



## RSP Psychology Clinic & e-Therapy Clinic Privacy Policy

### Privacy Policy for Management of Personal Information

ANU recognises that your privacy is very important. The way we collect, use, disclose, secure and dispose of your personal information is governed by our compliance with, and obligations as an 'agency' under the Privacy Act 1988 (Cth), including the [Australian Privacy Principles \(APPs\)](#) and other relevant Commonwealth, State and Territory legislation. More information about the [ANU's Privacy Policy and Procedures](#) is available here.

The Research School of Psychology ANU Psychology Clinic and eTherapy Clinic provides clinical psychology training to postgraduate students who are provisionally or fully registered Psychologists and are supervised by registered Clinical Psychologists. In addition to their obligations under the Privacy Act, 1988, the program, students and supervisors must comply with standards and obligations imposed by the following regulatory and professional bodies.

- [Australian Psychology Accreditation Council](#)
- [Psychology Board of Australia, Australian Health Practitioner Regulation Agency](#)
- [The Australian Psychological Society](#)

This document describes how clients' personal information is collected, used and secured by the ANU RSP ANU Psychology Clinic and eTherapy Clinic.

### What personal information is collected and held by the ANU Psychology Clinic and e-Therapy Clinic?

The ANU Psychology Clinic and eTherapy Clinic collects sensitive personal information about you including your name, date of birth, contact details for yourself and people that you nominate, psychological/ medical / social history and current situation.

### How do the ANU Psychology Clinic and e-Therapy Clinic collect this information?

It is collected in a number of ways by ANU Psychology Clinic and e-Therapy Clinic staff during registration, psychological assessment and consultations, including when:

- you provide information directly to e-Clinic clinicians and administrators in person or other means such as via email, phone, SMS, video-conferencing or online forms, or
- other health practitioners provide information via referrals and other correspondence.

ANU also collects data about internet addresses and activities of visitors to its website – [more information is available here](#).

### Why do the ANU Psychology Clinic and e-Therapy Clinic collect and use personal information?

This information is gathered and used to provide the best possible psychological service including assessment and treatment. For example, it ensures that the clinic staff can contact you when needed, record what happens during sessions, provide clinical supervision and deliver a relevant and informed psychological service.

Your personal information will also be shared with registered Clinical Psychologists employed by the RSP, who work in the Clinics to provide clinical supervision to student therapists. This includes the recordings that are made of your video-conferenced assessment and therapy sessions. These recordings are kept for a short time and destroyed once they have been reviewed by clinical supervisors. If you give us consent, there are two other ways your information may be used:

1. Recordings of your sessions may be kept for longer periods and used to assist in training other students
2. Your data may be used for research purposes, and shared with a clinic researcher. Data used for research is de-identified when it is extracted from the clinic system and will not be used to identify you in any way.

## How is this information kept secure?

The clinics operate similarly will take reasonable steps to keep your personal information secure in the various forms in which it is collected, stored and disposed of. These steps are designed to ensure that your personal information is not subject to unauthorized access, loss or misuse.

The clinics' systems are designed to restrict access to your information to authorized staff who need to see it in order to provide services to you. When the information is no longer required for clinical or legal reasons, it is securely destroyed.

De-identified data extracted for research will be stored on password-protected computers at the ANU for at least 5 years from any publication arising from the research. Data will then be archived at the ANU Research School of Psychology.

**Training, protocols and review processes:** Students and staff are provided with ongoing training and support to implement ANU Psychology Clinic and e-Therapy Clinic privacy and data security procedures. Your therapist will also talk with you about actions that you can take to protect your privacy during video-therapy sessions, during phone-calls and in communicating with either clinic.

**Data security:** The ANU Psychology Clinic and e-Therapy Clinic implement technology and processes that comply with relevant standards and are as secure as possible including the following:

- Printed and written material is kept in secure filing cabinets. Electronic material is encrypted and password protected. Final versions of this material are transferred into a secure electronic health record system and the original hard and electronic copies are disposed of securely.
- Questionnaires about mental health symptoms are completed using an online software that has been approved as secure by ANU information technology (Qualtrics).
- The e-Therapy Clinic strives to send and receive information securely and whenever possible uses healthcare electronic message delivery systems to correspond with other health practitioners. These systems include [HealthLink](#) or similar services. Privacy information about the [HealthLink service](#) is available on its website. Messages sent through these systems are encrypted and digitally signed so that the staff working in the messaging services cannot see the information contained within the messages.

In exceptional cases where other health practitioners do not have access to this technology, correspondence may be sent by fax or post. Access to the Clinic fax machine is restricted to authorized staff.

The ANU Psychology Clinic and e-Therapy Clinic can be contacted by the public and other health professionals via email. Whilst clients of the ANU Psychology Clinic are informed that email is not a secure method of communication, clients can consent to corresponding with their student therapist and clinic staff via email.

- You can choose to receive automated SMS texts to remind you of appointments, but we will ask your consent to send these reminders.
- The video-conferencing service used in sessions uses encrypted connections and does not retain personally identifiable information when the session is finished. The VideoCall website provides information about how it manages [privacy and data security](#).
- Information may be stored for short periods with a third party data storage provider contracted by the ANU – where this is necessary, the data is encrypted and access restricted to authorized staff.

## What if I do not want to provide personal information?

You may request to be anonymous or to use a pseudonym, but in most cases, it will not be practicable for you to receive services while remaining anonymous or using a pseudonym. If you do not wish for your personal information to be collected, the RSP ANU Psychology Clinic and e-Therapy Clinic may not be able to provide psychological services to you.

## How can I access and correct my personal information?

From time to time, Clinic staff may ask you to confirm that the information held in your records is accurate and up to date. They will ask you to confirm your location, phone number and other contact information at the beginning of each video-conferencing session.

You can request to see the personal information held in your records at any time. The therapist may discuss the contents with you and/or provide a copy of relevant material, subject to the exceptions in the Privacy Act 1988 (Cth).

If you wish to request that your information be changed, please make this request in writing to The Clinic Manager, Research School of Psychology, Building 39, Australian National University. The Manager will respond in writing within 30 days and will request an appointment if necessary for clarification purposes. Reasonable steps will be taken to correct personal information that is inaccurate, out of date or incomplete.

There are some circumstances in which we may be unable to release or change some aspects of your information and if this is the case, we will explain the reason.

You can also make a [formal request to the ANU](#) to access and/or correct the personal information held about you under Privacy and Freedom of Information legislation.

## Disclosure of personal information

Clients' personal information will remain confidential except when:

- you have given prior written approval, to provide a written report to, or share information with, another professional or agency (e.g., a medical practitioner); or
- failure to disclose the information would in the reasonable belief of the e-Clinic staff place you or another person at serious risk to life, health or safety; or
- disclosure is required by law (e.g., mandatory reporting of certain illegal activities, or in response to a subpoena or summons).

Other than in the course of providing psychological services or as otherwise described in this policy, the e-Clinic will not share personal information with any third party without your consent.

We will not disclose your personal information outside Australia without your consent, unless there are exceptional circumstances in which this disclosure is required by law.

Privacy breaches may occur despite the best efforts of the clinics to keep information secure and private. In the event of a breach, the ANU Psychology Clinic and / or eTherapy Clinic will investigate and assess the situation promptly, take immediate steps to contain the breach where possible and activate its [Data Breach Response Plan](#). Where a breach may cause serious harm, this Plan provides for notification of affected individuals and the Office of the Australian Information Commissioner under the Privacy Act 1988 (Cth).

## What if I am concerned about my privacy or wish to make a complaint?

If you have a concern about the management of your personal information, please contact The Clinic Manager, Research School of Psychology, Building 39, Australian National University in the first instance.

Any [formal complaint or concern](#) about the use of, disclosure of, or access to your personal information should be communicated to the ANU Privacy Officer by email at [privacy@anu.edu.au](mailto:privacy@anu.edu.au).

Complaints may be made to 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. However, the [Office of the Australian Information Commissioner advises](#), complaints should be made to OAIC after complaints have been made to the University and a response has been received from the relevant ANU officer.