



PRIVACY POLICY

LATEST REVIEW
13/08/2025

This Privacy Policy outlines how we manage and protect the privacy of your personal information in The Three Seas Group. Our practice is managed according to the Code of Conduct for Psychologists of the Australian Health Practitioners Regulation Agency. The Three Seas Group is committed to protecting your privacy in accordance with the Australian Privacy Principles set out in the Privacy Act 1988 (Cth).

Your information

Client files are held in:

- a secure filing cabinet, and/or
- an encrypted, cloud-based storage online booking system with medical grade security

which is only accessible to your practitioner and the Practice Manager. The information on each file includes personal information such as name, address, contact phone numbers, medical history, and other personal information collected as part of providing the psychological and/or counselling service.

Personal information will also be collected and held in a secure internet-based appointment scheduling program. Additionally, if you provide consent for your credit card details to be stored, they will be stored in a secure PCI-compliant, encrypted, cloud-based payment processing system.

We hold all records for at least seven years. For clients under the age of 18, records are kept for either seven years or until the client turns 25, whichever occurs last.

How your personal information is collected

Your personal information is collected in a number of ways during psychological consultation. These include times when you provide information directly to the practitioner using soft or hardcopy forms, correspondence via email, when you interact directly with employees of The Three Seas Group such as the Client Connect Team, and when other health practitioners provide personal information to The Three Seas Group, via referrals, correspondence and medical reports.

Consequences of not providing personal information

If you do not wish for your personal information to be collected in a way anticipated by this Privacy Policy, your practitioner at The Three Seas Group may not be in a position to provide the service to you.

Purpose of holding personal information

Your personal information is gathered and used for the purpose of providing psychological services, which includes assessing, diagnosing and treating your presenting issue(s). The personal information is required to be retained in order to document what happens during sessions and enables the therapist to provide a relevant and informed service.

Disclosure of personal information

All personal information gathered during the provision of services will remain confidential except when:

- it is subpoenaed by a court, or disclosure is otherwise required or authorised by law; or
- failure to disclose the information would in the reasonable belief of your practitioner place a client or another person at serious risk to life, health or safety; or
- the client's, or consent of a parent or guardian who is legally authorised to act on their behalf, prior approval has been obtained to:
 - a. provide a written report to another agency or professional, e.g., a GP or a lawyer; or
 - b. discuss the material with another person, e.g. a parent, employer, health provider, or third-party funder; or
 - c. disclose to another professional or agency (e.g., your GP) and disclosure of your personal information to that third party is for a purpose which is directly related to the primary purpose for which your personal information was collected.
- clinical consultation with another professional is required when any issues are identified that may interfere with your practitioner's ability to provide effective and culturally safe clinical services. In these cases, practitioners may seek supervision or advice from another or more experienced practitioner. If this occurs, identifying details will remain confidential.

A client's personal information is not disclosed to overseas recipients unless the client consents or such disclosure is otherwise required by law. Clients' personal information will not be used, sold, rented or disclosed for any other purpose.

We will not disclose any identifiable information about you without your consent. You may provide consent for your practitioner to disclose or obtain information about you to or from other third parties. This consent is valid for a period of 12 months in the absence of significant changes. Your consent can be withdrawn at any time; if this occurs your practitioner will discuss the implications of this with you.

In the event that unauthorised access, disclosure, or loss of a client's personal information occurs the practitioner will activate a data breach plan and use all reasonable endeavours to minimise any risk of consequential serious harm.

Requests for access and correction to client information

At any stage a client may request to see and correct the personal information about them kept on file. The psychologist may discuss the contents with you and/or give you a copy, subject to the exceptions in the Privacy Act 1988 (Cth). If satisfied that personal information is inaccurate, out of date or incomplete, reasonable steps will be taken in this circumstance to ensure that this information is corrected. All requests by clients for access to or correction of personal information held about them should be lodged with their practitioner in writing. These requests will be responded to 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 practitioner. If requested, a copy of the Australian Privacy Principles may be given to you, 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 <http://www.oaic.gov.au/privacy/making-a-privacy-complaint> or by post to:
Office of the Australian Information Commissioner, GPO Box 5218, Sydney, NSW 2001.

Please note: We undertake to treat all your information with respect and confidentiality. If you have any concerns with regards to these matters or require further clarification after reading this page, please discuss them with your practitioner or a member of our Client Connect Team.