COMPASS
Clinical Psychology

Privacy Policy

Introduction:

This privacy policy is to provide information to you, our client, on how your personal information (which includes your health information) is collected and used within our practice, and the circumstances in which we may share it with third parties.

Purpose and Objectives:

The policy is designed to communicate to clients how a practice manages personal information and to complement other practice policies such as complaint resolution and breach notification procedures.

The policy covers:

- Practice procedures
  Staff responsibilities
- Client consent
- Collection, use and disclosure of information
- Access to information

Scope:

This policy applies to all clients and their families/carers. The policy also applies to all staff including permanent and casual, contract workers, temporary agency workers, and volunteers.

Definitions:

- The organisation: Refers to Compass Clinical Psychology Pty Ltd
- The practice: Refers to any healthcare service run by the organisation

Why and when your consent is necessary:

When you register yourself or your child as a client of our practice, you provide consent for our practice staff to access and use their personal information so they can provide you/your child with the best possible healthcare. Only staff who need to see their personal information will have access to it. If we need to use their information for anything else, we will seek additional consent from you to do this.

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Why do we collect, use, hold and share your personal information?

Our practice will need to collect your/your child's personal information to provide healthcare services to you/your child. Our main purpose for collecting, using, holding and sharing your personal information is to manage your/your child's health. We also use it for directly related business activities, such as financial claims and payments, practice audits and accreditation, and business processes (e.g., staff training).

What personal information do we collect?

The information we will collect about you includes your/your child's:

- Names, date of birth, addresses, contact details
- Medical information including medical history, medications, allergies, adverse events, immunisations, social history, family history and risk factors
- Medicare number (where available) for identification and claiming purposes
- Healthcare identifiers
- Health fund details

Dealing with us anonymously:

You/your child has the right to deal with us anonymously or under a pseudonym unless it is impracticable for us to do so or unless we are required or authorised by law to only deal with identified individuals.

How do we collect your/your child's personal information?

Our practice may collect your and your/your child's personal information in several different ways:

1. When you make your/your child's first appointment our practice staff will collect their personal and demographic information via their registration.
2. While providing medical services, we may collect further personal information.
3. We may also collect personal information when you visit our website, send us an email, SMS, or telephone us.
4. In some circumstances personal information may also be collected from other sources. Often this is because it is not practical or reasonable to collect it from you/your child directly. This may include information from:
    a) Other family members
    b) Other involved healthcare providers, such as specialists, allied health professionals, hospitals, community health services, pathology and diagnostic imaging
    c) Out of home care providers, caseworkers, and The Department of Community and Justice
    d) Your health fund or Medicare

When, why, and with whom do we share your personal information?

We sometimes share your/your child's personal information:

- With third parties who work with our practice for business purposes, such as accreditation agencies or information technology providers – these third parties are required to comply with Australian Privacy Principles and this policy
- With other healthcare providers, allied health or NDIS providers
- With out of home care agencies, caseworkers and The Department of Community and Justice
- When it is required or authorised by law (e.g., court subpoenas)
- When making a mandatory child protection notification
- When it is necessary to lessen or prevent a serious threat to a client's life, health or safety or public health or safety, or it is impractical to obtain the client's consent
- To assist in locating a missing person
- To establish, exercise or defend an equitable claim
- For the purpose of confidential dispute resolution process
- When there is a statutory requirement to share certain personal information (e.g., some diseases require mandatory notification)

Only people who need to access your/your child's information will be able to do so. Other than while providing medical services or as otherwise described in this policy, our practice will not share personal information with any third party without your consent.

We will not share your/your child's personal information with anyone outside Australia (unless under exceptional circumstances that are permitted by law) without your consent.

Our practice will not use your/your child's personal information for marketing any of our goods or services directly to you without your express consent. If you do consent, you may opt out of direct marketing at any time by notifying our practice in writing.

Our practice may use your/your child's personal information to improve the quality of the services we offer to our clients through research and analysis of our client data. We may provide de-identified data to other organisations to improve population health outcomes. The information is secure, clients cannot be identified, and the information is stored within Australia. You can let our reception staff know if you do not want your or your child's information included.

How do we store and protect your personal information?

Your/your child's personal information will be stored on our electronic medical record system. Our practice stores all personal information securely. Our practice uses Zanda from Zanda Architectural Hardware and Zanda Health electronic medical record system. All records are stored securely in Australia. Access to our computer systems is restricted and password controlled.

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How can you access and correct your personal information at our practice?

You have the right to request access to, and correction of, your/your child's personal information. Our practice acknowledges clients may request access to their medical records. We require you to put this request in writing and send by email to info@compassclinpsych.com.au and our practice will respond within 30 days. Printing of documentation may incur a fee of $20.

Our practice will take reasonable steps to correct your/your child's personal information where the information is not accurate or up to date. From time to time, we will ask you to verify that your/your child's personal information held by our practice is correct and current. You may also request that we correct or update your information. You should make such requests in writing and send by email to info@compassclinpsych.com.au or discuss with our reception staff.

How can you lodge a privacy-related complaint, and how will the complaint be handled at our practice?

We take complaints and concerns regarding privacy seriously. You should express any privacy concerns you may have in writing, send by email to info@compassclinpsych.com.au, and we will then attempt to resolve it in accordance with our resolution procedure within 30 days. You may also contact the OAIC. Generally, the OAIC will require you to give them time to respond before they will investigate. For further information visit www.oaic.gov.au or call the OAIC on 1300 363 992.

Privacy and our website:

Before a new client appointment with a psychologist, you are requested to complete an online client questionnaire and information and consent form which will be sent to you via email.

Related legislation and policy:

• Privacy Act 1988

Policy review statement:

This policy will be reviewed regularly to ensure it reflects the current processes and procedures of the organisation and current legislation requirements.

Approvals:

Date of approval: 2nd May 2025

Date of review: 2nd May 2026