

Subiaco Medical Collective Privacy Policy

Current as of: 06/09/2026

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.

Who can I contact about this policy?

For enquiries concerning this policy, you can contact subi@medicalcollective.com.au

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 to facilitate the delivery of healthcare. Access to your personal information is restricted to practice team members who require it for your care. If we ever use your personal information for purposes other than outlined in this document, we will obtain additional consent from you.

It is important to us that as our patient, you understand why we collect and use your personal information.

By acknowledging this Privacy Policy you consent to us collecting, holding, using, retaining and disclosing your personal information in the manners described below.

Why do we collect, use, store, 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.

Why personal information is collected?

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

Can you deal 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 is personal information collected?

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 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 (if relevant).
- While providing medical services, further personal information may be collected via:
 - Electronic prescribing
 - My Health Record
 - Online appointments

Various types of images may be collected and used, including:

- **CCTV footage:** Collected from our premises for security and safety purposes
- **Photos and medical images:** These can be taken using personal devices for medical purposes, following the guidelines outlined in our guide on using personal devices for medical images.

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, who 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 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 it is a statutory requirement to share certain personal information (e.g., some diseases require mandatory notification)
- when it is provision of medical services, through electronic prescribing, My Health Record (e.g., via Shared Health Summary, Event Summary).

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

We do not share your personal information with anyone outside Australia (unless under exceptional circumstances that are permitted by law) without 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 of direct marketing 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 the services offered to patients through research, analysis of patient data for quality improvement and for training activities with the practice team.

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

At times, general practices are approached by research teams to recruit eligible patients into specific studies which require access to identifiable information. You may be approached by a member of our practice team to participate in research. Researchers will not approach you directly without your express consent having been provided to the practice. If you provide consent, you would then receive specific information on the research project and how your personal health information will be used, at which point you can decide to participate or not participate in the research project.

How are document automation technologies used?

Document automation is where systems use existing data to generate electronic documents relating to medical conditions and healthcare.

The practice uses document automation technologies to create documents such as referrals, which are sent to other healthcare providers. These documents contain only your relevant medical information.

These document automation technologies are used through secure medical software called Best Practice.

All users of the medical software have their own unique user credentials and password and can only access information that is relevant to their role in the practice team.

The practice complies with the Australian privacy legislation and APPs to protect your information.

All data, both electronic and paper are stored and managed in accordance with the Royal Australian College of General Practitioners Privacy and managing health information guidance.

How are Artificial Intelligence (AI) Scribes used?

The practice uses an AI scribe tool to support GPs take notes during their consultations with you. The AI scribe uses an audio recording of your consultation to generate a clinical note for your health record. The practice AI scribe service is Lyrebird.

Lyrebird:

- does not share information outside of Australia.
- destroys the audio file once the transcription is complete.
- removes sensitive, personal identifying information as part of the transcription.

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

How do we store and protect your personal information?

Your personal information may be stored at our practice in various forms.

- Paper records
- Electronic records
- Visual records (medical imaging such as X-Ray and CT, medical photography)

Our practice stores all personal information securely. Our staff are trained and required to respect and protect your privacy. We take reasonable steps to protect information held for misuse and loss, and from unauthorised access, modification or disclosure. This includes:

- Strong password protections apply to all computer software.
- Two factor authentication for access to all computer software.
- Access to personal information is restricted on a 'need to know' basis.
- Holding your information on an encrypted database.
- Holding your information in secure cloud storage, stored only in Australia.
- Our staff sign confidentiality agreements.
- Our practice has document retention and destruction policies.
- Where information is provided in hard copy, it will be held in a lockable cabinet.
- Any discarded printed patient information is stored in a locked bin, and shredded by an accredited company.

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, handing your request directly to a staff member and showing a form of ID. Our practice will respond within 30 days. There is a \$30.00 (for individual) and \$50.00 (for a family) fee to provide these records to you.

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 sure requests in writing to our practice staff (subi@medicalcollective.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. We will then attempt to resolve it in accordance with our resolution procedure. All complaints and concerns should be forwarded to our email (subi@medicalcollective.com.au) or via mail to 11 Hamilton Street, Subiaco WA 6008. All requests will be responded to within 30 days by our practice staff.

You may also contact the Office of the Australian Information Commissioner (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.

Privacy and our website

The practice website (www.medicalcollective.com.au/subiaco) contains links to other sites. The practice is not responsible for the privacy practices of any linked sites. We encourage users who leave our site to read the privacy statements of each and every linked website that they choose to visit. All links to external sites is provided for your convenience. The information, products and advertisements contained in the linked sites are neither approved or endorsed by us, and the practice is not responsible for such information, products or advertisements.

Your privacy is important to us, and we want you to feel comfortable visiting our website. Any personal information that patients have given us, including email addresses, will be used only in the following ways:

- Personal data will be securely stored.
- We will not provide your personal data to any third party without your permission.
- We do not automatically collect your personal email address, when you visit our website. It is provided on the registration form.
- If we join with a third party to provide services and you sign up for those services, we will share your name and other contact details, necessary, with our partner to provide these services to you.
- If you view specific pages or download information from specific pages on our website, we will track and add the number of your visits to the aggregate number of visits by all users in order to better design our website.
- We may share aggregate demographic information with our affiliates. This is not linked to any personal information that can identify you or any other visitor to our website.

Policy review statement

Our privacy policy is regularly reviewed to ensure compliance with current obligations.

If any changes are made:

- They will be reflected on the website.
- Significant changes may be communicated directly to patients via email or other means.

Please check the policy periodically for updates. If you have any questions, feel free to contact us.

Disclaimer

The Privacy policy template for general practices is intended for use as a guide of a general nature only and may or may not be relevant to particular practices or circumstances. The Royal Australian College of General Practitioners (RACGP) has used its best endeavours to ensure the template is adapted for general practice to address current and anticipated future privacy requirements. Persons adopting or implementing its procedures or recommendations should exercise their own independent skill or judgement, or seek appropriate professional advice. While the template is directed to general practice, it does not ensure compliance with any privacy laws, and cannot of itself guarantee discharge of the duty of care owed to patients. Accordingly, the RACGP disclaims all liability (including negligence) to any users of the information contained in this template for any loss or damage (consequential or otherwise), cost or expense incurred or arising by reason of reliance on the template in any manner.