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Privacy and pharmacy: What does it mean for you?

In common with many other health care professionals, pharmacists have privileged access to personal and confidential consumer information.

With this privilege comes considerable responsibility and accompanying obligations under the Commonwealth *Privacy Act 1988* including those reforms contained in the Commonwealth *Privacy Amendment (Enhancing Privacy Protection) Act 2012*. For example, health information is defined in the Privacy Act as 'sensitive information' and, as such, attracts additional privacy protections compared to other types of personal information.

The new privacy regime takes effect from 12 March 2014, including the adoption of a single set of 13 Australian Privacy Principles (APPs) which will apply to Government agencies and private sector organisations ('APP entities') which include community pharmacies, pharmacist consultants and other pharmacy businesses. The APPs set out what can and cannot be done with a consumer's personal and health information. Details of each APP are available from www.oaic.gov.au.*

While compliance with the Commonwealth Privacy Act has always been compulsory, pharmacists should be aware that as part of the changes, the Office of the Australian Information Commissioner now has enhanced powers, including the ability to assess privacy performance and the seeking of penalties for serious or repeated breaches of privacy.

Be aware that the consumer owns their personal and health information and that you and your pharmacy staff are the custodians of the consumer's information. If in doubt always seek the consumer's consent before using or disclosing their personal or health information.

Remember, privacy is your responsibility.

**The topics and issues covered in this document are not exhaustive. The Office of the Australian Information Commissioner (OAIC) web site (www.oaic.gov.au) should be consulted where further comprehensive information is required.*



Scope of this document

This document is intended to provide guidance to pharmacists including owners or managers of a pharmacy, employee pharmacists, intern pharmacists, pharmacy students, pharmacist consultants (contracted to a pharmacy or operating as an individual health service provider) and pharmacy assistants.

Provisions under the privacy legislation do not alter pharmacists' obligations in relation to the collection, use or disclosure of personal information under other laws for purposes such as the supply of specific therapeutic products or mandatory reporting of registered health practitioners.

This document is a brief summary provided for information purposes only and does not purport to exhaustively deal with every privacy issue a pharmacist or employee may face, nor with every element of privacy law. The content is not, and is not intended to be, legal advice.



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March 2014

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Summary of key privacy obligations for pharmacy

The following table summarises the key obligations for pharmacists/pharmacies under several APPs. Other APPs are also referred to in the bullet points where relevant. Links to templates of relevant privacy forms are provided in the right hand column.

OPENNESS AND TRANSPARENCY (APP 1)	PRIVACY FORM TEMPLATES
Ensure there is a privacy policy in place.	Our privacy policy: respecting your privacy
Establish a process for handling enquiries and complaints about privacy from consumers receiving a health service from you or your pharmacy.	Complaint form
COLLECTION OF CONSUMERS' INFORMATION (APP 3)	
Only collect necessary information from consumers. Note that a higher standard applies to the collection of 'sensitive information' which includes a consumer's health information.	Collection and disclosure of information (for the provision of health services)
Inform consumers why you are or your pharmacy is collecting information about them and to whom else the information may be provided (APP 5).	Collection and disclosure of information (for direct marketing purposes)
Consumers have the option to interact with you or your pharmacy anonymously or pseudonymously. Some limited exceptions apply (APP 2).	
You are and your pharmacy is required to take reasonable steps to ensure that the personal or health information you collect and hold is accurate, current and complete (APP 10).	
You or your pharmacy must take reasonable steps to protect personal or health information you collect from misuse, interference and loss and unauthorised access, modification or disclosure (APP 11).	
USE AND DISCLOSURE OF CONSUMERS' INFORMATION (APP 6)	
As a general rule, a consumer's information may only be disclosed for the primary purpose for which it was collected.	
Seek the consumer's consent before using or disclosing their personal or health information.	Collection and disclosure of information (for the provision of health services)
Particular attention is required to the use or disclosure of a consumer's personal or health information for direct marketing activities, including those by you or your pharmacy (APP 7).	Collection and disclosure of information (for direct marketing purposes)
Similar attention is required to the use or disclosure of a consumer's information in relation to pharmaceutical company patient support programs.	
Care is required where a consumer's personal or health information is transferred overseas (APP 8). For example, where a consumer's information is transferred to a cloud service provider located overseas for the limited purpose of storing and managing this information, you or your pharmacy should ensure that the contract with that provider binds them to not use or disclose the consumer's personal or health information.	
APP 9 governs the adoption, use or disclosure of government-related identifiers (e.g. consumer's Medicare number) or Individual Healthcare Identifier (used in the national Electronic Health Record system). Pharmacists, together with other healthcare providers, may adopt, use and disclose such identifiers in certain limited circumstances, for example in some jurisdictions in the sale of products containing pseudoephedrine (APP 9).	
ACCESS BY CONSUMERS TO THEIR INFORMATION (APP 12 AND APP 13)	
A consumer has a general right of access to information that you hold or your pharmacy holds about them. You should provide the capacity for consumers to access and, where necessary, correct their own information.	Request for access

Key changes relevant to pharmacists/pharmacies

SUBJECT (RELEVANT APP)	KEY CHANGE
Organisation's privacy policy (APP 1)	More prescriptive requirements and greater expectations around steps taken in implementing and promoting the privacy policy. See under <i>Privacy dos and don'ts</i> .
Use of pseudonyms (APP 2)	Individuals have the option of dealing with you or your pharmacy anonymously (existing requirement) or by using a pseudonym. Exception applies where you or the pharmacy is required or authorised under law or a court/tribunal order to deal with the individual, or it is impracticable to deal with individuals in this manner.
Receiving unsolicited personal information (APP 4)	This new principle relates to situations when you or your pharmacy receives unsolicited personal information. If you could not have collected the unsolicited personal information (e.g. the information does not relate to the functions or activities of a pharmacist or pharmacy), you should within a reasonable period destroy or de-identify the information. For example, if you receive bank records of a person known to you or your pharmacy, you should advise or confirm with the sender of this error and destroy the information promptly.
Notification of collection of personal information (APP 5)	You or your pharmacy must now take reasonable steps to notify an individual about your privacy policy and information it contains on: how to access and seek correction of personal information; a complaints process; and whether you or your pharmacy is likely to disclose personal information to overseas recipients. In addition, individuals must be notified if you collect or your pharmacy collects personal information from someone other than the individual.
Direct marketing (APP 7)	A discrete principle will now cover direct marketing. You or your pharmacy must not use or disclose personal and sensitive information for the purpose of direct marketing except where the individual has provided consent. You should also provide a simple means by which the individual may request not to receive direct marketing communications from you or your pharmacy.
Cross border disclosure (APP 8)	If personal information about an individual to be disclosed to an overseas recipient, reasonable steps must be taken to ensure the recipient does not breach the APPs in relation to the information. You or your pharmacy are likely to be held accountable for any such breaches by the overseas recipient. Note that the provision of personal information to a server or a cloud service provider located overseas is regarded as 'use' rather than 'disclosure' provided it is limited to storage and management of information. A binding contract with the provider should specify that you/your pharmacy retains effective control of how the information is handled by the provider.
Quality of personal information in use and disclosure (APP 10)	You or your pharmacy will need to take reasonable steps to ensure that personal information being used or disclosed is accurate, up-to-date, and complete as well as relevant, having regard to the purpose of the use or disclosure.
Security of personal information (APP 11)	In addition to existing obligations to protect personal information from misuse, loss and unauthorised access, modification and disclosure, you or your pharmacy will need to also protect personal information from interference (e.g. attacks on computer systems which may not amount to modification of content of information). The requirement to destroy or de-identify personal information no longer required by you or your pharmacy remains but now includes the exception of where you are or your pharmacy is required by law or court/tribunal order to retain the information.
Access to personal information (APP 12)	Requests for access to the individual's personal information held by you or your pharmacy must now be responded to within a reasonable period and in the manner requested by the individual. A 'reasonable period' will vary depending on other factors (e.g. scope of the request) but generally should not exceed 30 calendar days. If access is not granted, you or your pharmacy must generally provide written reasons for the refusal and the mechanisms available to complain about the refusal. Note there are specified grounds of refusal (e.g. giving access would have an unreasonable impact on the privacy of other individuals), however rather than relying on these grounds, other possible strategies (e.g. redacting some information to enable access) should be considered. A charge must not be applied to the making of the request. Items that may be charged for (but must not be excessive) include: staff costs in searching, locating, retrieving or reproducing the requested information; postage costs; costs associated with using a mutually agreed intermediary to facilitate access to the information.
Correction of personal information (APP 13)	Individuals will no longer need to establish that their personal information is not accurate or up to date when making a request to correct personal information. If a request to correct personal information is refused, the individual may request a statement be attached to the record stating that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading. You or your pharmacy generally needs to attach this statement in a way that will make it apparent to users of the information. Requirements around timeframe of response, written notice when request has been refused, and mechanisms for complaints are similar to those under APP 12 <i>Access to personal information</i> . If personal information previously disclosed to another APP entity is corrected, your pharmacy must take reasonable steps to notify that APP entity of the correction, where that notification is requested by the individual. However this will depend on considerations around the practicability of notifying the other entity, the nature or importance of the correction, and time period since the information was previously disclosed.

Exceptions

As with existing privacy legislation there are a number of exceptions where collection, use or disclosure of information will not be a breach of certain APP obligations. There are seven 'permitted general situations' and five 'permitted health situations'. The exceptions most relevant to pharmacy are summarised below.

PERMITTED SITUATIONS MOST RELEVANT TO PHARMACY	NOTE
Permitted general situations Collection of sensitive information (APP 3) Use or disclosure of personal information (APPs 6 and 8) or a government related identifier (APP 9)	
Serious threats to life, health or safety of any individual, or to public health or safety	Applies where: <ul style="list-style-type: none"> • it is unreasonable or impracticable to obtain the individual's consent; and • there is reasonable belief that the action is necessary to lessen or prevent the threat to life, health and public safety.
Suspected unlawful activity or serious misconduct (relating to the organisation's functions or activities)	Applies to a pharmacy's internal investigations about activities within or related to the pharmacy that are either unlawful or relates to misconduct of a serious nature.
Permitted health situations Collection, use or disclosure of health information or genetic information (APPs 3 and 6)	
Collection of health information to provide a health service	Collection is required or authorised by law. Only the minimum amount of information necessary to provide the health service should be collected.
Collection of health information for certain research and other purposes	Example of purposes include: <ul style="list-style-type: none"> • Research and statistics relevant to public health or public safety (e.g. diabetes, communicable diseases, mental health, cancer). • Management, funding or monitoring of a health service.
Use or disclosure of health information for certain research and other purposes	Applies where (amongst other circumstances): <ul style="list-style-type: none"> • The purpose could not be achieved by using or disclosing de-identified information. • It is impracticable to obtain the individual's consent.
Use or disclosure of genetic information	Applies where (amongst other circumstances): <ul style="list-style-type: none"> • Information was obtained in the course of providing a health service to the individual. • You or your pharmacy staff reasonably believes that use or disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of another individual who is a genetic relative of the individual.
Disclosure of health information to a responsible person for an individual	Applies where: <ul style="list-style-type: none"> • You or your pharmacy provides a health service to the individual who is physically or legally incapable of giving consent, or physically cannot communicate consent. • The recipient of information is a responsible person for the individual. • You are satisfied that disclosure is reasonable and necessary to provide appropriate care or treatment, or is made for compassionate reasons. • You are satisfied that disclosure is not contrary to any wish about disclosing health information you or your pharmacy does, or should, know about. <p>Note: A 'responsible person' under the Act is:</p> <ul style="list-style-type: none"> • a parent, spouse or de facto of the individual; • a child, or sibling, of the individual who is at least 18 years old; • a person who has an intimate personal relationship with the individual; • a person nominated by the individual to be contacted in case of emergency; or • a person exercising an enduring power of attorney granted by the individual that is exercisable in relation to decisions about the individual's health. <p>Although carers are a significant and regular group of people with whom pharmacists engage and interact with on behalf of an individual, they are not explicitly included in this definition. Therefore for the purposes of the exception outlined here, you or your pharmacy must carefully consider whether disclosure of health information can be made to a carer where no formal/legal arrangement exists. Any decisions taken by you or your pharmacy (and the reasons) must be clearly documented for future reference if needed.</p>

Privacy dos and don'ts

To assist pharmacists and pharmacy staff in continuing to meet obligations under the Privacy Act:

DO

- ✓ have a privacy policy in place and ensure all staff understand and comply at all times with your policy (see Privacy form template: *Confidentiality undertaking*).
- ✓ implement a training program for your staff and ensure that they understand their privacy obligations in your workplace.
- ✓ seek a consumer's consent before using or disclosing their personal or health information, except where this is not required by law (e.g. PBS-related processes) (see Privacy form templates: *Collection and disclosure of information (for the provision of health services)* and *Collection and disclosure of Information (for direct marketing purposes)*).
- ✓ take immediate corrective action if there is a data breach of personal information held by you or your pharmacy. (Refer to the *data breach response process* on the Office of the Australian Information Commissioner web site: www.oaic.gov.au)

DO NOT

- ✗ discuss a consumer's personal or health details in open or public areas or in an indiscreet manner (e.g. loud voice).
- ✗ discuss details of medicines or treatment regimens with anyone other than the consumer's treating practitioner.
- ✗ leave a consumer's personal or health information (including medicines awaiting collection) in a way where it can be seen (e.g. on a pharmacy counter) or heard (e.g. leaving a telephone message on an impersonal number) by others.
- ✗ automatically provide details of a consumer's medicines or medication history to family members who might request the information.
- ✗ use a consumer's personal information for direct marketing activities (e.g. promotions) by your pharmacy without the consumer's consent.
- ✗ disclose a consumer's personal details to direct marketing companies, pharmaceutical companies or research organisations without the consumer's consent.

Some actions to take now!

Is your privacy policy up-to-date?

Your/your pharmacy's privacy policy should contain the following information:

- What type of personal and health information is collected and held, and how that information is collected (e.g. directly from individuals) and held (e.g. stored by a third party data storage provider).
- How you/your pharmacy uses and discloses personal and health information, including the range of people or entities that may access that information.
- Your/your pharmacy's quality assurance and security procedures for the collection and storage of personal and health information.
- Whether you are or your pharmacy is likely to disclose personal information to overseas recipients and the countries (if practicable to specify) in which such recipients are likely to be located.
- How the consumer can request access to, and correction of their personal information. The policy should state that individuals have a right to request access/correction to their personal information. Position title of contact person, and a generic telephone number and email address should be provided.
- How the consumer can lodge a complaint about a possible breach of their privacy and how the complaint will be handled by you / your pharmacy. Details of the procedure, contact details for complaining directly to you or the pharmacy, and the procedure for complaining to an external complaint body should be included.

Your privacy policy should:

- be clear
- be prominently displayed, be readily available (e.g. on your / your pharmacy's web site) or made available on request (promptly and free of charge).

You/your pharmacy should:

- regularly (e.g. annually, following receipt of a complaint, or if there has been a privacy breach) review and update (if necessary) your privacy policy and related policies and procedures
- provide regular training to your staff on your pharmacy's privacy obligations and each staff member's obligations and responsibilities.

Do you have a complaints handling process?

You/your pharmacy must have processes in place to be able to receive and deal with any complaints from consumers about possible breaches of privacy.

- Identify a staff member who will be responsible for handling complaints.
- Establish a generic email address for lodgement of complaints.
- Make every attempt to resolve complaints satisfactorily.
- Where resolution is not possible, refer the complainant appropriately to the Office of the Australian Information Commissioner (www.oaic.gov.au).

Other laws relating to privacy issues for pharmacists

State and territory based health privacy principles

Generally speaking the Australian Privacy Principles govern how pharmacists handle health information of patients/ consumers. However, there are a few other laws that address how patient information is to be handled.

In New South Wales, Victoria and the Australian Capital Territory there are laws regarding information and health records. In these jurisdictions, pharmacists must comply with two sets of principles: the APPs and the state/territory based privacy principles.

NSW

Applicable law in NSW:

- www.austlii.edu.au/au/legis/nsw/consol_act/hraipa2002370

Relevant information provided by NSW Government agencies:

- www.ipc.nsw.gov.au/privacy/ipc_index.html

Victoria

Applicable law in Victoria:

- www.austlii.edu.au/au/legis/vic/consol_act/hra2001144

Information provided by Victorian Government agencies:

- www.privacy.vic.gov.au/domino/privacyvic/web2.nsf/pages/privacy-laws
- health.vic.gov.au/healthrecords
- www.health.vic.gov.au/hsc/downloads/access_nonhsp.pdf

ACT

Applicable law in the ACT:

- www.austlii.edu.au/au/legis/act/consol_act/hraaa1997291

Guidance provided by ACT Government agencies:

- www.hrc.act.gov.au/health
- health.act.gov.au/consumers/health-records

Our privacy policy: respecting your privacy

Name of pharmacy:.....

Address of pharmacy:.....

Phone and email address of pharmacy:.....

This pharmacy is bound by the Australian Privacy Principles set out in the *Privacy Act 1988*.

About the information we hold

To help meet your health care needs we may hold and use records, including your name and address details, your medication record and other health care information that you or your treating doctor or other health practitioner may need to provide to us. This personal information will not be disclosed to overseas recipients and will be used only for the purposes of meeting your health care needs, unless you consent to its use for other purposes, or the law permits its use for other purposes.

Much of the information we ask for is because the law requires it to be collected.

For example, the law requires us to collect personal details contained in your prescriptions (which is where we get most of our information about you) and, in some jurisdictions, we are required to collect some information like your driver's licence number when supplying medicines containing pseudoephedrine.

For some services we will not need to collect any personal information. You need to be aware that if you do not provide us with certain information about yourself, in some circumstances we may be unable to provide a service that you require.

Direct marketing

If we hold information about you, for example, as part of a loyalty program, this information may be used for marketing purposes. If you do not wish to receive marketing communications from our pharmacy you can tell us and we will take steps to have your name removed from our pharmacy's loyalty program marketing list.

Our disclosure and information practices

In accordance with other related policies on confidentiality, computer access and security, personal information we hold is stored in a secure manner and is not disclosed to any other person or organisation without your consent. However, we may need to provide your information to other health service providers if it is necessary to help us to provide services to you.

Special pharmaceutical services and activities

Some activities such as Medication Management services or research activities will have privacy practices and consent forms specific to the activity. If our pharmacy is part of the team involved in that activity, we are required to meet our privacy obligations for that activity whether they arise under the Act or otherwise.

How you can gain access to information

You can request access to personal information we may hold about you. If you make such a request, we will ask you to complete a form for this purpose.

You can also request that corrections be made to your information we may hold about you. There is no charge for lodging a request to access your information. However, we may make a small charge for our time involved in providing this information and for associated costs such as photocopying.

Complaints

If you have a concern please raise it with us first as we may be able to resolve the issue. You can speak to the pharmacist in charge or contact us at the above address. You may also use a complaints form available from the pharmacy. If you are still concerned, you may lodge a formal complaint with the Office of the Australian Information Commissioner at:

Email: enquiries@oaic.gov.au

Mail: Sydney Office
GPO Box 5218 Sydney NSW 2001

Address: Office of the Australian Information
Commissioner
Level 3, 175 Pitt Street, Sydney NSW 2000

Fax: +61 2 9284 9666

Canberra Office
GPO Box 2999, Canberra ACT 2601



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Complaint form

It is not mandatory for the patient/consumer to identify themselves and/or provide contact details when submitting a complaint. If the patient/consumer chooses not to be identified, the pharmacy will not be able to inform them of the outcome(s) of the complaint.

Patient/consumer chooses not to be identified.

Patient/consumer submitting the complaint chooses to identify themselves (please complete the following):

Name of patient/consumer:

Address:

Phone:

Email:

Preferred method of contact: Mail Phone Email

Collection statement

The information contained in this form will be used for the purpose of facilitating and resolving the complaint.

Details of complaint

Ask patient/consumer to fill out or tell you the manner in which they believe their privacy rights have been infringed.

Pharmacy details

Name of pharmacy:

Address of pharmacy:

Email address of pharmacy:

Outcome(s) of complaint

Signature of pharmacist: Date:

Note: if requested, provide a copy of the completed form to the patient/consumer and retain the original on file at the pharmacy.



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Collection and disclosure of information

For the provision of health services

Please read this information carefully as it concerns your privacy rights.

In some situations, we may need to provide information to those responsible for your health care needs or to other health service providers. For example, this may be necessary to help us to provide health care services to you.

Some of the information we record MUST be collected because the information is necessary to provide a health service to you and is permitted by an Australian law. For example, this applies to prescription details that we are required to collect in accordance with relevant legislation including the *National Health Act 1953* (and its regulations) and the poisons laws as in force in the Australian States and Territories.

If you do not provide us with certain information about yourself, we may be unable to provide a service to you. Please let us know if you have any concerns about providing information about yourself so that we can explain why we are collecting it and tell you about our privacy policy and information management practices.

You can request access to personal information we may hold about you. Most of the information we hold comes from the prescriptions presented to us. You can also request that corrections be made to your information we may hold about you. There is no charge for lodging a request to access your information. However, we may make a small charge for our time involved in providing this information and for associated costs such as photocopying.

If you have a concern please raise it with us first as we may be able to resolve the issue. You can speak to the pharmacist in charge or contact us at the address below.

We:

Name of pharmacy:

Address of pharmacy:

Phone: Fax:

Email address of pharmacy:

Website of pharmacy:

are collecting, using and disclosing your personal information, including health information, for the following purposes and to the following organisations or people:

List the purposes for which the information is being collected, used and disclosed, for example, to provide a medication management service (MedsCheck) or a health screening service (Blood Pressure Monitoring service).



Collection and disclosure of information

For the provision of health services

I,
Name of patient/consumer

of
Address of patient/consumer

authorise
Name of pharmacy

of
Address of pharmacy

to collect, use and disclose my personal information, including health information, for the purposes listed above.

I understand that this form and the information it contains may be used by the pharmacy to manage the personal information that it holds about me. I know I can gain access to my information and understand that my information may be disclosed to the organisations or people listed above.

I understand that I do not have to sign this consent form and that I can withdraw my consent at any time. I am aware that if I do decide to withdraw my consent to any of the disclosures that I have authorised on this form I need to notify the pharmacy.

Signature of patient/consumer: Date:

Signature of pharmacist: Date:

Note: provide a copy of the completed form to the patient/consumer and retain the original on file at the pharmacy.



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Collection and disclosure of information

For direct marketing purposes

We:

Name of pharmacy:.....

Address of pharmacy:.....

Phone:..... Fax:.....

Email address of pharmacy:.....

Website of pharmacy:.....

are collecting, using and disclosing your personal information, including health information, for the following purposes and to the following organisations or people:

List the purposes for which the information is being collected, used and disclosed, for example, details of the pharmacy's loyalty club(s):

Please read this information carefully as it concerns your privacy rights.

One of the primary purposes of our program(s) is to provide and promote associated products and services to you, including the products and services of our partners and other third parties who we believe may have products and services in which you would be interested. Other purposes include providing personalised benefits and services, understanding your interests or health requirements to enhance your use of the program(s) and improving our services.

You may at any time request not to receive direct marketing communications from us. However, if you do not provide us with certain information about yourself, or decide not to receive direct marketing communications from us we may not be able to provide a service to you. Please let us know if you have any concerns about providing information about yourself so that we can explain why we are collecting it and tell you about our privacy policy and information management practices.

Most of the information we hold comes from prescriptions presented to us.

However, you may request access to personal information we may hold about you. You can also request that corrections be made to your information we may hold about you.

If you make such a request we will ask you to complete a form for this purpose.

There is no charge for lodging a request to access your information. However, we may make a small charge for our time involved in providing this information and for associated costs such as photocopying.

If you have a concern please raise it with us first as we may be able to resolve the issue. You can speak to the pharmacist in charge or contact us at the above address.



Collection and disclosure of information

For direct marketing purposes

I,
Name of patient/consumer

of
Address of patient/consumer

authorise
Name of pharmacy

of
Address of pharmacy

to collect, use and disclose my personal information, including health information, for the purposes listed above.

I understand that this form and the information it contains may be used by the pharmacy to manage the personal information that it holds about me. I know I can gain access to my information and understand that my information may be disclosed to the organisations or people listed above.

I understand that I do not have to sign this consent form and that I can withdraw my consent at any time. I am aware that if I do decide to withdraw my consent to any of the disclosures that I have authorised on this form I need to notify the pharmacy.

Signature of patient/consumer: Date:

Signature of pharmacist: Date:

Note: provide a copy of the completed form to the patient/consumer and retain the original on file at the pharmacy.



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Request for access

I,
Name of patient/consumer

of
Address of patient/consumer

request access to the personal information held about me by

.....
Name and address of pharmacy

I am seeking access to: *Insert details of request e.g. prescription record or medication history for myself*

from to
Inclusive start date *Inclusive end date*

I understand there may be a fee for the provision of copies or printouts of personal information that are prepared at my request. I am also aware that I can request that corrections be made to information about me that is inaccurate, incomplete and not current. I understand that I cannot ask for deletion of information from my record that is required by law to be collected.

Collection statement

I understand that this form and the information contained thereon will be used for the purposes of considering my request for access to my personal information or records that the pharmacy may hold about me. I am aware that this information will be used to facilitate the processing of my request by the pharmacy.

Signature of patient/consumer: Date:

Record of action(s) taken:

Signature of pharmacist: Date:

Acknowledgment that access has been given, records corrected or a statement about them has been added.

I acknowledge that on I was given access to personal information held about me by the above pharmacy and requested corrections or additions have been made as above.
Date

Signature of patient/customer: Date:

Access NOT provided (*pharmacy to provide reasons*):

If you have a concern about being refused access to information, please raise it with us first as we may be able to resolve the issue. You can speak to the pharmacist in charge or contact us at the above address.

Note: provide a copy of the completed form to the patient/consumer and retain the original on file at the pharmacy.



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Confidentiality undertaking

To be completed by each employee/staff member.

By to
Name of employee/staff member *Name of proprietor*
of
Name of pharmacy

I understand that, in the course of my duties in this pharmacy I have access to confidential and personal information about its patients and staff and other confidential information relating to the pharmacy business.

I understand that it is a condition of my employment that I must take all reasonable action to not disclose this information in any way.

I understand that, as an employee/staff member of this pharmacy I must meet the obligations under all relevant legislation including the Australian Privacy Principles and the *Privacy Act 1988*.

Signature of employee/staff member: Date:

Address of employee/staff member:

Note: provide a copy of the completed form to the employee/staff member and retain the original on file at the pharmacy.



**The Pharmacy
Guild of Australia**



**Pharmaceutical
Society of Australia**

March 2014

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