

POLICY



Oxford Medical Spot - Privacy Disclosure Statement

Policy reference:	Oxford Medical Spot – Privacy Disclosure Statement
Approved date:	Apr 2026
Review date:	Apr 2026
Applies to:	All: <ul style="list-style-type: none">– clinical staff, non-clinical staff, peer workers, volunteers– contracted services, agents, suppliers
Policy Group:	Privacy & Personal Health Information
Related RACGP criteria:	Core Standard 3 – Practice Governance and Management (C3.6C) Core Standard 6 – Information Management (C6.3, C6.4B, C6.4C, C6.4D, C6.4E)
Related Standards/Legislation:	Privacy Act 1988 (Cth) ; Health Records and Information Privacy Act 2002 (NSW) ; Health Practitioner Regulation (NSW) 2016

Version & Change History

Date	Description	Reason for Change	Author	Version
Apr 2026	Initial	Initial development of policy	OMS	V1.0

CONFIDENTIALITY STATEMENT

The content of this document is the confidential information of Oxford Medical Spot. It may not be reproduced, disclosed, or otherwise used in any form without authorisation by Oxford Medical Spot. The contents of this document may be disclosed only to persons with the “need to know” and who agree to be bound by obligations of confidentiality, or otherwise with consent from Oxford Medical Spot.

Table of Contents

1. Background 3

2. Purpose 3

3. Scope..... 3

4. Why and when your consent is necessary 3

5. Why do we collect, use, hold and share your personal information? 4

6. What personal information do we collect? 4

7. Dealing with us anonymously 5

8. How do we collect your personal information?..... 5

9. Storage of Information..... 6

10. When, why and with whom do we share your personal information? 6

11. Sharing information outside of NSW and Australia 6

12. Will your information be used for marketing?..... 7

13. How is your information used to improve services? 7

14. How are document automation technologies used?..... 7

15. How are Artificial Intelligence (AI) Scribes used? 7

16. Research..... 8

17. How is your personal information stored and protected?..... 8

18. How can you access and correct your personal information? 8

19. How can you lodge a privacy-related complaint, and how will the complaint be handled at OMS? 9

20. Privacy and our website..... 9

21. Policy review statement..... 9

Approved	Apr 2026	Version	V1.0	Related RACGP Standards	C3.6C, C6.3, C6.4B, C6.4C, C6.4D, C6.4E
----------	----------	---------	------	-------------------------	---

OXFORD MEDICAL SPOT – PRIVACY DISCLOSURE STATEMENT

1. Background

The objective of this privacy statement is to provide you, our client, with clear information on what personal information is collected/held by us, how your personal information (which includes your health information) is collected and used within Oxford Medical Spot (“OMS”), and the circumstances in which we may share it with third parties, in accordance with the Privacy Act 1988 (Cth) (the “Act”) and the Australian Privacy Principles ('APPs') contained in the Privacy Act.

The APPs set out the way organisations can collect, use, disclose and provide access to personal and sensitive information. OMS complies with and, wherever possible, strives to exceed the requirements of the Act and complies with all of APPs.

OMS may, from time to time, review and update this Privacy Statement and our Privacy Policy to take account of new laws and technology, changes to operations and practices and to make sure it remains appropriate to the changing legal environment.

2. Purpose

This statement outlines our policy on how we use and manage personal information provided to or collected by it.

This policy is designed to communicate to our clients how we manage personal information and to complement our policy and procedure manual.

For more information on privacy, please visit www.oaic.gov.au

For enquiries concerning this policy, you can contact info@oxfordmedicalspot.com.au

3. Scope

This policy statement covers:

- OMS procedures
- staff responsibilities
- client consent
- collection, use and disclosure of information
- access to information.

4. Why and when your consent is necessary

When you register as a client of Oxford Medical Spot, you provide consent for our GPs and other staff to access and use your personal information so they can provide you with the best possible healthcare. Access to your personal information is restricted to OMS team members who require it for your care.

By using our website, you consent to the use of tracking pixels as described in this policy. You can manage your tracking preferences through your browser settings or privacy-focused browser extensions.

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

Approved	Apr 2026	Version	V1.0	Related RACGP Standards	C3.6C, C6.3, C6.4B, C6.4C, C6.4D, C6.4E
----------	----------	---------	------	-------------------------	---

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

OMS 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 audits, accreditation purposes, and staff training to maintain high-quality service standards.

We may also collect additional information about you, such as your sexual orientation, ethnicity/cultural background, preferred language. This helps us to better understand and assess our services so we can work to improve. This additional information is always **optional** and you do not need to provide this in order to receive care.

6. What personal information do we collect?

When you engage with us, we may collect and hold some or all of the following personal information:

- **Contact information:** We may collect information such as your name, address, date of birth, contact number and email address;
- **Medical / Health information:** We may collect health or medical information that is relevant to our services, which may include medical or health records, medical history, medicines, allergies, and adverse reactions immunisations, social history, family history and risk factors
- **Other information:** such as Medicare number (where available) for identification and claiming purposes, as well as healthcare identifiers numbers and/or health fund details.

If you choose **not** to provide the information that is critical to the services you are seeking, we may not be able to provide you with the services, resources and other tools that you may require.

When collecting personal information, we will take reasonable steps to make an individual aware of:

- What Oxford Medical Spot is and how to contact us; and
- The purpose(s) of the collection; and
- Consequences (if any) to the individual of non-collection; and
- How to gain access to the information; and
- Why the information is collected; and
- To whom (if anyone) OMS may disclose the information; and
- Any law or court/tribunal order that requires the information to be collected; and
- The consequences (if any) to the individual if all or part of the information is not provided; and
- Our complaint handling process; and
- Any potential overseas disclosure and, if so, the countries to which the disclosure will be made.

OMS uses fair and lawful ways to collect personal information and only collects personal information that is necessary for our functions or activities. We collect personal information directly from the individual whenever it is reasonable and practicable to do so.

Approved	Apr 2026	Version	V1.0	Related RACGP Standards	C3.6C, C6.3, C6.4B, C6.4C, C6.4D, C6.4E
----------	----------	---------	------	-------------------------	---

7. 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 (in accordance with APP 2).

Dealing with us anonymously may also affect certain processes such as your ability to claim Medicare rebates or use your private health insurance (where applicable).

8. How do we collect your personal information?

OMS may collect your personal information in several different ways.

1. When you make your first appointment, our staff will collect your personal and demographic information via your registration.
2. During the course of providing medical services, we may collect further personal information.
Information may also be collected through electronic transfer of prescriptions (eTP), My Health Record, MyMedicare or other eHealth services you have opted in to.
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 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).
 - While providing medical services, further personal information may be collected via:
 - electronic prescribing
 - My Health Record
 - online appointments.

We will always comply with privacy obligations when collecting personal information from third-party sources. This includes ensuring transparency with patients, obtaining necessary consents, maintaining data accuracy, securing the information, and using it only for specified purposes.

5. Various types of images may be collected and used, including:
 - **CCTV footage:** Collected from our premises for security and safety purposes. Footage will be used only by OMS and by the providers of our security services for security purposes. Surveillance videos are not used by OMS for other purposes and the footage is not publicly available. Surveillance cameras are not located in any consult rooms, bathrooms or change room facilities.
 - **Photos and medical images:** These can be taken using personal devices for medical purposes, following the guidelines outlined in the RACGP guide on using personal devices for medical images: [Using personal mobile devices for clinical photos](#)
6. **Use and Purpose of Tracking Technologies:** We use tracking technologies, such as third-party tracking pixels, to collect information about your interactions with our website. These technologies help us analyse website traffic,

Approved	Apr 2026	Version	V1.0	Related RACGP Standards	C3.6C, C6.3, C6.4B, C6.4C, C6.4D, C6.4E
----------	----------	---------	------	-------------------------	---

improve user experience, and deliver targeted advertising. The information collected via tracking pixels is used to understand user behaviour, enhance website functionality, and provide content and advertisements tailored to your interests.

9. Storage of Information

The Australian Privacy Principles and the Health Privacy Principles require us not to store personal information longer than necessary. In particular, the Health Privacy Principles impose certain obligations about the length of time health records must be stored.

Under our destruction and de-identification policies, your personal information that is no longer required will be de-identified or destroyed. In many circumstances, however it will be kept for marketing purposes, as you will have consented to that in writing with us.

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

We will sometimes share your personal information:

- 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 client’s life, health or safety or public health or safety, or it is impractical to obtain the client’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)
- during the course of providing medical services, through eTP, My Health Record, MyMedicare, or other eHealth services you have opted in to.
- with third parties providing services to OMS, such as accreditation agencies or information technology providers. These third parties are required to comply with APPs and this policy. Only people who need to access your information will be able to do so.
- with anyone you authorise OMS to disclose information to.

Third-Party Tracking:

- We may share information collected via tracking pixels with third-party service providers who assist us in analysing data and delivering personalised content. These providers are obligated to protect your information in accordance with this policy.

Other than in the course of providing medical services or as otherwise described in this policy, we will not share personal information with any third party without your consent.

11. Sharing information outside of NSW and Australia

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

Approved	Apr 2026	Version	V1.0	Related RACGP Standards	C3.6C, C6.3, C6.4B, C6.4C, C6.4D, C6.4E
----------	----------	---------	------	-------------------------	---

12. Will your information be used for marketing?

OMS treats marketing for the future growth and development of the organisation. Personal information held by OMS may be disclosed to an organisation(s) that assist us in marketing.

We will not use your personal information for marketing any of our goods or services directly to you without your consent. If you do consent, you may opt-out of direct marketing at any time by notifying us in writing using the following details:

- Email: info@oxfordmedicalspot.com.au
- Mailing address: Oxford Medical Spot, 68 Garfield Rd E, Riverstone, NSW 2765

13. How is your information used to improve services?

We may use your personal information to improve the quality of the services offered to clients through research, analysis of patient data for quality improvement and for training activities with our team.

We may provide de-identified data to other organisations to improve population health outcomes (e.g. clinical registries). The information is secure, clients 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, or email info@oxfordmedicalspot.com.au

14. How are document automation technologies used?

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

We may use 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 our secure medical software, 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 within the practice.

OMS 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 (RACGP) [Privacy and managing health information guidance](#).

15. How are Artificial Intelligence (AI) Scribes used?

We may use 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 AI scribe service which may be used at OMS is HeidiAI or LyreBird Scribe.

Importantly, if it is used by your practitioner, these AI scribe:

- does not share information outside of Australia
- destroys the original audio files from their servers immediately once the transcription is complete.

Approved	Apr 2026	Version	V1.0	Related RACGP Standards	C3.6C, C6.3, C6.4B, C6.4C, C6.4D, C6.4E
----------	----------	---------	------	-------------------------	---

- removes sensitive, personal identifying information as part of the transcription

We will only ever use data from our digital scribe service to provide health care services to you.

16. Research

The National Health and Medical Research Council (NHMRC) has issued guidelines (s95 and s95a) relating to the use of information for research purposes. These guidelines balance the protection of an individual's health information with the need for ethically approved research using individuals' health data without consent.

All research projects are required to have appropriate Human Research Ethics Committee (HREC) approval in place prior to any information being provided, or before any client can be approached to participate in research. The HREC approval will outline the consent requirements for the study (e.g. individual express consent, opt-out consent or a waiver of consent) in accordance with the NHMRC guidelines and privacy requirements.

17. How is your personal information stored and protected?

Your personal information may be stored at our practice in various forms. This may include paper records, electronic records – including within our Practice Management software, Best Practice – as well as visual records (X-rays, CT scans, videos and photos), and audio recordings.

OMS also uses CCTV at our premises, outside the building and within main/waiting areas, but excluding consulting and treatments rooms.

OMS stores all digital personal information securely in protected information systems and takes various precautions to prevent misuse, loss, unauthorised access, modification, interference or disclosure by use of various methods including firewalls and passworded access rights to computerised records.

Any paper records or information which contain personal or sensitive information are stored in locked cabinets or offices and will only be accessible to people with a need to access that information.

18. How can you access and correct your personal information?

We endeavour to ensure that the personal information it holds is accurate, complete and up-to-date. You have the right to request access to, and the correction of, your personal information.

We will do this either over the phone or face-to-face. An individual may arrange an appointment to view their personal information or they may request a written copy.

OMS acknowledges clients may request access to their medical records. We require you to put this request in writing to info@oxfordmedicalspot.com.au and we will respond within a reasonable time (approximately 30 days). You may be required to complete an additional consent form to access a transcript of your medical records.

We will not charge any fee for your access request but may charge an administrative fee for providing a copy of your Personal Information. If a fee is applicable, we will advise you of this prior to completing your request so you are aware of any costs involved. Fees will be set in accordance with the [State Insurance Regulatory Authority](#) (SIRA) or Australian Medical Association (AMA) guidelines.

We will take reasonable steps to correct your personal information where the information is not accurate or up to date. Sometimes, we will ask you to verify your personal information held by us is correct and current. You may also request that we correct or update your information. To do this, please make a request in writing to info@oxfordmedicalspot.com.au

Approved	Apr 2026	Version	V1.0	Related RACGP Standards	C3.6C, C6.3, C6.4B, C6.4C, C6.4D, C6.4E
----------	----------	---------	------	-------------------------	---

Under special circumstances outlined in APP 12, we may refuse to allow a client to see information held about them, but is required under the Act to explain why. If a client thinks their information is not being used or held appropriately (in accordance with the Act), they may make a complaint to OMS or the Privacy Commissioner.

19. How can you lodge a privacy-related complaint, and how will the complaint be handled at OMS?

We take complaints and concerns regarding privacy seriously. You should express any privacy concerns you may have in writing using the details provided below:

- Email address: info@oxfordmedicalspot.com.au
- Mailing address: Oxford Medical Spot, 68 Garfield Rd E, Riverstone, NSW 2765
- Contact number: 02 9627 3191

We will then attempt to resolve it within 30 days, in accordance with our resolution procedure.

If you do not feel we have resolved your issue, 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.

Alternatively, you may contact the NSW Health Care Complaints Commission (HCCC) via telephone: (02) 9219 7444 / 1800 043 159 (Toll Free in NSW) or via their website: www.hccc.nsw.gov.au

20. Privacy and our website

We may collect personal information via our website and social media channels when you engage with us. Any personal information you share with us through website, email, and social media, is handled securely and confidentially.

21. Policy review statement

This policy is reviewed regularly, at least every 3 years, to ensure it remains applicable to current practice procedure and complaint with legal requirements.

If any changes are made:

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

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

This policy statement was developed in line with guidance from [Australian Government Office of the Australian Information Commissioner \(OAIC\)](#) and the [Royal Australian College of General Practitioners \(RACGP\)](#).

Approved	Apr 2026	Version	V1.0	Related RACGP Standards	C3.6C, C6.3, C6.4B, C6.4C, C6.4D, C6.4E
----------	----------	---------	------	-------------------------	---