



Clinic Client FOI – Requests for Records Procedure

Procedure Code: PR-034**Version:** 4.0**Effective Date:** 31 May 2022**Related Policy Code:** CLI-014**Related Policy Name:** Clinic Client FOI – Requests for Records Policy

Purpose

This procedure details the steps for a client requesting access to their own health information records from a Campus Clinic and must be read in conjunction with the *Clinic Client FOI - Requests for Records Policy*.

Definition of “College” – *The Australian College of Natural Medicine Pty Ltd (ACNM) trades as Endeavour College of Natural Health and FIAFitnation. For the purpose of this procedure, any reference to ‘College’ or ‘the College’ should be considered a reference to each or any of these respective trading names / entities.*

Scope

- All campus
- All campus clinics
- All staff and students

Procedure:

1. Requests for access to client health information must be made in writing to the local clinic using the *Clinic Release of Health Information Form*.

NOTE: A fee may be applicable for accessing information contained in client files. Fees are based on the costs involved for checking the information and preparation of the information for release. Relevant fees will be notified to the requestor prior to the information being released.

2. Evidence of identity (100 points ID) of the person will be required. Processing of the request cannot begin if any of the requested information and Proof of Identity is not supplied.
3. Each request for access will be acknowledged promptly in writing, quoting a reference number allotted to the request.
4. No later than 45 days of this acknowledgement, the applicant will be advised as to whether or not the documents sought are available, and if so, where access to all or part of the documents is granted.
5. Once it is determined that the College has access to all or part of the health record, a full review of the health record must be carried out by the Academic Clinic Coordinator (HE) or the National Program Manager (VET) of the related discipline that the client received treatment from before the health records can be released to the requestor. If the client has attended more than one treatment discipline, the review should be conducted by all relevant parties for approval of release.
6. The College is entitled to withhold information if it is considered that it might prejudice the physical or mental health or wellbeing of that person. Individuals can request a review of that decision through the Clinic Manager (for escalation to the Director of Clinic and Campus Operations).



- a) Requests for review of decision must be emailed to the Clinic Manager within 20 working days of the decision being communicated to the requestor.
 - b) The Clinic Manager will acknowledge receipt of the request for review within 3 working days of receipt and will conduct a full review of the decision. This will usually include final approval of the review documentation and decision by the Director of Clinic and Campus Operations prior to communication to the requestor within 45 business days of the request.
 - c) If the requestor remains unsatisfied with the decision after formal review, they should follow the steps outlined in the relevant State's legislative framework relating to records and privacy complaints (such as escalation to an Administrative Appeals Tribunal, Privacy Commissioner or similar).
7. Once approval of release has been made by the nominated Academic staff member, the Clinic Manager will prepare the health records by downloading and deidentifying the information from Wellnation software.
 8. If deletions of some of the documents or part of the documents are proposed, the sub-sections of the relevant Act under which those deletions are claimed will be quoted.
 9. The Clinic Manager will then provide the approved health records as per the above process to the requestor via email.

Definitions

Health Information – For the purpose of this policy, health information means:

- a) Personal information that is information or an opinion about –
 - i) The physical or mental health or a disability (at any time) of an individual, or
 - ii) An individual's express wishes about the future provision of health services to them, or
 - iii) A health service provided, or to be provided, to an individual, or
- b) Other personal information collected to provide, or in providing, a health service, or
- c) Other personal information that is genetic information about an individual arising from a health service provided to the individual in a form that is or could be predictive of the health (at any time) of the individual or a genetic relative of the individual, or
- d) Healthcare identifiers,

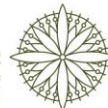
But does not include health information, or a class of health information or health information contained in a class of documents, that is prescribed as exempt health information for the purposes of the relevant State legislation.

Health Professionals in relation to health records – This includes registered medical practitioners, dentists, opticians, pharmaceutical chemists, registered nurses, community psychiatric nurses, community learning disability nurses, registered podiatrists, dietitians, occupational therapists, psychologists, psychotherapists, counsellors, acupuncturists, naturopaths, homoeopaths, herbalists, all forms of massage and remedial therapists, art therapists, speech therapists, physiotherapists, aroma therapists, drama therapists, music therapists, podiatrists and osteopaths or any health care professional employed by a health service body.

Health Records – These are defined as records which consist of health information specific to a clinic client and which have been made by, or on behalf of, a student or clinic supervisor in clinic practicum and in connection with the care of the clinic client.

This includes health records in all areas of the College (including teaching clinics and all areas of natural medicine) and also applies to the records of employers who hold information relating to the physical or mental health of their employees.

Health Service – Any services offered in the clinic environment at the College.



Further Information

Related Policies

[Clinic Client FOI – Requests for Records Policy](#)

[Privacy Policy](#)

Related Procedures

Not Applicable

Related Documents

[Clinic Release of Health Information Form](#)

[Clinic Handbook](#)

Guidelines

Not Applicable

Benchmarking

Not Applicable

Supporting Research and Analysis

Not Applicable

Related Legislation

[Privacy Act 1988](#)

[NSW – Health Records and Information Privacy Act 2002](#)

[QLD – Information Privacy Act 2009](#)

[VIC – Health Records Act 2001](#)



Review and Approval

Procedure Author

Content separated from associated policy

Procedure Owner

Director of Clinic and Campus Operations

Contact

Director of Clinic and Campus Operations

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Procedure Status

New

Responsibilities for Implementation

- Director of Clinic and Campus Operations
- Academic Clinic Coordinators
- Clinic Managers
- Heads of Departments

Key Stakeholders

- Director of Clinic and Campus Operations
- Clinic Managers
- Academic Clinic Coordinators
- Heads of Departments
- Clinic Clients
- Clinic Students
- Clinic Supervisors