Introspect Psychology Group Privacy Policy

The aim of this policy and procedure is to lay out Introspect Psychology Group Pty Ltd employees duty to gather, use, safeguard and disclose, confidential information in accordance with the legislation on privacy. This policy and procedure extend to all Introspect Psychology Group Pty Ltd employees and complies with all applicable laws, regulations and standards.

Definitions

Health information - All details or perhaps an opinion regarding an individual's physical, emotional or psychological health or capacity at any moment.
Personal information - Documented records, like images or perceptions about an individual whose identity can reasonably be determined, either true or otherwise.
Sensitive information-Knowledge or a personal view on the ethnicity roots of an individual, political opinions, political party member, religious views or associations, philosophical beliefs, professional or trade organization membership, trade union membership, sexual orientation or practises, or criminal history. Which is also regarded as personal information

Policy

Confidentiality and privacy are fundamental to Introspect Psychology Group Pty Ltd.
Introspect Psychology Group Pty Ltd shall protect the privacy of all individuals including the confidentiality of their clients and employees. Every individual and his or her legal representatives has the authority to decide who will have access to their private information.
Introspect Psychology Group Pty Ltd supports and encourages confidentiality and privacy standards throughout its records and information management practices. See Introspect Psychology Group Pty Ltd's Records and Information Management Policy and Procedure
Introspect Psychology Group Pty Ltd will only use the information gathered for the purpose for which it was collected and guarantee that it is safeguarded appropriately and will only obtain the data necessary for the effective and productive delivery of supports and services.
All Introspect Psychology Group Pty Ltd employees are responsible for the protection of the privacy and confidential rights of the company, clients and all other employees
In accordance with the applicable state and territory laws and federal privacy act Introspect Psychology Group Pty Ltd gathers, handles and discloses information.

The procedures of privacy and confidentiality communicate with the lifecycle of data as follows:

- Create a collection of all forms of client details and any other relevant information as well as service agreements to ensure they have given both verbal and written consent.

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- Store all information securely as per the records and information management policy and procedure and limit access.
- Use the information to update when applicable, disclose the information to staff members and report if necessary.
- Archive the documents securely once the participant has exited the service as per the records and information management policy and procedure and limit access.
- Once the archive period is complete dispose of documents securely as per the records and information management policy and procedure.

Procedures

The director(s) is committed to ensuring that Introspect Psychology Group Pty Ltd follows the 1988 (Cth) Privacy Act standards and all other relevant government and territory laws and specifications.
This requires developing, implementing as well as reviewing procedures for how much information Introspect Psychology Group Pty Ltd collects regarding individuals and their source. Why and exactly how Introspect Psychology Group Pty Ltd gathers, uses, and discloses an individual's private information. Who will have access to the information as well as collection, storage, access, use, disclosure and disposal of data. How individuals can consent to the collection, retraction or modification of private information. Clients consent and review of Introspect Psychology Group Pty Ltd stored personal information. How it uses records that require to be updated, destroyed or removed. How Introspect Psychology Group Pty Ltd protects and handles private information, including how it manages questions and complaints about confidentiality.
The director(s) regularly checks these procedures via periodic Privacy Audits. See Introspect Psychology Group Pty Ltd's Privacy Audit Form and Schedule 2.
It is the responsibility of all Introspect Psychology Group Pty Ltd employees to read and comply with this policy and procedure and their data protection, privacy and data management duties. Collection, processing, storage, use, disclosure and disposal of confidential and health data from clients, other employees and all other participants in agreement with state and federal legislation and this policy and procedure.
Documentation from other employees and other participants must be kept in compliance with the privacy criteria of their employment or contract.
Introspect Psychology Group Pty Ltd employees must receive training to provide confidentiality privacy and data management guidelines. If required, employees will receive further official and at work education. see Introspect Psychology Group Pty Ltd's policy and procedure on human resources.
The employee's knowledge and implementation of practices to manage the confidentiality and privacy of data will be tracked daily and through annual performance reviews.
Introspect Psychology Group Pty Ltd's Privacy Statement must be notably demonstrated at Introspect Psychology Group Pty Ltd's premises and it will be included in the Introspect Psychology Group Pty Ltd's Client Handbook.

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Upon request, a copy of this policy and procedure will be provided to any Introspect Psychology Group Pty Ltd employee, client or participant.

Photos and Videos

Some forms of personal information include:

1. Photographs
2. Films
3. Recordings

Employees are required to respect the wishes made by individuals over being filmed or photographed and will only use an individual's picture if notifiable consent has been given. Employees will need to be mindful of cultural understandings and additionally the necessity for some pictures to be handled with particular care.

Information Collection and Consent

Client Information Collection and Consent
Introspect Psychology Group Pty Ltd will only ask for confidential information required:

1. To determine a potential client's suitability for a service
2. To monitor the services provided
3. To fulfil government non-identification and statistical data requirements.

Personal participant information that Introspect Psychology Group Pty Ltd collects. Involves but is not limited to:

- Incident reports
- Clients emergency contact details
- Health status of the client
- Clients and their guardians contact information
- Medical documents
- Immunisation records
- Medicine records
- Additional Organization information.
- Development of records, plans, portfolios and observations.
- Consent forms
- Intake of delivery of services, assessment, data review

It is the clients right to:

1. Supply, access, update and use personal information.
2. Refuse to disclose information
3. Revoke their consent to disclose personal information

Before collecting personal information from clients or their advocates, employees must clarify:

1. All private and confidential information will be stored safely

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2. Introspect Psychology Group Pty Ltd will clarify why the information is being collected, exactly how it is being stored and used as well as why Introspect Psychology Group Pty Ltd requires the information
3. Introspect Psychology Group Pty Ltd only gathers the necessary personal information of clients for the protected and effective provision of services.

Clients, their family members and advocates will obtain a Privacy Statement from Introspect Psychology Group Pty Ltd and notify them that a copy of this policy and procedure is available on request. Employees are expected to provide privacy details to Clients and their families in forms that meet their individual communication needs. Written information can be provided or clarified verbally by employees in different languages and simple English. Introspect Psychology Group Pty Ltd employees will support clients if they need to gain access to an interpreter
Following from the information provided in this policy and procedure. Introspect Psychology Group Pty Ltd employees must use a Consent Form to verify and clarify the information stated in this policy and procedure and then obtain consent from the client or their advocate to gather, store, gain access to, use, disclose and dispose of their personal information.

Clients and their family and advocates are accountable for:

- Always being mindful of an individual's privacy when using photos and videos
- Return the completed consent form, in a well-timed manner.
- Being thoughtful, polite and respectful to individuals who do not desire to be photographed or videotaped
- when necessary, deliver accurate information

Access

The director(s) must be addressed, within two business days of obtaining a request for access or correction, the responding representative will give access or make clear why access has been rejected, rectify the private and confidential information, or provide explanations for not modifying it as well as present clarifications for any anticipated interruption in responding to the request.

A request for access or correction may be rejected in whole or in portion where it would have an unwarranted impact on the privacy and confidentiality of other individuals, the request is thoughtless and annoying. It may cause a dangerous threat to any individuals life or wellbeing. All client requests for access or correction refused by the director(s) must be authorized and documented in the Client's file.
All employees who have been refused access or correction requests must be approved by the CEO and recorded in the employees file.

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Storage

See Introspect Psychology Group Pty Ltd's Records and Information Management Policy and Procedure for additional details on exactly how Introspect Psychology Group Pty Ltd securely stores and protects private data of their employees and clients.

Disclosure

Personal client information can only be disclosed:

- To comply with legislative responsibilities such as mandatory reporting when required by law.
- To outside associations with the employee or client's consent. [or of the child clients, parents or guardians].
- With the written consent of the authorized individual
- if emergency medical treatment is required.

If an individual is in a situation where they believe they must disclose information about a Client or other employee that they would not usually reveal, they must consult with the director(s) before disclosing the information

International Disclosure

Under the Privacy Act 1988, Introspect Psychology Group Pty Ltd is obliged to take proper measures to ensure that the foreign recipient does not infringe Australian Privacy Principles (APPs) Principle 8 prior to revealing private information and records to a foreign beneficiary. The director(s) will be responsible for these investigations.
This obligation will not apply if the foreign recipient is dependent to a legislation or binding system which has the power to protect the private and confidential information in an approach significantly equivalent to that delivered by the APPs.

Reporting

Notifiable Data Breaches Scheme
Under the Privacy Act 1988 (Cth), the Notifiable Data Breaches (NDB) Scheme is a federal scheme. Organizations are required to disclose certain information breaches to those impacted by the infringement, and to the Australian Information Commissioner.
A data breach happens when the private information retained by companies is damaged or exposure to it is not permitted. A violation of the data can occur as a result of failure of the management or security system, deliberate intent or technical failure.

Instances of information violations include:

- Devices and documents that contain private and confidential information, either lost or stolen
- Unapproved entry by an employee to personal information.

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- Unintentional release of private and confidential information. For example, an email accidentally being sent to the wrong person.
- Release of private information to a scammer because of lacking methods for identification conformation.

In addition to the damage done to individuals who are the subject of information violations, such an incident may also cause Introspect Psychology Group Pty Ltd significant economic harm.
The Data Breach Preparation and Response — A Guide to Managing Data Breaches under the Privacy Act 1988 (Cth), released by the Office of the Australian Information Commissioner (OAIC), provides further details on the NDB Scheme.
The Data Breach Response Plan of Introspect Psychology Group Pty Ltd explains its method to contain, assess and manage occurrences breaches of information.

Identifying a Notifiable Data Breach

A Notifiable Data Breach, occurs when:
Introspect Psychology Group Pty Ltd is unable to prevent the potential risk of harm through corrective measures.
Release or access to private information not permitted, or data lost in circumstances in which unauthorised access or release is probable to be present. Release or loss is expected to affect all individuals involved with the information. Serious damage may include damage to credibility in the form of a breach of information. Which may result in:

- Physical damage
- Emotional damage
- Financial damage

Any suspected or current information breaches must be identified to the director(s), who is responsible to assess the action of Introspect Psychology Group Pty Ltd and if the breach is to be registered under the NDB Scheme. It will not be considered a notifiable data breach if the director(s) of Introspect Psychology Group Pty Ltd responds promptly to reduce the information violation.

Responding to a Data Breach

If the director(s) assumes that a data breach is notifiable under the NDB Scheme, then an assessment must be conducted to evaluate whether this is the case. If the data breach is considered notifiable by the director(s), the Data Breach Response Team of Introspect Psychology Group Pty Ltd must be advised.

- Director(s) as support for risk leadership, assessing danger from infringement.
- the director(s) supporting human resources where the infringement was caused by the worker's actions; and
- the director(s) providing media/communications knowledge and helping to communicate with impacted people and deal with media and external stakeholders.
- the director(s) as Project Manager, coordinating the team and supporting its participants

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- Senior Worker / Privacy Officer to introduce privacy knowledge to the team.
- Director(s) as Team Leader, accountable for guiding the reaction team and reporting to the CEO (unless they are the same person)
- the director(s) as legal assistance, identifying legal commitments and providing guidance.
- the director(s) as support for information and communication technology (ICT) or forensics, helping to define the cause and effect of infringement involving ICT technologies.
- the director(s) providing information and documents management knowledge, assisting in the review of breach-related safety and tracking checks (e.g. access, authentication, encryption, audit logs) and providing guidance on recording data breach reaction.

All implicated individuals will be informed of the breach of information as promptly as possible by the Data Breach Response Team.
All occurrences of database breach, whether reportable or otherwise, must always be handled in compliance with Introspect Psychology Group Pty Ltd's Data Breach Response Plan and recorded in Introspect Psychology Group Pty Ltd's Incident Register. As well as, appropriate activities recorded in the Continuous Improvement Register of Introspect Psychology Group Pty Ltd where necessary.

Where a breach is submitted to the Data Breach Response Team, its response will be established on the subsequent measures:

- 1: control information violation.
- 2: evaluate the information breach and correlated threats
- 3: inform individuals involved and the Australian Information Commissioner
- 4: Prevent potential data breaches.

For additional information see Introspect Psychology Group Pty Ltd's Data Breach Response Plan.

Notifiable Data Breaches Involving More Than One Entity
The NDB Scheme acknowledges that the private information is often kept together by more than one individual. For example, one individual may have physical possession of the documentation while the other will have legal power or ownership of the document. Other examples include:

- Contracts for subcontracting or brokering
- Combined opportunities.
- Where Introspect Psychology Group Pty Ltd service provider stores information

Under these circumstances, all companies ' responsibility under the NDB Scheme is deemed to be an eligible violation of the details. Just one corporation requires the measures needed by the NDB Scheme, and this should be the corporation most directly related to the individuals affected by the data breach. In which obligations are not fully met under the Scheme, both corporations will breach the Scheme's requirements.

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Other Reporting Requirements

The NDIS Commission must be directly and immediately informed by the director(s) if Introspect Psychology Group Pty Ltd becomes aware of any breaches or potential breaches of privacy law.
Breaches of information may also affect reporting obligations beyond the Privacy Act 1988, such as:

• Government Departments of the Federal, State or Territory
• Insurance providers
• The Australian Securities and Investment Commission (ASIC)
• Australian Reporting and Analysis Centre (AUSTRAC)
• Australian Tax Office (ATO)
• Australian Prudential Regulation Authority (APRA)
• Australian Cyber Security Centre (ACSC)
• Australian Digital Health Agency (ADHA)
• The financial service sector of Introspect Psychology Group Pty Ltd
• Professional and regulatory organizations
• The police or other law prosecution organizations

Victorian Protective Data Security Standards
Information, staff, ICT and physical security are covered by requirements. Four protocols support each standard. The Victorian Information Commissioner's Office (OVIC) regulates the standards.
Even though Introspect Psychology Group Pty Ltd does not require to report straight to OVIC or finish the VPDSS compliance records released on the OVIC website (which public sector organizations are needed to do), compliance with the VPDSS is needed. [This refers to businesses receiving financing from the Victorian Government. Public sector agencies need to report.]
The Victorian Protective Data Security Standards (VPDSS) are component of the Victorian Protective Data Protection Structure (VPDSF) and create 18 compulsory high-level data security criteria across the Victorian public sector as well as service providers.

To ensure that Introspect Psychology Group Pty Ltd cooperates completely with the Standards:

- Assess Introspect Psychology Group Pty Ltd against Question 13 of the Organization Compliance Checklist (protective information safety) of the Department of Health and Human Services. On http:/fac.dhhs.vic.gov.au/organization-compliance-checklist you can find the checklist.

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- The director(s) will collaborate with the Victorian Government on the implementation of risk-based reporting mechanisms and ensure that Introspect Psychology Group Ltd takes reasonable steps to protect all Introspect Psychology Group Pty Ltd participant records.
- The director(s) will create an immediate measurement on information security
- Subscribe to the' Stay Smart Online ' website at: https:/www.staysmartonline.gov.au.
- Review Introspect Psychology Group Pty Ltd's compliance with the Essential Eight and rectify any identified gaps
- This website helps on knowledgeable Online behaviour patterns as well as how to respond to internet threats

You can find more details at: https:/www.asd.gov.au/publications/protect/eight-explained.htm.

Archiving and Disposal

For details on how Introspect Psychology Group Pty Ltd archives and disposes of Clients ' personal details, see Introspect Psychology Group Pty Ltd's Records and Information Management Policy and Procedure.

Supporting Documents

Documents relevant to this policy and procedure include:

- Introspect Psychology Group Pty Ltd Information Sharing Guidelines [It is a South Australian Government requirement that businesses have an Information Sharing Guidelines (ISG) Appendix, based on the state government's ISG.]
- Data Breach Response Plan
- Privacy Audit Form
- Continuous Improvement Register
- Records and Information Management Policy and Procedure
- Client Handbook
- Consent Form
- Privacy Statement

Policy review

Introspect Psychology Group Pty Ltd may make changes to this policy and procedures from time to time to improve the effectiveness of its operation. Generally, this entire policy will be reviewed in consultation with people using the service, their families and carers and workers annually.
All service planning, delivery and evaluation activities will include workers, client and other stakeholders and their feedback. Introspect Psychology Group Pty Ltd's annual service delivery and satisfaction surveys will include questions regarding:

- The extent to which clients and their supporters feel their privacy and confidentiality has been protected.

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- Satisfaction with Introspect Psychology Group Pty Ltd's privacy and confidentiality processes.
- Whether relevant stakeholders have received adequate information about privacy and confidentiality.

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