

## Devolved Local Recording (DLR) Enablement Request Form

The capability of recording consultations (audio or audio/video) is available on the healthdirect Video Call platform and can be provided to approved health organisations to use by their clinicians with their patients in the enabled clinics within the organisation.

This form outlines the governance and process required by any requesting Organisation to access the Video Call Devolved Local Recording (DLR) function.

### Background

Your organisation [**Name of the Organisation** (.....)] (**Organisation**) has requested to add Devolved Local Recording capability to its existing Video Call Service with Healthdirect Australia Limited (**Healthdirect**).

By adding Devolved Local Recording capability, the Organisation will collect, use, store disclose and maintain personal information, including sensitive personal information, and is therefore required to comply with the obligations under the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles.

**Excluding any liability on the part of Healthdirect, we provide the following guidelines as a recommendation for the requesting Organisation.**

Please note that this is not an exhaustive list of all the requirements. As such, it is also recommended that the Organisation obtains independent advice in relation to legal, IT security and any other related obligations under the Privacy Act.

The healthdirect Video Call platform (**Platform**) does not and will not store or maintain a copy of a Devolved Local Recording.

The Organisation requesting to add DLR capability will need to:

1. implement the outlined **Devolved Local Recording Guidelines** stated in this document.
2. implement the processes related to security, privacy for accessing, storing, securing and maintaining the digital recordings outlined in the **Local Health Service Provider Organisation DLR Responsibilities** in this document.
3. sign off the **Acknowledgement** section of this document before requesting enablement of DLR as outlined in the **Devolved Recording Service Request Process** in this document.

### Definitions

**Devolved Local Recording:** A digital recording and stored file copy of an audio or video and audio consultation that has taken place between a clinician and patient on the healthdirect Video Call platform and is held or stored by the Organisation, not by Healthdirect. The recording is recorded live during the consultation and no digital copy of the recording is available on the platform post consultation.

**Waiting Area:** The online web management console entity that creates and controls access to waiting area rooms within the Organisation's clinics.

## Devolved Local Recording Guidelines

The following guidelines apply to the setup and establishment of DLR within the Organisation.

### 1. Establishment of DLR on the platform:

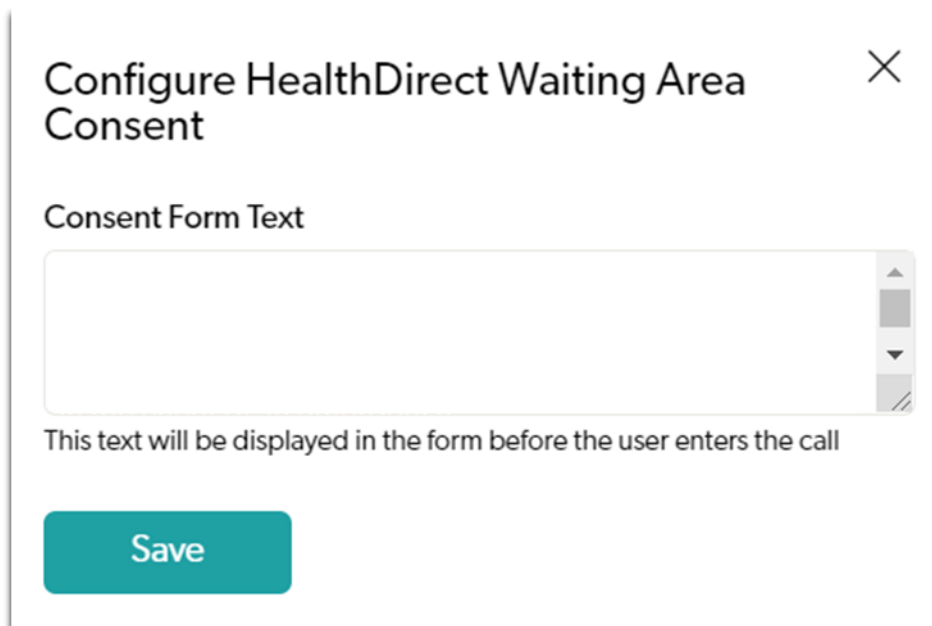
#### 1.1 Patient information and consent:

The Organisation Waiting Area privacy consent wording, which a patient must read and consent to prior to the commencement of a video call consultation, should include information that the Organisation has the capability to make a DLR of their Video Call consultation subject to obtaining the patient's consent as per the Organisation's defined policies and procedures process.

The Organisation Waiting Area Consent must be updated and configured by the authorised administrator as shown below in Figure 1 that the healthdirect Video Call platform hosts.

The updated consent must be shown and consented to by the patient as part of entering the Waiting Area for the Video Call consult.

**Figure 1: healthdirect Video Call Clinic Configuration for Waiting Area Consent**



#### 1.2 Organisation Privacy Policy

The Organisation must link its privacy policy to the online clinic configuration (hosted by healthdirectVideo Call) at the Privacy Policy URL field and should include terms related to audio/video recording of consultations. This must include collection process, purpose for collection and use, disclosure and transfer of recordings in accordance with Australian privacy laws.

The Organisation Privacy Policy web link must be updated and configured by the authorised administrator as shown in figure 2 that the healthdirect Video Call platform hosts.

The updated Privacy Policy must be accessible to the patient to read via hyperlink as part of entering the Waiting Area for the Video Call consult.

**Figure 2: healthdirect Video Call Clinic Configuration for Waiting Area Consent**



Privacy policy URL

**1.3 Organisation Terms of Service for signed in users:**

The Organisation must link its Terms of Use for the service link in the online clinic configuration under Terms of service URL including terms related to audio/video consults recording.

The Organisation Terms of Service web link must be updated and configured by the authorised administrator as shown in figure 3 that the Platform hosts.

The updated Terms of Service will be accessible to the patient to read via hyperlink as part of entering the Waiting Area for the Video Call consult.

**Figure 3: healthdirect Video Call Clinic Configuration for Terms of service for signed in users**



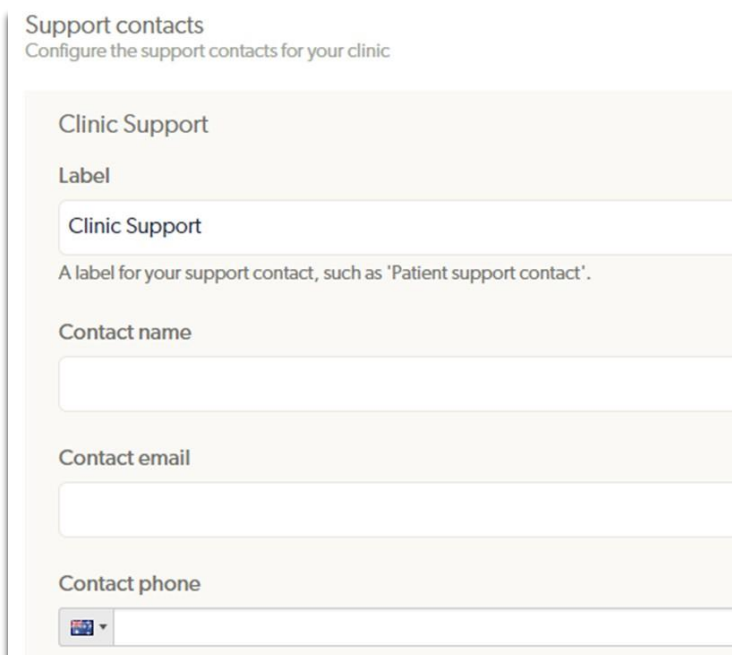
Terms of service URL

**1.4 Organisation Support Contacts:**

The Organisation support contacts details must be configured by the authorised administrator as shown in figure 4 that the healthdirect Video Call platform hosts.

The clinic support contact is the person to contact in relation to the DLR operation and support and can respond to DLR questions raised by patients and/or clinicians accessing the service.

**Figure 4: healthdirect Video Call Clinic Configuration for Support contact details**



Support contacts  
Configure the support contacts for your clinic

Clinic Support

Label

A label for your support contact, such as 'Patient support contact'.

Contact name

## 2. DLR Responsibilities of Organisation

- 2.1 The Organisation must ensure that telehealth managers and clinic administrators who coordinate telehealth consults and clinicians conducting telehealth video call consults and recordings:
  - i. have read and understood these guidelines;
  - ii. are trained on the functionality of Devolved Local Recording on the healthdirect VideoCall platform available on the [healthdirect Video Call Resource Centre](#); and
  - iii. are aware of any other guidelines prescribed by the Organisation for audio/video recording (for example, what to do if a patient asks to stop the recording of the session).
- 2.2 The Organisation acknowledges that the healthdirect Video Call platform cannot retrieve the recording file once consultations have ended and the web browser window is closed. Clinicians who wish to create a DLR of a consultation following consent from all participants must download DLRs before closing the video call window, as the Healthdirect VideoCall platform will not store a copy of the DLR.
- 2.3 The Organisation must ensure that the clinical records system which stores any patient consultation recordings is managed and maintained in accordance with the Privacy Act, the Australian Privacy Principles and the Australian Government Security Manual (ISM) in relation to handling sensitive patient data.
- 2.4 The Organisation must ensure that adequate IT processes are in place to access, store, secure and maintain the recordings since Healthdirect does not have access to the recordings and does not take any responsibility in relation to any recordings post consultation.
- 2.5 Any recordings made by the Organisation should not be stored locally on users' devices and must be securely stored in the Organisation's clinical records system with appropriate access read/write permissions for authorised users only.
- 2.6 The Organisation must not process, transfer, or otherwise disclose any recordings outside Australia.
- 2.7 Any recordings must not be transferred or disclosed to any other third party (including clinicians) unless prior written consent has been obtained from all persons reasonably identifiable in the recording.
- 2.8 The Organisation must ensure that its devices, and the devices of its clinicians used for video consultations comply with the Organisation's IT security guidelines (for example, password protection preferably multi-factor authentication, individual login account, up to date operating system, web browser, antivirus software, firewall protection deployed by the Organisation) and devices and account credentials are not shared between users.

### **3. Devolved Recording Service Request Process:**

The authorised telehealth manager for the Organisation must raise a service request ticket via the HealthdirectJira service desk (<https://videocall.direct/service desk>) to access healthdirect Video Call DLR add-on capability for the Organisation's clinics.

Once the ticket has been received, Healthdirect will:

1. acknowledge receipt of the service request ticket from the Organisation;
2. process the service request ticket by sending this DLR request form to the telehealth manager or equivalent of the Organisation;
3. review the signed DLR request form once received from the Organisation and attach it to the service request ticket;
4. enable DLR add-on capability for the requesting Organisation; and
5. close the service request ticket.

**Acknowledgement**

The Organisation acknowledges and understands the Healthdirect Devolved Recordings Guidelines, the Service Request Process, the obligations of the Organisation under the Privacy Act and Australian Privacy Principles and that the Platform does not and will not store or maintain a copy of the DLRs undertaken by the Organisation.

Signed for and on behalf of the Organisation by its authorised representative,

**Signature:**

**Name of Signatory:**

**Position of Signatory:** Chief Technology Officer (or similar role)

**Organisation:**

**Date:**

**In the presence of:**

**Name of witness:**

**Position of Witness:** Telehealth administrator/Practice Manager (or similar)

**Signature of witness:**

**Date:**

**-END-**