

## HS21 – AMS PRIVACY POLICY

This policy includes the following sections and should be read in conjunction with all relevant North Coast Aboriginal Corporation for Community Health (NCACCH) policies and procedures.

### 1.0 Purpose

The purpose of this policy is to outline how NCACCH Aboriginal Medical Services (AMS) collects, uses, stores, and protects personal health information in compliance with the Privacy Act 1988 and the Australian Privacy Principles (APPs). This policy ensures that NCACCH AMS provides culturally safe, transparent, and respectful management of patient information, consistent with the needs and rights of Aboriginal and Torres Strait Islander clients.

This policy supports NCACCH AMS's commitment to empowering patients through informed consent, maintaining privacy, and ensuring that personal health information is used appropriately to deliver high-quality healthcare services. It also reinforces the importance of patient trust by clarifying how secondary use of personal health information supports service delivery, management, and continuous improvement.

### 2.0 Policy Protocols

- **Privacy Policy Framework:**
  - NCACCH maintains a Privacy Policy in compliance with the *Privacy Act 1988* and the APPs, which has been adapted from the RACGP privacy policy template to reflect NCACCH-specific practices.
  - The Privacy Policy is displayed in patient-accessible locations, including the waiting room, practice information sheet, and NCACCH's website, and is available upon request.
- **Collection of Personal Health Information:**
  - Patients are informed of how their personal health information is collected, used, and disclosed through:
    - Practice privacy statements in patient information sheets, brochures, and signage.
    - New Patient Information Forms, which incorporate the practice privacy statement.
    - Verbal communication when appropriate during consultations.
  - Patient consent to collect, use, and disclose personal health information is obtained at the first visit through the New Patient Information Form, which is scanned into their health record.
- **Primary and Secondary Use:**
  - Personal health information is collected for the primary purpose of providing health services to patients.
  - Secondary use or disclosure of personal health information is permitted when directly related to the primary purpose, provided the patient has a reasonable expectation of such use. Secondary purposes include:

- Health service management, funding, monitoring, and complaint-handling.
- Planning, evaluation, and accreditation activities.
- Patients are informed of secondary purposes via:
  - Discussions during consultations with general practitioners.
  - Privacy statements displayed in the practice or on the practice website.
  - New Patient Information Forms signed at the time of registration.
- **Patient Rights and Consent:**
  - NCACCH Aboriginal Medical Services respects the rights and needs of all patients.
  - Patients have the right to opt out of secondary use of their personal health information by refusing consent. Negative views or opposition expressed by a patient regarding proposed secondary use are documented in their health record.
  - Prior to signing consent for the release of personal health information, patients are advised that a full copy of the Privacy Policy is available upon request.
- **Information Sharing:**
  - Consent for the transfer of personal health information to other healthcare providers (e.g., treating practitioners and specialists) is obtained at the patient's first visit and documented in the health record.
- **Patient Awareness:**
  - NCACCH ensures patients are informed about the practice's collection and management of personal health information through:
    - Signage at reception.
    - Brochures in the waiting area.
    - Practice information sheets.
    - New Patient Information Forms.
    - Verbal communication when appropriate.
    - The practice website.

### 3.0 Definitions

- **Personal Health Information:** Information or opinions about an individual's health, healthcare provided, or other personal details collected for the purpose of delivering healthcare services.
- **Primary Purpose:** The main reason for collecting personal health information, which is to provide healthcare services.
- **Secondary Purpose:** A use or disclosure of personal health information that is directly related to the primary purpose and within the reasonable expectations of the individual.

### 4.0 Responsibilities

Directors

CEO

Senior Managers

All staff  
Contractors  
Consultants

## 5.0 References

- *Privacy Act 1988*
- Australian Privacy Principles (APPs)
- RACGP Standards for General Practices, 5th Edition
  - **Core Standard 2 – Patient rights and needs**
    - **Criterion C2.3 – Privacy and confidentiality of health information:** Ensures the protection of personal health information and adherence to privacy standards.
    - **Core Standard 6 – Safety, quality improvement, and risk management**
      - **Criterion C6.4 – Information security:** Addresses the secure management and storage of patient health information.
    - **GP Standard 1 – Communication with patients**
      - **Criterion GP1.1 – Providing information about the practice:** Ensures patients are informed about the practice’s policies, including the collection, use, and sharing of their personal health information.

## 6.0 Related policies/procedures

## 7.0 Related forms

- New Patient Consent Form