

Purpose of this Policy

Working Life (Rangdon Pty Ltd) collects, works with and retains its clients' personal information. This information is important in the optimal provision of vocational rehabilitation, employee assistance programs, coaching and people/organisational development services. However, it is also important that the information is appropriately managed in accordance with law and ethical guidelines of the profession. This policy outlines how Working Life manages clients' personal information, in accordance with Australian Privacy Principles. These privacy principles came into force on 12th March 2014 and are contained in schedule 1 of the *Privacy Act 1988*.

An appropriate version of this privacy policy is available to all clients and referrers.

Relevant Laws and other Documents

Commonwealth Privacy Act 1988

Australian Psychological Society – Code of Ethics (2007)

What is personal information?

Personal information is any information which identifies you or could reasonably be used to identify you.

What personal information do we collect and why?

In order to provide optimal vocational rehabilitation, employee assistance program, coaching and people / organisational development psychological services Working Life will collect the following information from clients or referrers. As a base, the following information will likely be collected:

- Your name, address and date of birth.
- Your contact details.
- Current and past medical / psychological information.
- Your educational and occupational history.
- Legal history (in the case of medico-legal services).

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In addition, in the provision of vocational rehabilitation, employee assistance programs, coaching and people/organisational development services, Working Life will in all likelihood collect the following personal information:

- Psychosocial history
- Responses and results from psychological tests and questionnaires.
- Information pertaining to your response to treatment.

All of the above material is used to inform accurate management, assessment, diagnosis and treatment plans for Working Life clients. Not having this information may increase the risk that our services are sub optimally delivered.

Information provided by third parties

We will collect information from you where it is reasonable and practical to do so. We may also need to collect information from others who have been involved in your management, like doctors, employers, solicitors, allied health practitioners and insurers. We will always endeavour to keep clients reliably informed of the information collected and the source of that information, and where appropriate will seek and obtain written informed consent to contact and retrieve that information.

Use and disclosure of personal information

Working Life will use and disclose personal information for the primary purpose of providing optimal vocational rehabilitation, employee assistance programs, coaching and people/organisational development services. This will primarily take the form of a report prepared by the consultant and sent to the referrer or referring agent, plus others involved in the client's care where applicable.

It is noted that in some circumstances Psychologists are required by law to disclose personal information without the consent of the client. Specifically, Psychologists may disclose personal information if a "permitted general situation" exists such as to "lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety". This threat *does not need to be imminent*.

There may be occasions when Working Life discloses the personal information of a client where there is a serious threat to the life, health, or safety of an individual or the public, or on a rare occasion to assist in the location of a missing person.

Storage and security of personal information

All Working Life consultants will take reasonable steps to protect the personal information of clients from misuse, interference or loss, and from unauthorised modification, access or disclosure.

Paper documents containing personal information listed above will be stored under lock. Electronic information containing personal information listed above will be stored and backed up securely, in accordance with the APS Code of Ethics (2007).



Can you access your personal information?

Clients have a right to access your personal information held by Working Life. Such requests need to be put in writing for security and recording purposes and to assist in finding the information for you.

Working Life may refuse the request for such information, or limit the information so provided, where it is legally entitled to do so. We will endeavour to provide reasons for refusal. For example, release of information may be denied or limited where such release may have an unreasonable impact on the privacy of others or is considered frivolous or vexatious.

Research and personal information

On occasion Working Life will engage in research activities to improve the quality of the service we provide. In such cases, personal information of clients will be used. In this context, the information will not be released to third parties, but will be retained within Working Life for the *sole purpose* of quality evaluation and improvement of services.

In addition, Working Life may engage in academic or scientific research. In such cases clients will be asked to sign a consent form allowing the use of their personal information for the purposes of a specific research project. Such research will be required to have obtained the prior approval of a Human Research Ethics Committee within the Department of Health or the relevant University.

Anonymity and Pseudonymity

Where it is desired by Working Life clients, and is practically and legally appropriate, the option is available to interact with Working Life anonymously or using a pseudonym. This option is not available if doing so is impractical in terms of providing a or where the law or a court requires clients to identify themselves.

Psychologists Duty of Care

All the Directors of Working Life are guided by the Australian Psychological Society's (APS's) Code of Ethics (2007). Section A.4. of the Code relates to the appropriate collection of private information related to the provision of psychological services. Sections A.5. to A.7. of the Code relate to Confidentiality, the Release of Information to Clients, and the Collection of client information from associated parties. Section B.2. of the Code relates to appropriate record-keeping. The APS Code of Ethics (2007) can be obtained from Working Life, or from the APS website (www.psychology.org.au).

It is noted that under section A.5.2.(c) of the Code that psychologists disclose confidential information obtained in the course of their provision of *psychological services*, "if there is an immediate and specified risk of harm to an identifiable person or persons that can be averted only by disclosing information" (p.15).

Clients may also refer to the APS Charter for Clients of Psychologists, appended to this policy.

The Australian Health Practitioner Regulation Agency (AHPRA) is responsible for the registration of psychologists throughout Australia. Through AHPRA, and under National Law, there are requirements for registered health practitioners to make mandatory notifications to prevent the public from being placed at risk of harm. Revised guidelines took effect from 17thMarch 2014.



Changes to this policy

Working Life may from time to time make changes to this policy to reflect changes in the law or professional best-practice guidelines. All clients and referrers are encouraged to periodically review this policy to remain informed.

Complaints

Clients have a right to make a complaint about the handing of their personal information. Complaints can be made to Working Life via email (mail@working-life.net). We will endeavor to respond appropriately to reasonable complaints (i.e. not of a frivolous or vexation nature) within 30 days of the receipt of the email.

Other agencies to which clients may bring complaints are as follows:

The Office of the Australian Information Commissioner (www.oaic.gov.au)

Australian Health Practitioner Regulation Agency (www.ahpra.gov.au)