

# Sound Counselling & Supervision Services Pty Ltd



Sound Counselling & Supervision Services  
*All for a sound mind*

## Privacy Policy

### 1. Definitions

- 1.1. “We, us, our, SCSS”: Sound Counselling & Supervision Services Pty Ltd
- 1.2. “Website”: <https://www.soundcss.com.au>
- 1.3. “You” or “your”: Any individual, client, supervisee (clinical or non-clinical), company, or organisation using our services.
- 1.4. “Services”: Counselling and clinical or non-clinical supervision services provided by SCSS.
- 1.5. “Session” or “Appointment”: Your scheduled counselling or clinical or non-clinical supervision session
- 1.6. “Privacy Act”: The Privacy Act 1988 (Cth)
- 1.7. “CRM”: Customer Relationship Management
- 1.8. “NDIS: National Disability Insurance Scheme

### 2. Purpose and Objectives

This Privacy Policy applies to all personal and sensitive information collected by SCSS via the Website, the provision of our Services, during the delivery of your Session and when being in contact with you in writing or over the phone.

### 3. Types of information

The Privacy Act defines types of information, including Personal Information and Sensitive Information.

- 3.1. **Personal Information** means information or an opinion about an identified individual or an individual who is reasonably identifiable:
  - (a) whether the information or opinion is true or not; and
  - (b) whether the information or opinion is recorded in a material form or not.

If the information does not disclose your identity or enable your identity to be ascertained, it will in most cases not be classified as “Personal Information” and will not be subject to this Privacy Policy.

- 3.2. **Sensitive Information** is a more specific category of Personal Information. It is defined in

the Privacy Act as including information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information such as information regarding the mental, emotional and health conditions you discuss with us during the provision of our Services and Sessions.

Sensitive Information will be used by us only:

- (a) for the primary purpose for which it was obtained;
- (b) for a secondary purpose that is directly related to the primary purpose;
- (c) with your consent or where required or authorised by law.

#### **4. Information We Collect**

- 4.1. Personal Information: is information SCSS holds which is being identifiable as being about you. This may be your full name, date of birth, address, email address, phone number, credit card information, and other relevant data like the type of Services you have requested and that SCSS has provided to you, or any additional information that you provide to us directly through our Website or given to us in other forms.
- 4.2. Sensitive Information: which is health information regarding the mental and emotional health conditions you discuss with us during the provision of our Services.

#### **5. How we collect your Personal and Sensitive Information**

- 5.1. We may collect Personal and Sensitive Information from you whenever you provide such information on our Website and through the provision of our Services and Sessions.
- 5.2. We may collect additional information at other times, including but not limited to, when you provide feedback, when you update your contact preferences, or when you communicate with us over the phone, by email or mail correspondence.
- 5.3. We may also collect cookies from your computer which enable us to tell when you use the Website, and also to help customise your Website experience. As a general rule, however, it is not possible to identify you personally from our use of cookies.
- 5.4. Where reasonable and practicable we collect your Personal and Sensitive Information from you only. However, sometimes we may be given information from a third party such as a Psychiatrist, Psychologist, Counsellor, Doctor, Court, Child Safety, family member, NDIS Provider or any other relevant stakeholder, in cases like this we will take steps to make you aware of the information that was provided by a third party.

## 6. Purpose of collection

- 6.1. We collect Personal Information to provide you with the best service experience possible on the Website, our Services, Sessions and to keep in touch with you about developments in our business.
- 6.2. We customarily only disclose Personal Information to our third parties who assist us in operating the Website and our Services with the purpose of:
  - (a) Providing Services: This includes when booking Sessions through our cloud-based CRM platform, when conducting Sessions through our online video platform or over the phone, and when conducting follow ups as required.
  - (b) Processing payments: To process payments, refunds and billing services through our cloud-based CRM platform.
  - (c) Improving our Services: To enhance our Website and Services based on your feedback interactions.
  - (d) Communicating with you: To send you updates, SMS reminders, and information related to your Services and answer your inquiries.
  - (e) Managing our Services: your Personal and Sensitive Information may also be exposed from time to time to maintenance and support personnel acting in the normal course of their duties.
  - (f) Fulfilling our responsibilities as registered Counsellors, we may discuss your case in a de-identified manner with an external Professional Supervisor. This disclosure is subject to the limitations of confidentiality.
- 6.3. By using our Website and our Services, you consent to the receipt of direct marketing material. We will only use your Personal and Sensitive Information for this purpose if we have collected such information direct from you, and if it is material of a type which you would reasonably expect to receive from use. We do not use your Personal and Sensitive Information in direct marketing activity. Our direct marketing material will include a simple means by which you can request not to receive further communications of this nature, such as an unsubscribe button link. Alternatively, you can email us at this address [hello@soundcss.com.au](mailto:hello@soundcss.com.au) if you want to unsubscribe.

## 7. Security, Access and Correction

- 7.1. We store your Personal and Sensitive Information in a way that reasonably protects it from unauthorised access, misuse, modification or disclosure.
- 7.2. When we no longer require your Personal and Sensitive Information for the purpose for which we obtained in, we will take reasonable steps to destroy and anonymise or de-

identify it. Most of the Personal and Sensitive Information that is stored in our client files and records will be kept for a maximum of 7 years to fulfill our record keeping of tax and Services obligations.

- 7.3. As our Website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.
- 7.4. The Australian Privacy Principles:
  - (a) permit you to obtain access to the Personal Information we hold about you in certain circumstances (Australian Privacy Principle 12); and
  - (b) allows you to correct inaccurate Personal Information subject to certain exceptions (Australian Privacy Principle 13).
- 7.5. Where you would like to obtain such access, please contact us in writing on the contact details set out at the bottom of this Privacy Policy. Note if the request involves significant administrative costs or is complex there may be an admin fee for the time involved in retrieving such information.
- 7.6. Access Request Procedures: When requesting access to your information:
  - (a) Requests must be in writing
  - (b) We will respond within 30 days
  - (c) Identify verification is required
  - (d) Access may be provided by electronic transfer

## **8. Health Records Management**

- 8.1. As Registered Counsellors working in the realm of mental health we comply with the Privacy Act, the Information Privacy Act (2009), the Australian Counselling Association privacy standards and the professional counselling confidentiality requirements
- 8.2. Clinical Records:
  - (a) Sessions notes and clinical documentation are stored securely on our cloud-based CRM platform
  - (b) Access is strictly limited to authorised personnel
  - (c) Records are maintained for the legally required period
  - (d) Disposal follows secure destruction protocols.

## 9. NDIS Privacy Obligations

- 9.1. As a NDIS provider we
  - (a) Comply with NDIS Privacy Notice Requirements
  - (b) Handle information according to NDIS practice Standards
  - (c) Maintain specific security for NDIS participant records
  - (d) Follow NDIS incident reporting requirements
  - (e) Ensure staff are trained in NDIS privacy obligations.
- 9.2. NDIS Participant's Rights:
  - (a) Access to their service records
  - (b) Control over information sharing
  - (c) Privacy in service delivery
  - (d) Complaints handling through NDIS Commission

## 10. Complaint Procedure

If you have a complaint concerning the manner in which we maintain the privacy of your Personal and Sensitive Information, please contact us as on the contact details set out at the bottom of this policy. All complaints will be considered by the Director of SCSS, and we may seek further information from you to clarify your concerns. If we agree that your complaint is well founded, we will, in consultation with you, take appropriate steps to rectify the problem. If you remain dissatisfied with the outcome, you may refer the matter to the Office of the Australian Information Commissioner.

## 11. Overseas transfer

Your Personal and Sensitive Information may be transferred overseas or stored overseas for a variety of reasons such as when using our third-party CRM and cloud-based software. As far as we know your Personal and Sensitive information may be transferred to recipients located in USA that has data protection laws which protect Personal and Sensitive information in a way which is substantially similar to the Australian Privacy Principles

If your Personal and Sensitive Information is sent to a recipient in a country with data protection laws that are at least substantially similar to the Australian Privacy Principles, and where mechanisms are available to you to enforce the protection of your Personal and Sensitive Information under that overseas law, we will **not** be liable for a breach of the Australian Privacy Principles if your Personal and Sensitive Information is mishandled in that jurisdiction. If your Personal and Sensitive Information is transferred to a jurisdiction that does not have data

protection laws as comprehensive as Australia's, we will take reasonable steps to secure a contractual commitment from the recipient to handle your information in accordance with the Australian Privacy Principles.

## 12. Data Breach Response

- 12.1. In the event of a data breach, we will:
- (a) Assess the potential harm.
  - (b) Notify affected individuals if serious harms are likely.
  - (c) Report to the Office of the Australian Information Commissioner if required
  - (d) Take steps to contain and remedy the breach
  - (e) Review and update security measures

## 13. For Online Services

- 13.1. SCSS is committed to:
- (a) Implementing Online Sessions with strong encryption for data in transit and at rest
  - (b) No recording without explicit written consent
  - (c) Secure transmission protocols
  - (d) Emergency procedures for technical failures
- 13.2. Client Responsibilities:
- (a) Ensure private session environment
  - (b) Maintain device security
  - (c) Not record sessions
  - (d) Report any privacy concerns promptly

## 14. Mandatory Reporting Disclosure

- 14.1. We may disclose your information without consent where:
- (a) Required by Law
  - (b) There is imminent risk of a serious harm to you or others
  - (c) Child Protection concerns exist
  - (d) Court orders require disclosure
  - (e) Mandatory reporting obligations apply under state or federal law
- 14.2. In such cases:
- (a) Only relevant information will be disclosed
  - (b) Disclosure will be limited to appropriate authorities

- (c) You will be informed where possible and appropriate
- (d) Records of a disclosure will be maintained

## 15. Consent Management

15.1. Your consent:

- (a) Must be voluntary, informed, specific and current
- (b) Can be withdrawn at any time
- (c) Will be recorded and maintained

15.2. We will:

- (a) Explain how your information will be used
- (b) Honour your right to withdraw consent

## 16. Policy Updates

From time to time, we may update our Privacy Policy. When we make any changes, the updated version will be posted on our Website at <https://soundcss.com.au/policies/>, so you can stay informed about how we protect your information.

## 17. How To Contact Us About Privacy

If you have any queries, or if you seek access to your Personal Information, or if you have a complaint about our privacy practices, you can contact us at:

Sound Counselling & Supervision Services Pty. Ltd.

PO BOX 3129 Browns Plains QLD 4118

hello@soundcss.com.au

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