

How Kookaburra stands against your 10 AI obligations

Where Kookaburra clears the AI-tool obligations for you — and where it arms you to meet the rest, with ready-to-use wording inside.

AHPRA · Privacy Act (APP 1.7 & APP 8) · TGA (January 2026 guidance) · Disclosure deadline 10 December 2026

Australian privacy law changed on 10 December 2024, and the grace period for disclosing automated decision-making ends **10 December 2026**. AHPRA has set clear obligations for practitioners using AI, and in January 2026 the TGA clarified which AI tools are regulated as medical devices. Here is exactly where **Kookaburra** — a non-clinical, Australian-resident practice-intelligence tool — sits against each one.

WHAT KOOKABURRA IS (AND ISN'T)

- Reads **only** scheduling, billing and practice-management data — appointments, invoices, and patient/practitioner records. Read-only.
- **Never** reads or stores clinical notes, diagnoses or treatment content (built-in AHPRA s.133 guard).
- The AI reasons over **de-identified** data (opaque IDs); patient names and contacts are revealed only on your explicit, **audited** request.
- Runs on Anthropic Claude via **AWS Bedrock in Sydney** — your practice data stays in Australia and is never used to train AI models.
- **Never** writes to your PMS or patient records, and suggests no diagnoses or treatments.

#	OBLIGATION	KOOKABURRA'S POSITION	STATUS
1	Clinical accountability documented AHPRA	Produces no clinical output and writes nothing to a patient record. Its analysis explicitly avoids diagnoses, health outcomes and treatment efficacy (AHPRA s.133).	NOT APPLICABLE
2	Patient informed consent AHPRA	Disclose Kookaburra as a practice-data processor in your intake. The AI sees de-identified data by default, which keeps this light — wording provided in this pack.	YOU + WE SUPPORT
3	AI scribe assessed vs TGA thresholds TGA · Jan 2026	Not a scribe and suggests no diagnoses or treatments, so it falls outside TGA medical-device regulation.	NOT APPLICABLE
4	Patient data not in public AI AHPRA · Privacy Act	No public LLM is ever used. Runs on Anthropic Claude via AWS Bedrock (Sydney), data is not	CLEARED

#	OBLIGATION	KOOKABURRA'S POSITION	STATUS
		used for training, and the AI reasons over de-identified data — never clinical notes.	
5	Privacy policy updated for automated decision-making Privacy Act · APP 1.7	Kookaburra informs business decisions, not decisions affecting patient rights or interests. Ready-to-paste disclosure text provided in this pack.	YOU + WE SUPPORT
6	Cross-border data disclosure Privacy Act · APP 8	Your practice data and its AI analysis are stored and processed entirely in Sydney (AWS ap-southeast-2) — no overseas disclosure. Disclose ancillary vendors (email, payments) as you would any provider.	CLEARED
7	PI insurance covers AI use AHPRA	Confirm AI-assisted practice management is covered with your insurer. A written tool description for them is in this pack.	YOUR CLINIC
8	AI tool limitations understood & documented AHPRA	A plain-English description of what Kookaburra does, its data scope and its limitations is provided in this pack.	WE PROVIDE
9	Workplace AI governance policy AHPRA	List Kookaburra as an approved, Australian-resident, non-clinical tool in your staff AI policy. A starter template is in this pack.	YOU + WE SUPPORT
10	AI use transparently communicated to patients AHPRA	Because Kookaburra is non-clinical (it informs business operations, not patient care), what you need to disclose is lighter. Suggested patient-facing wording is in this pack.	YOU + WE SUPPORT

5

Cleared outright — handled by Kookaburra's design (3 cleared + 2 not applicable)

5

You + we support — your obligation, with the wording & templates that follow

How to use this. Keep it on file. It documents the compliance posture of Kookaburra as a tool in your practice, and the wording below covers the obligations that are yours. It is not a substitute for your own clinic policies, patient consent and insurance.

The wording, ready to paste

Drop these straight into your privacy policy, intake forms, patient materials and staff policy. Replace anything in **[brackets]** with your clinic's details.

1 · Privacy-policy disclosure (Automated decision-making · APP 1.7)

FOR: YOUR WEBSITE PRIVACY POLICY – ADD BEFORE 10 DEC 2026

Practice analytics. We use Kookaburra Health, an Australian practice-intelligence service, to analyse our practice-management data – appointments, billing, and patient and practitioner records – and produce business-performance reports. Kookaburra reads this data on a read-only basis and does not access clinical notes, diagnoses or treatment information. Analysis is performed by AI (Anthropic Claude) hosted on Amazon Web Services in Sydney, Australia; the AI works with de-identified records by default, your data is not used to train AI models, and it is not disclosed overseas for this processing. Kookaburra supports our business decisions; it does not make decisions about your clinical care.

2 · Patient transparency statement

FOR: WAITING-ROOM SIGN, WEBSITE, OR NEW-PATIENT PACK

This practice uses AI-assisted analytics to run better – for example, spotting patients who are due for a recall and reducing wait times. We use Kookaburra Health, an Australian service that works with de-identified practice data hosted in Australia. It does not access your clinical notes and does not make decisions about your care. Please ask us if you'd like to know more.

3 · Intake / consent wording

FOR: NEW-PATIENT INTAKE FORM

I understand that **[Clinic name]** uses secure Australian software (Kookaburra Health) to analyse appointment and billing data to manage the practice, that this software does not access clinical notes, and that any analysis is performed on de-identified data hosted in Australia.

4 · Description for your professional-indemnity insurer

FOR: YOUR PI INSURER, TO CONFIRM COVER

Kookaburra Health is a read-only practice-analytics service. It connects to our practice-management system (Cliniko or Halaxy) and analyses scheduling and billing data to produce business-performance reports and answer operational questions. It does not access clinical notes, does not make or suggest clinical decisions, and does not write to patient records. AI analysis runs on Anthropic Claude via Amazon Bedrock in Sydney, Australia; data is encrypted, processed in Australia, and not used to train AI models.

5 · Tool limitations – for your records (AHPRA #8)

FOR: YOUR CLINIC'S AI OVERSIGHT FILE

What it does: analyses your practice-management data to produce KPIs, benchmark comparisons, reports and operational answers.

Data scope: appointments, invoices, and patient/practitioner records (read-only). It does not access clinical

notes, diagnoses or treatment content.

Known limitations:

- It is business analytics, **not clinical advice**, and not a substitute for professional, financial or legal advice.
- Benchmark comparisons are **indicative**, not standards of care.
- Outputs are only as accurate as the data in your practice-management system.
- AI-generated narrative should be sanity-checked before you rely on it for a decision.

6 · Staff AI policy – starter template

FOR: YOUR CLINIC PROCEDURES · SIGN AND DATE IT

AI use policy – [Clinic name]

Purpose. To set out how AI tools may be used in this practice.

Approved tools. Kookaburra Health – an Australian-resident, read-only, non-clinical practice-analytics tool – is approved for practice-management analysis. [List any other approved tools.]

Prohibited. Staff must not enter identifiable patient information into public AI tools (e.g. ChatGPT, Gemini, Copilot) or any tool that has not been approved in writing.

Consent & transparency. Patients are informed of our use of practice analytics through our privacy policy and patient materials.

Clinical responsibility. AI tools do not make clinical decisions. Practitioners retain full responsibility for all clinical care.

Escalation. Questions or concerns about an AI tool go to [name / role].

Review. This policy is reviewed at least annually. Last reviewed: [date] · Signed: [name].

This pack describes the design and data handling of Kookaburra Health, current as at June 2026, and provides general wording you may adapt. It is **not legal advice** and does not by itself make a clinic compliant. The suggested wording is a starting point – confirm your clinic's specific obligations, and the final wording, with your professional-indemnity insurer and a privacy advisor.