

Privacy Policy

Version 2.1 | Effective 12 August 2026

1. Introduction

Behavioural Edge Psychology Pty Ltd (ABN 95 693 874 645) is the private psychology practice of Dr Sarah Fischer, Principal Psychologist and sole director. We are committed to protecting your privacy and handling your personal information in accordance with the Privacy Act 1988 (Cth), the Australian Privacy Principles (APPs), the Health Records Act 2001 (Vic) and the Health Privacy Principles that apply to health information in Victoria.

Dr Fischer is a psychologist registered with the Psychology Board of Australia through the Australian Health Practitioner Regulation Agency (AHPRA) and practises in accordance with the Psychology Board of Australia Code of conduct for psychologists (effective 1 December 2025) and applicable professional standards. She is a member of the Australian Psychological Society (APS) and the Australian Association of Psychologists Inc (AAPi).

This Privacy Policy explains how we collect, use, store, disclose and manage your personal and sensitive information. We will discuss privacy and confidentiality with you when you begin services, and we seek your consent to collect and handle your information as described in this policy. You can ask questions about this policy at any time.

2. Definitions

Personal information. Information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether recorded in a material form or not.

Sensitive information. A subset of personal information that includes health information and information about matters such as racial or ethnic origin, religious beliefs and criminal record. Sensitive information receives a higher level of protection under the APPs.

Health information. Information or an opinion about your health, an illness, injury or disability, or a health service provided or to be provided to you. Most information collected in a psychology practice is health information and is also regulated by the Health Records Act 2001 (Vic).

3. What Information We Collect

3.1 Personal Information

We may collect the following types of personal information:

- Name, date of birth, gender and contact details (address, phone number, email)
- Medicare number and private health insurance details
- NDIS participant details, TAC or WorkSafe Victoria claim numbers, victims of crime financial assistance references, or other scheme identifiers where services are funded by a third party
- Emergency contact information
- Occupation and employment details, where relevant to the service

- Billing and payment information

3.2 Sensitive Information

We collect sensitive information that is necessary for providing psychological services, including:

- Health information, including mental health history, diagnoses, treatment plans and progress notes
- Information about current and past medications
- Medical history and information from other healthcare providers
- Psychological assessment results and clinical observations
- Information about family, relationships and social circumstances
- Any other information disclosed during sessions that is relevant to your care

4. How We Collect Information

We collect personal and sensitive information through various means:

- Directly from you during intake, therapy and assessment sessions, questionnaires and written forms
- From your authorised representatives, with appropriate consent
- From other healthcare providers, such as GPs, psychiatrists or specialists, where you have provided consent
- From third parties such as referrers, insurers, Medicare, the National Disability Insurance Agency, the Transport Accident Commission, WorkSafe Victoria and its agents, the Victorian Financial Assistance Scheme, employers or lawyers, where you have consented or the collection is authorised by law
- Through our website, secure online forms, email communications or telephone conversations

5. Why We Collect and Use Your Information

We collect and use your personal and sensitive information for the following purposes:

- To provide psychological assessment, diagnosis, treatment and ongoing care
- To prepare reports you have consented to, including reports for referrers, the NDIS, TAC, WorkSafe Victoria, victims of crime financial assistance schemes, employers, insurers, courts or tribunals
- To communicate with you about appointments, treatment plans and service updates
- To process billing, insurance claims and Medicare rebates
- To comply with legal and regulatory obligations, including AHPRA requirements
- To facilitate referrals and coordinate care with other healthcare providers, with your consent
- For quality assurance, clinical supervision and professional development purposes
- To respond to complaints or legal proceedings
- For de-identified quality improvement and service analysis, with appropriate safeguards

6. Recording of Client Sessions

6.1 Audio and Video Recording

Behavioural Edge Psychology does not routinely record therapy sessions. Any audio or video recording of sessions will only occur in the following limited circumstances:

- For clinical supervision or professional development purposes
- For approved research purposes where participants have given informed consent
- For specific therapeutic interventions where recording is part of the treatment approach
- In any other situation where your informed consent has been obtained

Where digital tools are used to support clinical note taking during a session, this will be explained to you and your consent obtained before use.

6.2 Consent Requirements

We will always obtain your express written consent before recording any session.

You have the right to:

- Decline consent to be recorded without any impact on the quality of care you receive
- Withdraw consent at any time, including during a session
- Request that recordings be deleted after the specified purpose has been fulfilled

6.3 Storage and Security of Recordings

All recordings are:

- Stored securely on encrypted, password-protected systems
- Accessible only to the treating psychologist and, where applicable, an approved clinical supervisor
- Deleted within 12 months of creation unless there is a specific clinical or legal reason for retention
- Subject to the same confidentiality protections as written clinical records

6.4 Client-Initiated Recordings

Clients are not permitted to record sessions without the express written consent of the psychologist. Unauthorised recording of sessions may result in termination of the therapeutic relationship.

7. Telehealth Services

Behavioural Edge Psychology provides psychological services by secure video telehealth to clients located in Victoria and Western Australia. Telehealth sessions are conducted through encrypted video platforms, currently the Cliniko telehealth facility for treatment services and Doxy for independently commissioned assessments. Telehealth sessions are not video recorded, and the consent requirements in section 6 apply to any exception.

Telehealth services are delivered from Victoria, and your clinical records are created and held in Victoria regardless of where you are located. The Privacy Act 1988 (Cth) applies to your information wherever you are in Australia, and the Health Records Act 2001 (Vic) applies to the health

information we hold. Appointment links and related correspondence are sent by email or SMS, and we take reasonable steps to secure these channels. You are responsible for the privacy of your own environment during a telehealth session, and we will discuss with you at the outset how to manage privacy, interruptions and technology failures.

8. How We Store and Secure Your Information

8.1 Security Measures

We implement comprehensive security measures to protect your information:

- Electronic clinical records are held in secure, encrypted systems with restricted access. The practice uses Cliniko practice management software, NovoPsych, PARiConnect and Pearson Q-interactive and Q-global for psychometric test administration and scoring, Jotform for secure intake and screening questionnaires, secure video telehealth platforms (Cliniko telehealth and Doxy), a secure OneDrive account for document storage and a practice email service
- Access to client information is protected by unique credentials and multi-factor authentication where available
- Any paper records are stored in locked storage within secure premises
- Regular security updates and reviews to protect against unauthorised access
- Secure channels are preferred for transmission of sensitive information

8.2 Retention of Information

We retain client records for the following minimum periods, consistent with the Psychology Board of Australia Code of conduct for psychologists and the Health Records Act 2001 (Vic):

- Adult clients: 7 years from the date of the last entry in the record
- Clients who were under 18 at the time of the last entry: until the client turns 25
- Records relating to legal proceedings or complaints: until the matter is fully resolved, plus 7 years

Behavioural Edge Psychology provides services to adults only; the retention rule for minors is stated for completeness. We retain your information to support continuity of care, to comply with legal and professional obligations, to respond to complaints or legal proceedings, and to support clinical supervision and quality assurance.

8.3 Destruction of Information

After the required retention period, records are securely destroyed through: (a) shredding and secure disposal of paper records; (b) permanent deletion and overwriting of electronic records; and (c) destruction of backup copies. Destruction is documented and logged in accordance with our Digital Record Retention and Notekeeping Policy.

9. Disclosure of Information

9.1 Disclosure With Consent

With your written consent, we may disclose your information to:

- Your general practitioner or other treating healthcare providers
- Private health insurers for the purpose of processing claims
- Medicare and Services Australia for rebate processing
- Funding and compensation bodies relevant to your care, such as the National Disability Insurance Agency, the Transport Accident Commission, WorkSafe Victoria and its agents, or the Victorian Financial Assistance Scheme
- Other referring professionals or organisations
- Family members or support persons you have nominated

9.2 Disclosure Without Consent

We may disclose your information without your consent where:

- Required or authorised by law, for example court orders, subpoenas or mandatory reporting obligations
- Necessary to prevent or lessen a serious threat to your life, health or safety, or that of another person or the public
- Required for child protection reporting obligations under Victorian legislation
- Necessary to investigate or respond to suspected unlawful activity or serious misconduct
- Required to comply with AHPRA investigations or professional conduct processes

9.3 Clinical Supervision and Professional Development

Your information may be discussed in clinical supervision or peer consultation for quality assurance and professional development purposes. In such cases, reasonable steps are taken to de-identify information where possible, and all supervisors and peers are bound by equivalent confidentiality obligations.

10. Medicolegal and Independently Commissioned Assessments

In addition to treatment services, the practice conducts independent psychological assessments commissioned by third parties, including insurers, employers, lawyers, courts, tribunals, WorkSafe Victoria, the Transport Accident Commission and independent medical examination referral agencies. These assessments operate on a different privacy footing from treatment. There is no treating relationship, the information you provide is collected for the purpose of the assessment, and the resulting report is provided to the commissioning party.

Before an independently commissioned assessment begins, we will explain who has commissioned the assessment, the purpose of the assessment, what information will be collected, to whom the report will be provided, and the limits on confidentiality that apply. We will obtain your informed consent before proceeding. Information collected for an independently commissioned assessment is used and disclosed for that purpose only and is not used for other purposes without your consent unless the use or disclosure is required or authorised by law.

Your rights of access and correction under section 12 apply to information we hold about you. In the medicolegal context, access to a report may in some circumstances be declined or directed to the commissioning party, for example where the information is subject to legal professional privilege, where release is governed by the rules of a court or tribunal, or where an exception under the Privacy Act 1988 (Cth) or the Health Records Act 2001 (Vic) applies. If we decline access, we will provide written reasons and information about your review options.

11. Notifiable Data Breaches

11.1 The Notifiable Data Breaches Scheme

Under the Privacy Act 1988 (Cth), Behavioural Edge Psychology is subject to the Notifiable Data Breaches (NDB) scheme. This scheme requires us to notify affected individuals and the Office of the Australian Information Commissioner (OAIC) when a data breach is likely to result in serious harm to individuals.

11.2 What Is an Eligible Data Breach

An eligible data breach occurs when there is unauthorised access to, unauthorised disclosure of, or loss of personal information that we hold, and this is likely to result in serious harm to one or more individuals. Examples include theft of devices containing unencrypted client information, ransomware attacks that compromise client data, unauthorised access to client files, or accidental disclosure of client information to the wrong recipient.

11.3 Assessment of Data Breaches

When we become aware of a suspected data breach, we will conduct an immediate assessment to determine whether it is an eligible data breach. This assessment will be completed as soon as practicable, and within 30 days of becoming aware of the suspected breach. Our assessment process includes identifying what personal information has been involved, determining how the breach occurred, assessing the risk of serious harm to affected individuals, and considering whether remedial action can prevent serious harm from occurring.

11.4 Notification Requirements

If we determine that an eligible data breach has occurred, we will notify the OAIC as soon as practicable using the approved form, and notify affected individuals directly or, if that is not practicable, publish a statement on our website. The notification will include a description of the data breach, the kind of information concerned, recommendations about steps you should take in response, and contact details for further information.

11.5 Our Response and Remediation

In the event of a data breach, we will take immediate action to contain the breach, investigate its cause and extent, implement remedial measures to prevent recurrence, provide support to affected individuals, and review and update our security practices as necessary.

11.6 Reporting a Suspected Breach

If you suspect that your personal information has been compromised or accessed without authorisation, please contact us immediately using the details provided in section 17 of this policy.

12. Your Rights and Choices

12.1 Access to Your Information

You have the right to request access to the personal information we hold about you, under both the Privacy Act 1988 (Cth) and the Health Records Act 2001 (Vic). To request access, please contact us in writing using the details in section 17. We will respond to your request within 30 days.

We may charge a reasonable fee to cover the administrative costs of providing access. We will inform you of any fees before processing your request. In limited circumstances we may decline access, for example where providing access would pose a serious threat to the life, health or safety of any person, or would have an unreasonable impact on the privacy of others. If we decline access, we will provide you with written reasons and information about your review options.

12.2 Correction of Information

You have the right to request correction of personal information we hold about you if you believe it is inaccurate, out of date, incomplete, irrelevant or misleading. We will take reasonable steps to correct the information and will respond to your request within 30 days. If we do not agree with the requested correction, we will provide written reasons, and you may request that a statement be attached to your record noting that you dispute the accuracy of the information.

12.3 Withdrawal of Consent

You may withdraw your consent to the collection, use or disclosure of your information at any time, subject to legal and contractual restrictions. Withdrawing consent may affect our ability to provide services to you, and we will discuss this with you at the time.

13. Third-Party Service Providers

We engage third-party service providers to assist with practice management and clinical software, psychometric test administration and scoring platforms, telehealth video platforms, secure data storage and backup, professional indemnity insurance, accounting and financial services, and IT support. All third-party providers are required to comply with the APPs and are bound by confidentiality obligations. We take reasonable steps to satisfy ourselves that third parties have appropriate security measures in place to protect your information.

14. Overseas Disclosure

We do not routinely disclose personal information to overseas recipients. Some of our third-party service providers, such as cloud software and storage providers and the platforms used for psychometric test administration and scoring, may store data on servers located outside Australia, including in the United States and the European Union. Where we use service providers that store data overseas, we take reasonable steps to ensure they are subject to privacy protections comparable to the APPs. We will notify you if circumstances change such that your information will be disclosed to overseas recipients in other ways.

15. Website and Online Privacy

Our website may collect certain information automatically, such as IP addresses, browser types and pages visited. This information is used for website administration and improvement purposes only. We use cookies and similar technologies to improve user experience. You can configure your browser to reject cookies, but this may affect website functionality. Any information you submit through our website contact forms or appointment booking system is transmitted securely and handled in accordance with this Privacy Policy.

We do not use automated decision-making that produces decisions significantly affecting individuals. If this changes, this policy will be updated to describe the information used and how those decisions are made.

16. Complaints and Concerns

If you have a complaint about how we have handled your personal information, please contact us in writing using the details in section 17. We will acknowledge your complaint within 7 days, investigate it thoroughly and impartially, and provide a written response within 30 days outlining our findings and any action taken. Our Feedback and Complaints Policy describes this process in more detail.

If you are not satisfied with our response, you may lodge a complaint with:

Office of the Australian Information Commissioner (OAIC)

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Website: www.oaic.gov.au

Complaints about the handling of health information in Victoria may also be made to the Health Complaints Commissioner (phone 1300 582 113, website hcc.vic.gov.au). You may also contact AHPRA (www.ahpra.gov.au) if you believe there has been a breach of professional standards.

17. Contact Information

If you have any questions about this Privacy Policy or wish to exercise your rights, please contact:

Behavioural Edge Psychology Pty Ltd

Dr Sarah Fischer, Principal Psychologist

Phone: 03 8771 4315

Email: sarah.fischer@behaviouraledgepsychology.com

Consulting rooms: 223 North Road, Caulfield South VIC 3162; Stable Health Clinic, 22 Alma Road, St Kilda VIC 3182

Website: www.behaviouraledgepsychology.com

18. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology or legal requirements. The current version will always be available on our website and at our practice. We will notify current clients of any material changes that may affect how we handle their personal information, via email, during appointments, or through a notice on our website.

Document Control

Item	Detail
Version	2.1 (supersedes version 2.0, August 2026)
Approved by	Dr Sarah Fischer, Principal Psychologist and sole director

Item	Detail
Effective date	12 August 2026
Next review	August 2027, or earlier if legislation or practice arrangements change
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