

THE GLEN NEVIS CLINIC REDUCED FEE PSYCHOANALYTIC PSYCHOTHERAPY SERVICE: PRIVACY POLICY

INTRODUCTION

The Glen Nevis Clinic is operated by the Glen Nevis Clinic (for Psychoanalytic Psychotherapy) Inc ("GNC"). The GNC's Reduced Fee Psychoanalytic Psychotherapy Service ("Service") provides assessment and, if deemed appropriate, Psychoanalytic Psychotherapy to individuals ("Users") through members and candidates of the Victorian Association of Psychoanalytic Psychotherapists Inc (VAPP) who have volunteered to provide their services at reduced fees ("Participating Psychotherapists").

This Privacy Policy applies to the GNC and the VAPP ("we", "us") in relation to their operation of the Glen Nevis Clinic and explains how we handle personal information and comply with the requirements of applicable privacy laws, including the Privacy Act 1988 (Commonwealth) ("Privacy Laws").

We recognise the importance of your privacy, and that you have a right to control how your personal information is collected and used. This Privacy Policy seeks to address any concerns you may have about the handling of your personal information.

WHAT IS PERSONAL INFORMATION?

"Personal information" is information or an opinion, whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

COLLECTION OF PERSONAL INFORMATION

We collect personal information about existing and prospective Users and Participating Psychotherapists, for various purposes listed below. The types of personal information we will collect about you will depend on the circumstances in which that information is collected. It may include:

- (a) your contact details;
- (b) information which you provide as part of your application or other correspondence with us;

If you are a User, then also:

- (c) information about your circumstances which may be relevant to evaluating your situation and suitability for initial assessment ("Assessment") or subsequent Psychoanalytic Psychotherapy;
- (d) information about any past and present treatment you may have received and details of your doctor or other health practitioners with whom you have been in contact; and
- (e) information regarding your contacts with us; and
- (d) statistical information regarding the use of the VAPP website at <http://vapp.asn.au> (the "Site"), including Site users' IP addresses and the dates and times of visits.

HOW WE COLLECT PERSONAL INFORMATION

The main ways in which we may collect personal information are as follows:

from you: we collect personal information which you provide to us (for example, on a completed application form, while in contact with one of our volunteers by email or telephone, or otherwise);

if you have provided us with contact details for a practitioner who has previously been treating you, we may also contact that practitioner to obtain further information about your situation.

If you do not provide us with your personal information when requested, this may limit the assistance we are able to provide you. For example, we may not have sufficient information to be able to place you with a Participating Psychotherapist.

Where practicable, we will collect personal information directly from you. If we receive information about you from anyone else, we will take reasonable steps to ensure you are aware that we have collected personal information about you and the circumstances of the collection.

SENSITIVE INFORMATION

In order to provide our services, we will collect personal information, such as health information or other information about your personal circumstances, that is designated as "sensitive information" under Australian Privacy Laws.

As noted above, we collect such information in order to verify eligibility to receive our services and to help us to assess if Psychoanalytic Psychotherapy is best for you.

In providing any consent to the collection or handling of personal information (including sensitive information), you consent to us collecting, transferring, disclosing, storing, and processing the information you provide in accordance with this Privacy Policy and the terms of those consents.

USE AND DISCLOSURE OF PERSONAL INFORMATION

General

We will only use and disclose your personal information in accordance with Privacy Laws and this Privacy Policy.

Our main purposes for collecting, holding, using and disclosing personal information are the following:

- (a) to provide you with services you have requested;
- (b) to respond to your enquiries about our services and communicate with you;
- (c) to verify your eligibility for the Service;
- (d) to find and liaise with a Participating Psychotherapist who is able to offer you an Assessment with a view to providing Psychanalytic Psychotherapy
- (e) to comply with legal and policy requirements including in relation to medical ethical guidance and standards, quality assurance and complaint handling.

We will only use or disclose personal information for a purpose other than for which it was collected or a related purpose if you have consented to such different use or disclosure or such use or disclosure is otherwise allowed by Privacy Laws.

Sharing of patient information

In carrying out our activities, it may be necessary to share information about Users with our Participating Psychotherapists. We do not otherwise routinely disclose your personal information to any other person or organisation unless

- (a) it is necessary to protect the rights, property or personal safety of any person (including you, our volunteers and any member of the public) or our interests;
- (b) to comply with our legal obligations (e.g., to notify public health authorities of certain infectious diseases; to notify our insurers of certain matters; or to comply with mandatory requirements of law enforcement authorities); or
- (c) you have provided your consent.

Sharing of information about other people

We require our Participating Psychotherapists to adhere to strict privacy guidelines and not to keep this information or use it for any unauthorised purposes.

SECURITY OF INFORMATION

We care about the security of your information. We take reasonable steps to protect personal information we hold about you from misuse, interference and loss and from unauthorised access, modification or disclosure. These steps may include limiting access to hard copy information we hold about you and requiring those who use your personal information in order to provide the Service (including Participating Psychotherapists and volunteers) to take reasonable steps to keep personal information secure. In addition, information we hold about patients of the GNC is hosted by a cloud service provider in password protected storage, and we limit access to this storage to those people who need to know that information for the purposes of operating the GNC. As mental health professionals, Participating Psychotherapists and our volunteers are also subject to ethical and professional standards, which include duties of confidentiality towards patients.

RETENTION OF INFORMATION

When we no longer need to use your information, we will take steps to properly de-identify or destroy it, except to the extent we need to retain it for legal reasons.

CONTACTING US REGARDING THE INFORMATION WE KEEP ABOUT YOU

You may contact us by writing to us at the following postal address:

The Glen Nevis Clinic
18 Erin St
RICHMOND VIC 3121

If you want to know exactly what personal information we hold about you, you may request access to your record by contacting us at the above address. Our file of your information will usually be made available to you within 14 days.

If you wish to change personal information that we hold about you because it is inaccurate or out of date, please contact us and we will amend our records. If you request to have your personal information deleted, we will take all reasonable steps to delete it unless we need to keep it for legal reasons.

If you have any concerns or complaints about how we handle your personal information, or if you have any questions about this policy, please contact us at the above address. We will investigate your complaint and will use reasonable endeavours to respond to you in writing in a timely manner. If we fail to respond to your complaint within 30 days of receiving it in writing or if you are dissatisfied with our response, you may lodge a complaint with the Office of the Australian Information Commissioner ("OAIC"). Details of how to contact the OAIC are located at www.oaic.gov.au.

Please include your full name and address, and full details of your enquiry, request or complaint in all messages to us.

FUTURE CHANGES

Over time, aspects of the GNC's operations may change. This may require our policies to be reviewed and revised. We reserve the right to change this Privacy Policy at any time and notify you by posting an updated version on the Site. Please check the Site regularly for changes. Where updates or modifications affect how we handle your sensitive information, we will seek your consent as required by law.