



## Lilley Place AI Policy

December 2025

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1. **Lilley Place's commitment to the legal, ethical and responsible use of AI:**
  - 1.1. Lilley Place ("us", "we" or "our") is committed to using AI to improve the health outcomes of patients, in a way that is legal, ethical and responsible.
  - 1.2. The purpose of this AI Policy is to create a set of guiding principles that comply with the legal and ethical obligations that govern the responsible use of AI tools by clinicians.
  - 1.3. Lilley Place takes the privacy of clients' information seriously, and our Privacy Policy sets out how we collect and treat your Personal Information and Sensitive Information. Our Privacy Policy and this AI Policy operate together.
  - 1.4. This AI Policy deals with both the general principles Lilley Place is committed to in order to ensure the legal, ethical and responsible adoption and use of AI tools, as well as guidelines for the AI tools used by Lilley Place to ensure the use of those tools is of benefit to clients and promotes client health outcomes while protecting client data and information.
2. **Definitions**

In this Policy:

  - 2.1. "AI" stands for artificial intelligence and refers to the capability of a machine to imitate intelligent human behaviour.
  - 2.2. "AI tool" describes any software program that uses AI to perform tasks.
  - 2.3. "Large language model" or "LLM" is a type of artificial intelligence model designed to understand, generate or manipulate human language. They are trained on very large amounts of text data and use statistics and machine learning techniques to generate text based on the input they receive.
  - 2.4. "Generative AI" is a type of machine learning model that generates new content (for example, text, images, videos etc) as outputs.

### 3. **Lilley Place's Statement of Values and Ethics in the use of AI**

- 3.1. Lilley Place believes that with appropriate policies in place, AI can support the delivery of healthcare outcomes.
- 3.2. Lilley Place believes that human-delivered care must never be replaced by AI, but that AI has the potential to assist in care delivery and improve client outcomes. AI is seen by Lilley Place as a means to achieving the goal of improved healthcare but can only support the psychologist and patient to reach this goal.
- 3.3. Improved patient health and well-being will always be the primary and guiding focus of the adoption of all AI tools by Lilley Place. AI tools will only be adopted by Lilley Place where this will genuinely contribute to improving health outcomes of patients.
- 3.4. The adoption and implementation of all AI tools by Lilley Place will be patient-centred and used to benefit patients' health and well-being.
- 3.5. AI must never compromise the clinician's clinical independence or professional autonomy.
- 3.6. A registered health practitioner or otherwise appropriately qualified clinician must always be ultimately responsible for decisions and communications and should have meaningful involvement at all stages of the patient journey.
- 3.7. All AI tools implemented by Lilley Place must uphold and support the patients' rights to make their own informed healthcare decisions.
- 3.8. It is important to Lilley Place to be accountable and transparent to patients, the health profession and the wider community about the use of AI in supporting clients' healthcare outcomes.
- 3.9. The application of AI in health care must never lead to greater health inequalities for any population.
- 3.10. Patients have the right to refuse to be involved in the use of AI at any time
- 3.11. AI tools will only be adopted by Lilley Place after first establishing robust and effective frameworks for managing risks which ensure patient safety and guarantee the privacy for all involved. These frameworks will be bespoke to the AI tool being adopted, and regularly and vigorously reviewed.
- 3.12. Lilley Place will never establish protocols where the clinical independence of the clinician is undermined by AI or the final decision is made by a person in a non-clinical role with the aid of AI.
- 3.13. AI tools will not be used by administrative (non-clinical) staff.

### 4. **Use of patient's data and information**

- 4.1. As outlined in our Privacy Policy, Lilley Place may receive and store your Data.

- 4.2. Lilley Place is committed to the protection of the privacy of patient health information.
  - 4.3. Lilley Place will always use AI in accordance with the Privacy Policy in place at the relevant time.
  - 4.4. Lilley Place will only adopt and use AI tools following a careful review of that tool's approach to privacy and has adopted a protocol of regular checking the tool to ensure there has been no material change to the way client data and information is stored, used and deleted.
  - 4.5. AI tools will not be used, disclosing a client's personal or sensitive information, without written consent from the client.
  - 4.6. The disclosure of Health Information must be limited to initiatives that exclusively aim to provide the health service to the client and/or improve the clients health outcomes.
5. **Complaints about our AI policy**
- 5.1. If you have any complaints about our AI practices, please feel free to send in details of your complaints to:  
  
lilleyplace@lilleyplace.com.au
  - 5.2. We take complaints very seriously and will respond shortly after receiving written notice of your complaint.
6. **Changes to our AI policy**
- 6.1. Our AI Policy is subject to change.
  - 6.2. Lilley Place may modify this policy at any time, in our sole discretion and all modifications will be effective immediately upon our posting of the modifications on our website [www.lilleyplace.com.au](http://www.lilleyplace.com.au) or through distribution by email. Please check back from time to time to review our AI Policy.
7. **Current AI tools in use**
- 7.1. Lilley Place will maintain a list of AI tools in regular use by its clinicians. If any clinician is wanting to use a separate tool to those made available by Lilley Place, it is their responsibility to discuss this with you and make adequate information available for you about this tool.
  - 7.2. At present, Lilley Place uses:
    - NovoNote
  - 7.3. A summary of each AI tool adopted and how it is used is set out below.

### NovoNote

- A. **What NovoNote does:** NovoNote is a secure and encrypted platform designed to transform audio from consultations into concise clinical summaries.
- B. **Why NovoNote has been adopted:** To promote the ability of clinicians to focus more on conversation and less on recording notes during the session, enhancing the quality of care you receive. It will also enable the clinician to manage administrative tasks / letters and reports efficiently to spend more time on therapeutic matters, improving client outcomes.
- C. **What NovoNote will be used for:** Lilley Place plans to utilise NovoNote for assistance with session notes, letters, meeting summaries and draft reports.
- D. **What NovoNote will not be used for:** NovoNote cannot and will not be used to make decisions in relation to client care.
- E. **Written consent:** NovoNote will only be used with clients who have provided written consent for its use.
- F. **Accountability:** The clinician using NovoNote will be responsible for reviewing the clinical note for accuracy and adopting it in our secure Practice Management Software within 72 hours.
- G. **Specific risk mitigation policies in place:** Clinicians and Client Services can opt whether to use NovoNote and can attend regular professional development to upskill on effective service delivery/tool usage.
- H. **Transparency:** for internal record-keeping purposes, content created with the assistance of NovoNote will be labelled as such.
- I. **Data storage by NovoNote:** NovoNote states that it does not process or store data in a way that it is personally identifiable, and it is therefore not utilised for AI model training or other secondary purposes. Data is stored within Australia on secure servers with cloud backup that meet **ISO 27001** and **SOC 2 Type II** standards. All data is securely encrypted during transit (using TLS 1.2 or higher) and at rest (with AES-256 encryption), ensuring that sensitive information remains inaccessible to unauthorized individuals. Audio recordings are not stored; instead, they are instantly converted into redacted text-based transcripts. Only the session summary is retained as part of the patient's file. Default settings are for transcripts to be deleted after use. NovoNote has been carefully selected by Lilley Place as it complies with the Australian Privacy legislation and the Australian Privacy Principles, in addition to HIPAA and AHPRA.
- J. **Authorised Use:** Only clinicians will have access to and use their individual NovoNote profiles. Administrative staff will utilise the tool on an admin setting for secondary functions such as summarising staff meetings.
- K. **Assessment and Review schedule:** Lilley Place is committed to a regular assessment and review of the adoption and use of NovoNote. In addition to the contemporaneous review for accuracy and completeness conducted at the time of adoption through Lilley Place will conduct a comprehensive random audit in line with our existing clinic-wide sessions, which occur 3 times per year. The purposes of the random audit include confirmation that this AI Policy is being adhered to, that the information contained in the AI policy in relation to each AI tool adopted is correct and up-to-date, and that the implementation of AI has enhanced our clinical documentation and record-keeping.