

# **Privacy Policy**

Current as of: 28/11/2025

#### Introduction

Toowoomba Medical Centre is committed to protecting the privacy of patient information and handling personal information responsibly in accordance with the Privacy Act 1988, the Australian Privacy Principles, and relevant state legislation. This policy explains how we collect, use, disclose, and store your information, and how you may access or correct it.

#### Scope

This policy applies to the patients and staff at Toowoomba Medical Centre

### Purpose and objectives

This policy applies to all patients and staff at Toowoomba Medical Centre. It ensures transparency in how we manage personal and health information essential for providing safe, high-quality healthcare.

#### Policy content

### Meeting your privacy obligations

### 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 that 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.

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

The practice collects, uses, stores, and shares your personal information primarily to manage your health safely and effectively. This includes providing healthcare services, managing medical records, and ensuring accurate billing and payments. Additionally, we may utilise your information for internal quality and safety improvement processes such as practice audits, accreditation purposes, and staff training to maintain high-quality service standards.

### 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, medicines, allergies, and adverse reactions, immunisations, social history, family history and risk factors
- Medicare number (where available) for identification and claiming purposes
- healthcare identifier numbers
- health fund details

### How your personal information is communicated

Your personal information is corresponded via several communication modes including:

Fax

- Australia Post
- Courier
- Secure Messaging Services
- Email (not a preferred method)

It is the practice's policy that we do not send patient information via email (or accept correspondences) as the identity of the patient cannot be verified. If a patient wishes to communicate with the practice via email, they are required to have their consent recorded in their file. It is also preferable that the patient forwards an email to the practice confirming the email address they wish communications to be directed to.

For privacy reasons, the preferred communication method with other practitioners and specialists is via Medical Objects. This practice utilizes Medical Objects Secure Messaging as the means for real time point-to-point communication of clinical correspondence between medical practitioners and specialists.

If a specialist or practitioner does not use Medical Objects, then communication is sent via Fax, Australia Post or Courier.

#### Who is your personal information is shared with

We will treat your personal information as strictly private and confidential. We will only use or disclose it for purposes directly related to your care and treatment, or in ways that you would reasonably expect that we may use it for your ongoing care and treatment. For example, the disclosure of blood test results to your specialist or requests for x-rays.

There are circumstances where we may be permitted or required by law to disclose your personal information to third parties. For example, to Medicare, Police, insurers, solicitors, government regulatory bodies, tribunals, courts of law, hospitals, or debt collection agents. We may also from time to time provide statistical data to third parties for research purposes.

We may disclose information about you to outside contractors to carry out activities on our behalf, such as an IT service provider, solicitor or debt collection agent. We impose security and confidentiality requirements on how they handle your personal information. Outside contractors are required not to use information about you for any purpose except for those activities we have asked them to perform.

### Dealing with us anonymously

You can 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.

### How do we collect your personal information

The practice may collect your personal information in several different ways:

When you make your first appointment, the practice team will collect your personal and demographic information via your registration.

We may also collect your personal information when you visit our website, send us an email or SMS, telephone us, make an online appointment, or communicate with us using social media.

In some circumstances, personal information may also be collected from other sources, including:

- Your guardian or responsible person
- Other healthcare providers (specialists, allied health, hospitals, pathology, diagnostic imaging)
- Your health fund, Medicare or the Department of Veterans' Affairs

While providing medical services, further personal information may be collected via:

- · electronic prescribing
- My Health Record
- online appointments

Images collected

CCTV footage: collected for safety and security

Clinical photos or medical images: taken for medical purposes following approved guidelines

#### When why and with whom do we share your personal information

We sometimes share your personal information:

- with third parties 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 (e.g., in referral letters)
- 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 consent
- to assist in locating a missing person
- to establish, exercise or defend an equitable claim
- · for confidential dispute resolution processes
- when statutory requirements mandate information sharing (e.g., notifiable diseases)
- when providing medical services via electronic prescribing or My Health Record

Only people who need to access your personal information will be able to do so. Other than providing medical services or as described, the practice will not share personal information without your consent.

We do not share your personal information with anyone outside Australia unless permitted by law or with your consent.

#### Will your information be used for marketing purposes?

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

### How is your information used to improve services?

The practice may use your personal information to improve the quality of services through research, quality improvement and staff training.

We may provide **de-identified data** to other organisations to improve population health outcomes. This information does not identify you, and is stored securely within Australia. You may opt out of this by notifying reception.

Where identifiable data is requested for research, your **express consent** will be obtained before any information is shared.

### How are document automation technologies used?

The practice uses document automation technologies to create documents such as referrals. These systems use secure medical software (Best Practice Premier).

All medical software users have unique credentials and can access only what is necessary for their role.

The practice complies with Australian privacy legislation and APPs.

### How are Artificial Intelligence (AI) scribes used?

The practice uses an Al scribe tool to support GPs take notes during their consultations with you. The Al scribe uses an audio recording of your consultation to generate a clinical note for your health record. The practice Al scribe services are **Lyrebird** and **Heidi**.

Lyrebird	oird:
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Lyrebird:

- · does share information outside of Australia
- destroys the audio file once transcription is complete
- removes sensitive, personal identifying information as part of the transcription process

#### Heidi:

Heidi:

- does not share information outside of Australia
- stores the audio file for clinical quality purposes in accordance with its privacy framework
- retains sensitive, personal identifying information only as required to generate the clinical note

The practice will only use data from our digital scribe services to provide healthcare to you.

GPs will give individual patients the option to opt out of the use of Al scribes at any time. If you prefer not to have an Al scribe used in your consultation, please advise your GP or reception.

#### How is your personal information stored and protected?

Your personal information may be stored in various forms, including paper records, electronic records, visual records (X-rays, CT scans, videos, and photos) and audio recordings.

The practice stores all personal information securely, including:

- electronic records protected by passwords and user-level access
- secure cabinets and restricted-access rooms for physical files
- confidentiality agreements for staff and contractors
- secure CCTV footage (excluding consulting and treatment rooms)

Your personal information may be stored at our practice in various forms, including paper records, electronic records, and visual records (X-rays, CT scans, videos and photos).

Our practice stores all personal information securely. Our electronic records are password protected, hard copy files are stored in a secured environment and all staff and contractors are required to sign confidentiality agreements before obtaining access to these records. We will not transfer your personal information to an overseas recipient unless we have your consent, or we are required to do so by law.

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

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

Requests can be made in writing to:

reception@toowoombamedicalcentre.com.au

The practice will respond within 30 days.

A reasonable fee may apply for producing copies of records (not for making the request).

The practice will take reasonable steps to ensure information is accurate and up to date. You may also request corrections at any time.

## How can you lodge a privacy-related complaint?

We take complaints and privacy concerns seriously. You may contact us via:

Email: reception@toowoombamedicalcentre.com.au

Post: Toowoomba Medical Centre, 146 Drayton Road, Toowoomba QLD 4350

Phone: (07) 4635 6111

We will respond within 30 days.

If you are dissatisfied, you may contact the **Office of the Australian Information Commissioner (OAIC)**: <a href="https://www.oaic.gov.au">www.oaic.gov.au</a> | 1300 363 992

#### Who can I contact about this policy?

For enquiries concerning this policy, you can contact: Service Manager – Toowoomba Medical Centre Email: reception@toowoombamedicalcentre.com.au Address: 146 Drayton Road, Toowoomba QLD 4350

Phone: (07) 4635 6111

#### How is privacy on the website maintained?

Any personal information you submit through our website, email or social media is handled securely and confidentially. This practice uses analytics and cookies.

#### Policy review statement

From time to time, we may make changes to our policy, processes and systems in relation to how we handle your personal information. We will update this Privacy Policy to reflect any changes. Those changes will be available on our website and in the practice.

<b>Document Title</b>		Privacy Policy	Version #	1
Effective Date				
Version #	Chang	e Description		Introduced
1	Original document 2020			
2	Review	2023		
3	Review	2025		