

## Health Internet & Email Policy

Kingsway Medical Clinic Health recognise that the practice team requires access to email and internet to assist in the efficient and safe delivery of healthcare services to our patients, as well as for limited personal use (where it does not interfere with the ability to perform expected duties Kingsway Medical Clinic Health aims to create a healthy use of internet of email across all our locations. Kingsway Medical Clinic Health supports the right of staff to have access to internet and email in the workplace within guidelines to ensure privacy and security of personal and sensitive health information, and appropriate follow up of clinical correspondence. It also recognises that there is increasing pressure on doctors and general practices to use email to address requests from patients, other clinicians, and third parties and that there are some inherent risks associated with this. Kingsway Medical Clinic Health also recognise the importance of educating patients with regards to potential risks of email use, the importance of consent being obtained and recorded, and the importance of individual doctor autonomy in terms of risk assessment. Kingsway Medical Clinic Health recognises that under the ownership of Kingsway Medical Clinic that staff should be aware of their policies in relation to email and internet, as well as those specific to each practice. The Kingsway Medical Clinic Health Policy manual states that Kingsway Medical Clinic Health has legal ownership of the contents of all files stored on its computers and network systems, as well as all messages transmitted via these means- “management therefore reserves the right to monitor and examine all electronic mail, personal file directories, hard disc drive and other information stored on Kingsway Medical Clinic Health Information systems”.

### **Purpose and objectives**

This policy sets out guidelines for acceptable use of internet and email by the practice team, contractors and other staff. Internet and email is provided primarily to assist the team carry out their duties of employment. The purpose of this policy is to ensure employees are aware of their responsibilities, that measures are taken to ensure information privacy and security, and that good clinical care is maintained.

### **Scope**

This internet and email policy applies to the practice team, contractors and other staff of Kingsway Medical Clinic Health who access the internet and email on practice owned devices, including, but not limited to desktop computers, laptops, tablets, and smartphones, to perform their work.

Use of the internet by the practice team, contractors and other staff is permitted and encouraged where this supports the goals and objectives of Kingsway Medical Clinic

Health. Access to the internet is a privilege and the practice team, contractors and other staff must adhere to this policy.

Violation of these policies could result in serious outcomes. Action may include:

- disciplinary and/or legal action
- termination of employment
- the practice team, contractors and other staff being held personally liable for damages caused by any violations of this policy]

All employees are required to confirm they have understood and agree to abide by this email and internet policy. They will be provided with this policy.

### **Policy content**

The practice team, contractors and other staff may use the internet and email access provided by Kingsway Medical Clinic Health for:

- any work and work-related purposes, including but not limited to: receiving updated health information; receiving requests for medical reports from WorkSafe/ Insurance Companies; receiving updated health information; receiving patient complaints; ordering supplies/sample medications; sending invoices for accounts.
- limited personal use

### **Limited personal use of email and internet**

Limited personal use is permitted where it:

- is infrequent and brief use
- does not interfere with the duties of the practice team, contractors and other staff
- does not interfere with the operation of the practice
- does not compromise the security of the practice
- does not impact on the practice's electronic storage capacity
- does not decrease the practice's performance (e.g. large email attachments can decrease system performance and potentially cause system outages)
- does not incur any additional expense for the practice
- does not violate any legislation
- does not compromise any confidentiality requirements of the practice Examples of what could be considered "limited personal use:
- conducting a brief online bank transaction
- paying a bill

- responding to an urgent request from a child's school or making arrangements for child pick-up after school/activities
- brief personal communication if on break
- booking an urgent appointment e.g. vet, personal doctor, windscreen repairer

### **Unacceptable internet and email use**

The practice team, contractors and other staff may NOT use internet or email access provided by Kingsway Medical Clinic Health:

- create or exchange messages that are offensive, harassing, obscene or threatening
- visit web sites containing objectionable (including pornographic) or criminal material
- exchange any confidential or sensitive information held by your general practice outside of clinical purposes
- create, store or exchange information in violation of copyright laws
- use internet-enabled activities such as gambling, gaming, conducting a business or conducting illegal activities
- create or exchange advertisements, solicitations, chain letters and other unsolicited or bulk email
- play electronic or online games in work time
- access social media unless being utilized for clinical information (e.g. patient support group)

Specific considerations when using emails

All practice team members, contractors, and other staff must adhere to the following:

- work email address is never to be used to send or receive personal emails
- be diligent in checking email addresses before sending
- be diligent in checking how you are replying to an email to ensure you are only replying to the intended recipient, especially where you are part of a group email
- all electronic communications must be courteous, respectful, and professional

### **Email communication with patients**

For email communication with patients, each doctor is to consider the following information and risk stratification and then determine if they will or will not engage with patients via general email (this does not include emailing directly from medical software). Whilst Kingsway Medical Clinic Health respects individual doctor preference,

we discourage the use of email for consultation purposes and expect all staff members to actively minimize risks associated with email use.

Email is a convenient form of communication but there are associated risks associated with privacy and security of patient information. The use of unsecured and unencrypted email creates the risk that if the email is intercepted during transmission, it may be read. Like all forms of written communication, emails involve potential for breach of privacy if read by someone other than the intended recipient. This most commonly occurs through the email being sent to the wrong recipient(s), and occasionally because the device on which the email is stored being lost or stolen. Unauthorised disclosure of healthcare information may have significant consequences for the individuals impacted both patient and doctor. Whilst doctor to doctor communication is usually encrypted, emails between patients and a doctor's clinical email are not.

It is the responsibility of each doctor/staff member of our clinic, under the Privacy Act 1988, to take reasonable steps to ensure protection of patient information.

As per the RACGP fact sheet "Using Email in General Practice" every doctor/ staff member, should consider the level of risk associated with how they use email. The following risk stratification is suggested:

NO RISK – no email communication is used

LOW RISK – documented policies and resources exist; consent for patient is obtained and recorded; email address is verified by the practice before sending an email; emails are sent with password protection OR email communications are sent using encryption software or via a secure website

MEDIUM RISK – no written consent from patient is obtained or recorded; email communications are undertaken without the use of passwords or encryption; no processes in place to ensure mail addresses are correct

HIGH RISK – email communications are undertaken without use of passwords or encryption; no formal policy or supporting resources are in place; no processes are in place to ensure email addresses are correct; no written consent from patient is obtained or recorded.

The consent process for email communication with patients at Kingsway Medical Clinic Health is:

1. Patients are asked to provide their email address in writing when completing the new patient form.
2. If a patient requests any documents or correspondence during a telehealth consultation with their doctor and they wish to receive that by email, the doctor is to discuss the risks associated with email communication with the patient and

obtain verbal consent if the patient agrees to accept those risks. If consent is obtained, the doctor is to document the consent in the patient's consult notes and is to obtain verbal confirmation that the email address on file is correct. The doctor will then take the document to reception and ask for it to be emailed. The receptionist is to check that email communication consent has been obtained and documented before emailing the patient. If consent has not been documented on the patient file, the receptionist is to call the patient and follow the procedure outlined in step 3a below.

3. If a patient calls reception and asks for a document to be sent by email, the receptionist is to:
  - a. Discuss the risks associated with email communication with the patient and obtain verbal consent if the patient agrees to accept those risks. If consent is obtained, the receptionist is to document the consent in "today's notes" in the patient file and is to obtain verbal confirmation the correct email address is on file.
4. Once consent has been obtained/confirmed, the receptionist is to copy and paste the email address from the patient file into the email and send the email. Once an email has been sent, a copy of the outgoing email is to be saved to the patient file in "correspondence out."

#### Definitions

Social Media – online social networks used to disseminate information through online interaction. Social media for the purposes of this policy includes but is not limited to: Facebook, Flickr, Foursquare, Grindr, Instagram, LinkedIn, Pinterest, SnapChat, TikTok, Tinder, Tumblr, Twitter, Viber, Vimeo, Vine, and WhatsApp (unless being utilized for clinical group discussion), Yelp, YouTube (unless being utilized for clinical application).

#### References:

RACGP fact sheet (Using email in general practice)

Kingsway Medical Clinic Internet and Social Media Use Policy Version Number 1

Policy review statement

This policy will be reviewed regularly to ensure it reflects the current processes and procedures of Kingsway Medical Clinic Health and current legislation requirements.