

# HARBOUR

## Privacy and Data Protection Policy

**Current as of:** April 2026

**Due for review:** April 2027

---

### Introduction

Harbour Psychology has developed this Privacy and Data Protection Policy to support compliance with the Australian Privacy Principles (APPs) and applicable legal and professional obligations.

This policy applies to Harbour Psychology and to all practitioners, employees, and contractors who collect, use, or manage personal information as part of services provided through the practice.

This policy covers:

- practice procedures
- personnel responsibilities
- client consent
- collection, use and disclosure of information
- protection of data
- access to information

This policy is to be considered in the context of:

- the Privacy Act 1988 (Cth)
- guidance provided by the Office of the Australian Information Commissioner (OAIC)
- the Health Records Act 2001 (Victoria)

This policy is reviewed annually to ensure it remains current with legal, regulatory, and practice requirements.

---

### Contact Information

For more information regarding Harbour Psychology's collection, use, and sharing of information:

Telephone: 03 9002 0440

Email: [admin@harbourpsychology.com.au](mailto:admin@harbourpsychology.com.au)

---

## Alignment to Code of Conduct

The Psychology Board of Australia Code of Conduct describes the standards of behaviour and practice expected of all registered psychologists.

Section 3.3 of the Code outlines ethical and legal obligations relating to client privacy and confidentiality.

All practitioners at Harbour Psychology comply with the Code of Conduct and relevant guidelines.

All psychologists and practitioners are individually responsible for complying with the requirements of the Australian Health Practitioner Regulation Agency (AHPRA) and applicable professional standards. This includes maintaining confidentiality, ensuring appropriate use of personal information, and exercising professional judgement in all aspects of information handling.

This policy outlines how Harbour Psychology implements these obligations in practice.

---

## Why and When Client Consent is Necessary

Harbour Psychology obtains **informed consent** from clients prior to the collection, use, and disclosure of personal information.

Personal information is primarily used for the purpose of providing psychological services (“primary purpose”). Only staff and contractors who require access to personal information to perform their role will be permitted access.

In addition to general consent, Harbour Psychology obtains **explicit consent** where required, including for:

- sharing information beyond the primary purpose of care
- use of third-party digital systems
- use of AI-supported tools
- use of de-identified data for research or service improvement

All personal information gathered during the provision of services remains confidential except where:

- disclosure is required or authorised by law (e.g. subpoena)
- there is a serious and imminent threat to the life, health, or safety of the client or another person
- the client has provided prior consent for disclosure

Harbour Psychology will seek consent **directly from the client** for secondary uses of information, unless otherwise permitted or required by law.

Clients may withdraw or modify their consent at any time. Withdrawal of consent may affect the ability to provide services.

Personal information will not be used, sold, rented, or disclosed for purposes other than those described in this policy without consent.

---

## **Data Breach Mandatory Reporting**

In the event of unauthorised access, disclosure, or loss of personal information, Harbour Psychology will activate its data breach response procedures.

Harbour Psychology will:

- assess the nature and extent of the breach
  - take steps to contain and mitigate risks
  - notify affected individuals where there is a risk of serious harm
  - notify the Office of the Australian Information Commissioner where required under the Notifiable Data Breaches scheme
  - implement measures to prevent recurrence
- 

## **Billing and Administrative Information**

Billing and administrative information may, in some circumstances, constitute personal information where it can reasonably identify an individual.

Harbour Psychology applies appropriate privacy and security protections to all such information.

For the purposes of this policy, references to practitioners and medical specialists include their staff and contractors involved in service delivery or administrative support.

---

## **Why Does Harbour Psychology Collect, Use, Hold and Share Personal Information?**

Harbour Psychology collects and maintains personal information for the purpose of delivering psychological services and managing practice operations.

This includes:

- providing clinical services
  - maintaining accurate clinical records
  - managing billing and claims processing
  - communicating with clients and relevant healthcare providers
- 

## **What Personal Information Does Harbour Psychology Collect?**

The information collected may include:

- name, date of birth, address, and contact details
- Medicare number and healthcare identifiers
- health fund details
- medical and psychological history
- referrals, reports, and correspondence
- clinical notes and assessment results
- billing and financial information

Only information that is reasonably necessary for service provision is collected.

---

## **Dealing with Harbour Psychology Anonymously**

Clients may have the option to deal with Harbour Psychology anonymously or under a pseudonym where lawful and practicable.

However, in most cases, identification is required to provide safe and effective healthcare and to meet legal obligations. Clients will be informed where anonymity is not practicable and advised of available options.

---

## **How Does Harbour Psychology Collect Personal Information?**

Personal information may be collected in the following ways:

1. At the time of registration or initial appointment
2. During the provision of psychological services
3. Through referrals from healthcare providers
4. From third parties where it is not practical to collect information directly from the client (e.g. guardians, healthcare providers, Medicare)

Clients will be informed where additional information is requested and the reason for its collection.

---

## **When, Why and With Whom Does Harbour Psychology Share Personal Information?**

Harbour Psychology may share personal information:

- with other healthcare providers involved in the client's care
- where required or authorised by law
- to prevent a serious threat to life, health, or safety
- to assist in legal processes or dispute resolution
- with trusted third-party service providers

Personal information will not be disclosed for other purposes without consent unless permitted by law.

Harbour Psychology will not disclose personal information to overseas recipients without consent, unless required or authorised by law.

Where third-party providers store or process data outside Australia, reasonable steps will be taken to ensure compliance with Australian Privacy Principles, and clients will be informed where relevant.

Harbour Psychology does not use personal information for marketing.

---

## **Use of De-Identified Information**

Harbour Psychology may use de-identified information for research, quality improvement, and service development.

Where appropriate, clients will be informed and given the opportunity to consent or decline participation.

De-identification is conducted in accordance with guidance from the Office of the Australian Information Commissioner.

---

## **How Does Harbour Psychology Store and Protect Personal Information?**

Personal information is stored securely in electronic systems used for practice management, communication, billing, and clinical documentation.

Harbour Psychology implements appropriate safeguards, including:

- role-based access controls (minimum necessary access)
- secure authentication measures
- encryption where supported
- audit logging and monitoring
- staff confidentiality agreements

All staff and contractors are required to maintain the confidentiality and security of personal information.

---

## **Use of AI-Supported Tools**

Harbour Psychology may use AI-supported tools to assist with clinical documentation and administrative processes.

- These tools support, but do not replace, professional judgement
- All outputs are reviewed by the treating practitioner

Before use:

- clients are informed of the purpose and function
- explicit consent is obtained
- clients may decline without affecting their care

Reasonable steps are taken to ensure that:

- personal information is handled securely
  - data is not used to train external systems without consent
  - providers comply with privacy obligations
- 

## **How Can Clients Access and Correct Their Personal Information?**

Clients have the right to request access to and correction of their personal information.

Requests should be made in writing. Harbour Psychology will respond within a reasonable timeframe and take reasonable steps to correct inaccurate or incomplete information.

---

## **How Does Harbour Psychology Manage Withdrawal of Consent?**

Clients may withdraw consent for the collection, use, or disclosure of their personal information at any time.

Harbour Psychology will explain any implications this may have for the provision of services.

---

## **How Does Harbour Psychology Retain and Destroy Data?**

Harbour Psychology retains:

- adult client records for a minimum of 7 years from the date of last contact
- records for clients under 18 until the client reaches 25 years of age

Records are securely destroyed or de-identified when no longer required, in accordance with legal obligations.

---

## **How Can a Privacy Complaint Be Lodged?**

Harbour Psychology takes privacy concerns seriously. Complaints should be made in writing and will be managed in accordance with internal procedures.

If a complainant is not satisfied with the outcome, they may contact:

- the Office of the Australian Information Commissioner (OAIC)
  - the Australian Health Practitioner Regulation Agency (AHPRA)
- 

## **Website Privacy**

The Harbour Psychology website does not collect personally identifiable information. Standard cookies and non-identifiable analytics may be used.

---

## **Policy Review Statement**

Harbour Psychology reviews its privacy and data protection practices regularly and updates this policy as required.

This policy is reviewed annually, or more frequently in response to legislative or regulatory changes.

---