AI at every clinic

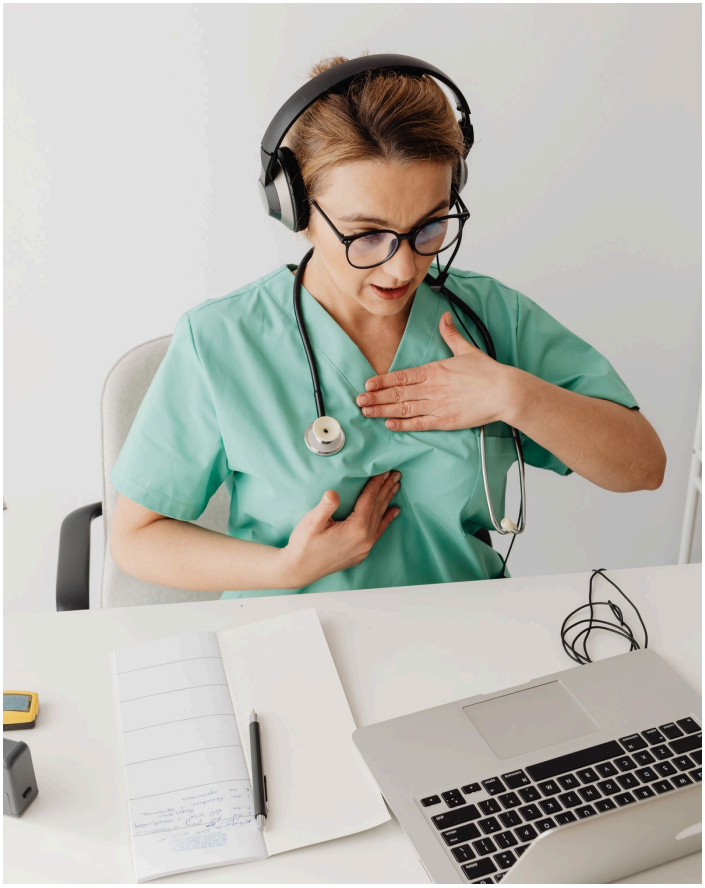
What changes on 20 November, 1 December and 10 December 2026, and how to use every AI tool across your clinics with confidence

pspsignaldesk.com/ai-governance/clinics



Why AI governance is a strategic move

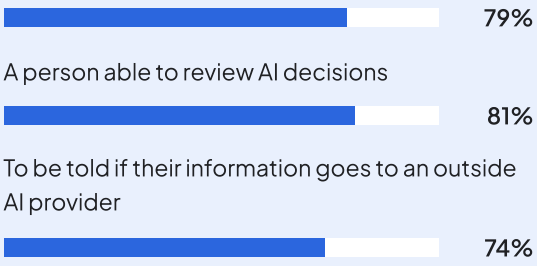
AI now writes consult notes, answers the phones, reminds patients and suggests item numbers. Govern it well, and every clinic can use more of it, with confidence.



25%

of GPs say their practice has an AI governance policy.

What Australians expect when organisations use AI, March 2026



Sources: Healthed and The Medical Republic survey of 1,535 GPs, May 2026; OAIC Community Attitudes to Privacy Survey 2026

1

Lower your risk

The rules you know apply to every AI tool. A scribe that records a consult needs the patient's consent, and an item number it suggests is still the practitioner's claim.

2

Earn the trust of patients, practitioners and owners

Clear answers for patients about the AI in their care. Simple rules for every practitioner. A versioned report for each clinic that shows owners how you govern AI.

3

Take up AI with confidence

See the AI your teams use, approve each new tool before it reaches patients, and add tools across your clinics knowing what each requires.

The records your tools write are yours to check

Ahpra's guidance is direct: practitioners must apply human judgement to any output of AI, and remain responsible for the health records an AI scribe creates. The TGA's scribe guidance of 16 October 2026 asks the same of consent and accuracy.

Govern, Guard and Built responsibly

Three stages on one platform. Set it up yourself in minutes, at any clinic, and see your results the moment you add your first AI tool.

1 Govern

List every AI tool at each clinic and see its risk in every market it reaches, with each rule linked to its official source and the date it starts. Clear next steps for each tool are ready for your team to act on.

At every clinic
A register and a versioned report for each clinic, ready for owners, practice managers and auditors.

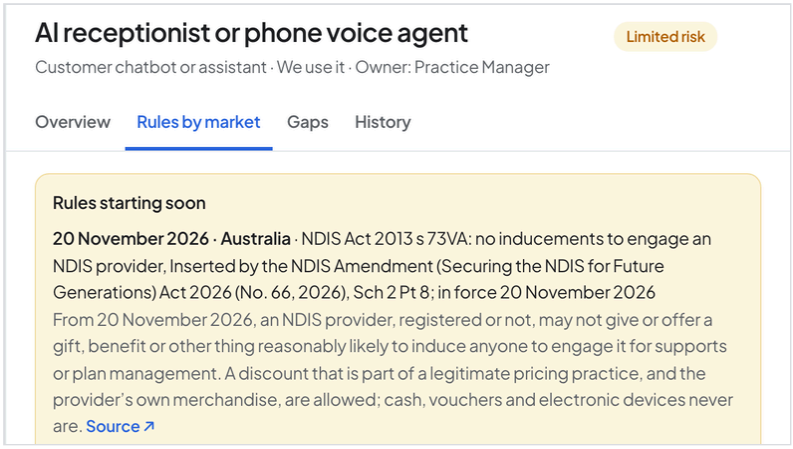


Exhibit 1. Sample clinic: the AI receptionist and its first rule starting soon
Source: PSP SignalDesk AI Governance, Sample Clinic Perth

2 Guard

Microsoft 365 integration identifies the AI apps your teams use with work accounts, and staff declare their own through a private link, with no account needed. Each app shows its staff count and the data it reaches, checked nightly and on demand.

At every clinic
You approve every new tool before it joins the register, and each team gets a written AI policy and training through the free PSP AI Quickstart.

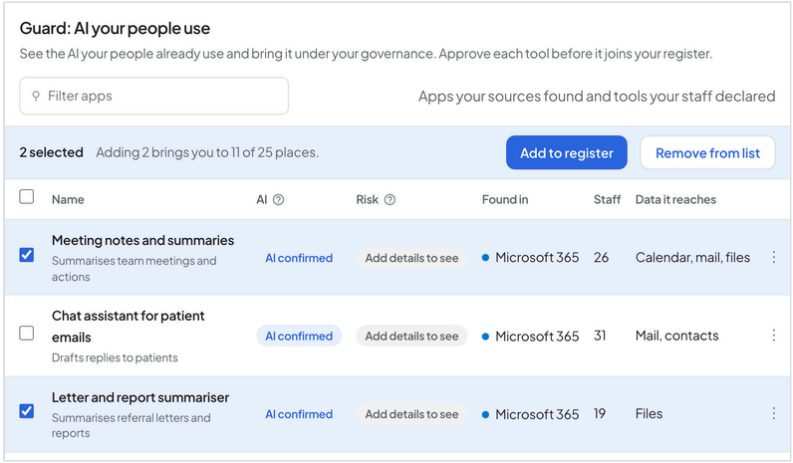


Exhibit 2. Sample clinic: the AI apps its teams use, by staff count
Source: PSP SignalDesk AI Governance, sample Sydney clinic

3 Built responsibly

For the AI tools you build, such as a patient booking assistant on your website, answer 23 checks in plain words and attach your evidence, mapped to the NIST AI RMF, ISO/IEC 42001 Annex A and the EU's ALTAI. Versioned reports carry the evidence, confirmed by QR code.

At every clinic
Show patients, owners and auditors how each tool you build was made.

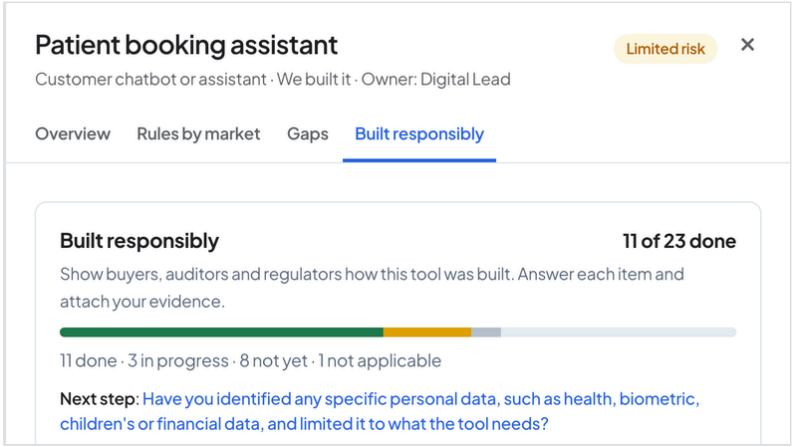


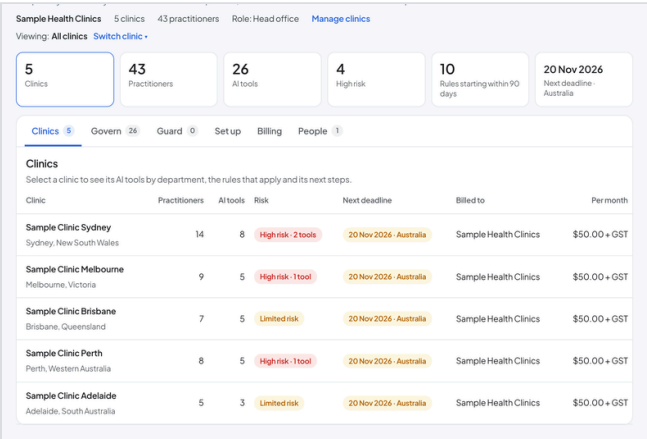
Exhibit 3. Sample clinic: its patient booking assistant, 11 of 23 checks done
Source: PSP SignalDesk AI Governance, sample Sydney clinic

From head office to every clinic

One account runs the whole group. Head office sees every clinic at once, each clinic keeps its own register, and every AI tool shows the rules of each market it reaches.

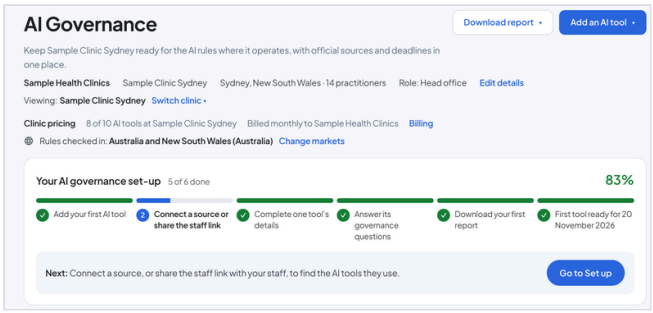
1 Head office

Every clinic with its risk, next deadline and price, for owners and practice managers.



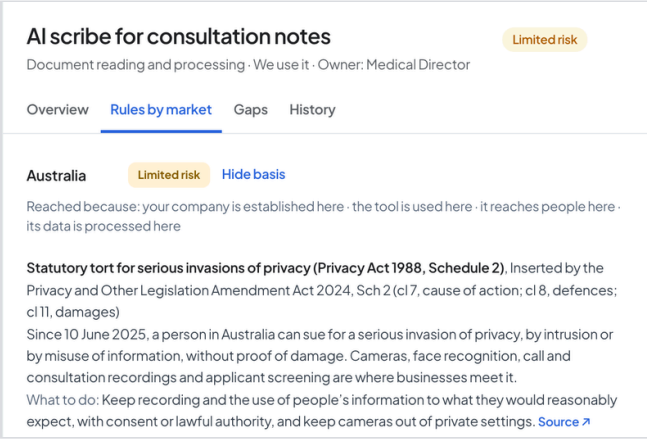
2 Each clinic

Its AI tools, what each needs next and the dates it is getting ready for.



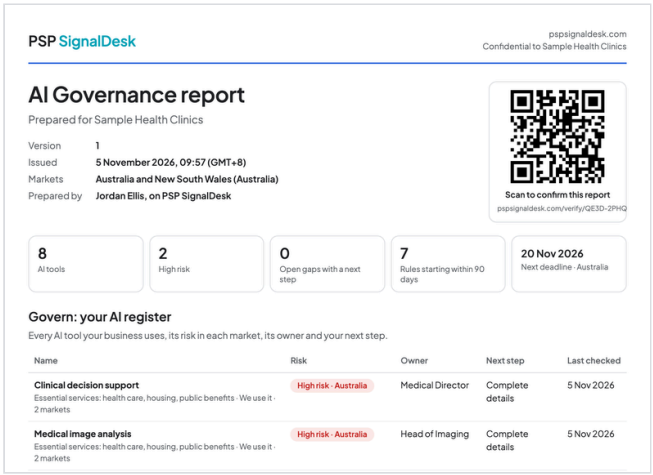
3 Each AI tool

The rules of each market it reaches, why they reach it, and their official sources.



4 Each report

A versioned report for each clinic, confirmed by its QR code.



Source: PSP SignalDesk AI Governance, sample clinic group (Sample Health Clinics: five clinics across Australia)

Know the rules behind every AI tool

AI works in five areas of a clinic. Each area meets its own rules, set by Commonwealth, state and territory law, by practitioners' professional obligations and, for NDIS supports, by the NDIS rules.

Area	The AI at work	The rules it meets	What to keep in place
Front desk and phones	AI receptionists and phone voice agents; online booking; call recording and transcription	Consent to collect health information; telling callers a call is recorded; state and territory recording laws; Do Not Call rules for marketing calls	Callers told they are speaking with AI and being recorded, and a route to a person
The consult and the AI scribe	AI scribes that record the consult and draft notes, referral letters and item numbers; decision support inside scribes	Patient consent and recording laws; Ahpra's obligations on AI; TGA rules where a scribe suggests diagnoses, treatments or tests; the NDIS Code of Conduct	Consent noted in the record, and every note read before it is filed
Patient messages	Reminders and recalls by SMS and email; AI-drafted replies and after-visit summaries; review replies and social posts	Spam Act rules for promotions; the SMS Sender ID Register; National Law advertising rules, including no testimonials	Reminders kept factual, and a person approving every reply and post
Billing and claims	Item number suggestions; claim checks before lodging; invoices and payment reminders	Medicare: every claim under a provider number is the practitioner's; NDIS price limits and claim times; privacy for billing details	A practitioner confirming every item before it is billed
Staff and rostering	Rostering and scheduling; applicant screening; staff chat assistants	Fair Work and discrimination law in hiring; NDIS worker screening for risk-assessed roles; notice before workplace surveillance in the ACT	A person in every hiring decision, and no patient details in public chat tools

Exhibit 4. The AI at work across a clinic, the rules each area meets and what to keep in place

Every patient can choose a person

A patient can decline the scribe, the voice agent or the chatbot. Offer another way to book or to record the visit, and route each request to a member of your team who can act on it.

The rules every clinic runs on

Commonwealth privacy law, professional obligations, Medicare and the NDIS rules apply at every clinic, whoever or whatever does the work. State and territory laws add to them.

Commonwealth and national rules

Privacy at any size

Privacy Act 1988, s 6D(4)(b) and APP 3

Every clinic is bound, whatever its turnover. An AI tool that collects health information needs the patient's consent, unless an exception applies, and a notice alone is not consent.

Professional obligations

Ahpra, professional obligations when using AI

Practitioners apply human judgement to every AI output and check the records it creates. They tell patients about their use of AI and obtain informed consent.

Software as a medical device

TGA, digital scribes guidance, 16 October 2026

A scribe that only records and transcribes is not a medical device. One that suggests diagnoses, treatments or tests, triages or monitors patients, or draws diagnostic conclusions from coding is likely to be one, whatever its disclaimer says.

NDIS supports

NDIS (Code of Conduct) Rules 2018 and Practice Standards

Every clinic paid for NDIS supports, registered or not, follows the Code of Conduct, including participants' privacy and safe, competent supports. Registered providers also meet the Practice Standards.

Medicare claims

Improving Medicare Compliance, April 2026

Practitioners are responsible for every service claimed under their provider number, so they check every item number an AI tool suggests before it is billed.

At a glance

8 of the 12 AI scribes the TGA reviewed include functions likely to meet the definition of a medical device

5 of the 8 states and territories need every principal party's consent to record a private conversation, or a listed exception

3 states and territories, Victoria, NSW and the ACT, add their own health records laws for private clinics

30 days to assess a suspected data breach under the Privacy Act

5 business days to honour a request to unsubscribe from marketing messages

24 hours for a registered NDIS provider to notify the NDIS Commissioner of a serious reportable incident

Read at official Commonwealth, state and territory sources, 2 November 2026.

One standard for people and AI tools

Each rule applies to the work, whether a person or an AI tool does it. Consent, a practitioner who checks the output and a record of why serve every tool you add.

The dates to plan for in 2026

Plan each rule from its official source, linked below.

16 October — TGA scribe guidance
20 November — NDIS inducements
1 December — NDIS claims
10 December — Privacy policies

16 October 2026 TGA

Digital scribes guidance

A scribe that suggests diagnoses, treatments or tests, or triages patients, is likely a medical device, whatever its disclaimer says. Check each scribe for these features after every update.

20 November 2026 NDIS

NDIS Act, s 73VA

No gift, benefit or other thing reasonably likely to induce a person to engage you for NDIS supports. Keep inducements out of offers and messages your AI tools write.

1 December 2026 NDIS

NDIS Act, s 45A

Claims for NDIS supports are made within 90 days, down from 2 years. Check and lodge the claims a billing tool drafts within that time.

10 December 2026 Commonwealth

Privacy Act, APP 1.7 to 1.9

Your privacy policy names the personal information your software uses to make, or substantially help make, decisions that significantly affect a person. Without it, a policy can draw an infringement notice.

To be announced New South Wales

Digital Work Systems Act 2026

Passed in February 2026, with its main duties starting on dates the NSW Government will announce. It brings digital work systems, such as algorithms, AI and automation, into work health and safety law.

The TGA names no compliance date for scribes and will conduct proportional compliance. The Attorney-General's Department's draft bill for a 72-hour breach statement to the Information Commissioner, consulted on to 18 September 2026, is not yet law.

In force today

22 August 2024 Ahpra
Professional obligations when using AI in healthcare

10 June 2025 Commonwealth
The right to sue for a serious invasion of privacy

13 August 2025 ACSQHC
The AI Clinical Use Guide and the ambient scribe scenario

21 October 2025 Australian Government
Guidance for AI Adoption: six essential practices

1 July 2026 ACMA
SMS sender names registered, or shown as "Unverified"

1 July 2026 Pathology and imaging
Reports shared to My Health Record within 24 hours

1 November 2026 TGA
Decision support exempt only under five conditions

Sources read at their official pages on 2 November 2026.

Use AI scribes and patient messages with confidence

The scribe and the messages your clinics send reach every patient, so they meet the most rules. A few habits keep both clear at every clinic.

1 The AI scribe and patient consent

Ask every patient before the scribe starts, and note their answer in the health record.

Seek everyone's consent: five states and territories let a party record a private conversation only with every principal party's consent, or under a listed exception.

Read every note, letter and item number before it is filed or billed, and correct anything that was not said in the consult.

Know where the scribe stores audio and notes. If they leave Australia, your clinic stays responsible for what the vendor does with them (APP 8), so check the vendor's protections or ask the patient's informed consent; in New South Wales the state's health privacy principle 14 sets its own conditions. Stop and delete the recording if consent is withdrawn.

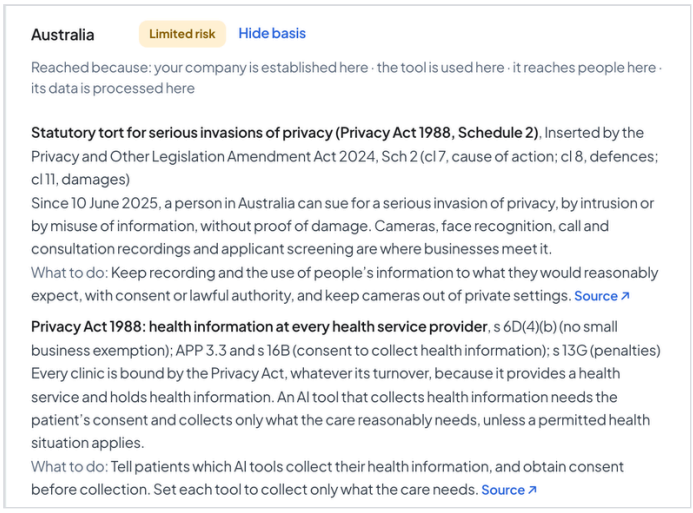


Exhibit 5. Govern: Australian rules for the AI scribe, each with its source
Source: PSP SignalDesk AI Governance, Sample Clinic Sydney

2 Patient messages and the front desk

Keep reminders factual: a promotion or a promotional link makes a message commercial.

Have a person approve each AI-drafted reply to a review: engaging with reviews on a third-party site may count as using a testimonial.

Tell callers at the start that the voice agent is AI and the call is recorded.

Appointment reminders	Factual messages need no consent or unsubscribe, and still name the clinic
Promotions	Consent, the clinic named and a working unsubscribe, honoured within 5 business days
Branded SMS	Sender names registered since 1 July 2026, or shown to patients as "Unverified"
Marketing calls	The Do Not Call Register checked first, unless the patient consented
Reviews and posts	No clinical testimonials and no unreasonable expectation of beneficial treatment
NDIS offers	No gift or benefit likely to induce a person to engage the clinic, from 20 November 2026

Exhibit 6. The rules for patient messages and calls, by kind of message

The advertising rule for every clinic

Section 133 of the Health Practitioner Regulation National Law applies to every advertisement for a regulated health service, whoever or whatever writes it: nothing false or misleading, no testimonials and no unreasonable expectation of beneficial treatment.

Five steps to lead with AI at every clinic

A plan your teams can start this quarter, in place for 10 December 2026.

1	**List every AI tool at each clinic** Its purpose, the data it uses and its owner, including the apps staff use, found through Microsoft 365 and a private staff link.	This quarter Govern and Guard
2	**See the rules each tool must meet** Each rule and professional obligation, with its source and start date.	This quarter Govern
3	**Keep a practitioner in every clinical decision** Consent before the scribe starts; every note, letter and item number checked.	At every consult
4	**Update your privacy policy, consents and contracts** The decisions your software makes or helps make, scribe consent, where audio and notes are stored, and vendor terms on training and overseas access.	By 10 December 2026
5	**Show owners and auditors how you govern AI** A versioned report for each clinic, with the evidence for the tools you build, kept current as rules change.	Every quarter Govern and Built responsibly

Your plan for 2026

- **This quarter**
  List and check every AI tool
- **20 November 2026**
  NDIS inducements rule starts
- **10 December 2026**
  Privacy policy changes start
- **Every quarter**
  Each clinic's report reissued

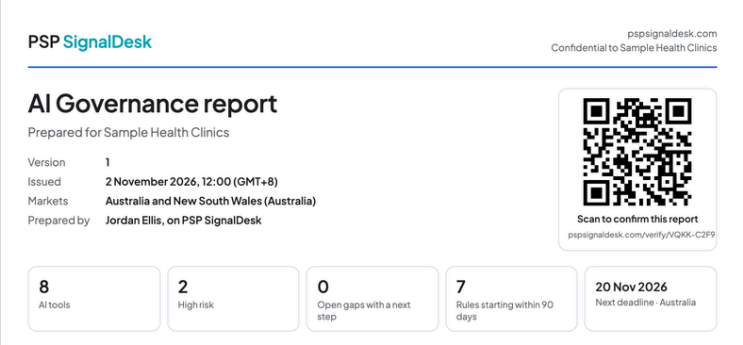


Exhibit 7. Govern: a versioned report for Sample Health Clinics, with a QR code anyone can scan to confirm it
Source: PSP SignalDesk AI Governance, Sample Clinic Sydney

Each step supports the Australian Government's Guidance for AI Adoption, whose six essential practices include deciding who is accountable and maintaining human control, and the national AI Clinical Use Guide for clinicians.

Start with your first clinic today

Your first AI tool is free, and your results are ready the moment you add it. Set it up yourself in minutes, at any clinic, with our team there whenever you need us.
Next step: plan your AI governance. Contact david@pacificstrategypartners.com to get started.

Check your first AI tool free

Every rule in this guide was read at its official source on 2 November 2026.

Govern AI with the team global leaders choose

Keep every AI tool at every clinic ready for the rules of each market you serve, and give patients, clinicians and partners every reason to trust how you use AI.

US$15B+
in APAC transactions across the principals' record

30 years
advising senior leaders across Asia Pacific

3 continents
of governments and institutions engaged

Work with leading AI governance experts	Our team comprises leading AI governance practitioners and cyber security experts, members of the IAPP, and board members of AI advisory committees and AI research labs at leading US universities and colleges.
Lead with a team governments and leading businesses trust	Our leadership has spoken at the United Nations in Geneva, served on the advisory board of the UK Parliament's All-Party Parliamentary Group on Blockchain, and drafted two Senate bills with Colombia's Office of the President, both passed into law by unanimous vote.
Move faster at fixed prices	Our practitioners and technologists work alongside yours from the first plan to everyday use: AI policy and impact assessments, testing, red teaming and AI security, and training for your team.
Act on the official text of every rule	Every rule links to its official text, shows the day it was checked, and is kept up to date as laws change.
Add specialist depth across ASEAN	When the work needs specialist depth, we bring the region's leading practitioners across Indonesia and ASEAN to your side.

Organisations our team has delivered high-stakes outcomes for

12
Healthcare and life sciences
Johnson & Johnson, Roche, Bayer, Medtronic

17
Industry, energy and materials
Vestas, Eaton, Sumitomo, Worley

7
Consumer brands
Kimberly-Clark, Pernod Ricard, Brown-Forman, Campbell's

8
Technology, media and services
HP, NetApp, SATS, Nine Entertainment

Plan your AI governance with our team

david@pacificstrategypartners.com · pspsignaldesk.com