

## Inner North Centre for Mental Wellbeing Privacy Policy for Management of Personal Information

This document describes the privacy policy of Inner North Centre for Mental Wellbeing (ABN 63 631 783 492) for the management of clients' personal information. The psychological service provided is bound by the legal requirements of the Australian Privacy Principles set out in the Privacy Act 1988 (Cth).

### **Client information**

Client files are held in a secure filing cabinet or electronically using the "Halaxy" practice management system which is accessible only to authorised employees. The information on each file includes personal and sensitive information such as name, address, contact phone numbers, medical and mental health information, emergency contact information, credit card and Medicare number and other personal information collected as part of providing the psychological service.

### **How clients' personal information is collected**

A client's personal information is collected in a number of ways during psychological consultation with Inner North Centre for Mental Wellbeing (IN), including when the client provides information directly to IN using hardcopy forms, correspondence via email, when the client interacts directly with IN employees such as their therapist or the receptionist, and when other health practitioners provide personal information to IN via referrals, correspondence and medical reports. We may also collect personal information from our website through the use of cookies or our secure 'contact us' message form.

### **Consequence of not providing personal information**

If the client does not wish for their personal information to be collected in a way anticipated by this Privacy Policy, IN may not be in a position to provide the psychological service to the client. In some circumstances, clients may request to be anonymous or to use a pseudonym, unless it is impracticable for IN to deal with the client or if IN is required or authorised by law to deal with identified individuals.

### **Purpose of holding personal information**

A client's personal information is gathered and used for the purpose of providing psychological services, which includes assessing, diagnosing and treating a client's presenting issue. Not all information collected is required by law, however the personal information collected is required to provide our services. The personal information is retained in order to document what happens during sessions, and enables the psychologist to provide a relevant and informed psychological service with continuity of care.

## **Disclosure of personal information**

Clients' personal information will remain confidential except when:

1. it is subpoenaed by a court, or disclosure is otherwise required or authorised by law; or
2. failure to disclose the information would in the reasonable belief of the IN place a client or another person at serious risk to life, health or safety; or
3. the client's prior approval has been obtained to:
  - a) provide a written report to another agency or professional, e.g., a GP or a lawyer; or
  - b) discuss the material with another person, e.g. a parent, employer, health provider, or third party funder; or
  - c) disclose the information in another way; or
  - d) disclose to another professional or agency (e.g. your GP) and disclosure of your personal information to that third party is for a purpose which is directly related to the primary purpose for which your personal information was collected.

A client's personal information is not disclosed to overseas recipients, unless the client consents or such disclosure is otherwise required by law. Clients' personal information will not be used, sold, rented or disclosed for any other purpose except for previously authorised recipients.

## **Potential cross border disclosure of information**

Halaxy is a service provider that provides a secure online platform that assists in the administration and storage of information and integration with other online systems including payment, invoicing and Medicare. While Halaxy stores their data in Australia, they and IN may use third party providers who store their data offshore. In the event we share your personal information with Halaxy or any other third party provider, we will endeavour to ensure that the provider complies with local privacy legislations. In consenting to our use, collection and disclosure of your personal information you also consent to Halaxy and our third party providers to same.

In the event that unauthorised access, disclosure or loss of a client's personal information occurs IN will activate its data breach plan as set out by the Office of the Australian Information Commissioner and use all reasonable endeavours to minimise any risk of consequential serious harm. If the data breach is a notifiable breach under the Privacy Act, we will endeavour to notify you as soon as practicable after we become aware of the breach.

## **Requests for access and correction to client information**

At any stage clients may request to see and correct the personal information about them kept on file. The psychologist may discuss the contents with them and/or give them a copy, subject to the exceptions in the Privacy Act 1988 (Cth). If satisfied that personal information is inaccurate, out of date or incomplete, reasonable steps will be taken in the circumstances to ensure that this information is corrected. All requests by clients for access to or correction of personal information held about them should be

lodged with IN. These requests will be responded to in writing within 28 days, and an appointment will be made if necessary for clarification purposes.

### **Concerns**

If clients have a concern about the management of their personal information, they may inform IN. Upon request they can obtain a copy of the Australian Privacy Principles, which describe their rights and how their personal information should be handled. Ultimately, if clients wish to lodge a formal complaint about the use of, disclosure of, or access to, their personal information, they may do so with the Office of the Australian Information Commissioner by phone on 1300 363 992, online at <http://www.oaic.gov.au/privacy/making-a-privacy-complaint> or by post to: Office of the Australian Information Commissioner, GPO Box 5218, Sydney, NSW 2001.

## Privacy concepts and definitions

Term	Description
Personal information	Any kind of information or opinion that could be used to identify an individual. Name, DOB, phone number, address, credit information, photographs, location information and others fall under the definition of personal information.
Sensitive information	Sensitive information is personal information that is subject to a higher level of privacy than other personal information, including information on an individual's race, ethnicity, religion, sexual orientation and health information.
Health information	Health information includes client notes, specialist reports, test results, prescriptions, genetic information, information on an individual's future health service wishes, appointment and billing details and any other information collected by a health service provider.
Use	Using information means handling, managing or undertaking an activity with information. This could include updating a client database, making a treatment decision, discussing a client's patient data with another member of the practice and accessing or reading a client's medical file.
Collection	Collecting information means gathering, acquiring or obtaining information for inclusion in a record. Taking notes while a client is talking and keeping records or patient forms (digital or hardcopy), for example, is collecting information.
Disclosure	Disclosing information means making it accessible to people outside of the practice. This can include showing information on a computer screen in a location where others can see it. However, it most often covers when information is sent to other service providers.

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