

# Southern Women's Health

## Privacy Policy

Updated September 2026

This policy replaces the May 2017 patient privacy pamphlet previously used by Southern Women's Health. It is a practice-specific privacy policy describing how the practice collects, uses, discloses, stores and protects personal and health information.

### 1. Our commitment to privacy

Southern Women's Health is committed to protecting the privacy and confidentiality of personal and health information.

We manage personal information in accordance with the Privacy Act 1988 (Cth), the Australian Privacy Principles (APPs),

and applicable NSW privacy and health-records legislation, including the Health Records and Information Privacy Act 2002 (NSW).

This policy explains, in plain language, what information we collect, why we collect it, how we use and disclose it,

how we store and protect it, and how you can access or correct your information or make a privacy complaint.

### 2. What personal information we collect and hold

Depending on the services you receive, we may collect and hold:

- identifying information such as your name, date of birth and address;
- contact details, including telephone number and email address;
- Medicare, healthcare identifier and private health insurance details;
- health information, including medical history, symptoms, diagnoses, treatment, medications, allergies, test and imaging results, referrals and correspondence;
- information relevant to reproductive, sexual and women's health;
- billing, payment and appointment information;
- information provided by another healthcare professional or organisation involved in your care;
- information about your communication preferences and requests; and
- information reasonably required to administer and improve our services.

Health information is sensitive information and is handled with additional protections.

### 3. How we collect information

Our Privacy Collection Notice is provided at or before collection of personal information, including through HotDoc registration forms and other forms used to collect patient information. The Privacy Collection Notice is separate from this Privacy Policy and may contain information specific to the particular collection, including the use of AI-assisted clinical documentation where applicable.

We generally collect information directly from you during consultations, through registration and health questionnaires,

online forms, telephone or electronic communications, appointment-booking services, and other interactions with the practice.

We may also collect relevant information from other people or organisations involved in your care, such as your GP, specialists,

hospitals, pathology providers, imaging providers, pharmacies or other healthcare professionals, where permitted or required.

Where practicable, we will tell you at or before collection why information is being collected, how it will be used or disclosed,

and other information required under applicable privacy law.

At the point of collection, including through HotDoc registration forms, we aim to provide patients with a collection notice or privacy-policy link explaining the purposes for which information is collected, the usual types of disclosure, and other matters required by applicable privacy law.

### 4. Why we collect, use and disclose information

We collect, hold, use and disclose personal information for purposes including:

- providing, coordinating and managing your healthcare;
- maintaining an accurate and complete medical record;
- arranging referrals, investigations, prescriptions and follow-up care;
- communicating with you about appointments, results, recalls and healthcare;
- processing Medicare, private health insurance and other payments or rebates;
- practice administration, quality improvement, education and clinical governance;
- meeting legal, regulatory and professional obligations;
- responding to requests, complaints and medico-legal matters; and
- other purposes that are permitted or required by law or for which you have consented.

We will generally only use or disclose information for the purpose for which it was collected, a related purpose that you would reasonably expect,

or another purpose permitted or required by law.

## **5. Disclosure to other healthcare providers**

To provide safe and coordinated care, relevant information may be shared with healthcare professionals and organisations involved in your care, including your GP, specialists, hospitals, pathology providers, diagnostic imaging providers, pharmacies and other treating clinicians. This may include sending pathology or diagnostic imaging requests to your selected provider and receiving reports and results electronically into the practice's clinical system.

Where consent is required, we will seek your consent. Information may also be disclosed without consent where permitted or required by law,

including where necessary to lessen or prevent a serious threat to health or safety or where disclosure is otherwise authorised or required.

## **6. Other disclosures**

We may disclose information to organisations such as Medicare, private health insurers, professional advisers, technology and service providers,

and government or regulatory bodies where this is reasonably necessary for the purposes described in this policy or where permitted or required by law.

We limit disclosures to information reasonably necessary for the relevant purpose.

Results and reports received by the practice form part of the patient's clinical record and may be communicated to the patient or other healthcare professionals involved in their care, where appropriate and authorised.

Pathology and diagnostic imaging requests may be generated through Best Practice. Where electronic integration is available, pathology reports and diagnostic imaging reports and results may be transmitted electronically and automatically downloaded or imported into the patient's Best Practice medical record. Relevant information may be disclosed to the provider for the purpose of providing the requested healthcare service.

Southern Women's Health may request pathology and diagnostic imaging services from a range of external pathology laboratories and diagnostic imaging providers selected by the practice or patient. Examples of providers may change over time and are therefore not exhaustively listed in this policy.

## **7. Electronic communication and online services**

7A. HotDoc online registration and transfer to Best Practice

Lyrebird states that consultation audio is processed in real time and is not retained as an audio recording, that Australian data is processed and stored in Australia, and that patient data is not used to train its AI models. Lyrebird-generated clinical notes remain subject to the practice's clinical review and record-keeping processes. These supplier arrangements may change and the practice will review relevant privacy and security information periodically.

Specific written consent is obtained before each visit using a Lyrebird consent form generated and delivered through HotDoc. The completed consent form is retained in the patient's Best Practice medical record. Patients may decline the use of Lyrebird, and the consultation will then be documented using the practice's usual clinical documentation process. Consent to Lyrebird is separate from consent to medical treatment.

Southern Women's Health uses Lyrebird Health, an AI-assisted clinical documentation tool, to assist clinicians with documenting consultations. With the patient's specific consent, Lyrebird processes information from the consultation to assist in generating draft clinical documentation for the clinician to review and approve. The treating clinician remains responsible for reviewing the output and the accuracy and content of the patient's medical record.

#### 7B. Lyrebird Health and AI-assisted clinical documentation

With your consent, Southern Women's Health may request relevant health information from other healthcare providers involved in your care. This may include previous or current GPs, specialists, hospitals, pathology providers, diagnostic imaging providers and other treating healthcare professionals.

Where appropriate, patients are asked to complete a consent form generated and delivered through HotDoc authorising Southern Women's Health to request relevant medical information from another healthcare provider. The completed consent is retained in the patient's Best Practice medical record.

Requests will generally be limited to information reasonably necessary to provide and coordinate your healthcare. Information received from another healthcare provider may be incorporated into your medical record and managed in accordance with this Privacy Policy.

#### 7C. Obtaining health information from other healthcare providers

Requests for medical information will be assessed by the practice. Appropriate consent or authority will be obtained and documented before information is released, unless disclosure is otherwise permitted or required by law. The practice will verify the identity of the person making the request and, where relevant, the identity of the patient, and consider the scope and currency of the consent or authority before releasing information.

Where appropriate, consent or authority to release information may be obtained using a form generated through HotDoc, and the completed form will be retained in the patient's Best Practice medical record.

Requests from third parties such as insurers, solicitors, employers or other organisations may require additional authority and will be assessed separately. The practice will only disclose information where authorised or otherwise permitted or required by law.

With your consent, Southern Women's Health may provide relevant health information to another healthcare provider involved in your care, such as a new GP, specialist or hospital. We generally limit information released to what is reasonably necessary for your care or the specific request.

#### 7D. Releasing health information to other healthcare providers

Southern Women's Health may request pathology and diagnostic imaging services from a range of external pathology laboratories and diagnostic imaging providers selected by the practice or patient. Examples of providers may change over time and are therefore not exhaustively listed in this policy.

Pathology and diagnostic imaging requests may be generated through Best Practice. Where electronic integration is available, pathology reports and diagnostic imaging reports and results may be transmitted electronically and automatically downloaded or imported into the patient's Best Practice medical record. Relevant information may be disclosed to the provider for the purpose of providing the requested healthcare service.

#### 7E. Pathology and diagnostic imaging

Southern Women's Health will take reasonable steps required by applicable privacy law before disclosing personal information to an overseas recipient.

Where practicable, this policy will identify countries in which overseas recipients are likely to be located.

HotDoc states that personal information is hosted and stored on Australian servers, but its current privacy policy also states that some disclosures may involve overseas recipients, including software and service providers in the United States and United Kingdom, and other sub-processors or staff working overseas. Southern Women's Health will take reasonable steps required by APP 8 before making a disclosure to an overseas recipient and remains accountable where required by the Privacy Act.

### 8. Overseas disclosure

Some third-party technology or service providers used by healthcare practices may store, process or provide support for information outside Australia.

Where the relevant integration is enabled, information submitted through HotDoc registration forms is transferred into the patient's record in Best Practice. This may reduce manual data entry and make relevant information available for safe and efficient care. Once information

forms part of the medical record, Southern Women's Health manages it in accordance with applicable privacy and health-records obligations.

Patients may contact the practice if they require an alternative registration process, although some information may be necessary for the practice to safely provide healthcare or meet legal and administrative requirements.

Southern Women's Health uses HotDoc for online bookings and patient registration. Registration forms may collect identifying and contact information, Medicare details and health information, including relevant past medical history and other information needed to provide healthcare.

## **9. Storage and security**

We take reasonable steps to protect personal information from misuse, interference, loss and unauthorised access, modification or disclosure.

Records may be held in electronic and/or paper form. Security measures may include access controls, passwords, user permissions, secure systems,

backups, staff confidentiality obligations and physical security.

We do not publish detailed security controls where doing so could reduce their effectiveness.

### **9A. My Health Record**

Where Southern Women's Health accesses or contributes information to a patient's My Health Record, this is done in accordance with the My Health Records Act 2012 (Cth), applicable privacy requirements and the practice's My Health Record procedures. Patients may discuss access to or handling of My Health Record information with the practice.

## **10. Medical records and accuracy**

We aim to keep medical records accurate, complete, up to date and relevant to your care. Clinical records may include information needed to allow

another treating clinician to provide appropriate care when necessary.

If you believe information we hold is inaccurate, incomplete, out of date or misleading, you may ask us to correct it.

## **11. Access to your information**

You may request access to personal information and health information we hold about you.

Requests should be made to the practice in writing where practicable. We will respond within a reasonable period and may need to verify your identity.

Access may be refused or limited in circumstances permitted by law, including where providing access would create a serious threat to the life, health or safety

of an individual or would unreasonably impact another person's privacy. Where appropriate, we will explain the reason for any refusal and discuss available alternatives.

## **12. Correction of information**

If you believe information we hold about you is inaccurate, incomplete, out of date or misleading, please contact us.

Where appropriate, we will correct the information. If we do not agree that correction is required, you may ask us to attach a statement to the record noting your concerns.

We will not delete or alter original clinical records where doing so would be inconsistent with legal or professional record-keeping requirements.

## **13. Anonymity and pseudonymity**

Where lawful and practicable, you may ask to deal with the practice anonymously or using a pseudonym for a particular matter. However, we may need to identify you to provide safe healthcare, maintain your medical record, process Medicare or other payments, or meet legal requirements.

meet legal requirements, or safely manage your care.

## **14. Quality improvement, education and research**

We may use health information for activities such as clinical audit, quality improvement, education and practice management where permitted by law.

Where information is used for research or other secondary purposes, we will comply with applicable privacy, ethical and consent requirements.

Where practicable, information will be de-identified. Identifiable information will only be used or disclosed where permitted or required by law,

including where an applicable research exception or public-interest requirement applies.

## **15. Direct marketing**

We do not use health information for direct marketing.

If the practice sends administrative or service communications, such as appointment reminders or information about your care, these are not intended to be direct marketing.

You may contact us if you have concerns about any communication you receive.

## **16. Children and young people**

We recognise that privacy and confidentiality considerations apply to children and young people. Access to information about another person, including a child,

will only be provided where authorised or permitted by law and having regard to the person's capacity, consent, best interests and applicable legal requirements.

## **17. Privacy complaints**

If you have a concern about how we have handled your personal or health information, please contact our Privacy Officer.

We will acknowledge and investigate your complaint and aim to respond within a reasonable period. We will handle complaints fairly and confidentially.

If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner (OAIC).

For matters within NSW health privacy legislation, you may also contact the NSW Information and Privacy Commission (IPC NSW).

## **18. Data breaches**

We maintain procedures for responding to suspected privacy and information-security incidents. If a data breach occurs that is subject to the Notifiable Data Breaches scheme,

we will comply with the applicable notification requirements, including notifying affected individuals and the OAIC where required.

## **19. Changes to this policy**

We review this policy regularly and when our information-handling practices or privacy obligations change. The current version will be made available free of charge

on our website and on request.

Last updated: September 2026

Next review: September 2027

## **20. Contact details**

Southern Women's Health

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Reception phone: (02) 9553 9823

Email: [info@southernwomenshealth.com.au](mailto:info@southernwomenshealth.com.au)

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