

## PRIVACY POLICY

We are committed to protecting the privacy of patient information and to handling your personal information in a responsible manner in accordance with the Privacy Act 1988 (Cth), the Privacy Amendment (Enhancing Privacy Protection) Act 2012, the Australian Privacy Principles and relevant State and Territory privacy legislation (referred to as privacy legislation).

This Privacy Policy explains how we collect, use and disclose your personal information, how you may access that information and how you may seek the correction of any information. It also explains how you may make a complaint about a breach of privacy legislation. This Privacy Policy is current from September 23, 2025. 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 in the practice.

### 1. Consent.

When you first attend MCP&P psychiatry and psychology practice, we will ask you to provide information (for example, contact details) and ask you to confirm your consent to the collection of your information. This means that you are providing consent for the practitioners and staff to gather, access and use your personal health information to facilitate the delivery of healthcare to you. Your personal information will only be accessed by practitioners and staff who need to do so for the purpose of providing healthcare to you.

We will seek your express consent before using your information for any purpose not directly related to your healthcare.

### 2. What information does this practice collect?

When you become a patient of MCP&P we collect information, on behalf of the therapist, that is necessary and relevant so they can provide you with medical care and treatment, and manage our medical practice. This information may include your name, address, date of birth, gender, health information, family history, credit card and direct debit details and contact details. This information may be stored on our computer medical records system and/or in hand written medical records.

Wherever practicable we will only collect information from you personally. However, we may also need to collect information from other sources such as treating specialists, radiologists, pathologists, hospitals and other health care providers. We collect information in various ways, such as over the phone or in writing, in person in our practice or over the Internet if you transact with us online. Medical and non-medical staff may collect this information.

In emergency situations we may also need to collect information from your relatives or friends.

We may be required by law to retain medical records for certain periods of time depending on your age at the time we provide services. This is all recorded on a medical software program called Xestro.

When you visit our website, we collect information through the following ways:

Functional cookie for pop-ups:

- Purpose: remembers when a visitor has closed a pop-up so it doesn't show again.
- Data collected: non-identifiable browser information only (no personal details).

Google Analytics:

- Purpose: provides anonymous, aggregated statistics about how visitors use the site (e.g. pages visited, time on site, device type).
- Data collected: non-identifiable usage data such as browser type, IP address (which Google truncates/anonymises), and general location data.
- We do not receive any personally identifiable information from this.

This is not personal information as you are not identified or reasonably identifiable.

### **3. Why is information collected?**

To ensure that you receive the best care possible we need to manage your information effectively. Collation of information prevents unnecessary repetition of tests and previous treatments. Accurate contact information assists us with maintaining good communication with our patients and/or their parents/guardians and allows for prompt rescheduling of appointments if needed.

Research is a key part of improving medical care and if research is undertaken in this practice patients will have the opportunity to read the information brochure as well as consent policies. If they give consent their information may be used for the project, which is covered by such consent.

### **4. How can I have access to or correct my medical records?**

You have the right to request access to, or correction of, your personal information. To request access please submit a written request by completing a Request To Access Medical Records form, available at reception. We will respond within 30 days.

You may also request corrections by emailing us at: [reception@mcpp.com.au](mailto:reception@mcpp.com.au)

A small fee may apply to cover administrative costs (but you will not be charged for making the request), these are not claimable through Medicare.

We will respond to such requests in accordance with applicable privacy principles and legislation.

We may deny access to your medical records in certain circumstances permitted by law, for example, if disclosure may cause a serious threat to your health or safety. We will always tell you why access is denied and the options you have to respond to our decision.

If you would like a third party to have a copy of your medical record, such as another doctor or allied health practitioner this can also be requested. A fee will be charged for the preparation and copying of the medical files.

### **5. Uses and Disclosure**

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 in a de-identified form. 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.

Overseas Disclosure of Personal Information:

We may use secure third-party service providers to support our healthcare services, including tools that assist with clinical documentation. Some of these providers may store or process personal information on servers located outside Australia.

Where overseas disclosure occurs, it is most likely to involve providers based in the United States and the European Union. We take reasonable steps to ensure that any overseas recipients handle personal information in a way that is consistent with the Australian Privacy Principles, including through appropriate safeguards.

### **6. Data Quality and Security**

We will take reasonable steps to ensure that your personal information is accurate, complete, up to date and relevant. For this purpose our staff will ask you to confirm that your contact details are correct when you attend a consultation. We request that you let us know if any of the information we hold about you is incorrect or out of date.

Personal information that we hold is protected by:

# Securing our premises;

# Placing passwords and varying access levels on databases to limit access and protect electronic information from unauthorised interference, access, modification and disclosure.

The information is saved and stored offsite on a server within Australia and is backed up regularly. No paper records are kept, any paper information given is scanned into the Xestro program and then cross shredded and disposed of securely. Every time you or your child attends an appointment a new record is added to your medical record in Xestro.

All staff and contractors at MCP&P have signed confidentiality agreements.

## **7. AI Scribe**

The therapists may use an AI scribe tool to support note taking during their consultations with you. The AI scribe listens to your consultation to generate a clinical note for your health record. The AI scribe services used by some of the therapists in the practice are Heidi, Nabla and Novonote.

Heidi:

- Does not share information outside of Australia.
- Does not store the audio file during or after the transcription is complete.
- Removes sensitive, personal identifying information as part of the transcription.
- Once the transcription has been deleted from Heidi, all data associated with it is deleted as well.

The therapist will only use data from their digital scribe service to provide healthcare to you.

Nabla:

- Servers sit outside of Australia and are located in the EU.
- Destroys the audio file once the transcription is complete.
- Removes sensitive, personal identifying information as part of the transcription.

The therapist will only use data from their digital scribe service to provide healthcare to you.

Novonote:

- Servers are held within Australia.
- Destroys the audio file once the transcription is complete.
- Removes or redacts sensitive, personal identifying information as part of the transcription.
- Once the transcription has been deleted from Novonote, all data associated with it is deleted as well.

The therapist will only use data from their digital scribe service to provide healthcare to you.

Governance of AI Use:

- We use AI tools in a manner consistent with the APPs and relevant ethical standards.
- Personal information is not used to train AI models unless express consent has been obtained.
- All outputs generated by AI systems are subject to human review and clinical oversight.
- No automated decision-making tool is used in this practice.

## **8. 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 Xestro.

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.

## **9. How is privacy on the website maintained?**

At MCP&P, any personal information you share with us through website, email, and social media, is handled securely and confidentially. This practice uses analytics and cookies.

## **10. Marketing and Research**

We are committed to continuously improving the quality of our services and supporting clinical education. We may use your information in the following ways:

- **Quality Improvement and Staff Education**

We may use patient information for internal audits, staff training, clinical review, and accreditation activities, de-identified where practicable. These processes help ensure we maintain high standards of care and safety.

- **Research**

From time to time, we may participate in health research projects. If identifiable information is required, we will seek your express consent before sharing your data. You may be contacted by a member of our team to discuss a research opportunity, but you will never be contacted directly by researchers unless you have provided consent.

We will only provide identifiable information for research if the project has appropriate ethics approval and meets legal and privacy requirements.

- **De-identified Data Sharing**

We may contribute de-identified health data to health improvement initiatives or registries. This data cannot identify you and is stored securely. If you do not want your data included in these de-identified datasets, please inform our reception staff.

- **Marketing**

We will not use your personal information to market goods or services directly to you without your express consent. If you do provide consent, you may opt out of receiving marketing communications at any time by notifying us in writing or using the unsubscribe function.

## **11. Dealing with us Anonymously**

The APPs provide for individuals to be dealt with anonymously or under a pseudonym, except where impracticable or where the law requires individuals to be identifiable. Please raise this with us if you wish to remain anonymous or use a pseudonym when interacting with our practice and we will consider your request. However, given the nature and requirements of providing healthcare, if impractical or required by law we will require you to be identifiable.

## **12. Complaints**

We take complaints and concerns regarding privacy seriously. If you have a complaint about the privacy of your personal information, we request that you contact us in writing by either:

Email - [manager@mcpp.com.au](mailto:manager@mcpp.com.au) or by mail - P.O.Box 4010, Norwood South, SA 5067.

If you need further information, our contact phone number is - 08 7231 1703.

Upon receipt of a complaint we will consider the details and attempt to resolve it in accordance with our complaints handling procedures. The turn around time is 30 days from the date we receive the complaint.

If you are dissatisfied with our handling of a complaint or the outcome you may make an application to the Commonwealth or you can contact the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner will require you to give them time to respond before they investigate. For further information visit [www.oaic.gov.au](http://www.oaic.gov.au) or call the OAIC (Office of the Australian Information Commissioner) on 1300 363 992.