

First Floor, 636 Sydney Rd

Brunswick VIC 3056

Ph: (03)9191 6726



## **Privacy Policy – In Dialogue Practice**

First Floor, 636 Sydney Rd

Brunswick VIC 3056

Ph: (03)9191 6726



## 1 Purpose

**In Dialogue Practice Pty Ltd** are committed to protecting the privacy of their clients (including supervisees/trainees), clinicians/private practice professionals and staff. In Dialogue Practice upholds the right of the consumer to have their privacy and confidentiality recognised and maintained to the extent that it does not impose serious risk to the consumer or others (Standard 1.8, National Mental Health Standards, 2010)

## 2 Scope

This Privacy Policy sets out how IDP collect and manage personal information and the steps taken to protect it. This Privacy Policy operates in addition to our obligation of confidentiality to clients under the Mental Health Act (Vic) 2014.

## 3 Definition

### 3.1 What is personal information?

Personal information means information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable.

## 4 Dissemination and Review

The policy is reviewed annually or as changes are required. Approval of this policy and any amendments will be required by the Directors of In Dialogue.

First Floor, 636 Sydney Rd

Brunswick VIC 3056

Ph: (03)9191 6726



## 5 Collection

### 5.1 Overview

The type of personal information we collect depends on the type of dealings we have with you as a client, family member/support person of client, clinician or service. You provide most of your personal information directly to us and for a specific purpose of being seen for counselling, professional supervision, consultation or training. As a client for counselling, your information is recorded by your In Dialogue therapist electronically and in password protected electronic files held by halaxy (see [halaxy.com.au](http://halaxy.com.au)). As a supervisee we will also hold electronic notes through halaxy for reference and ongoing review of learning.

If you attend training or supervision through In Dialogue your registration details will be used for billing and catering purposes, provide follow up learning documents, gain feedback or to send future training opportunities unless you have expressed not to receive this. When we collect personal information, we will whenever practical, outline why this information is being collected. We will only record personal information when you:

- a. send us a message (e.g. in the contact us section on the **In Dialogue** website);
- b. ask us to provide you with services – including as a client, supervisee, trainee, face to face, online or by phone;

We sometimes collect your personal information from persons or sources other than you. For example:

- a. We may collect information from third parties such as past medical/mental health services that are referring you for counselling, but this is with your permission and we will require your consent.
- b. When you are referred by your GP or medical service and they have faxed/sent this referral directly onto us. This information will be filed in your clinician notes or held for one month in a password protected file and deleted if you do not become a registered client.

First Floor, 636 Sydney Rd

Brunswick VIC 3056

Ph: (03)9191 6726



## 5.2 Sensitive information

Sensitive information is personal information that generally has greater privacy protections under the Privacy Act. It covers information about health, race and sexual preferences or practices, among other things. We will only collect such information from you and only if it is relevant to providing you with **In Dialogue** psychotherapy/clinical services, supervision or training/education.

## 5.3 Employees

The Privacy Act does not apply to personal information about current or former employees and this Privacy Policy does not apply to that information. Instead, workplace laws prescribe the personal information to be held in employee records and the way in which employees may access their personal employee records. Further, where State or Territory health privacy legislation applies, **In Dialogue Practice** is still required to protect the privacy of employee health information. This Privacy Policy will apply in those circumstances.

## 5.4 Users of In Dialogue website

If **In Dialogue** needs to contact you via email, we will use the email address provided in registration or through the "contact us" page on the website. The personal details you give us will be kept confidential and will not be used for any other purpose, except to follow up referral, offer counselling/supervision/training or to consult to you about where best to get ongoing psychological support or other services to you.

## 5.5 Information provided by "cookies"

**In Dialogue** uses "cookies" as a reporting mechanism on our website. Cookies identify traffic coming into and out of the **In Dialogue** website. Cookies enable our web server to collect information back from your browser each time you visit the In Dialogue website. You can find out more about the use of cookies at [www.cookiecentral.com](http://www.cookiecentral.com).

First Floor, 636 Sydney Rd

Brunswick VIC 3056

Ph: (03)9191 6726



## 5.6 Duty of Care

In certain circumstances, if your communication with us raises safety concerns, we will try to contact you to check that you and/or others are safe. If necessary, we may need to pass on your contact information (if you have supplied it) to authorities who can help protect you and/or others, such as a crisis service or the police. Where possible we will work with you openly, letting you know if our concerns reach the point where we need to involve other services. We are obliged to try to protect you and/or others if the information you submit tells us that:

- a. you are being seriously hurt by someone else;
- b. you are thinking of seriously harming yourself;
- c. someone else is being, or is likely to be, seriously hurt by you or another person.

## 5.7 Credit card information

IDP may hold your credit card information for billing purposes and will only do so with your permission. These details are stored on Halaxy, practice management software, who have their own privacy and security. <https://www.halaxy.com/article/privacy>

# 6 Use and Disclosure

## 6.1 General

We will only use your personal information for the purpose for which it was collected unless:

- a. you have consented to its use for another purpose;
- b. you would reasonably expect it to be used for a related purpose (or if the information is sensitive information, for a directly related purpose);
- c. it is permitted or required by law.

First Floor, 636 Sydney Rd

Brunswick VIC 3056

Ph: (03)9191 6726



We will not disclose your personal information to any third parties without your consent, unless permitted or required to do so by law, in particular when we exercise our Duty of Care: **Our Duty of Care** (Appendix A).

## 7 Complaints

If you have a complaint about how we have collected or handled your personal information, please contact one of our Directors through [admin@indialogue.com.au](mailto:admin@indialogue.com.au) or email [feedback@indialogue.com.au](mailto:feedback@indialogue.com.au). We will investigate your complaint and communicate the outcome of our investigation within 14 working days.

If you are not satisfied with the outcome of our investigation/follow up, you can refer your complaint to the Office of the Australian Information Commissions at [enquiries@oiac.gov.au](mailto:enquiries@oiac.gov.au) or in some instances, to some other regulator such as the statutory body in your State for health complaints or the Australian Health Practitioner Regulation Agency at [www.ahpra.gov.au](http://www.ahpra.gov.au).

## 8. Related legislation and policy:

1. Mental Health Act (Vic) 2014
2. Disability Act (Vic) 2006
3. Privacy Act 1988
4. National Mental Health Standards, 2010.
5. National Disability Insurance Scheme (Provider Registration and Practice Standards) Rules 2018

Review of this policy to be annual. Recent edition review in March 2020.