



TLC Primary Care Privacy Policy

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TLC PRIMARY CARE PRIVACY POLICY

Introduction

This privacy policy is to provide information to you, our patient, on how your personal information (which includes your health information) is collected and used within our practice, and the circumstances in which we may share it with third parties.

Patient health record system

Our practice uses Best Practice software as a patient health record system.

Patient health record is defined as a personal health record is a health record where health data and other information related to the care of a patient is maintained by the patient.

Why and when your consent is necessary

When you register as a patient of our practice, you provide consent for our GPs and practice staff to access and use your personal information so they can provide you with the best possible healthcare. Only staff who need to see your personal information will have access to it. If we need to use your information for anything else, we will seek additional consent from you to do this.

The medical practitioner will also obtain consent from the patient/any other person present for real-time audio/visual recording, duplication and storage of a consultation, including those via Telehealth or those conducted remotely (if applicable). Consent will also be obtained for the disclosure of any relevant health information when required. This will be documented in the clinical file.

Why do we collect, use, hold and share your personal information?

Our practice will need to collect your personal information to provide healthcare services to you. Our main purpose for collecting, using, holding and sharing your personal information is to manage your health. We also use it for directly related business activities, such as financial claims and payments, practice audits and accreditation, and business processes (eg staff training).

What personal information do we collect?

The information we will collect about you includes your:

- names, date of birth, addresses, contact details
- medical information including medical history, medications, allergies, adverse events, immunisations, social history, family history and risk factors
- Medicare number (where available) for identification and claiming purposes
- healthcare identifiers
- health fund details.
- The practice uses document automation technologies, to ensure only relevant medical information is included in clinical documents

Dealing with us anonymously

You have the right to deal with us anonymously or under a pseudonym unless it is impracticable for us to do so or unless we are required or authorised by law to only deal with identified individuals.

If you wish to communicate with our clinic anonymously, you may do so by withholding your name when making general enquiries or by using a pseudonym when appropriate.

How do we collect your personal information?

Our practice may collect your personal information in several different ways.

1. When you make your first appointment our practice staff will collect your personal and demographic information via your registration. A collection statement is attached within the patient registration form.
2. During the course of providing medical services, we may collect further personal information. Information can also be collected through electronic transfer of prescriptions (eTP), My Health Record, eg via Shared Health Summary.
3. We may also collect your personal information when you visit our website, send us an email or SMS, telephone us, make an online appointment using Hotdoc system or communicate with us using social media.
4. In some circumstances personal information may also be collected from other sources. Often this is because it is not practical or reasonable to collect it from you directly. This may include information from:
 - your guardian or responsible person
 - other involved healthcare providers, such as specialists, allied health professionals, hospitals, community health services and pathology and diagnostic imaging services
 - your health fund, Medicare, or the Department of Veterans' Affairs (as necessary).

When, why and with whom do we share your personal information?

We sometimes share your personal information:

- with third parties who work with our practice for business purposes, such as accreditation agencies or information technology providers – these third parties are required to comply with APPs and this policy
- with other healthcare providers
- when it is required or authorised by law (e.g. court subpoenas)
- when it is necessary to lessen or prevent a serious threat to a patient's life, health or safety or public health or safety, or it is impractical to obtain the patient's consent
- to assist in locating a missing person
- to establish, exercise or defend an equitable claim
- for the purpose of confidential dispute resolution process
- when there is a statutory requirement to share certain personal information (eg some diseases require mandatory notification)
- during the course of providing medical services, through eTP, My Health Record (eg via Shared Health Summary).

Only people who need to access your information will be able to do so. Other than in the course of providing medical services or as otherwise described in this policy, our practice will not share personal information with any third party without your consent.

We will not share your personal information with anyone outside Australia (unless under exceptional circumstances that are permitted by law) without your consent.

Our practice will not use your personal information for marketing any of our goods or services directly to you without your express consent. If you do consent, you may opt out of direct marketing at any time by notifying our practice in writing.

Our practice may use your personal information to improve the quality of the services we offer to our patients through research and analysis of our patient data.

We may provide de-identified data to other organisations to improve population health outcomes. The information is secure, patients cannot be identified and the information is stored within Australia. You can let our reception staff know if you do not want your information included.

How do we store and protect your personal information?

Your personal information may be stored at our practice in the form of electronic records.

Our practice stores all personal information securely.

Refer to:

- (C6.3A - D) Confidentiality and privacy of health and other information
- (C6.4A) Systems and security responsibilities
- (C6.4B) Health information storage

Use of Document Automation Technologies

Our practice uses document-automation technology to assist in preparing referral letters and other clinical correspondence. Only the medical information that is relevant and necessary for the purpose of the referral is included. All automatically generated content is reviewed and confirmed by a medical practitioner before it is finalised or disclosed to another healthcare provider. This process helps ensure accuracy, protects your privacy, and supports the secure handling of your health information.

How can you access and correct your personal information at our practice?

You have the right to request access to, and correction of, your personal information.

Our practice acknowledges patients may request access to their medical records. We require you to put this request in writing to admin.TLCPrimarycare@tlcprimarycare.com.au, and our practice will respond within 30 days.

Our practice will take reasonable steps to correct your personal information where the information is not accurate or up to date. From time to time, we will ask you to verify that your personal information held by our practice is correct and current. You may also request that we correct or update your information, and you should make such requests in writing to admin.TLCPrimarycare@tlcprimarycare.com.au.

How can you lodge a privacy-related complaint, and how will the complaint be handled at our practice?

We take complaints and concerns regarding privacy seriously. You should express any privacy concerns you may have in writing to admin.TLCPrimarycare@tlcprimarycare.com.au. We will then attempt to resolve it in accordance with our resolution procedure.

You may also contact the OAIC. Generally, the OAIC will require you to give them time to respond before they will investigate. For further information visit www.oaic.gov.au or call the OAIC on 1300 363 992. Or visit Health Services Commissioner (1300 582 113).

Refer to:

- (Core 3.1D) Complaints

How are Artificial Intelligence (AI) Scribes used in your consultation?

The practice uses an AI scribe tool to assist GPs in taking notes during consultations with you. The AI scribe records audio of your consultation and generates a clinical note for your health record. The AI scribe service used by the practice is Lyrebird.

Lyrebird:

- Does not share information outside of Australia
- Destroys the audio file once transcription is complete
- Removes sensitive, personally identifying information as part of the transcription process

Policy review statement

This privacy policy will be reviewed regularly in every 2 years to ensure it is in accordance with any changes that may occur.

The most recently updated policy can be accessed via our website:

<https://www.tlchealthcare.com.au/medical/patient-information/privacy/>

Copies are also available at reception for patients who request them.



TLC Primary Care Privacy Policy

HISTORY

Updated 29/10/2024

Updated 07/11/2024

Updated 12/8/2025 – added AI scribes

Updated 02/01/2026 – updated use of document automation technologies, add next review date

APPENDIX

N/A

NEXT REVIEW DATE:

02/01/2028