



## *Beth Kavanagh Naturopathy* BHSc ANTA

### **CLIENT CONFIDENTIALITY/PRIVACY**

#### **Statement of Purpose**

Client information is collected for the purpose of provision of care. Beth Kavanagh Naturopathy is committed to maintaining the security of all client information.

The purpose of this policy is to ensure that all client information is private and confidential. Client privacy must be maintained in accordance with all federal and local / state regulations.

#### **Definitions**

#### **Policy**

Under no circumstances will employees of Beth Kavanagh Naturopathy discuss, or in any way reveal client information to unapproved employees, colleagues, other clients, family or friends, whether at the practice or outside of it, such as in the home or at social occasions. This includes client accounts, appointments, referral letters or any other clinical documentation.

Beth Kavanagh Naturopathy is aware of confidentiality requirements for all client encounters and understands that significant breaches of confidentiality may provide grounds for disciplinary action or dismissal.

#### **Procedure**

Beth Kavanagh Naturopathy is a sole trader consisting of one Practitioner/Owner providing naturopathic care to clients within Australia. This document provides details on how personal and sensitive information is stored and used. This document is for clients.

Beth Kavanagh Naturopathy adopts the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The NPPs govern the way in which the personal information provided is collected, used, disclosed, stored, secured and disposed of.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at [www.aaic.gov.au](http://www.aaic.gov.au)

What is Personal Information and why does Beth Kavanagh Naturopathy collect it?:

Personal Information is information or an opinion that identifies an individual. Examples of Personal Information you may provide to Beth Kavanagh Naturopathy include:

- your name, address, email address, phone numbers.



## *Beth Kavanagh Naturopathy* BHSc ANTA

This Personal Information is obtained when you as a client access our public pages or contact the clinic and provide personal information as part of a query, booking, form submission or invoice payment.

The Personal Information collected from you is collected as part of providing healthcare practitioner services, and is used purely in the provision of providing those services. Personal Information you provide is not used for marketing, or advertising purposes.

Sensitive Information:

Sensitive Information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive Information you may provide Beth Kavanagh Naturopathy includes:

- your health history information.

The Sensitive Information provided by you, is used only for the provision of services by the healthcare practitioner.

Training and Orientation of Employees:

The practitioner has been trained regarding to understand and accept the obligations in relation to client privacy and the confidentiality of information. Beth Kavanagh Naturopathy has developed and reviews policies and procedures regarding this.

Third Parties:

Personal Information and Sensitive Information is stored in secure phone, email, or cloud storage while it is being used by the practitioner as part of service provision for the client. The final version of the record is stored within the electronic Client Record Management (CRM) system including information collected from you as a client.

Personal Information or Sensitive Information is not collected from third parties.

Disclosure of Personal Information and Sensitive Information:

Client information is treated as confidential at all times.

There are only three exceptions where it may be required by law to disclose the Personal Information you have provided to a third party:

- If subpoenaed by a court to provide documentation.
- If there is reason to suspect the possibility of harm to the client or another person. If there is felt to be a risk of harm, the mental health worker may be contacted while the client is still in room or, if no mental health, the CAT team for acute emergency.
- If consent has been received from the client to provide the information to another party



## Beth Kavanagh Naturopathy BHSc ANTA

Examples of notifications to another party include:

- Suspicion of a notifiable illness (not a legal obligation but client will be referred to their medical practitioner)
- As a result of an adverse reaction eg notification to the manufacturer/TGA/ANTA (see Safety PP).

The Personal Information stored within the CRM may be disclosed in a number of circumstances including the following:

- The healthcare practitioner may choose to integrate with third party services. These include: payment gateway providers, email service providers, financial and accounting providers (Xero), our upstream communications providers (Mailgun, Twilio, and FoneDynamics), and external calendar providers (Cronofy, Google, Apple, Microsoft).

The healthcare practitioner controls which services the Personal Information is disclosed to and which information is disclosed.

Security of Personal Information and Sensitive Information:

Medical records are kept electronically and secure with password protection.

Antivirus software is present and up to date at all times.

The Personal Information you provide is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure. A number of safeguards are used to protect Personal Information including:

- Username and password access to the CRM platform.
- Encryption of all Sensitive Information at rest using AES-256 bit encryption.
- Encryption of all Sensitive Information in transit using 256 bit SSL encryption.
- Encryption of all Personal Information in transit using 256 bit SSL encryption.
- Access logging and auditing of requests to access and modify Personal Information and Sensitive Information.
- Firewall and IP traffic monitoring for suspicious or malicious traffic.

If transport of electronic devices is required, they are to remain with the practitioner and not be left in any unsupervised location.

It is mandatory to report to the client and OAIC any breach of privacy if likely to cause serious harm and unable to be rectified.

Use of Cookies:



## *Beth Kavanagh Naturopathy* BHSc ANTA

Cookies may be utilised on Beth Kavanagh Naturopathy public pages. When you consent to cookies they may be used to do the following:

- Deliver core services to you including online booking, forms, invoice payments etc.
- Monitor page performance and network capacity.

Cookies are not utilised for marketing or advertising purposes.

Access to your Personal Information and Sensitive Information:

Medical records are only to be accessed by the practitioner for the purpose of providing treatment to the client.

Requests for access to information can be made under Freedom of Information. A request must be made in writing, dated and signed by the client. An administrative fee to cover costs may apply and the client will be notified of this before costs are incurred. The information must be provided within 30 days of receipt of request.

A request to access the Personal Information and Sensitive Information should be lodged with the healthcare practitioner who will provide further information and advice on the process to be followed.

Disposal of your Personal Information and Sensitive Information:

Hard copy documents are shredded immediately after being saved electronically.

When the Personal Information and Sensitive Information provided is no longer needed for provision of services, reasonable steps will be taken to destroy or permanently de-identify your Personal Information and Sensitive Information.

If the client-practitioner relationship is officially terminated the Personal Information and Sensitive Information you have provided is retained for a minimum of 7 years

### **Policy Updates**

This Policy may change from time to time and is available by emailing [bethkavanaghnaturopathy@gmail.com](mailto:bethkavanaghnaturopathy@gmail.com).

### **Policy Complaints and Enquiries**

If you have any queries or complaints about this Policy, please use the email above or contact via:

[www.bethkavanaghnaturopathy.com.au](http://www.bethkavanaghnaturopathy.com.au)

0419 007 768



*Beth Kavanagh Naturopathy* BHSc ANTA

**Related policies, forms and legislation**

Privacy and Personal Information Act 1998

[http://webcache.googleusercontent.com/search?q=cache:zwS7f0AnITUJ:scu.edu.au/healthclinic/download.php%3Fdoc\\_id%3D14543%26site\\_id%3D212%26file\\_ext%3D.pdf+%&cd=4&hl=en&ct=clnk&gl=au](http://webcache.googleusercontent.com/search?q=cache:zwS7f0AnITUJ:scu.edu.au/healthclinic/download.php%3Fdoc_id%3D14543%26site_id%3D212%26file_ext%3D.pdf+%&cd=4&hl=en&ct=clnk&gl=au)