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– PsyAx Record Keeping & Privacy Policy –

Purpose of this policy
At PsyAx, we respect and protect the privacy of all our clients. This policy explains what personal information we collect, why we collect it, how we keep it safe, who we may share it with, and how we use artificial intelligence (AI) and other computer programs. It also explains how you can see your information and how to make a complaint.

We follow the Privacy Act 1988 (Cth), including the Australian Privacy Principles, and the Health Records Act 2001 (Vic). As registered psychologists, we also follow the Psychology Board of Australia's Code of conduct for psychologists.

Personal information is any information that identifies you or could reasonably be used to identify you. Information about your health is a special kind of personal information, and the law requires us to take extra care with it.

What information do we collect?
We collect the personal information we need to arrange appointments, provide assessments and counselling, and write reports. This may include your:

- full name, date of birth, address, and contact details
- current and past medical history
- Medicare, National Disability Insurance Scheme (NDIS), Transport Accident Commission (TAC), WorkSafe (WorkCover), Department of Veterans' Affairs (DVA), or insurance details, where these fund your service
- legal history (e.g. when we do medicolegal assessments)
- responses on neuropsychological tests and questionnaires
- comments you make during appointments, over the phone, by text message, by email, or in other ways

If you can't give us the information we need, we may not be able to provide a service to you.

How do we collect your information?
Most of the time we collect information directly from you, during appointments, on forms, and through online questionnaires. With your permission, we may also collect information from:

- a family member or support person
- your GP, hospitals you have attended, and other health services where you have been treated

We will ask for your written consent before we request records from another health service. You don't have to give us consent if you don't want to. It's your choice.

If you are a child, or you cannot make decisions about your information yourself, we deal with a parent, guardian, or other person the law allows to act for you.

Sometimes we receive information about you from the person or organisation that referred you, such as your GP, a solicitor, an insurer, or a funding body. For medicolegal assessments, the party that asked for the assessment usually sends us documents about you.

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Why do we collect and use your information?
We use your information to:

- provide assessments, counselling, and reports
- book and manage your appointments
- send invoices and process payments and claims
- meet our legal and professional obligations

We do not sell your information, and we do not use it for marketing.

How do we use artificial intelligence (AI)?
We use AI tools to help us run the practice and prepare our work. These are Claude by Anthropic and ChatGPT by OpenAI. We use paid business premium accounts and the most capable ("frontier") models available, set to their most thorough settings, because these are generally the most accurate.

We may use these tools to:

- turn the brief notes we take during your appointments into full sentences, for us to edit
- summarise and organise your records and other documents we receive about you
- help draft and check reports, letters, emails, and text messages
- help with administrative tasks, such as appointments, filing, and invoices

When we use AI tools:

- the AI works under our direction, following detailed written instructions we have developed about how we write reports and handle your information
- a PsyAx psychologist checks and edits the AI's work before we rely on it or send it
- under our business agreements, our AI providers do not use your information to train their AI models
- we try to give the AI only the information the task needs
- the providers encrypt your information when it is sent and stored
- once the work is done, we delete it from the AI tool, and the providers then erase it from their servers, usually within 30 days

At PsyAx, we do not record your voice and we do not use AI scribes. While AI can improve the speed and quality of our work at PsyAx, you can say no to our use of AI. Even if you agree, you can change your mind at any time by telling us.

Who makes decisions about you?
A PsyAx psychologist makes every clinical decision about you. This includes any diagnosis, our recommendations, and the opinions in our reports. We base these on our assessment of you, your test results, your history, and our professional judgement. Our clinical impressions start in our own notes, and the AI helps us write them up. Computer programs never make decisions about you. Feel free to ask us how we used a computer program in your care.

The law also asks us to explain where computer programs play a part. Test-scoring software calculates your test scores and compares them with those of other people your age. AI tools help us organise information and write up our findings, as described above. These programs may use the following kinds of personal information:

- identity and contact details, such as your name and date of birth (our test-scoring software uses an anonymous ID instead of your name)

- health information, including your medical, mental health, and personal history
- your responses on tests and questionnaires, and your test scores
- information from referrals, records, and reports about you
- legal, insurance, or claim information, where this is relevant to the service

They help us prepare documents that record our decisions, or that others rely on, such as:

- assessment reports, including any diagnosis and recommendations
- reports and letters that others use to make decisions about you (e.g. about funding, government benefits, insurance or compensation claims, legal matters, or your capacity to make decisions)
- invoices, including our fees and the Medicare or funding codes we bill

Can I stay anonymous?
You can make a general enquiry without giving your name. However, to provide an assessment or counselling, we need to know who you are.

Who might we share your information with?
Where clinically appropriate, we aim to share reports, letters, and clinical opinions directly with you, in a way that you will understand. We may also share your information with:

- health practitioners who are treating you, such as your GP, as this can help them give you the best care (where possible, we discuss this with you first)
- the person or organisation that referred you
- the organisation funding your service, such as Medicare, the NDIS or your plan manager, the TAC, WorkSafe and its agents, the DVA, or an insurer
- businesses that help us run the practice, such as our reception service and providers of email, calendar, file storage, booking, payment, text messaging, telehealth, survey, test-scoring, and AI services
- anyone else you have given us written permission to share it with

We share only the information that is needed for the purpose.

Medicolegal assessments
If a solicitor, insurer, court, or other third party has asked us to assess you, we share our report and relevant information with that party. You may be able to get a copy of the report from them. Your right to see it through us may be limited while legal proceedings are under way.

Does your information go overseas?
Some of the businesses that help us run the practice store or process information outside Australia. Your information may therefore be stored or processed in the United States, the United Kingdom, Europe, and other countries. We use well-established providers, and take reasonable steps to make sure they protect your information.

How do we store and protect your information?
We take reasonable steps to protect your information from misuse, loss, and unauthorised access, changes, or copying. For example:

- all PsyAx devices are locked with the Face ID biometric login
- we use two-factor authentication, password-protection, and other security measures

- we use Apple devices, which we believe are more secure against malware, hacking, and other cyberattacks
- all online questionnaires and cognitive tests use an anonymous ID, rather than your name
- once we have saved survey responses, text messages, and similar information to your health record, we routinely delete the copies held by online services

In the unlikely event of a serious data breach, we will tell you and the Office of the Australian Information Commissioner, as the law requires.

How long do we keep your information?
By law, we keep health records for at least seven years after we last provided a service to you. If you were under 18 when we collected your information, we keep it until you turn 25, if that is later. When we no longer need your information, we destroy it securely.

Storage of psychological test data
We store psychological test data securely, in line with our professional obligations. Only PsyAx psychologists access clients' test data. Administrative and reception staff may handle client information to do their work (e.g. filing), but must not access or share it for any other reason without the treating psychologist's approval.

Accessing and correcting your information
You can ask to see the personal information we hold about you. You can also ask us to correct information that is wrong, out of date, or incomplete. The easiest way is to email us at info@psyax.com.au. We ask for requests in writing so that we have a record of who has accessed your information. We will usually respond within 30 days. On rare occasions, we may not be able to give you access to everything. For example, the law may not allow it, or it may affect someone else's privacy. If so, we will explain why in writing and tell you how to make a complaint.

Is your information always confidential?
We must keep information about you private and confidential. Apart from the sharing described above, we share your information only with your permission, except when:

- a court or tribunal requires us to (e.g. by subpoena)
- you or another person would be at serious risk of harm if we did not share it
- the law otherwise requires or allows us to share it

Privacy complaints
If you are concerned about how we have handled your information, please contact us first at info@psyax.com.au or 1300 455 677. We will usually respond in writing within 30 days.

If you are not satisfied with our response, you can contact:

- the Office of the Australian Information Commissioner (www.oaic.gov.au, 1300 363 992)
- the Health Complaints Commissioner, Victoria (www.hcc.vic.gov.au, 1300 582 113)

Feel free to read our Feedback, Compliments, and Complaints Policy at www.psyax.com.au/feedback.

Changes to this policy
We update this policy when laws, guidelines, or our practices change. You can always find the latest version at www.psyax.com.au/privacy.