and electronic systems.

Policy Statement

Who can I contact about this policy

For enquiries concerning this policy, you can contact reception@plahs.org.au

Why and when your consent is necessary.

- When you register as a client at PLAHS, you provide consent for our GPs and practice team to access and use your personal health information so they can provide you with the best possible healthcare.
- Only staff who need to see your personal information will have access to it. If we need to use your information for anything else, we will seek additional consent from you to do this.
- By acknowledging this Privacy Policy you consent to us collecting, holding, using, retaining and disclosing your personal information in the manners described below.

Why do we collect, use, hold and share your personal information?

- PLAHS needs to collect your personal information to provide healthcare services to you.
- The main purpose for collecting, using, holding and sharing your personal information is to manage your health.

- PLAHS also uses your personal information for directly related business activities, such as financial claims and payments, practice audits and accreditation and business processes (e.g. staff training).

What personal information do we collect?

The information we collect about you includes:

- Names, date of birth, address, sex, gender, contact and emergency details.
- Medical information including medical history, medications, allergies, adverse events, immunisations, social and family history and risk factors.
- Medicare number (when available) for identification and claiming purposes.
- DVA and Health Care Card numbers.
- Healthcare Identifiers.

A patient's health record is a collection of a patient's medical history, clinical findings, diagnoses, treatment plans, medication and test results as well as their demographic, contact and identification details.

Dealing with PLAHS anonymously:

- You have the right to deal with PLAHS using a pseudonym unless it is impractical or we are required or authorised by law to only deal with identified individuals.

How does PLAHS collect your personal information?

PLAHS collects your personal information:

- When you make your first appointment and register as a client the PLAHS staff will collect your personal and demographic information.
- During the course of providing medical services, PLAHS may collect further personal health information.
- Information can also be collected through investigations, ScriptCheck, electronic prescribing, and My Health Record, e.g. via Shared Health Summaries, Event Summary.
- When you contact PLAHS by phone, SMS, make an online appointment, social media or visit our website we may also collect further information.
- In some circumstances we receive information from other sources from:
 - Your guardian or responsible person

- Other healthcare providers such as specialists, allied health professionals, hospitals, community health services, and pathology and diagnostic imaging services.
- Medicare, Department of Veteran Affairs (as necessary) or your health fund.

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

- CCTV footage: Collected from our premises for security and safety purpose
- Photos and medical images: These can be taken using personal devices for medical purposes, following the guidelines outlined in our guide on using personal devices for medical images.

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.

When, why and with whom does PLAHS shares your personal information with?

PLAHS sometimes shares your personal information:

- With other healthcare providers (e.g. in referral letters)
- When it is provision of medical services medical services, through electronic prescribing, My Health Record (e.g. via Shared Health Summary, Event Summary).
- When required or authorised by law (e.g. court subpoenas).
- When there is a statutory requirement to share certain personal information (e.g. some diseases require mandatory notification).
- When necessary to lessen or prevent a serious threat to a client's life, health or safety or it is impractical to obtain client's consent.
- For the purpose of confidential dispute resolution process.
- To establish, exercise or defend an equitable claim.
- When it is a statutory requirement to share certain personal information (e.g. some diseases require mandatory notification).
- Accreditation agencies, business and IT providers who agree to abide by the APPs and this policy.
- To improve quality of services at PLAHS through research and analysis of de-identified client data.

- As de-identified data to other organisations to improve population health outcomes. This de-identified data is secure, and clients cannot be identified and the information is stored in Australia. Let Reception staff know if you do not consent for your de-identified data to be used.

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

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.

How does PLAHS share your information

PLAHS may share your information by the following mediums:

- Via Clinical Information System, telephone, fax, secure messaging, email, and in person.

PLAHS will NOT share your personal information or images:

- With any unauthorised medical or business service without your consent.
- With anyone outside Australia without your consent.
- For marketing of any goods or services.

How PLAHS stores and protects your personal information.

- Your information is stored securely in electronic format with regular encrypted backups stored offsite.
- Any hard copy records are stored in a secured environment.
- Regular cybersecurity checks and audits are undertaken by an external IT company.
- PLAHS uses password protection to access client information and defines levels of access to client information.
- All PLAHS staff and external contractors have signed confidentiality agreements and abide by the Australian Privacy Principles.
- PLAHS does not record telehealth or audiovisual consultations.

- PLAHS utilises CCTV in the Driveway and Carpark area, Oxford the entrance, Playground, outside staff area, entrance foyer and reception area. Access to this is limited to the Business Services Manager and is stored on site with a retention period of up to 60 days.

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 would 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.

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 Communicare.

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 Australian privacy legislation and APPs to protect your information.

All data, both electronic and paper are stored and managed in accordance with the Royal Australian College of General Practitioners [Privacy and managing health information guidance](#).

Official – This document is controlled. The only valid and official version is located on Logic; printed or locally saved copies are not considered official.

How are Artificial Intelligence (AI) Scribes used?

The practice uses an AI scribe tool to support GPs 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
- destroys the audio file once the transcription is complete.
- removes sensitive, personal identifying information as part of the transcription

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

Patient consent is required and recorded before the consultation commences. Patients can withdraw consent at any time.

How to access your personal information at PLAHS:

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

The practice acknowledges patients may request access to their medical records.

To request access or update your personal information at PLAHS, please fill in the *Request for personal information* form from reception or write to the Practice Manager at PLAHS or email reception@plahs.org.au

The practice will respond to any requests to access or correct your personal information within 7 days.

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

If you have a complaint about privacy at PLAHS:

- Complete a Complaint form on PLAHS website.
- OR see the CEO in person
- OR, if still not satisfied with the response:
 - Contact the Office of the Australian Information Commissioner (OAIC) on 1300 336 002
 - Further information: www.oaic.gov.au

The PLAHS Privacy Policy is available on the PLAHS website and as a brochure. It is regularly reviewed and updated.

How is privacy on the website maintained?

Official – This document is controlled. The only valid and official version is located on Logic; printed or locally saved copies are not considered official.

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

Related Documents

- Privacy Policy
- Information Management Policy
- Client file access and correction procedure
- Compliments, Complaints and Feedback policy
- Information Sharing Guidelines
- Notifiable Data Breach procedure
- PLAHS Email policy
- PLAHS Social Media Policy
- PLAHS Confidentiality Agreement
- PLAHS Code of Conduct
- Acceptable Use of Internet & Email Agreement
- Privacy Act 1988 (Cwlth)
- Privacy Amendment (Enhancing Privacy Protection) Act (2012)
- National Privacy Principles
- HealthCare Identifiers Act 2010 (Cwlth)
- My Health Records Act 2012
- My Health Records Regulation 2012
- My Health Records Rule 2016
- Australian Digital health Agency (ADHA)
- Office of the Australian Information Commissioner

Accreditation Standards

RACGP

- C6.3A
- C6.3B
- C6.3C
- C6.4C

Australian Service Excellence Standards

- C.2.2.1
- C.2.2.7
- C.6.1.7
- C.7.1.6
- C.8.1.3

Review and Amendment

Official – This document is controlled. The only valid and official version is located on Logic; printed or locally saved copies are not considered official.

This policy will be reviewed every three years, or sooner if required by legislative or operational changes. The Document Manager is accountable for initiating the review process, incorporating feedback from audits, breach investigations, and staff consultation. Amendments require approval by the Document Owner.

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.

This policy has been developed or reviewed in accordance with the Planning and Quality Policy.

Policy Development Notes

Date	Activity
2026 03 05	Policy reviewed and updated to new template