

(Also trading as Doctors' Health in Queensland)

Privacy Policy

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1. Purpose

DHAS(Q) is a not-for-profit charitable organisation that is committed to doctors' health and wellbeing. The DHAS(Q) Privacy Policy establishes the organisation's commitment to comply with the Australian Privacy Principles, as set out in the Privacy Act 1988 (Cth). The policy will provide a guideline for all persons associated with DHAS(Q), particularly Management Committee members, employees, contractors and volunteers, to ensure the privacy and confidentiality of DHAS(Q) clients.

2. Introduction

DHAS(Q)'s ability to effectively deliver doctors' health services is directly dependent on the ability of their Management Committee members, employees, contractors and volunteers to manage different kinds of sensitive information responsibly. Consequently, DHAS(Q) places the utmost importance on the confidentiality and privacy of clients, while operating within the legal and regulatory framework that governs our core business.

3. Definitions

The terms relevant to this privacy policy reflect the requirements of the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

While the definition of privacy and confidentiality may be distinct, when it comes to health information, DHAS(Q) treats all information in a confidential and private manner and therefore this policy covers both privacy and confidentiality issues together.

4. Principles

The maintenance of privacy and confidentiality of health information and all identifying information is a key responsibility in all health organisations. DHAS(Q) only collects personal information to provide a service to that individual or for the business activities directly related to DHAS(Q), such as financial claims and payments, practice audits, accreditation and business processes such as follow-up with clients.

DHAS(Q) recognises the essential right of individuals to have their information administered in ways that they would reasonably expect – protected on one hand, and made accessible to them on the other. These privacy values are reflected in and supported by the core values and philosophies.

DHAS(Q) further recognises the importance of maintaining privacy and confidentiality of details related to other stakeholders who engage with our service, including information related to members of the DHAS(Q) Management Committee, GP On Call Panel and Specialist Panel.

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5. Policy statement

DHAS(Q) receives a range of personal information for the purposes of optimal service delivery and sound human resources management practices.

DHAS(Q) will place appropriate, lawful restrictions on accessing personal information, and ensure that all associated persons understand the importance of, and consistently apply, these restrictions. DHAS(Q) recognises that Australian privacy law limits the use of personal information for direct marketing of goods and services. DHAS(Q) does not provide personal details other organisations as mailing lists or for other purposes without individual consent. DHAS(Q) may use contact information for direct individual communications as required and to inform stakeholders about updates, publications, functions and events. If you no longer wish to receive some or all of this material, you are welcome to contact us at ahasq@amaq.com.au.

The confidentiality and privacy of DHAS(Q) clients is of utmost concern to the organisation. The expectation of confidentiality and privacy is the same as what is afforded to patients in a doctor-patient relationship. There will be rare lawful instances where client confidentiality may be breached in accordance with respective state and federal legislation, e.g. court subpoena.

Providers of care to DHAS(Q) clients are cognisant of the fact that the medical community is small in Queensland, so must ensure the client's explicit consent before seeking or making referrals. No information relating to a client will be discussed without their permission. All persons should avoid using any identifiers in public spaces, including names, specialty or practice location.

In summary, DHAS(Q) will:

- Collect only information which the organisation requires for its primary function;
- Ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered;
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- Store any personal information securely, protecting it from unauthorised access; and
- Provide stakeholders with access to their own information upon request and allow the right to seek its correction.

5.1 Collection of Information

Information that may be collected depends upon the purpose and engagement of that stakeholder or client with the service.

In general, DHAS(Q) only holds the contact information provided directly to the organisation to enable the delivery of a service or engagement with that stakeholder.

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General stakeholder information may include business address and telephone number, personal address and telephone number, post office box details, information about your occupation, credit card and transactional information, personal details such as date of birth and other personal information such as dietary preferences. Client health information is kept in a de-identified format unless an individual provides specific consent to the contrary. In this situation, DHAS(Q) may collect: names, date of birth, addresses, contact details, demographic information and medical information, including: medical history, medications, allergies, adverse events, immunisations, social history, family history and risk factors.

DHAS(Q) acknowledges that people have the right to deal with our organisation anonymously or under a pseudonym unless it is impracticable to do so.

5.2 Storage of Information

DHAS(Q) conforms with the Australian Privacy Principles and [Privacy Act](#) (1988) by ensuring that all personal information is stored securely. All electronically stored information has password protection, and physical documents are stored in a locked cabinet. Only those who need to access the file to enable service delivery will be able to access this information. The Document Management Policy and Procedure outlines DHAS(Q)'s standard processes for securely managing confidential documents.

5.3 Sharing Information

DHAS(Q) will only share personal information with third parties such as other health care providers with the client's consent. DHAS(Q) will only share information without consent when required or authorised by law or statutory requirement (e.g. court subpoena). At no time will personal information be used for marketing goods or services without express consent.

DHAS(Q) will not send personal information about an individual outside Australia without obtaining the consent of the individual, or otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

5.4 Requesting Personal Information

DHAS(Q) acknowledges that individuals may request access to their personal records. If individuals wish to access such a record, then this request must be made in writing and DHAS(Q) will undertake to respond within a reasonable timeframe of 30 days. If requested in writing, DHAS(Q) will take all reasonable steps to correct any personal information that is not accurate or up-to-date.

5.5 Internet, Social Media and Emails

DHAS(Q) cannot ensure the security of all information transmitted to us over the internet and you do so at your own risk. Privacy of clients is always our priority in our communications, internally or externally, including emails. Social media is not used for personal communication with DHAS(Q) clients.

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Our website may contain links to other websites. These links are provided for your convenience only and links to third party websites do not constitute sponsorship, approval or endorsement of these websites. We are not responsible for the privacy practices of these other websites and recommend that users be aware, when leaving our website as this privacy policy applies solely to information collected by DHAS(Q).

5.6 Phone Calls

Staff or volunteers making calls or answering the DHAS(Q) office phones will confirm who they are talking to prior to confidential discussions. Phone calls are made in quiet, private locations.

5.7 Privacy of the DHAS(Q) Offices

The DHAS(Q) offices are located at AMA House, 88 L'Estrange Terrance, Kelvin Grove, QLD, 4059. Discussions regarding sensitive information, in person or using telecommunications, are always conducted in manner that protects the client's privacy. The office is secured when unattended.

5.8 Concerns and Complaints

All concerns and complains regarding privacy are taken seriously. Concerns or complaints should be submitted in writing and forward to the Office Manager: ahasq@amaq.com.au . DHAS(Q) will attempt to resolve the matter in a timely manner, and will ensure a response is received within 30 days regarding how this matter is being progressed. If the concerns have not been satisfactorily addressed, a meeting will be arranged to discuss further. After this process, complaints can be referred to the Office of the Australian Information Commissioner via:
Email: enquiries@oaic.gov.au Tel: 1300 363 992 Fax: +61 2 9284 9666

5.9 Periodic Changes to our Privacy Policy

DHAS(Q) plans to ensure this privacy policy remains current and it is therefore is subject to change. DHAS(Q) will modify this policy at different times with such modifications being effective immediately when available on our website. You are encouraged to review our privacy policy periodically.

6. Related policies, documents and legislation

This policy has been developed with respect to the following policies, documents and legislation.

6.1 Policies

- DHAS(Q) Code of Conduct
- Social Media Policy
- Board Charter

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6.2 Documents

Nil listed

6.3 References including Legislation

Privacy Act 1988 (Cth) <https://www.oaic.gov.au/privacy-law/>

Australian Privacy Principles <https://www.oaic.gov.au/privacy-law/privacy-act/australian-privacy-principles>

Guide to Developing an APP privacy policy <https://www.oaic.gov.au/agencies-and-organisations/guides/guide-to-developing-an-app-privacy-policy>

AHPRA (2014). Good Medical Practice: A Code of Conduct for Doctors in Australia. Section 3.4 Confidentiality & Privacy. Retrieved from <http://www.medicalboard.gov.au/Codes-Guidelines-Policies/Code-of-conduct.aspx>

7. Authorisation

This policy is available on the website and approved by the President, DHAS(Q).