



# SYNERGY RADIOLOGY APP PRIVACY POLICY

## INTRODUCTION

Synergy Radiology (Synergy) values our patient's privacy and adheres to the thirteen Australian Privacy Principles (APP's) in the Privacy Act to ensure all information kept is collected, stored, retained and used in the appropriate manner under the APP's.

The purpose of the Privacy Policy is to explain:

- The type of personal information that Synergy holds
- How the information is collected and stored by Synergy
- The purpose for which the information is collected, held, used and disclosed
- Matters related to anonymity and pseudonymity
- How our patients can access and correct their personal information
- Complaint procedure should an individual feel that Synergy has breached any of the APP's in any way
- Information that may be disclosed to any overseas recipients

Synergy is committed to ensuring our patient's privacy is maintained at all times by implementing this policy, by staff training and by continual review of processes.

## **ANNONYMITY AND PSEUDONYMITY**

Under the APP's an individual has the right to request to remain anonymous or use a pseudonym.

This is however impractical and Synergy cannot deal with patients requesting to be anonymous or using pseudonyms as this may:

- Impact on diagnosis
- Cause a risk to patient safety and would conflict with the Commission guidelines for Quality and Safety
- Cause a mismatch of patient records
- Create communication breakdown between patient and the treating physician
- Result in examination not being claimed under Medicare or relevant insurance fund

Patients may remain anonymous when they are either calling or visiting the practice to make an enquiry about a service provided by Synergy. Patient details will be requested at time of booking and at time of examination.

## **PERSONAL INFORMATION COLLECTED BY NORWEST MEDICAL IMAGING**

Synergy collects and stores the following information about our patients:

- Name
- Date of Birth
- Gender
- Address
- Contact details including phone number and email
- Medical History
- Results of any prior medical imaging and blood test either performed by Synergy or provided to us by the patient or referring GP
- Billing information
- Medicare details
- Workers compensation, Third Party Insurance, Health Insurance details
- Any other information provide to us by our patients at time of visit including details of any feedback, complaints, suggestion etc.

### **How do we collect Personal Information?**

- Face to face at time of procedure
- Via phone at time of booking
- Via details on referral provided by your GP, Specialist or referring Health Practitioner
- Email / fax

### **How do we use the Information?**

The information we collect is used to ensure that the best health service possible is provided to our patients. The use of medical records and examination history means our Radiologist can provide the most accurate reports possible to your referring physician and allows us the ability to provide comparison reports with previous studies. Storing of your medical Imaging examinations also ensure you do not have any unnecessary or duplicated tests.

We also use your information to deal with Medicare and Insurance Companies for billing and collection of outstanding debts.

## **PERSONAL INFORMATION HELD BY SYNERGY**

### **PATIENTS and PROSPECTIVE PATIENTS**

Information we collect may include the following

- Name, gender, address and contact details
- Medical history
- Medicare, pension, health care card and other government identifiers
- Health services requested or provided and results of these procedures
- Billing information / history
- Expressed wishes about the future provision of health services
- Details of feedback, complaints, incidents and suggestions

### **REFERRERS AND THEIR STAFF**

Information we collect about our referring physicians, their staff and the practices include:

- Name, address, telephone numbers, fax / email address and other contact details
- Details of IT systems
- Medicare provider numbers and billing information
- Area of specialisation
- Employment history
- Service delivery preferences, referral patterns and fees paid by referred patients
- Information gathered by marketing staff during site visits
- Expressed wishes about the future provision of health services
- Details of feedback, complaints, incidents and suggestions

### **STAFF**

Information we collect about our staff may include:

- Name, address, email address and other contact details
- Letters of application / expression of interest and associated correspondence
- Curriculum Vitae / resume
- Referee comments
- Performance records
- Superannuation membership details
- Bank details, tax file number and other employment records

## **EMPLOYMENT APPLICANTS**

Information we may collect and store about employment applicants may include:

- Name, address, email address and other contact details
- Letters of application / expression of interest and associated correspondence
- Curriculum Vitae / resume
- Referee comments

This information is stored for unsuccessful applicants as a future reference to other available positions that may arise.

## **UNSOLICITED INFORMATION**

The majority of personal information collected and stored by Synergy is solicited. On occasions we may receive information that is unsolicited. The principals of this policy will still apply to any such information received.

## **STORAGE and SECURITY OF INFORMATION**

Synergy has procedures in place that ensure your personal information is stored securely and protected from misuse, loss and unauthorised access. Some of the steps taken to ensure this include:

- A secure electronic database of both your personal information (RIS – Radiology Information System) and images (PACS – Picture Archiving and Communication System) of any procedures performed by Norwest Medical Imaging.
- Dedicated back up / archive system of the RIS and PACS systems
- Database only accessible by persons requiring access to the database for the purpose of their employment. Eg Medical Receptionist
- Hard copy storage in secure onsite and offsite storage facilities
- Hard Copy destruction using dedicated Third Party Secure Destruction Company.
- Staff Training regarding use of patient personal information and Privacy policy
- Regular review of policies and procedures.

## **DISCLOSURE OF PERSONAL INFORMATION**

Synergy will need to disclose information about you to external parties as part of your treatment. This includes the Diagnostic Imaging report that goes to your referring medical practitioner. Should you wish the report NOT to go back to your referring Medical Practitioner, please advise us at the time of examination and we will, in accordance with the privacy Act and the APP's take all reasonable steps to comply with these wishes.

We may also need to disclose your information with other parties, which include:

- Consultant Specialist that have been requested to provide further treatment / advise on your medical condition by your GP
- Your representatives, such as guardian or authorised family member
- Insurers such as Medicare, Workers Compensation Insurers, Transport Accident Insurers or Private Health funds
- Where Synergy have been requested under legal summons to provide this information

## **ONLINE ACCESS TO YOUR IMAGES and REPORTS**

Synergy may provide your report to your referring physician via a secure electronic system. The system is encrypted and requires certificates at the referrers end to allow them to de-encrypt the report and download it into their patient management system.

We also provide online access to your images, via a secure website that requires secure login by users. Your referring physician may request access to your images via this method.

We will seek your approval should a third party such as a specialist request access to these images.

You can also choose to have your images sent to you via electronic method, which would mean no hard copy images will be printed. You may use these images as you wish, and may also choose who gains access to these images, by providing them with an email and an access key to the images online. Images are accessed via a secure online cloud.

On your first visit to our practice, your permission to use, send and disclose your records via these secure online / electronic methods will be sought. Information will only be sent to your referring physician or treating specialist. At any time, should you wish to withdraw this permission, you may contact the practice to revoke the permission.

## **ACCESS TO YOUR INFORMATION**

The best way for you to obtain your medical Imaging results is via your Referring Practitioner. They will have your complete history and be best placed to diagnose you based on the clinical information they have and the Imaging information provide by us in the radiology report. The radiology report on its own may not provide all the answers and may need to be interpreted and explained by your doctor.

You may request access to your information and Synergy will provide this information, except in certain circumstances where the request will be denied due to legal reasons as set out in the Privacy Act, including if the request is vexatious or if a criminal proceeding is under way.

## **ACCURACY OF INFORMATION HELD**

Synergy takes all reasonable steps to ensure the information kept is accurate and up to date. The accuracy of the information depends on the information you provide to us. Staff will check information at subsequent visits, to ensure it is still current. We recommend that you:

- Inform us of any errors in the information we hold; and
- Inform us of any changes to your information such as name, address and Medicare number.

Personal information is stored securely and your privacy is important to us. Accurate information will ensure our specialists have all the information, including your prior imaging to ensure the best possible service is provided with the most accurate imaging report possible.

## **DISCLOSURE OF INFORMATION TO THIRD PARTIES LOCATED OVERSEAS**

In order for Synergy to provide the most efficient service to our patients, it may be required that information is disclosed and accessed by third parties overseas. In such circumstances, Synergy will ensure that any party accessing this information will adhere to the same standards that Synergy does and comply with the standards set out in the APP's.

## **DIRECT MARKETING**

Synergy may use personal information for marketing directly related to our services. All marketing communication includes instructions on how to opt out of future communications.

An individual may advise us that they do not wish to receive direct marketing from us at any time by contacting the privacy officer.

We will NOT disclose your personal information to a third party for any marketing purposes.

## COMPLAINTS

Should you feel that Norwest Medical Imaging has misused your information or breached the APP's, then you may make a complaint. Complaints should be lodged in writing to the Privacy Officer at the address below. We investigate the complaint and endeavour to respond as quickly as possible. A response will be made within 14 days. If you feel your complaint has not been dealt with correctly or you are unsatisfied with the response, you may lodge a complaint to the Office of the Australian Information Commissioner (OAIC)

Norwest Medical Imaging Privacy Officer

Peter Bonovas

14/6 Meridian Pl

Bella Vista, NSW, 2153

P – 8889 6300

E – [pbonovas@nwmi.com.au](mailto:pbonovas@nwmi.com.au)

Office of the Australian Information Commissioner (OAIC)

GPO Box 2999

Canberra ACT

2601

P: 1300363992

E: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

W: <http://www.oaic.gov.au/>

OAIC Online Privacy Complaint form

<https://forms.business.gov.au/aba/oaic/privacy-complaint/>