JOANNA HENDERSON
Clinical Psychologist

PRIVACY POLICY:
MANAGEMENT OF CLIENT INFORMATION

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PURPOSE OF THIS POLICY

This Privacy Policy explains how the Practice collects, uses, stores and discloses your personal information, including sensitive and health information, in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles, as well as the professional and ethical obligations applying to registered psychologists, including the Psychology Board of Australia's Code of conduct for psychologists, relevant registration standards and Ahpra requirements. By engaging with the Practice or using our website, your personal information will be handled in accordance with this Policy and applicable Australian privacy law. Where specific consent is required for a particular collection, use or disclosure of information, that consent will be sought separately.

WHAT PERSONAL INFORMATION WE COLLECT

For each person who receives a psychological service we maintain a client file. This file is primarily electronic, with some hardcopy documents where necessary.
Information we may collect includes:

- Identifying details – name, date of birth, address, phone number, email address, preferred contact details
- Emergency contact and next-of-kin details
- Referral information – referrer's name, date of referral, number of sessions approved, relevant Medicare or other program details
- Health and mental health information – relevant medical and psychological history, current difficulties, medications, treating professionals, risk information (for example, self-harm, harm to others)
- Family, social, educational and occupational information – where relevant to the issues being addressed
- Session and screening records - notes taken in or after sessions, responses and results from screening questionnaires, rating scales and outcome measures, treatment plans, letters and reports

- Billing and payment information – Medicare number and expiry, private health fund details, concession status, invoicing and payment history
- Communication records – emails, SMS, secure faxes, secure messages, telehealth links and relevant written correspondence with you and other providers

Where necessary and with your consent (or as otherwise permitted or required by law), we may also collect information about you from third parties such as your GP, psychiatrist, other health professionals, school staff, legal representatives, or funding bodies (for example, Medicare, insurers, EAP providers).

HOW WE COLLECT PERSONAL INFORMATION

We may collect personal information in several ways, including when you:

- Provide information during consultations (in person or via telehealth)
- Complete intake forms, questionnaires, screening measures or outcome measures (on paper or electronically)
- Contact us via phone, SMS, email or secure messaging
- Receive or send referrals, letters or reports
- Make an enquiry via our website or other online platforms

If you contact us through the website (www.jhpsych.com.au) or social media, we will collect the information you choose to provide (for example, name, contact details and brief message) and use it only to respond to your enquiry.

EMAIL, SMS AND TELEHEALTH

We use SMS, email and secure telehealth platforms for administrative and service-related purposes, such as:

- Appointment reminders and changes
- Telehealth links and access instructions
- Invoices and receipts
- Brief messages related to appointments or care

While we take reasonable steps to protect information sent electronically, email and SMS cannot be guaranteed to be completely secure. By engaging with the Practice, you consent to the use of SMS and email for these purposes. If you prefer not to receive communication via SMS or email, please let us know in writing; this may affect how we send reminders or other information to you.

Telehealth services are delivered via secure platforms where possible. We recommend you join telehealth sessions from a private, quiet location using a secure internet connection.

WHY WE COLLECT AND HOLD PERSONAL INFORMATION

We collect, hold and use personal information for purposes including:

- Providing psychological therapy, clinical formulation and treatment, and where clinically appropriate, the use of screening questionnaires and outcome measures.
- Planning, delivering and reviewing your care

- Communicating and coordinating care with your GP, psychiatrist or other professionals (where you consent or where otherwise permitted/required by law)
- Managing bookings, reminders, telehealth links and other administrative tasks
- Processing payments, rebates and claims
- Meeting legal, ethical, insurer and professional obligations (for example, record-keeping and documentation)
- Quality improvement, practice planning and service evaluation (using de-identified information wherever possible)

If you do not want to provide certain information, please discuss this with us. We will explain how this may impact the services we can provide.

NOT PROVIDING INFORMATION AND USE OF A PSEUDONYM

You may request to use a pseudonym or withhold certain identifying details, unless it is impracticable for us to provide services in that way or we are legally required to deal with identified individuals (for example, for Medicare-funded services). If you choose not to provide information that is needed to safely and effectively deliver psychological services, we may not be able to provide or continue services. In situations where anonymity is agreed, fees must be paid before the appointment and there may be limitations on reports, referrals or rebates.

DISCLOSURE OF PERSONAL INFORMATION

Your personal information is confidential and is not shared with others. It may only be disclosed to third parties in the following circumstances:

1. **With your consent**
    - For example, where you ask us to share information with your GP, psychiatrist, other health professionals, school staff, insurer, legal representative or support people; or
    - Where you consent to a written report or letter being sent to another professional or agency.
2. **As required or authorised by law**
    - For example, in response to a valid subpoena or court order, or to meet reporting obligations (such as mandatory reporting of child harm or certain health conditions).
3. **To prevent serious harm**
    - If we reasonably believe that failure to disclose information would place you or another person at serious risk to life, health or safety, we may disclose information to appropriate services or individuals (for example, emergency services, crisis lines, your GP, or a nominated support person).

Some technology and service providers involved in operating our systems may have access to personal information (for example, IT support, secure fax/messaging providers, cloud service providers). The Practice may also use external administrative service providers to assist with functions such as responding to enquiries, managing referrals, appointments, accounts and other Practice administration. These providers

may have access to personal information where reasonably necessary to perform their role and are required to maintain privacy and confidentiality. Such providers are only authorised to access information as needed to support the Practice and are bound by privacy and confidentiality obligations.

We do not sell, rent or trade your personal information for marketing or unrelated purposes.

HOW WE STORE AND PROTECT YOUR INFORMATION

Client information is primarily stored electronically within secure systems, and in some instances in secure hardcopy files.
We take reasonable steps to protect your information from misuse, interference, loss, unauthorised access, modification or disclosure, including through:

- Secure, password-protected systems and devices
- Role-based access so only authorised personnel can access client information
- Encrypted or secure platforms for telehealth, referrals and clinical communication where possible
- Staff and contractors being bound by confidentiality and privacy obligations
- Secure destruction or de-identification of information when it is no longer required

Despite these safeguards, no system can be guaranteed completely secure. In the unlikely event of unauthorised access to, unauthorised disclosure of, or loss of personal information, we will:

- Activate our data breach response procedures
- Take reasonable steps to contain the breach and reduce the risk of harm
- Assess the likely impact, including whether serious harm is likely

Where a data breach involving your personal information is likely to result in serious harm, we will notify you and the Office of the Australian Information Commissioner (OAIC) in line with the Notifiable Data Breaches scheme.

WEBSITE AND ONLINE SERVICES

Our website (www.jhpsych.com.au) is primarily an information resource about our services. When you visit the website, we may collect information about your visit, including:

- Your IP address and general location
- The type of browser and device you are using
- Pages you view and links you click
- The date, time and duration of your visit

This information is typically collected using standard website technologies such as server logs, cookies or similar tools, and is used to:

- Operate, maintain and improve the website
- Understand how people use the site (for example, which pages are most visited)
- Address technical issues and keep the site secure

Cookies and similar technologies

A cookie is a small file stored on your device by your web browser. Our website may use cookies or similar technologies to:

- Remember basic preferences (for example, language or display settings)
- Provide anonymised usage statistics and analytics

You can usually change your browser settings to block or delete cookies. If you do so, some parts of the website may not function as intended.

- **Website analytics and third-party services**

We may use website analytics tools (for example, Google Analytics or similar services) to collect anonymised or aggregated information about how the website is used. These services may use cookies or other technologies and may process data on servers outside Australia. We take reasonable steps to ensure that any third-party providers we use manage information in a way that is consistent with Australian privacy law. Our website is hosted and managed by third-party providers (for example, our web developer/hosting service). They may have access to limited technical information needed to operate the site (such as server logs). They are not permitted to use this information for unrelated purposes.

- **Online forms and email links**

If you submit an enquiry via an online form or email link, the information you provide (for example, name, contact details and message) will be sent to our business email accounts (for example, admin@jhpsych.com.au) and handled in the same way as other correspondence.

- **External links**

Our website may contain links to other websites, such as professional bodies, crisis services or information resources. We are not responsible for the privacy practices of external sites. We encourage you to read the privacy policies of any websites you visit.

PLEASE NOTE: Use of the website does not create a therapeutic relationship. The website is not monitored for crisis communication and should not be used in an emergency.

USE OF TECHNOLOGY, SOFTWARE AND AI

To provide services and manage the Practice, we use several secure, encrypted platforms to manage:

- Client bookings and records
- Session notes and reports
- Screening questionnaires, rating scales and outcome measures
- Invoices and payments
- Referrals and clinical correspondence
- Telehealth and messaging

These include (but may not be limited to): practice management software (for example, Zanda Health), online assessment platforms (for example, NovoPsych, MHS Assessment Center+ via PAA), secure fax and messaging providers (for example, Notifyre, Medical-Objects), email and cloud services (for example, Microsoft 365), accounting software (for example, Xero), payment processing (for example, Stripe),

and approved AI-assisted documentation tools (for example, Novonote and AI features within our existing platforms). A current list of key systems used by the Practice is provided in the Client Agreement and may be updated from time to time. You can request a copy of this list at any time.

We may use AI-assisted tools to support documentation (for example, to help structure clinical notes or letters). Where possible, these tools use de-identified information. AI tools are used only to support clinical care and practice administration, not for advertising or unrelated profiling. Further information about the Practice's use of AI-assisted tools, including NovoNote, client choice, consent, data handling and clinician responsibility, is set out in the Practice's AI Policy.

Some third-party service providers may store, process or access information outside Australia. Where the Practice is likely to disclose personal information to an overseas recipient, the Practice will take reasonable steps required by Australian privacy law to protect the information. Where practicable, information about the locations in which key service providers process or store Practice information can be obtained from the Practice on request.

RETENTION AND DESTRUCTION OF CLIENT INFORMATION

Client records are retained for at least:

- Seven (7) years from the date of last contact for adults; and
- Until the client turns (or would have turned) 25 years of age for clients who were under 18 at the time of last contact,

or for longer where required or permitted by law, insurer requirements, or professional guidance, or where it is clinically appropriate to do so. When records are no longer required, they are securely destroyed or de-identified.

ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

You may request access to the personal information we hold about you and request that it be corrected if you believe it is inaccurate, incomplete, out of date, irrelevant or misleading. Requests for access or correction should be made in writing to:

Joanna Henderson
Clinical Psychologist
Email: admin@jhpsych.com.au

We will respond in writing within a reasonable time (usually within 21 days). In some situations, access may be restricted or refused, for example where:

- Providing access may pose a serious threat to the life, health or safety of any individual
- Providing access would unreasonably impact the privacy of others
- The request is frivolous or vexatious
- The information relates to existing or anticipated legal proceedings and access would not be available through those proceedings

- Denial of access is otherwise required or authorised by law

If access is refused, or only partial access can be provided, we will explain the reasons in writing and outline how you can complain if you are dissatisfied.

PRIVACY CONCERNS OR COMPLAINTS

If you have any questions or concerns about how your personal information is handled, please raise them with us as soon as possible so we can work with you to resolve the issue. If you feel your concerns have not been resolved, you may lodge a complaint with:

Office of the Australian Information Commissioner (OAIC)
Phone: 1300 363 992
Online: privacy complaint form via the OAIC website
Post: GPO Box 5288, Sydney NSW 2001

You may also contact Ahpra or the Psychology Board of Australia if your concern relates to professional conduct or ethical obligations.

QUESTIONS ABOUT THIS POLICY

If you are unsure about how this policy applies to you, or if you would like to discuss your situation, please contact:

- **Email:** admin@jhpsych.com.au
- **Business mobile (phone call only):** 0435 013 760

We appreciate your understanding and cooperation. This policy helps us provide a reliable and sustainable service for you and for all clients of the practice.