

Crane Road Medical Centre Privacy Policy

Current as of 10/07/2025

Background

The objective of this privacy statement is to provide you, our client, with clear information on what personal information is collected/held by us, how your personal information (which includes your health information) is collected and used within Crane Road Medical Centre ("CRMC") and the circumstances in which we may share it with third parties, in accordance with the Privacy Act 1988 (Cth) (the "Act") and the Australian Privacy Principles ('APPs') contained in the Privacy Act.

The APPs set out the way organisations such as CRMC can collect, use, disclose and provide access to personal and sensitive information. CRMC complies with and, wherever possible, strives to exceed the requirements of the Act and complies with all of APPs.

CRMC may, from time to time, review and update this Privacy Statement and our Privacy Policy to take account of new laws and technology, changes to CRMC's operations and practices and to make sure it remains appropriate to the changing legal environment.

Purpose

This statement outlines CRMC's policy on how the organisation uses and manages personal information provided to or collected by it.

This policy is designed to communicate to our clients how we manage personal information and to complement our other policies, such as our Complaints Management policy and Information Security and Management policy.

For more information on privacy, please visit www.oaic.gov.au

Scope

This policy statement covers:

- CRMC procedures
- staff responsibilities
- client consent
- collection, use and disclosure of information
- access to information.

1. Who can I contact about this policy?

For enquiries concerning this policy, you can contact us via email- office@serendibhealthcare.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.

By using our website, you consent to the use of tracking pixels as described in this policy. You can manage your tracking preferences through your browser settings or privacy-focused browser extensions.

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.

We may also collect additional information about you, such as your sexual orientation, gender identity, ethnicity/cultural background, preferred language. This helps us to better understand and assess our services so we can work to improve. This additional information is always **optional** and you do not need to provide this in order to receive care.

4. What personal information is collected?

When you engage with us, we may collect and hold some or all of the following personal information:

- **Contact information:** We may collect information such as your name, address, date of birth, contact number and email address.
- **Payment information:** We may collect information from you in order to facilitate payment for services.
- **Medical / Health information:** We may collect health or medical information that is relevant to our services, which may include medical or health records, medical history, medicines, allergies, and adverse reactions immunisations, social history, family history and risk factors
- **Other information:** such as Medicare number (where available) for identification and claiming purposes, as well as healthcare identifiers numbers and/or health fund details.

If you choose **not** to provide the information that is critical to the services you are seeking, we may not be able to provide you with the services, resources and other tools that you may require.

When collecting personal information, CRMC will take reasonable steps to make an individual aware of:

- What CRMC is and how to contact us; and
- The purpose(s) of the collection; and
- Consequences (if any) to the individual of non-collection; and
- How to gain access to the information; and
- Why the information is collected; and
- To whom (if anyone) CRMC may disclose the information; and
- Any law or court/tribunal order that requires the information to be collected; and
- The consequences (if any) to the individual if all or part of the information is not provided; and
- CRMC's complaint handling process; and
- Any potential overseas disclosure and, if so, the countries to which the disclosure will be made.

CRMC uses fair and lawful ways to collect personal information and only collects personal information that is necessary for our functions or activities. We collect personal information directly from the individual whenever it is reasonable and practicable to do so.

5. Can you deal with us anonymously?

You have the right to 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 (in accordance with APP 2).

Dealing with us anonymously may also affect certain processes such as your ability to claim Medicare rebates or use your private health insurance (where applicable).

6. How is personal information collected?

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

6.1 When you make your first appointment, the practice team will collect your personal and demographic information via your registration. The practice will send the patient, secured information link for new patients once they book in with a doctor to fill their information

6.2 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.

6.3 The practice uses Automated booking software to patients for booking, we also use health link to receive information from third party and send information via health link. Patients' information will be uploaded to Myhealth record for the patients who have given permission to use my health records

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.
- While providing medical services, further personal information may be collected via:
 - electronic prescribing
 - My Health Record
 - online appointments.
- We may also collect information via Automated booking software and Better consult Software

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.

Doctors may use personal devices for medical images. Please see Australian privacy obligations, particularly the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth) on using personal mobile devices for clinical photos provides further information on the considerations required when taking clinical photos on a personal mobile device that belongs to a clinician and is used outside of the workplace. Or

Ask the Healthcare professional who is using the device for more information

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."

6.4 We use tracking technologies, such as third-party tracking pixels, to collect information about your interactions with our website. These technologies help us analyse website traffic, improve user experience, and deliver targeted advertising. The information collected via tracking pixels is used to understand user behaviour, enhance website functionality, and provide content and advertisements tailored to your interests.

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 APPs 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).
- We may share information collected via tracking pixels with third-party service providers who assist us in analysing data and delivering personalised content. These providers are obligated to protect your information in accordance with this policy.

We use Automated, Better Consult, Health link and Health share for patient information gathering or send referrals to other healthcare providers.

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.

- **Email:** office@serendibhealthcare.com.au

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.

When personal information (i.e. data has not been de-identified) is requested by a third-party, specific patient consent is usually needed, and the requesting entity will need to meet the requirements of a humans research ethics committee.

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 Software

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](#).

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

Practitioners working from CRMC (e.g. GPs) may use an AI scribe tool to support them to take notes during their consultations with you. AI scribes use an audio recording of your consultation to generate a clinical note for your health record, assisting with medical documentation and to give you a better experience. Your practitioner is responsible for ensuring the accuracy and completeness of the transcription and will check and edit your record at each consult to achieve this.

An example of an AI scribe service which may be used at CRMC is Lyrebird or Heidi, however other products may be used.

Importantly, if it is used by your practitioner, any AI scribe must:

- comply with Australian Privacy Principles;
- not share any information outside of Australia, and ensure any data stored is done so on local servers within Australia;
- encrypt all information captured and destroy original audio files from its servers immediately once the transcription is complete.
- remove sensitive, personal identifying information as part of the transcription.

CRMC practitioners will only ever use data from an AI digital scribe service to provide health care services to you.

12. How is your personal information stored and protected?

Your personal information may be stored at CRMC in various forms. This may include paper records, electronic records – including within our Practice Management software, Best Practice – as well as visual records (X-rays, CT scans, videos and photos), and audio recordings.

CRMC also uses CCTV at our premises, outside the building and within main/waiting areas, but excluding consulting and treatments rooms.

CRMC stores all digital personal information securely in protected information systems and takes various precautions to prevent misuse, loss, unauthorised access, modification, interference or disclosure by use of various methods including firewalls and passworded access rights to computerised records.

Any paper records or information which contain personal or sensitive information are stored in locked cabinets or offices and will only be accessible to people with a need to access that information.

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.

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

Patients can request their information in writing to the practice by email or letter with their personal identification. Eg copy of driver's licence

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

**Transfer of medical records cost 50 dollars to prepare and send to another practice or third party with written request by the patient. A copy of valid identification should be forwarded with each request.*

The practice will take reasonable steps to correct your personal information where the information is not accurate or up to date. Sometimes, we will ask you to verify your personal information held by the practice is correct and current. You may request we correct or update your information. To do this please contact via **email - office@serendibhealthcare.com.au**

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

We take complaints and concerns regarding privacy seriously. You should express any privacy concerns you may have. We will then attempt to resolve it in accordance with the resolution procedure.

All complains regarding privacy issues should be sent to office@serendibhealthcare.com.au with attention to the practice manager. We will contact you within 7 working days. You can also send in writing to Medical centre or meet the practice manager to discuss the issues in person.

If you do not feel we have resolved your issue You may also contact the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner will require you to give them time to respond before they investigate. For further information visit www.oaic.gov.au or call the OAIC (Office of the Australian Information Commissioner) on 1300 363 992.

15. How is privacy on the website maintained?

At Crane Road Medical Centre, we will not share any personal information through website, and social media, is handled securely and confidentially. Any emails sent through Practice are usually encrypted.

16. Policy review statement

This policy is reviewed regularly, at least every 3 years, to ensure it remains applicable to current practice procedure and complaint with legal requirements.

If any changes are made:

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

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

This policy statement was developed in line with guidance from [Australian Government Office of the Australian Information Commissioner \(OAIC\)](http://www.oaic.gov.au) and the [Royal Australian College of General Practitioners \(RACGP\)](http://www.racgp.org.au).