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Clinical Psychologist

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Privacy & Data Protection Policy

1. Introduction

Dr Nicole Gluckman *(Practicing as Dr Nicky Gluckman)*, Registered Psychologist (AHPRA Number: PSY0002924543), is committed to protecting client privacy and handling personal information in a safe, respectful, and lawful way. This Privacy & Data Protection Policy explains how personal information is collected, used, stored, and disclosed in accordance with the Privacy Act 1988 (Cth), the Australian Privacy Principles (APPs), and professional guidelines from the Psychology Board of Australia.

"Personal information" means any information that identifies a client or could reasonably identify a client. Sensitive information includes health and mental health information, Medicare details, assessment results, or any other information requiring higher protection under Australian privacy law.

The practice complies with all 13 Australian Privacy Principles (APPs).

Questions regarding this policy can be directed to Dr Nicole Gluckman *(Practicing as Dr Nicky Gluckman)*, Email: admin@drnickypsychology.com.

2. Why Personal Information Is Collected

Personal information is collected only where necessary to provide psychological services and to meet legal and professional obligations. This includes providing psychological assessment, treatment, and support; maintaining contact with clients during care; communicating with relevant third parties (e.g., GPs, psychiatrists, schools, or other professionals) with client consent unless otherwise required or permitted by law; preparing reports, assessments, or correspondence; managing appointments, billing, and record-keeping; complying with legal, ethical, insurance, and professional requirements; and responding to enquiries or concerns about services.

The primary legal basis for collecting and using personal information is client consent and the provision of healthcare services.

3. How Personal Information Is Collected

The practice collects information directly from clients via in-person sessions, intake forms, Halaxy forms, emails, phone calls, and telehealth sessions. Information may also be obtained from other health professionals with client consent.

The practice may use secure AI-assisted tools for note-taking, report drafting, or clinical analysis. These tools do not store identifiable information outside secure systems, and all use complies with privacy obligations. Outputs are reviewed by the

clinician and do not replace professional judgment. AI-assisted tools are used only as administrative or drafting supports, and all clinical decisions, interpretations, and records remain the sole responsibility of the treating psycholo$gist.

4. What Information Is Collected

Information collected may include identifying information (name, date of birth, contact details); health and mental health information; assessment results, clinical notes, and reports; appointment, billing, and payment information; and correspondence (email, letters, secure messages).

5. How Personal Information Is Stored and Protected

Reasonable steps are taken to protect personal information from misuse, loss, unauthorised access, or disclosure.

Clinical notes, reports, forms, and administrative records are stored securely using Halaxy practice management software, a secure cloud-based healthcare practice management system used to manage appointments, records, forms, invoicing, and telehealth services. Halaxy is a third-party service provider that supports the administrative and clinical functions of the practice. The system uses industry-standard security protections to safeguard client information, and the provider is contractually required to protect personal information in accordance with applicable privacy laws. Personal information stored in Halaxy remains under the control of the practice and is accessed only for the purpose of providing healthcare services and managing the practice.

Clients may choose to create an account on the Halaxy Patient Portal. The Patient Portal provides a secure way for clients to access documents such as letters, reports, and other confidential information related to their care. Through the portal, clients may also manage appointments, complete forms, view invoices, and share access with family members or other authorised individuals if they choose.

Creating a Patient Portal account is optional. Clients may still book, cancel, or reschedule appointments and complete forms online without creating an account.

Electronic communications are password-protected or encrypted where appropriate. Access to systems is restricted through secure passwords and authentication measures. Paper records (if any) are stored securely.

Personal information is not stored on unsecured personal devices or public cloud services.

Where data is stored or backed up outside Australia, appropriate legal and technical safeguards are implemented to maintain APP-compliant protection. Third-party service providers engaged to support administrative or clinical functions are contractually bound to protect personal information.

6. Disclosure of Information and Exceptions to Confidentiality

Personal information will not be shared without client consent unless required or authorised by law (e.g., mandatory reporting obligations, court order); there is a serious risk to client safety or the safety of others; or it is necessary to prevent or lessen a serious threat to life, health, or safety.

Other exceptions may include child protection matters or mandatory reporting requirements; court proceedings where disclosure is legally required; or situations where withholding information could result in serious harm.

Where possible, disclosures will be discussed with clients beforehand.

Personal information will never be sold, rented, or used for marketing purposes.

Clients may withdraw consent for disclosures at any time where legally permissible; implications of withdrawal will be explained.

7. Telehealth, Online Systems, and Third Parties

Telehealth sessions are conducted via Halaxy Telehealth and other secure platforms. The practice takes reasonable steps to protect privacy, including using secure, encrypted platforms; conducting sessions in private, professional settings; and not recording sessions without explicit consent.

Sessions are not routinely recorded. If a recording is required for clinical note-taking or report preparation, this will only occur with the client's explicit consent obtained in advance. Any recordings are stored securely and used solely for clinical purposes.

Clients are asked not to record sessions without the clinician's knowledge and consent in order to protect the privacy of all parties.

Clients are advised to ensure devices have up-to-date security software; conduct sessions in a private space where they will not be overheard; use personal headphones where possible; and be aware that connection issues may occasionally disrupt sessions.

Telehealth risks may include technical disruptions, privacy breaches if the environment is not fully private, and limits on therapeutic modalities. Alternative arrangements may be made if telehealth is not safe or effective.

8. Emergency or Crisis Situations

In situations where there is immediate risk to a client's life or safety, or that of others, the clinician may contact emergency services or crisis support teams without prior consent, in accordance with legal and ethical obligations.

9. Medicare & Mental Health Treatment/Care Plans (MHTP/MHCP)

When claiming Medicare rebates under a Mental Health Treatment Plan, certain personal information must be disclosed to Services Australia (Medicare), including name, date of birth, Medicare number, referral details, item numbers, and service dates.

Information is used solely for processing claims and meeting legal obligations.

Providing this information is voluntary, but rebates cannot be claimed without it.

All Medicare information is handled in accordance with the Privacy Act 1988 (Cth) and Services Australia privacy requirements.

10. My Health Record (MHR)

The practice does not routinely upload information to My Health Record. Psychological notes and therapy content are not automatically shared.

Information may be uploaded or accessed only with client consent or if required by law.

Clients have control over what appears in My Health Record and can set access controls or opt out entirely.

11. Use of De-identified Data

De-identified or aggregated data may be used for clinical audits, research, or quality improvement. This data cannot identify individual clients.

12. How Long Information Is Kept

Adult client records: at least 7 years after last contact.
Children and young people: until age 25.
Financial records: 7 years per taxation requirements.
Enquiry information for non-attending clients: 6 months, then securely deleted.

Records are securely destroyed when no longer required.

13. Children and Young People

Privacy and confidentiality are handled according to legal requirements and safeguarding obligations.

Information may be shared with parents or guardians only where appropriate and lawful.

14. Your Rights

Under Australian privacy law, clients can request access to personal information; request correction of inaccurate or incomplete information; make enquiries about information management; make a complaint if privacy has been breached; and request digital data in a portable format where practicable.

Requests must be in writing. Identity verification may be required.

Requests will be responded to within 30 days where practicable, with extensions explained if necessary.

15. Limits to Access

Access may be limited if providing records could pose a serious risk to the client or another person's health or safety, or if records contain information about third parties.

16. Emails, Text Messages, and Communication

The practice may contact clients via email, phone, or text to arrange or confirm appointments; provide invoices or receipts; share administrative information; and provide secure access to reports or documents where appropriate.

Email may occasionally be used for administrative communication. However, email is not considered a secure method for transmitting confidential health information.

For sensitive or clinical matters, clients are encouraged to use secure communication options such as the Halaxy Patient Portal where available or discuss these matters during sessions.

Marketing or promotional messages will only be sent if explicitly requested.

17. Cookies and Website Analytics

The practice's website may use cookies or tracking technologies to improve user experience.

No personal health information is collected through cookies.

Third-party analytics (e.g., Google Analytics) may anonymise IP addresses. Clients can disable cookies in their browser settings.

18. Data Breaches

In the unlikely event of a data breach, reasonable steps will be taken to manage the breach, affected individuals will be notified where required, and compliance with the Notifiable Data Breaches scheme will be maintained.

19. Complaints

Concerns about personal information handling can be directed to:

Dr Nicole Gluckman *(Practicing as Dr Nicky Gluckman)*,
Email: admin@drnickypsychology.com.

If not satisfied, clients may contact the Office of the Australian Information Commissioner (OAIC).

Website: https://www.oaic.gov.au
Phone: 1300 363 992

20. Telehealth Consent Statement

Clients understand that telehealth sessions are provided via a secure online platform and involve some limitations and risks.

Clients consent to receiving psychological services via telehealth.

21. Privacy Acknowledgement

Clients confirm that they have read and understood this Privacy & Data Protection Policy, including Medicare, My Health Record, telehealth, emergency procedures, AI-assisted tools, and session recordings for clinical purposes.

Clients understand how personal information is collected, used, stored, and disclosed.

22. Policy Changes

This policy may be updated to reflect changes in legal requirements, professional standards, or practice procedures.

Updated versions will be posted on the website and communicated to clients.

Last Reviewed: 12th March 2026

23. Agreement

By signing below, clients agree to the statements above.

Client Signature: _____
Name: _____
Date: _____

Parent/Guardian Signature (if applicable): _____
Name: _____
Date: _____