



INTEGRATIVE THERAPY NQ

Mara Gomes | Accredited Mental Health Social Worker | Play Therapist

Privacy Policy

How I collect, hold, use, disclose and protect your personal and health information

Privacy Act 1988 (Cth)

Australian Privacy Principles

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Document control

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1. About this policy

Integrative Therapy NQ ("my practice", "I", "me") is committed to protecting the privacy, confidentiality and dignity of every person who engages with my services or my website.

I am an Accredited Mental Health Social Worker providing clinical social work, play therapy, group facilitation and psychoeducation services in Townsville, Queensland.

This policy explains how I collect, hold, use, disclose, secure and dispose of your personal information, including your health information. It applies to clients, prospective clients, parents and guardians, referrers, website visitors, workshop and group participants, contractors and job applicants.

Practice details

Trading name	Integrative Therapy NQ
Legal entity	Integrative Therapy NQ
ABN	16448344897
Postal address	Office D, 112 Denham Street, Townsville QLD 4810, Australia
Email	integrativetherapynq@gmail.com
Phone	0435 901 601
Privacy Officer	Mara Gomes

2. The law I work under

My practice is bound by the *Privacy Act 1988* (Cth) and the 13 Australian Privacy Principles (APPs). Because I provide a health service and hold health information, the Privacy Act applies to me regardless of my annual turnover — the small business exemption does not apply to health service providers.

Depending on the service you receive, the following also apply:

- **Notifiable Data Breaches scheme** — Part IIIC of the *Privacy Act 1988* (Cth)
- **Healthcare Identifiers Act 2010** (Cth) and **My Health Records Act 2012** (Cth)
- **Health Insurance Act 1973** (Cth) — Medicare-funded services
- **National Disability Insurance Scheme Act 2013** (Cth), the NDIS Code of Conduct and other applicable NDIS requirements — where I provide services to NDIS participants.
- **Workers' Compensation and Rehabilitation Act 2003** (Qld) — WorkCover Queensland matters
- **Child Protection Act 1999** (Qld) and the *Criminal Code* (Qld)
- **Public Health Act 2005** (Qld)
- **Spam Act 2003** (Cth) — electronic marketing

- The **AASW Code of Ethics** and **AASW Practice Standards**, which impose confidentiality obligations that in some respects exceed the minimum legal standard

Queensland does not have separate private-sector health records legislation, so the Commonwealth Privacy Act is the primary framework governing your health information at my practice.

3. What personal information I collect

3.1 Identifying and contact information

Name, preferred name and pronouns, date of birth, gender, address, phone numbers, email address, emergency contact details, next of kin, and — where relevant to the service — Aboriginal or Torres Strait Islander identification, interpreter needs and accessibility requirements.

3.2 Health and other sensitive information

Under the Privacy Act, health information is "sensitive information" and attracts a higher level of protection. This may include:

- Presenting concerns, symptoms, history and current circumstances
- Assessment findings, screening tool and outcome measure scores
- Diagnoses and formulations, whether made by me or another practitioner
- Treatment plans, session notes, case notes and progress notes
- Risk assessments and safety plans
- Medication and treatment history
- Correspondence with GPs, psychiatrists, paediatricians, allied health practitioners and hospitals
- Family, relationship, developmental, educational, employment and cultural history
- For play therapy: developmental history, school reports, parenting and family observations, and material produced in session

3.3 Funding, billing and administrative information

Medicare number and Individual Reference Number, DVA file number, NDIS participant number and plan details, WorkCover claim number, private health fund details, referral documents, GP Mental Health Treatment Plans, invoices, receipts and payment records.

Card details. Keeping a card on file is a condition of my services. The card is stored in tokenised form within my practice management system and its payment provider. I do not see, hold or have access to your full card number, and I cannot retrieve it.

Bank account details. Where I submit a Medicare claim on your behalf, I collect the bank account details you have nominated with Medicare so that the rebate can be paid directly to you. These details are used only for that purpose.

3.4 Website and technical information

When you visit www.integrativetherapynq.com.au, I may collect:

- IP address, approximate location, browser type, device type and operating system
- Pages visited, time on page, referring website and navigation patterns
- Information you submit through contact forms, enquiry forms, booking forms, intake forms and newsletter sign-ups
- Cookie and analytics data (see section 10)

3.5 Recordings and AI-assisted documentation

Sessions are not recorded unless you have given specific, separate written consent — for example, for clinical supervision, training or a therapeutic purpose you have agreed to. Consent can be withdrawn at any time.

With your separate written consent, I use an AI clinical documentation tool (Heidi) to help me draft progress notes. This is explained in full at section 18. You can decline it, and I will take notes by hand instead.

4. How I collect your information

Wherever it is reasonable and practicable, I collect personal information **directly from you** — through enquiry and intake forms, consent documents, assessments, sessions, telehealth appointments, email, phone and my website.

I may collect information **from others** where you have consented, or where it is necessary to provide safe care and it is unreasonable or impracticable to collect it from you directly. This includes:

- Referring GPs, psychiatrists, paediatricians and other health practitioners
- Parents, guardians, carers or substitute decision-makers
- Schools, early childhood services and support coordinators (with consent)
- NDIS plan managers and support coordinators
- WorkCover Queensland, DVA and insurers in claim-related matters
- Legal representatives and courts where a matter is before them

If I receive information about you from a third party without your knowledge, I will take reasonable steps to notify you of the collection unless doing so would be unlawful, unreasonable, or would pose a serious risk to someone's safety.

5. Why I collect, hold and use your information

I collect and use your personal information to:

- Assess your needs and determine whether my service is appropriate for you
- Provide therapy, assessment, play therapy, group programs and psychoeducation
- Develop, review and document treatment plans and clinical progress
- Communicate with you about appointments, resources and your care
- Liaise with your treating team where you have consented
- Manage risk and respond to safety concerns
- Bill and claim through Medicare, DVA, WorkCover Queensland, NDIS or private payment
- Meet reporting requirements to funders and regulators
- Obtain professional supervision, consultation and peer review (de-identified wherever possible)
- Maintain accurate clinical records as required by law and professional standards
- Manage complaints, feedback, insurance and legal obligations
- Improve the quality, accessibility and safety of my services
- Respond to website enquiries and, where you have opted in, send you practice updates

I will only use your information for the purpose it was collected, a directly related secondary purpose you would reasonably expect, a purpose you have consented to, or a purpose required or authorised by law.

6. Consent

By providing your information and engaging my services, you consent to the handling of your personal information as described in this policy. For health information, I obtain **express consent** at intake through a signed consent and service agreement.

You may withdraw or vary your consent at any time by contacting me in writing. Withdrawing consent may affect my ability to provide a safe or funded service, and I will discuss the implications with you. Withdrawal does not apply retrospectively to disclosures already properly made, and does not override my legal obligations to retain records or to act where there is a serious risk to safety.

7. Who I disclose your information to

I do not sell, rent or trade your personal information. I disclose it only in the following circumstances.

With your consent:

- Your GP, psychiatrist, paediatrician or referring practitioner — including progress reports required under a Mental Health Treatment Plan
- Other treating practitioners involved in your care
- Family members, carers, guardians or advocates you have nominated
- Schools, workplaces or support services relevant to your goals
- Legal representatives you have authorised

To funding bodies, as required to process your claim:

- Services Australia (Medicare) — including where I submit a claim on your behalf through my practice management system
- Department of Veterans' Affairs
- WorkCover Queensland, self-insurers and their appointed advisors
- National Disability Insurance Agency, plan managers and support coordinators
- Private health insurers

To my service providers, who are contractually required to protect your information and use it only to deliver services to my practice:

- Practice management, clinical records, payment and claiming software (Halaxy)
- Payment processing providers engaged through my practice management system
- AI clinical documentation (scribe) providers — see section 18
- Secure cloud storage and backup providers
- Telehealth platform providers
- Accounting, bookkeeping and payment processing providers
- Email, website hosting and appointment reminder providers
- IT support providers

Without your consent, where required or authorised by law:

- Where there is a serious and imminent threat to your life, health or safety, or to that of another person
- Where I form a reasonable belief that a child or young person is at risk of significant harm, or where I am required to report under Queensland child protection and criminal law
- In response to a subpoena, warrant, court order or a lawful direction from a court, tribunal or coroner
- Where mandatory notification is required in relation to another health practitioner
- To meet notifiable disease reporting obligations
- To my professional indemnity insurer or legal advisors where a claim, complaint or legal risk arises
- To regulatory or oversight bodies conducting a lawful investigation

Where practicable and safe, I will tell you before information is released without your consent and will release only the minimum necessary.

8. Overseas disclosure

Some of the software providers I use store data on servers located outside Australia, or use overseas sub-processors — including in the United States, the European Union, New Zealand, Singapore and the United Kingdom.

Before using any such provider, I take reasonable steps to satisfy myself that they handle personal information in a way consistent with the Australian Privacy Principles, in line with my obligations under APP 8. I preference providers that store Australian health data onshore, and I hold written confirmation of data residency for my practice management system and my clinical documentation tool.

A current list of the providers I use and the countries in which they store data is available on request.

9. Anonymity and pseudonymity

You may make a general enquiry about my services anonymously or under a pseudonym.

This is not possible once you become a client. Accurate identification is required to provide safe clinical care, to keep lawful health records, and to claim through Medicare, DVA, NDIS or WorkCover. Medicare claiming in particular requires your name, date of birth, Medicare number and Individual Reference Number to match the details held by Services Australia.

10. My website

10.1 Cookies

My website uses cookies and similar technologies to keep the site functioning, remember your preferences and understand how the site is used. You can disable cookies in your browser settings, though some features may not work correctly. Where required, a cookie consent banner allows you to manage non-essential cookies.

10.2 Analytics

I use website analytics to understand traffic patterns and improve the site. This data is aggregated and is not used to identify you personally.

10.3 Online forms and bookings

Information you submit through enquiry, booking or intake forms is transmitted over an encrypted connection and stored in my practice management system. Please do not send detailed clinical or crisis information through website forms — they are not monitored continuously and are not a crisis service.

10.4 Email and electronic marketing

I will only send you newsletters, resources or practice updates if you have opted in. Every message includes an unsubscribe function, in accordance with the *Spam Act 2003* (Cth). Clinical and appointment communications are not marketing and will continue regardless of your marketing preferences.

10.5 Social media

If you interact with my practice on social media, that platform's own privacy policy governs its collection of your data. Please do not disclose personal or clinical information through social media, comments or direct messages. Following, liking or messaging a practice page may be visible to others.

10.6 Third-party links

My website may link to other organisations and resources. I am not responsible for their privacy practices, and I encourage you to read their policies.

11. Telehealth

Telehealth sessions are delivered using Zoom, a secure video-conferencing platform that uses encryption and other security safeguards to protect information transmitted during sessions. Sessions are not recorded unless you have given separate written consent.

You are responsible for choosing a private location and a secure internet connection for your session. I cannot guarantee the security of a public or shared network. Any risks specific to telehealth will be discussed with you before your first online session.

12. Where and how I store your information

Clinical records are held in electronic form in a secure, access-controlled practice management system, and where paper records exist, in a locked cabinet at my practice premises.

Security measures include:

- Multi-factor authentication and unique logins on all clinical systems
- Encryption of data in transit and at rest
- Password-protected and encrypted devices
- Secure, regularly tested backups
- Role-based access — information is accessible only to those who need it
- Confidentiality agreements with any contractor, administrative support or supervisor
- Physical security of premises and locked storage of paper files
- Secure destruction of records at the end of their retention period
- Regular review of systems, providers and access logs

Payment and banking information

- Card details are held in tokenised form by my practice management system and its payment provider. I do not store, view or have access to full card numbers.
- Bank account details collected for Medicare rebate purposes are held within my practice management system under the same access controls as your clinical record, and are used only to process claims you have authorised.
- I will charge a card held on file only as set out in your service agreement — session fees on the day of the appointment, and late cancellation or non-attendance fees. I will notify you before processing a cancellation fee. Any other charge requires your agreement first.
- You may update or remove your stored card or bank account details at any time by contacting me.
- A receipt is issued for every transaction.

No system can be guaranteed to be completely secure. I take reasonable steps proportionate to the sensitivity of health information, and I review these measures regularly.

13. Data breaches

I maintain a data breach response plan. If a data breach occurs that is likely to result in serious harm to you, I will:

- Contain the breach and assess it, ordinarily within 30 days
- Take steps to reduce the harm
- Notify you and the Office of the Australian Information Commissioner as required by the Notifiable Data Breaches scheme
- Tell you what happened, what information was involved and what you can do to protect yourself
- Review and strengthen my systems to prevent recurrence

14. How long I keep your records

I am required to retain clinical records for a minimum period, even after our work together ends:

- **Adults:** at least 7 years from the date of last service
- **Children and young people:** until the person turns 25 years of age
- **Funded services:** for any longer period required by Medicare, DVA, NDIS or WorkCover Queensland

At the end of the retention period, records are securely destroyed or permanently de-identified. Financial records are retained for at least 5 years as required by the Australian Taxation Office. Website enquiry data that does not become part of a clinical record is deleted when it is no longer needed.

15. Accessing and correcting your information

You have the right to request access to the personal information I hold about you, and to ask me to correct it if it is inaccurate, out of date, incomplete, irrelevant or misleading.

To make a request: contact me in writing at integrativetherapynq@gmail.com. I may need to verify your identity.

Timeframe: I will respond within 30 days.

Fees: there is no charge for making a request. I may charge a reasonable fee for the time and cost involved in retrieving, copying and providing records. Any fee will be advised in advance.

How access is provided: for clinical records, I will usually offer to go through the file with you, so that clinical language and context can be explained and the information is not distressing or misleading out of context.

Refusal: in limited circumstances I may refuse access — for example, where access would pose a serious threat to the life, health or safety of any person; where it would unreasonably affect another person's privacy; where the request is frivolous or vexatious; where the information relates to anticipated legal proceedings; or where access would be unlawful. If I refuse, I will tell you in writing why, and how to complain.

Third-party information: clinical files often contain information about other people, such as family members. That information may need to be redacted before release.

If I correct information, I will take reasonable steps to notify any third party to whom I previously disclosed it, if you ask me to. Where I do not agree that information is inaccurate, you may ask me to attach a statement of your view to the record, and I will do so.

16. Children, young people and parents

Where a client is under 18, information is generally handled with the consent of a parent or guardian.

However, I assess each young person's capacity to consent on their own behalf, in line with Queensland law and professional standards.

Where a young person has the maturity and understanding to consent to their own treatment, they also have the right to confidentiality — meaning I may not share the content of sessions with parents without that young person's agreement, except where safety requires it.

For play therapy and family work, I will explain to parents at the outset what will and will not be shared, and how progress will be communicated. Where parents are separated, both parents with parental responsibility generally have a right to information about the child unless a court order provides otherwise.

17. Healthcare identifiers and My Health Record

Where relevant, I may use your Individual Healthcare Identifier to accurately identify you and communicate with other providers, in accordance with the *Healthcare Identifiers Act 2010* (Cth).

If my practice participates in the My Health Record system, information may be uploaded to or viewed in your My Health Record. You control your My Health Record settings, including whether documents are uploaded and who can view them, and you can change these at any time through myGov or by calling 1800 723 471.

18. Automated decision-making and artificial intelligence

18.1 AI-assisted clinical documentation

I use an AI clinical documentation tool called Heidi to help me draft progress notes. I want you to understand exactly what that means before you agree to it.

What it does. With your consent, the tool listens to our session through my device and produces a written transcript, which it then uses to generate a draft progress note in a clinical format.

What it does not do. It does not diagnose you, assess you, make any decision about your care, or determine your eligibility for any service or funding. It is a drafting aid.

I remain responsible for your record. Every AI-generated draft is reviewed, corrected and edited by me before it becomes part of your clinical record. The note in your file is my clinical judgement, not the tool's output. I am accountable for its accuracy.

Audio. The provider states that audio is not retained — it is transcribed and then deleted. Transcripts and draft notes are held in the provider's system under retention settings I control, and are deleted once the note is finalised in your record.

Where it is stored. The provider states that Australian customers' data is stored in Australia and is encrypted in transit and at rest. I hold written confirmation of this and a data processing agreement, and I review them annually.

Your information is not used to train AI models without your express consent, and I do not give that consent on your behalf.

18.2 Your choice

Using this tool is entirely your choice.

- I will ask for your written consent before the first session in which I use it, and I will confirm verbally at the start of each session that you are still comfortable.
- **You can say no.** If you decline, I will write notes by hand or type them myself. Your care, your appointment times and your fees will be exactly the same.
- **You can change your mind at any time**, including partway through a session. Say so and I will stop immediately.
- You can ask me to pause it for part of a session — for example, when discussing something particularly sensitive.
- If you decline, I record that in your file so you are not asked repeatedly.

18.3 Children and young people

I do not use AI-assisted documentation in play therapy or in individual sessions with children. Children's sessions involve unstructured speech, disclosure and symbolic play in a setting where the child cannot meaningfully weigh what it means to have their words transcribed. I write those notes myself.

Where I use it in a parent or caregiver consultation, I obtain the parent's written consent, and where a young person aged 14 or over is present, I obtain their agreement as well. A young person's refusal is final and is not overridden by a parent's consent.

18.4 Other automated features

Other software I use includes automated administrative features such as appointment scheduling, reminders and invoicing. These support administrative processes only and do not determine clinical outcomes.

18.5 Automated decision-making

I do not use automated systems or artificial intelligence to make, or substantially assist in making, decisions about your clinical care, your eligibility for services, or your access to funding. All clinical decisions are made by me, as a qualified practitioner. Nothing in my practice currently falls within the automated decision-making transparency requirements under APP 1.7 of the *Privacy Act 1988* (Cth), which take effect on 10 December 2026. If that changes, I will update this policy.

19. Employment and contractor applications

If you apply for a position or contracting arrangement with my practice, I collect the information in your application, references, qualification and registration checks, and any police or working with children (Blue Card) check required for the role. This information is used only to assess your suitability, is stored securely, and unsuccessful applications are destroyed within 12 months unless you ask me to keep them on file.

20. Complaints

If you believe your privacy has been breached, or you are unhappy with how your information has been handled, please contact me first:

Privacy Officer, Integrative Therapy NQ

Email: integrativetherapynq@gmail.com | Phone: 0435 901 601

I will acknowledge your complaint within 7 calendar days and aim to resolve it within 30 calendar days. I will tell you in writing what I have found and what I intend to do.

If you are not satisfied with my response, you may contact:

Office of the Australian Information Commissioner (OAIC)

Phone: 1300 363 992

Online: www.oaic.gov.au/privacy/privacy-complaints

Post: GPO Box 5218, Sydney NSW 2001

Office of the Health Ombudsman (Queensland)

Phone: 133 646

Online: www.oho.qld.gov.au

Post: PO Box 13281, George Street, Brisbane QLD 4003

Australian Association of Social Workers (AASW) — Ethics Complaints

Phone: 03 9320 1000

Online: www.aasw.asn.au

Making a complaint will not affect the care you receive from my practice.

21. Changes to this policy

I review this policy at least annually and whenever my systems, services or legal obligations change. The current version is always available at www.integrativetherapynq.com.au/privacy-policy. Material changes will be communicated to current clients.

22. Contact

Email: integrativetherapynq@gmail.com

Phone: 0435 901 601

Web: www.integrativetherapynq.com.au

If you are in crisis or need immediate support, please contact Lifeline on 13 11 14, the Suicide Call Back Service on 1300 659 467, 13YARN on 13 92 76, or emergency services on 000. My practice is not a crisis service and enquiries are not monitored outside business hours.