

The humanitarian

Privacy Policy for Management of Personal Information

This document describes the privacy policy of *The Humanitarian* 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).

How personal information is collected

The Humanitarian collects personal information directly from clients or organizations in a range of ways, for example, through emails, phone calls, appointment requests, event registration forms, subscriber details, billing information, social media exchange, testing and screening data (using other professional web platforms), referral documentation, face-to-face exchanges and written notes of client sessions, interviews or screening activities.

A client's authorized manager / organizational representative may provide information directly about a client to *The Humanitarian* using hardcopy forms, correspondence via email or electronic interface. Other health practitioners may provide personal information via referrals, correspondence and medical reports. Any information submitted to *The Humanitarian* about a client should have the prior consent of the client before so doing. *The Humanitarian's* website is SSL protected which secures information in transmission via the website.

Consequence of personal information not being provided

If the client does not wish for their personal information to be collected in a way anticipated by this Privacy Policy, *The Humanitarian* may not be in a position to provide the psychological service to the client or the requesting organization.

Clients may request to be anonymous or to use a pseudonym, unless it is impracticable for *The Humanitarian* to deal with the client or if *The Humanitarian* is required or authorised by law to deal with identified individuals. In most cases it will not be possible for the client to be anonymous or to use a pseudonym, however if *The Humanitarian* agrees to the client being anonymous or using a pseudonym, the client must pay consultation fees at the time of the appointment.

Purpose of holding personal information

A client's personal information is gathered and used for the purpose of providing psychological services, which includes pre-training surveys, screening & assessing, diagnosing or treating a client's presenting issue; conducting a pre-deployment or post-deployment consultation, supporting recruitment and selection processes, other counselling or coaching.

The personal information is retained in order to document what happens during sessions and interactions, and enables the psychologist to provide a relevant and informed psychological service.

Disclosure of personal information

Clients' personal information will not be disclosed except when:

1. It is subpoenaed by a court; or
2. Failure to disclose the information would in the reasonable belief of *The Humanitarian* to 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 professional or agency, e.g., a GP or a lawyer; or
 - b) discuss the material with another person, e.g. a parent, employer or health provider; or
 - c) disclose the information in another way; or
4. You would reasonably expect your personal information to be disclosed to another professional or agency (e.g. your GP, deploying organization) 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; or
5. Disclosure is otherwise required or authorised by law.

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.

Storage of personal information

The Humanitarian maintains records of its contact with clients. All notes and data relevant to the client and recorded by a psychologist are maintained as confidential information in accordance with both relevant national and State or Territory legislation.

Records received electronically or in written format are stored securely to prevent loss or misuse; to remain confidential and not to be readily accessible by others.

Paper records of client files are held in a secure filing cabinet with any electronically transmitted information also held on *The Humanitarian's* computer systems and which is accessible only to the psychologist as a sole provider of service.

The information on each file includes personal information such as name, address, contact phone numbers, medical history, emergency contact details, date of birth, special needs, organizational and role details, relevant deployment information, consultation or training goals, confidential notes supplied by a doctor or manager with the client's consent and other personal information or business information collected as part of providing the psychological service.

Records are kept for up to 7 years following last date of activity and beyond for special reasons (such as in the event of legal action).

The Humanitarian will take all reasonable steps to ensure information collected is protected from:

- a. Misuse, interference and loss, and;
- b. Unauthorized access, modification or disclosure

If *The Humanitarian* no longer needs the information for any purpose, and is not obliged to retain the information by law then all reasonable steps to delete the information from its records will be taken.

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 Amanda Allan, proprietor of *The Humanitarian*. These requests will be responded to in writing within 30 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 Amanda Allan. 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.