Guidance on the use of AI scribes in optometry

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Introduction

An AI system is a machine-based system that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments. AI is increasingly used in optometry to enhance clinical workflows, diagnostic processes, and practice efficiencies.

Optometry Australia's 2024 Position Statement on Artificial Intelligence in Optometry provides a comprehensive overview of the benefits, risks, and governance requirements for the safe and effective use of AI tools in the profession.

This practice note builds on that foundation, offering practical guidance for optometrists considering the use of AI-empowered scribes—automated or semi-automated tools that transcribe, summarise, or generate clinical documentation based on real-time audio recordings or conversations between a clinician and a patient (AI scribes). While these tools can reduce administrative burden and improve documentation consistency, their integration into optometric care must be considered, transparent, and accountable.

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Key Considerations for Using AI Scribes in Optometric Practice

The following considerations are drawn from both the Australasian Institute of Digital Health's Implementation of AI Scribes in healthcare workflows information sheet and Optometry Australia's 2024 Position Statement on Artificial Intelligence in Optometry. They have been tailored specifically for the use of AI scribes in optometry:

Clinical Oversight

- Optometrists retain ultimate responsibility for all clinical decisions and record keeping.
- AI-generated notes must always be reviewed for clinical accuracy and completeness before entry into the patient record.
- Assess whether every part of your conversation with a patient is suitable for AI scribing. For example, some patients may prefer some of their discussion with you to be "off-the-record". Some patients may be reluctant to fully share information with you if they know their words are being recorded. Some patients may work in sensitive industries (e.g. defence forces, law enforcement, judiciary) or have non-optometry-related medical conditions they wish to keep private.
- Sole reliance on AI tools for finalising clinical documentation is not appropriate.
- Research suggests that AI use may atrophy your skills. Assess whether the act of writing or typing your own clinical notes improves or sustains the quality of your clinical judgment.

Tool validation and understanding

- Select AI scribes with clearly documented capabilities and limitations. Avoid using an AI scribe in situations where its limitations could affect patient outcomes.
- Where possible, seek tools with regulatory approval (e.g. TGA listing) or independent validation.

Informed Consent and Patient Communication

- Patients must be informed when an AI scribe is used, what it does, and what data is collected. Prepare printed privacy notices which patients can take home with them in addition to updating your practice's online privacy policy.
- Obtain and document explicit verbal or written consent. Avoid bundling consent for use of AI with other uses or disclosures. Effective consent is more complicated than you might think.

- Monitor for changes in supply chain data handling practices. If your practice, the AI scribe supplier (or their own suppliers) changes how it handles patient information, update your privacy notices and policies to reflect those changes and collect a new consent from your patients.
- Include signage in consult rooms or reception areas, and on your practice website to support transparency.
- Develop and implement policies for instances where a patient requests NOT to use an AI scribe to record a consultation.
- For detailed guidance, see: Avant's AI Scribes and Patient Consent resource.

Privacy and Security

- Ensure compliance with the Australian Privacy Principles and Surveillance Devices laws in your state/territory. Ensure AI Scribes are turned off after each patient consultation and avoid recording general workplace conversations.
- Confirm whether data is processed locally or offshore, and whether third-party vendors meet Australian cybersecurity and privacy standards.
- Monitor and confirm whether the supplier or its third-party vendors (such as LLM providers like OpenAI, Anthropic, Meta, Google, etc) make or introduce any un-related secondary uses or disclosures of patient information (e.g. to train their own models, to do biometric voice analysis, to do research, etc). The Privacy Commissioner has released guidance on the additional patient consent required if un-related secondary use or disclosure of patient information occurs.
- Store and delete audio/transcription data in accordance with applicable privacy and retention laws.

Quality and Safety

- Clinicians should pay particular attention to potential biases, accuracy, and alignment with best practice care, and should monitor for transcription errors, omissions, or misrepresentations of clinical detail.
- AI scribes may misinterpret cultural nuance, language, or tone—particularly with First Nations patients or those from diverse backgrounds. Apply additional care, review clinical documentation outputs carefully, and consult the National Indigenous Australians Agency Artificial Intelligence (AI) Transparency Statement for guidance.
- Clinicians should consider reporting any concerns or system issues to the vendor as appropriate.

Training and Competency

- Ensure staff are appropriately trained to use and oversee AI scribes. Keep staff up-to-date with changes.
- Define clear workflows and responsibilities for reviewing outputs and managing errors.
- Consider CPD on AI integration as part of your team's professional development.

Legal and Ethical Compliance

- Contact your professional indemnity insurer to confirm coverage and any specific conditions related to AI use in practice.
- If not an OA member, assess whether your professional indemnity insurance is adequate for the additional risks you are taking on and whether your practice has effectively implemented adequate risk controls.
- Refer to Avant's Checklist of considerations when using digital scribes in practice.
- AI scribes used in clinical care must comply with relevant legislation and regulatory requirements, including TGA standards and AHPRA guidelines.
- Consideration should be given to relevant ethical frameworks, including AHPRA's shared Code of Conduct.
- Document internal governance policies that outline when and how AI scribes are to be used. Keep these documents up-to-date.
- Assess whether the claimed productivity benefits of AI scribes are being achieved in your practice after fully implementing suitable risk controls and training. Positive patient outcomes and your clinical capabilities should be your highest priorities.

Summary

Artificial intelligence offers exciting opportunities to enhance optometric practice, patient outcomes, and operational efficiency. However, use of AI in optometric practice must comply with patient preferences, be thoughtful, ethical, and compliant with relevant legal and professional standards to protect patient safety and uphold the integrity of clinical care.

Optometry Australia remains committed to supporting members with guidance, resources, and professional development opportunities as AI tools continue to evolve. For further advice, contact Optometry Australia's Optometry Advisor Help Desk at OAHelpDesk@optometry.org.au or on (03) 9668 8500.

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