My Health Record Security & Access Policy

Last updated: 18 November 2025

1. Purpose and scope

Rural Psychiatry is a small telehealth psychiatry practice owned and operated by **Dr Matthew Brazel**. The practice participates in the **My Health Record system** to support safe and coordinated psychiatric care for adult patients.

This policy sets out how Rural Psychiatry:

- authorises, suspends and deactivates access to the My Health Record system
- manages training and awareness for the person using the system
- identifies who accesses a patient's My Health Record
- applies physical and information security measures
- identifies, manages and reports system-related security risks and data breaches
- addresses assisted registration (not provided).

At present, **only Dr Brazel accesses the My Health Record system on behalf of Rural Psychiatry**. Some requirements in the My Health Records Rule that are intended for larger organisations do not apply in a practical sense to this single-clinician practice. Where that is the case, this is noted explicitly.

2. Review and implementation

This written policy is in place before Rural Psychiatry registers to participate in the My Health Record system.

The policy will be **reviewed from time to time**, and in any event at least once every 12 months, and earlier if:

- there are changes to legislation or My Health Record participation obligations
- there are material changes to the practice's systems or structure
- new security, privacy or operational risks are identified.

Dr Brazel is responsible for implementing, reviewing and updating this policy and for ensuring his own access and practice comply with it.

Copies of previous versions of this policy will be retained so that current and past arrangements can be demonstrated to regulators if required.

3. Access to the My Health Record system

3.1 Authorised user

Only one person is currently authorised to access the My Health Record system on behalf of Rural Psychiatry:

- **Name:** Dr Matthew Brazel
- **Role:** Psychiatrist

No other employees or contractors access My Health Record for Rural Psychiatry. If this changes in future, this policy will be updated to describe how additional users are authorised and how their access is limited to their duties.

3.2 Suspending and deactivating access

Because there is only one person accessing the system, the following applies:

- If Rural Psychiatry ceases operating or no longer requires access to My Health Record, Dr Brazel will deactivate his My Health Record access and deregister the organisation from the system.
- If there is any suspicion that login details or accounts have been compromised (for example, a lost PRODA token, suspected malware, or credential theft), Dr Brazel will:
  - immediately stop accessing the My Health Record system
  - reset affected passwords and follow security steps recommended by the Australian Digital Health Agency and software vendors
  - temporarily suspend or deactivate My Health Record access until the account is secure
  - treat the incident as a potential data breach and follow the process in Section 7.

4. Training and awareness

As the only person accessing My Health Record on behalf of Rural Psychiatry, **Dr Brazel** will:

- complete relevant training provided by the Australian Digital Health Agency and the Office of the Australian Information Commissioner (OAIC) before using My Health Record for the first time
- stay up to date with changes to My Health Record requirements, privacy law and cyber security good practice
- review and refresh training from time to time, including security awareness training (for example, courses addressing phishing and cyber security basics).

A simple record of training (course or module name, provider and date completed) will be maintained by Dr Brazel for reference.

5. Identifying the user accessing a patient's record

Because only one person (Dr Brazel) accesses the My Health Record system for Rural Psychiatry, it is always possible to identify who accessed a patient's My Health Record at a given time.

My Health Record may be accessed via conformant clinical software and/or the National Provider Portal using PRODA. In each case:

- Dr Brazel uses his own individual login credentials
- where supported, audit logs record:
  - who accessed My Health Record
  - the date and time of access
  - which patient's record was accessed
  - the type of information viewed or uploaded.

If the Australian Digital Health Agency (as the System Operator) requests information about access to a particular My Health Record, that information will be provided by Dr Brazel.

6. Physical and information security measures

Rural Psychiatry applies physical and information security measures that are appropriate for a single-clinician telehealth practice.

6.1 Physical security

- Devices used to access My Health Record (such as a laptop or desktop computer) are stored securely and are not left unattended in public spaces.
- Screens are positioned or fitted with privacy measures so they cannot be easily viewed by other people.
- The device is locked (for example, via the operating system lock screen) whenever Dr Brazel steps away from it.

6.2 Information and cyber security

- Devices used to access My Health Record run supported, up-to-date operating systems and security patches.
- Reputable anti-virus and/or anti-malware software is installed, active and regularly updated.
- Full-disk encryption is enabled where available.
- Only Dr Brazel has user accounts on devices and systems used to access My Health Record.
- Strong passwords are used (for example, at least 10 characters and difficult to guess), and passwords are not shared.
- Multi-factor authentication (MFA), such as PRODA, is used wherever it is supported.
- If My Health Record is accessed from more than one location (for example, a home office and a consulting room), equivalent security measures are applied in each location.

7. Security incidents and data breaches

Rural Psychiatry takes security and privacy incidents seriously and will act promptly if something goes wrong.

7.1 Identifying potential incidents

- Dr Brazel stays informed about security alerts from the Australian Digital Health Agency, OAIC, the Australian Cyber Security Centre (where subscribed) and software vendors.
- Care is taken to avoid phishing emails, suspicious links and unexpected attachments.
- Before opening a My Health Record, the patient's details are checked to confirm the correct record is being accessed.
- Where the software supports it, audit logs may be reviewed from time to time to check that usage appears appropriate.

7.2 Responding to incidents

If there is a suspected or actual security incident involving My Health Record (for example, unauthorised access, malware, a wrong record opened, or lost credentials), Rural Psychiatry will take the following steps:

- **Contain:** immediately exit any My Health Record session, stop using affected systems, disconnect from the network if malware is suspected and suspend affected accounts where necessary.
- **Assess:** consider what happened, which patients and what information may be affected, and whether My Health Record was involved.
- **Notify:** meet obligations under the *My Health Records Act 2012*, including data breach notification requirements. This may involve notifying the Australian Digital Health Agency, OAIC and, where appropriate, affected individuals.
- **Remediate:** apply technical fixes (such as patches, password resets or rebuilding systems) and update processes or policies to reduce the risk of a similar incident occurring again.

If a patient raises concerns about possible unauthorised access to their My Health Record by Rural Psychiatry, their concerns will be taken seriously, investigated and responded to in line with the practice's complaints process.

8. Assisted registration

Rural Psychiatry **does not provide assisted registration** for the My Health Record system. Patients who wish to register for My Health Record are directed to official My Health Record information channels and Services Australia.

Because assisted registration is not provided and there are no other users, the detailed requirements in the assisted registration rules do not apply to Rural Psychiatry at this time. If assisted registration is introduced in future, this policy will be updated to describe how consent, identification and training are managed.

9. Updates and version history

This policy will be reviewed from time to time to ensure it remains accurate and reflects current legal and technical requirements. When it is updated, a new "Last updated" date will be included.

Version 1.0 – 18 November 2025: Initial My Health Record security and access policy for Rural Psychiatry.

Rural Psychiatry

Providing accessible specialist psychiatry to rural and remote Australia via secure telehealth.

Contact:
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(Physical correspondence not accepted)

Policies

Practice Policy

Privacy Policy

My Health Record Policy