

Connecting Circles Psychology

Privacy Policy for the handling of personal information

This document describes the privacy policy of Connecting Circles Psychology for the management of your 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), the Australian Privacy Principles and the Health Records Act 2001 (Vic)

This Privacy Policy applies to the collection, use, storage and disclosure of personal information in connection with the clinical, educational, community and consultancy services provided by Connecting Circles Psychology.

Privacy and Collection of Information

Connecting Circles Psychology is committed to protecting your privacy and handling your personal information in accordance with the Privacy Act 1988 (Cth), the Australian Privacy Principles and the Health Records Act 2001 (Vic).

To provide safe, effective and appropriate psychological services, we may collect personal and sensitive information about you. This may include information such as your name, date of birth, contact details, emergency contact information, Medicare or other funding details, referral information, relevant medical and psychological history, and information discussed during appointments.

There are a number of ways your personal information is collected, including when:

- You provide information directly to your psychologist in your session and in writing such as letters, forms, email or text messages.
- You interact directly with Connecting Circles Psychology employees such as our administration staff.
- Other health practitioners, such as your GP, provide personal information to Connecting Circles Psychology, through referrals, correspondence and medical reports.
- We receive personal information from other sources, such as lawyers, employers or insurance companies through correspondence or reports.

If you have concerns that the information recorded is not correct, please discuss your concerns with our administration staff or your psychologist.

We only collect information that is reasonably necessary to provide our services, meet our professional and legal obligations, and support your ongoing care.

Due to the nature of psychological services, it is not practical for clients to receive ongoing treatment anonymously or under a pseudonym.

Providing accurate and complete information helps us deliver safe and appropriate psychological services. If you choose not to provide certain information, there may be circumstances where we are unable to provide the service you are seeking.

How We Store and Protect Your Information

Connecting Circles Psychology takes reasonable steps to protect the security and confidentiality of your personal information.

Your information is stored securely and accessed only by your psychologist and the authorised staff or providers of the practice, as required, in accordance with the practice's policies and procedures.

Where possible, client information is stored securely in electronic systems used to support the delivery of psychological services and the administration of the practice. This may include secure practice management software, secure email services, telehealth platforms and other professional systems used to assist in the provision of care.

Connecting Circles Psychology currently uses systems such as Halaxy and Microsoft 365 for practice management, communication and record keeping. To support the delivery of psychological services and reduce administrative burden, secure documentation tools integrated within our practice management systems, including the Halaxy Scribe tool, may also be used to assist with the preparation of clinical notes and records. All clinical documentation is reviewed and remains the professional responsibility of your treating psychologist.

Halaxy Scribe securely processes information within Australia using Amazon Web Services (AWS) infrastructure. Audio from consultations is streamed securely for live transcription and is not stored. Only the resulting clinical transcriptions and summaries are retained within Halaxy's secure systems. Information processed through Halaxy Scribe is not used for AI training and is not shared with third parties for that purpose.

Clients may withdraw their consent to the use of AI-assisted documentation tools at any time by discussing this with their treating psychologist. Alternative documentation methods can be arranged where appropriate. The use of these tools does not replace the professional judgement or responsibilities of the treating psychologist.

Where telehealth services are provided through Halaxy Telehealth, consultations are conducted using secure technology built on Amazon Chime and AWS infrastructure. Audio and video communications are encrypted in transit, and Halaxy does not record telehealth consultations through its platform.

Where third-party services or software integrations are used, personal information may be disclosed or processed outside Australia where necessary. Reasonable steps are taken to

ensure that these providers comply with applicable privacy obligations and contractual requirements.

Reasonable steps are taken to protect your information through measures such as password protection, access controls, multi-factor authentication where available, secure data storage practices and regular review of our privacy and security processes.

Some information may be retained in paper form where required and stored securely.

Psychologists are legally required to retain client records for minimum periods set by law. In Victoria, this is generally at least seven years from the date of the last entry in the record, or, for children and young people, until they attain or would have attained 25 years of age. When records are no longer required to be retained, reasonable steps will be taken to securely destroy or de-identify them in accordance with applicable legal and professional requirements.

While reasonable steps are taken to protect your information, no method of electronic communication, internet transmission or data storage can be guaranteed to be completely secure. In the event of an eligible data breach, Connecting Circles Psychology will respond in accordance with applicable privacy legislation, relevant data breach notification requirements and the practice's Data Breach Response Plan.

Confidentiality and Its Limits

Your privacy is important to us, and information shared during psychological services is treated confidentially.

In most circumstances, your personal information will only be shared with your consent. We may ask for your consent when:

- sharing information with a family member, guardian or carer,
- communicating with your GP, another health professional or another agency involved in your care,
- discussing information with a third-party funding body or organisation involved in your treatment,
- or preparing reports or correspondence for another professional or agency.

Psychologists are also required to participate in professional supervision and peer consultation. In these circumstances, reasonable steps are taken to protect your privacy and, wherever possible, information is de-identified.

There are some situations where we may be legally or ethically required to disclose information without your consent. These may include:

- where a court or tribunal requires information or disclosure is otherwise required or authorised by law,
- where a mandatory report is required,
- where there is a serious concern for your safety or the safety of another person,

- or where disclosure is otherwise permitted under relevant privacy or health records legislation.

Where it is appropriate and safe to do so, we will aim to discuss these situations with you.

Sharing Information

Connecting Circles Psychology may use and disclose your personal information for the purpose of providing psychological services and managing your care.

With your consent, information may be shared with people or organisations involved in your treatment or the administration of your care. This may include your GP, medical specialists, other health professionals, hospitals, family members or carers, or third-party funding bodies and agencies.

Information may also be shared to:

- manage appointments and billing,
- process Medicare, private health, NDIS, TAC, WorkSafe or other funding arrangements,
- prepare reports or correspondence requested by you or another authorised party,
- coordinate your care with other professionals involved in your treatment.

From time to time, Connecting Circles Psychology may engage trusted service providers to assist with the operation of the practice, such as secure practice management software, information technology services, data security services and other professional support services. Reasonable steps are taken to ensure that these services protect your personal information.

With your consent, information may also be shared with interpreters, support persons or other individuals involved in your care.

Your personal information will not be sold or disclosed for marketing purposes.

There may also be circumstances where we are required or authorised by law to disclose information without your consent, as outlined in this Privacy Policy.

Accessing your personal information

At any stage, you can request to access your personal information kept on file. There may be some exceptions that impact your ability to access the information, which are outlined in the relevant legislation.

At any stage you may request to see and correct the personal information about you kept on file. Your psychologist may discuss the contents with you and/or give you a copy, subject to the exceptions in the Privacy Act 1988 (Cth).

If your psychologist is satisfied that your 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 you for access to or correction of personal

information held about you should be lodged with your psychologist or our administration staff.

If you would like to access your information, please discuss it with us or you can request in writing. All written requests for access to information will be responded to in writing within 30 days and an appointment will be made if necessary for clarification purposes.

Concerns

If you have a concern about the management of your personal information, you may inform your psychologist or the practice staff. Upon request you can obtain a copy of the Australian Privacy Principles, which describe your rights and how your personal information should be handled.

Ultimately, if you wish to lodge a formal complaint about the use of, disclosure of, or access to, your personal information, you may do so with the Office of the Australian Information Commissioner:

- By phone on 1300 363 992.
- Online at <https://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us>
- By post to: Office of the Australian Information Commissioner, GPO Box 5288, Sydney, NSW 2001

Further information is available in our:

- Client Information, Privacy and Practice Guide
- Your Rights and Responsibilities
- Complaints Process

Contact us

If you have questions about your privacy or personal information, or wish to request access to or correction of your records, please contact us:

Connecting Circles Psychology

- Email: hello@connectingcirclespsychology.com.au
- Phone: +61 411 840 829
- Website: www.connectingcirclespsychology.com.au

Document Version: 1.0

Approved: June 2026

Next Scheduled Review: June 2027

This document may be updated from time to time to reflect changes in legislation, professional standards or practice procedures.

P: +61 411 840 829

E: hello@connectingcirclespsychology.com.au

W: www.connectingcirclespsychology.com.au