



1.1. Privacy and confidentiality obligations

1.1.1. Policy

All information collected by this practice is deemed to be private and confidential. The right of every patient is respected.

This practice complies with federal and Queensland state privacy regulations including the *Privacy Act 1988* and *Privacy Amendment (Enhancing Privacy Protection) Act 2012* as well as complying with standards set out in the *RACGP Handbook for the management of health information in general practice (3rd edition)*. Available in Practice Managers office.

Under no circumstances are members of the practice team to discuss or in any way reveal patient conditions or documentation to unauthorised staff, colleagues, other patients, family, or friends, whether at the practice or outside it, such as in the home or at social occasions. This includes patient's accounts, referral letters or other clinical documentation.

General practitioners and other practice team members are aware of confidentiality requirements for all patient encounters and recognise that significant breaches of confidentiality may provide grounds for disciplinary action or dismissal.

Every member of the practice team is aware of our Privacy Policy and has signed a privacy agreement as part of their terms and conditions of employment or contract. This privacy statement continues to be binding even after the employment or contract has terminated.

1.1.2. Procedure

All members of the practice team are issued with the practice's Privacy Policy and sign a privacy statement as part of their terms and conditions of employment or contract. The policies and procedures of the practice are further explained during the induction of new practice team members, and the induction form is signed by the new team member as confirmation that they understand and accept their obligations in relation to patient privacy and the confidentiality of personal health information.

1.2. Communication with patients by electronic means

1.2.1. Policy

Our practice is mindful that even if patients have provided electronic contact details, they may not be proficient in communicating via electronic means and patient consent needs to be obtained before engaging in electronic communication. Electronic communication includes email, facsimile, social media direct messages and Short Message Service (SMS).

Communication with patients via electronic means is conducted with appropriate regard to privacy.



1.2.2. Procedure

Our practice's primary reason for communicating electronically to patients is to issue appointment reminders and we verify the correct contact details of the patient at the time of the appointment being made using our 3 patient identifiers.

Whilst not encouraged, our practice allows patients an opportunity to obtain advice or information related to their care by electronic means, but only where the general practitioner determines that a face-to-face consultation is unnecessary and that communication by electronic means is suitable. Our practice will only provide information that is of a general, non-urgent nature and does not initiate electronic communication (other than SMS appointment reminders) with patients. Any electronic communication received from patients is also used as a method to verify the contact details we have recorded on file are correct and up to date.

Communication with patients via electronic means is conducted with appropriate regard to privacy. Before obtaining and documenting the patient's consent, patients are fully informed through information contained in our patient privacy information brochure, and through discussion with our Practice Manager, our administration team and/or clinical team members, of the risks associated with electronic communication in that the information could be intercepted or read by someone other than the intended recipient.

When an email message is sent or received during a person's duties, that message is a business communication and therefore constitutes an official record. Patients are informed of any costs to be incurred because of the electronic advice or information being provided, and all electronic contact with patients is recorded in their health record.

All members of the practice team are made aware of our policy regarding electronic communication with patients during induction and are reminded of this policy on an ongoing basis. They are made aware that electronic communications could be forwarded, intercepted, printed, and stored by others. Each member of the practice team holds full accountability for emails sent in their name or held in their mailbox, and they are expected to utilise this communication tool in an acceptable manner. This includes, but is not limited to:

- Ensuring correct email address is used every time by sending a test email for the first instance
- Refraining from responding to unsolicited or unwanted emails
- Deleting hoaxes or chain emails
- Email attachments from unknown senders are not to be opened, and the Practice Manager is to be notified
- Virus checking all email attachments
- Maintaining appropriate language within electronic communications
- Ensuring any personal opinions are clearly indicated as such, and
- Confidential information (ie: patient information) must be encrypted using Zip 7 and a password.

Our practice reserves the right to check an individual's email accounts as a precaution to fraud, viruses, workplace harassment or breaches of confidence by members of the practice team. Inappropriate use of the email facility will be fully investigated and may be grounds for dismissal.

Due to the complexities of email security, Clifton Medical Practice does not communicate with patients via email for the purpose of making appointments, requesting repeat scripts or repeat referrals.



For all clinical related enquiries, patients are requested to make an appointment either by phoning the practice or making an appointment online via our website online booking system.

Emails are monitored during normal business hours; however, this does not constitute a timely or immediate response to patient-initiated emails.

All patient related emails are retained in the patient clinical file in accordance with record keeping requirements.

The practice uses an email/facsimile disclaimer notice on outgoing correspondence that are affiliated with the practice stating: **Private & Confidential:** *This e-mail/fax message is intended only for the addressee and may contain legally privileged and confidential information. If you are not the addressee, you are notified that any copying, transmission, or distribution of this email is strictly prohibited. The legal privilege and confidentiality attached to this email is not waived, lost, or destroyed by reason of a mistaken delivery to you. If you have received this email in error, please notify me immediately by telephone and return the original email to me at my address. Thank you.*

1.3. Using social media in our practice

1.3.1. Policy

'Social media' is defined as online social networks used to disseminate information through online interaction.

Regardless of whether social media is used for business related activity or for personal reasons, the following standards apply to members of our practice team, including general practitioners.

Practitioners and team members are legally responsible for their postings online. Practitioners and team members may be subject to liability and disciplinary action including termination of employment or contract if their posts are found to be in breach of this policy.

1.3.2. Procedure

The CCHS Executive Director – Community is appointed as our social media officer with designated responsibility to delegate access to Clifton Community Health Service Facebook site. The Practice Manager has access to the CCHS Facebook account and is responsible for monitoring the practice(s) social media accounts. All posts on the practice's social media can only be added by the Practice Manager.

When using the practice's social media, all members of our practice team will not:

- Post any material that:
 - Is unlawful, threatening, defamatory, pornographic, inflammatory, menacing, or offensive
 - Infringes or breaches another person's rights (including intellectual property rights) or privacy, or misuses the practices or another person's confidential information (e.g. do not submit confidential information relating to our patients, personal information of staff, or information concerning the practice's business operations that have not been made public)
 - Is materially damaging or could be materially damaging to the practice's reputation or image, or another individual
 - Is in breach of any of the practice's policies or procedures
- Use social media to send unsolicited commercial electronic messages, or solicit other users to buy or sell products or services or donate money



- Impersonate another person or entity (for example, by pretending to be someone else or another practice employee or other participant when you submit a contribution to social media) or by using another's registration identifier without permission
- Tamper with, hinder the operation of, or make unauthorised changes to the social media sites
- Knowingly transmit any virus or other disabling feature to or via the practice's social media account, or use in any email to a third party, or the social media site
- Attempt to do or permit another person to do any of these things:
 - Claim or imply that you are speaking on the practice's behalf, unless you are authorised to do so
 - Disclose any information that is confidential or proprietary to the practice, or to any third party that has disclosed information to the practice
- Be defamatory, harassing, or in violation of any other applicable law
- Include confidential or copyrighted information (ie. music, videos, text belonging to third parties), and
- Violate any other applicable policy of the practice.

All members of our practice team must obtain the relevant approval from our social media officer prior to posting any public representation of the practice on social media websites. The practice reserves the right to remove any content at its own discretion.

Any social media must be monitored in accordance with the practice's current policies on the use of internet, email, and computers.

Our practice complies with the Australian Health Practitioner Regulation Agency (AHPRA) national law and takes reasonable steps to remove testimonials that advertise our services (which may include comments about the practitioners themselves). Our practice is not responsible for removing (or trying to have removed) unsolicited testimonials published on a website or in social media over which we do not have control.

Social networking sites have varying levels of security and as public sites; all are vulnerable to security breaches. All Clifton Community Health Service employees have a responsibility to maintain the professional level of conduct expected of you. Employees are not to identify themselves as an employee of the company on any personal blogs and other personal posts. Some social sites provide for members to write recommendations or referrals for friends/associates. If an employee does this as a representative of the company, it may give the appearance that the company endorses the individual being recommended. For that reason, this policy prohibits employees from making such recommendations or referrals.

The practice's relationships with clients, customers and partners are valuable assets that can be damaged through a thoughtless comment. Even a positive reference could be picked up by a competitor and used to our disadvantage. Employees are not to reference any clients, customers, or partners under any circumstances.

Likewise defamatory comments regarding a co-worker can be considered libellous and may constitute workplace harassment or bullying. Defamatory statements can lead to lawsuits; at the very least it could result in disciplinary action and possible termination of employment. We are



committed to providing our employees with a healthy and safe work environment that is free from bullying. Breach of any part of this policy will result in disciplinary action which may include termination of employment.

Social media activities internally and externally of the practice must be in line with this policy.