



## **Privacy Policy for Management of Personal Information**

This document describes the privacy policy of Family Services Australia Psychology (FSA Psychology) for the management of clients' personal information. The specific legal requirements that FSA Psychology has when managing clients' personal information are set out in the *Privacy Act 1988 (Cth)* and in particular the Australian Privacy Principles found in that Act.

Additionally, in the provision of psychological services, FSA Psychology operates within the ethical principles articulated within the Australian Psychological Society Code of Ethics. Clinicians are to interpret the ethical principles of the Code with reference to legal requirements and any organisational rules and procedures. This document is therefore also to be used in conjunction with the Privacy Policy (FSA CPI 3) of our broader organisation, Family Services Australia.

### **Client information**

Client files are held in Halaxy, an electronic document management system which is accessible only to authorised employees. The information on each file includes personal information such as name, address, contact phone numbers, medical history, and other personal information collected as part of providing the psychological service. The only people who have access to a client's file are the treating clinician(s), administration (for the purpose of contacting the client), and the Service Manager and Clinical Lead (to review and audit clinician's work).

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

A client's personal information is collected in a number of ways during psychological consultation with FSA Psychology. This includes when the client provides information directly to FSA Psychology using hardcopy forms, correspondence via email, when the client interacts directly with their clinician or FSA Psychology employees such as the client care support worker, and when other health practitioners provide personal information to FSA Psychology via referrals, correspondence and medical reports.

### **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, FSA Psychology 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. This request will be accommodated unless it is impracticable for FSA Psychology to deal with the client or if FSA Psychology 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. The personal information is retained in order to document what happens during sessions, and enables the clinician to provide a relevant and informed psychological service.

### **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 FSA Psychology, 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.

In the event of unauthorised access, disclosure or loss of a client's personal information, FSA Psychology will activate its data breach plan and use all reasonable endeavours to minimise any risk of consequential serious harm.

#### **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 their treating clinician. These requests will be responded to in writing within 7 business days, and an appointment will be made if necessary for clarification purposes.

#### **Questions or for more information**

Clients can ask their clinician or FSA Psychology about how their personal information is being managed. They may also request copies of the Australian Privacy Principles, Australian Psychological Society Code of Ethics, and Family Services Australia Privacy Policy (FSA CPI 3), which describe their rights and how their personal information should be handled. Alternatively, they may access this information that is made freely available online:

- Australian Privacy Principles: <https://www.oaic.gov.au/privacy/australian-privacy-principles/read-the-australian-privacy-principles/>
- Australian Psychological Society Code of Ethics: <https://www.psychology.org.au/About-Us/What-we-do/ethics-and-practice-standards/APS-Code-of-Ethics>
- Family Services Australia Privacy Policy: [https://familyservices.org.au/wp-content/uploads/2020/07/FSA-CPI-3\\_Privacy-Policy-1.pdf](https://familyservices.org.au/wp-content/uploads/2020/07/FSA-CPI-3_Privacy-Policy-1.pdf)





### Concerns

If clients have a concern about the management of their personal information, they may inform their clinician or FSA Psychology. 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.

Title:	FSA Psychology – Privacy Policy for Management of Personal Information
Version:	2
Approval date:	22/ 03/ 2021
Review date:	22/ 03/ 2022
Approval authority:	Stevie-Rae Kirkland, Clinical Lead

