

# AI-Specific Privacy Policy

Your privacy is important to us. It is the policy of Time to Untangle Clinical Psychology services (ABN: 86 851 083 994) to respect your privacy and comply with any applicable law and regulation regarding any personal information we may collect about you, including across our website, [www.timetountangle.com.au](http://www.timetountangle.com.au), and other sites we own and operate.

This policy was last updated on 29/09/2024.

Please also see our [General Policy](#).

## PURPOSE OF THE FORM

As part of our ongoing commitment to providing the best possible care, we have integrated AI conversational intelligence software into our practice. This form seeks your written consent to use this technology during your engagement with Dr Jacinta Thomson and representatives of Time to Untangle.

This privacy policy outlines how AI clinical note-taking software is used in our practice, ensuring compliance with the Australian Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs). Our commitment is to protect client privacy and maintain confidentiality, adhering to the ethical standards set by the Australian Psychological Society (APS).

## MEANINGS

References to “Time to Untangle”, “Time to Untangle Clinical Psychology Services”, “we”, “us” and “our” are references to Time to Untangle and authorised representatives, including Dr Jacinta Thomson (ABN: 86 851 083 994). References to “you”, “your”, and the “client” are references to any individual about whom we collect personal information and provide services to.

When used in this Policy, “personal information” has the meaning given in the Privacy Act. Generally, it means any information or an opinion that could be used to identify you, such as your name, address, phone number, and date of birth.

Personal information also includes “sensitive information”, which includes information or an opinion about, for example, your physical and mental health, criminal record, sexual orientation, religious or philosophical beliefs, and racial or ethnic origin.



“Health information” or “protected healthcare information” is information about your health, health services provided or to be provided to you, or your express wishes about the future provision of health services.

“Primary use” of personal information means that AI tools are used primarily to deliver psychological services, enhance treatment outcomes, and ensure accurate clinical documentation.

“Secondary use” of personal information refers to instances where your there may be disclosure to third parties. For example, an AI software provider may have access to de-identified data for maintenance and improvement purposes.

## WHAT IS AI TRANSCRIPTION AND CONVERSATIONAL INTELLIGENCE SOFTWARE?

The software that we are currently using is called ‘Clinical Notes AI’. It helps transcribe (convert spoken language into written text) and analyse conversations during therapy sessions using ‘ambient’ listening technology. It is designed to capture the most important themes discussed, ensuring accuracy and completeness in Jacinta’s notes and helping to enhance the therapeutic process.

## WHY ARE WE USING THIS TECHNOLOGY?

Did you know that after every session we have, Jacinta spends 10 minutes to half an hour or more reflecting on our interaction and summarising the key topics in her notes? Keeping accurate records of sessions is essential for providing high-quality care, ensuring legal and ethical compliance, facilitating communication, and supporting professional accountability.

## WHAT IS CLINICAL NOTES AI?

Clinical Notes AI is a med-tech company that specialises in enhancing clinical documentation with AI technology. The platform captures and analyses clinical conversations, assisting healthcare professionals by reducing time spent on documentation and increasing focus on patient care. By automating the creation and management of clinical notes, the platform significantly enhances internal workflows, allowing clinicians to extend the reach of their practice without additional stress.

You can find an updated copy of Clinical Notes AI privacy policy here:

<https://www.clinicalnotes.ai/privacy-policy.html>

## WHY WILL AI COLLECT YOUR PERSONAL INFORMATION?



### *What are the Potential Advantages of Using AI to Enhance Your Psychological Care:*

- **Improved Accuracy:** Software such as Clinical Notes AI helps ensure that the most important points from your sessions are summarised, reducing the risk of errors or omissions in documentation.
- **Enhanced Focus:** By relying predominantly on AI software for note-taking, Jacinta can be even more present and engaged with you during session.
- **Increased Efficiency:** It allows Jacinta to quickly and efficiently review session notes and generate handouts and letters / reports. This will free up more time to focus on your care, reducing administrative burdens and the risk of professional burn out.
- **Better Consistency:** Consistent and thorough documentation helps track your progress over time and ensures continuity of care.
- **Fine-Tuning Clinical Processes:** Generative AI (e.g., ChatGPT) can help Jacinta review and synthesise a wealth of resources and scientific literature to facilitate clinical decision-making with regards to differential diagnoses and the treatment planning.

### *What are the Potential Benefits to You?*

- **Personalised Treatment:** Analysing conversations helps in tailoring interventions to better meet your individual needs and adjust treatment plans based on detailed session notes.
- **Enhanced Feedback:** The technology can provide insights and feedback that help identify patterns or areas that may need more focus, aiding in your therapeutic journey.
- **Supporting Diverse Needs:** The software can be used to generate a summary of the central topics discussed during session and any home practice tasks assigned, helping people with attention and memory difficulties.

### *What are the Potential Disadvantages to You?*

- **Privacy Concerns:** It is of paramount importance to select AI tools that have been assessed as being ethically robust and transparent about the parameters of data sharing, ensuring compliance with the Australian Privacy Act 1988 (Cth) and the APPs.
- **Adjustment Period:** It may take a few sessions to become comfortable with the use of this technology. You are welcome to withdraw your consent at any time.
- **Transcription Errors and AI “hallucinations”:** While AI is improving, it can still make mistakes, especially with complex language, accents, or expressive language differences, leading to inaccuracies in records. Jacinta will critically review and edit the AI output after each session to ensure accuracy of notes.



- **Biases in Generative AI:** AI bias or machine learning bias refers to AI systems that produce results that reflect and perpetuate human biases within a society, including historical and current social inequalities. Jacinta will consider the potential biases in results produced from any AI tools and avoid perpetuating any form of discrimination regardless of factors such as race, gender, or socio-economic status, based on biased data sets.

## WHAT INFORMATION WILL AND WON'T BE USED BY AI TOOLS?

Clinical Notes AI will use data, including personal and sensitive healthcare information, for the following purposes:

- To provide AI-assisted documentation and note services.
- To generate specific note types from standard templates (e.g. SOAP) and customised templates.
- To assist with referral letters to other medical professionals.
- To assist with writing letter and reports for you.

As best practice, personal information and de-identified personal information will not be sold, rented, loaned, or otherwise disclosed, to third parties without your consent, except where required by law or to prevent serious harm. Personal and health information will not be used to train AI models. AI software will not be used to replace professional judgement.

## HOW WILL AI COLLECT YOUR INFORMATION?

Clinical Notes AI will collect information through direct and indirect interactions with you, including intake forms, session transcripts, and other electronic communications. For the most part, it will be collected via listening to sessions through a USB microphone, which means it converts voice to text in live-time and creates a temporary transcript in its server, but does not record or store any audio (i.e., it is purely “ambient”). Then the transcript gets transformed by ‘Large Language Models’ (LLM; generative AI infrastructure) to a notes template developed by Jacinta.

At other times, Jacinta may choose to use the ‘Dictation’ feature of Clinical Notes AI after the session. Instead of ‘ambient listening’ in your session, Jacinta will talk to the software, giving a verbal summary of information relevant to your treatment progress and planning. The transcript will similarly get transformed through a LLM to organise Jacinta’s reflections in the format of a notes template.

## HOW LONG WILL AI KEEP YOUR INFORMATION?

Time to Untangle and any carefully selected AI tools will only keep your information for as long as we need to, to fulfil the primary purpose of this data collection. This time period may depend on what we are using your information for, in accordance with this



privacy policy. If your personal information is no longer required, we will delete it or make it anonymous by removing all details that identify you.

Clinical Notes AI automatically and permanently deletes data from its cloud-based servers every 30 days. Jacinta endeavours to transfer any AI-generated output from the Clinical Notes AI platform to your patient file in Cliniko (our practice management software) within two business days of your session. Once this transfer has been completed, we will manually delete all records of the data from Clinical Notes AI.

## HOW WILL WE PROTECT YOUR INFORMATION COLLECTED THROUGH AI TOOLS?

As per the General Privacy Policy, all personal information is stored securely, with physical, electronic, and administrative safeguards in place to protect against unauthorised access, alteration, or disclosure. In the context of using AI, Clinical Notes AI uses advanced encryption and secure storage solutions to protect data, ensuring compliance with industry standards for data security. Access to personal and sensitive information is restricted to authorised personnel only. We will conduct regular privacy and data security audits to assess whether we have adequately complied with and implemented these measures. We will comply with laws applicable to us in respect of any data breach.

## SCOPE OF CONSENT FOR AI TECHNOLOGIES

This consent form applies to the use of Clinical Notes AI and any future iterations, updates, or new models of similar AI technologies that may be integrated into our clinical service provision. Additionally, consent covers the use of other forms of AI tools not specifically listed in this policy, provided they are used for similar purposes and comply with the same privacy, confidentiality, and data security standards outlined herein. If substantial changes occur in the function or nature of these technologies, you will be notified, and additional consent will be sought as required.

## CHANGES TO OUR PRIVACY POLICY

We will update our AI Privacy Policy when our information handling practices change. We recommend that you periodically review our General Privacy Policy and AI Privacy Policy for any changes. The current versions are available at [www.timetountangle.com.au](http://www.timetountangle.com.au)

Sincerely,  
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