

Privacy and Confidentiality Statement for Research and Intervention

1. Suicide Risk Assessment Australia (SRAA)

SRAA provide high quality services to organisations and practitioners aiming to identify people vulnerable to suicidality, in addition to equipping them with evidence-based strategies for effective response and management (“**Services**”). Ultimately, our mission is to support organisations and practitioners to prevent suicide within their settings.

SRAA also effectively drive workplace initiatives that reduce the devastating impact of these losses through postvention support and referral.

2. The Purpose of the Privacy and Confidentiality Statement (“Statement”)

SRAA is bound by the *Privacy Act 1988 (Cth)* which protects your Personal Information and regulates the way SRAA collect, hold, use and disclose your Personal Information including Sensitive Information and Health Information. See section 12 for definitions.

SRAA is committed to respecting the privacy of your Personal Information and recognises the need for appropriate protection and management of Personal Information which you share with us either in person by attending training sessions, consultations or interviews or by telephone, email or through our website e.g. online surveys and audits.

This Statement outlines how we manage your Personal Information which we may obtain from you. This Statement is reviewed annually, to ensure it remains up to date. It may be amended from time to time, and is available on our website at www.suicideriskassessment.com.au.

For further information on privacy laws and regulations in Australia, please visit the website of the Office of the Australian Information Commissioner at www.oaic.gov.au.

3. How we collect information

Your Personal¹ Information

SRAA only collect Personal Information for purposes that are related to the Services and activities of SRAA.

We will, if it is reasonable or practicable to do so, collect Personal Information directly from you or your authorised representatives when you receive Services from us including when you:

- (a) participate in a psychological assessment;
- (b) fill out an application to attend a workshop or service;
- (c) complete a survey or audit including online forms;
- (d) become one of our contractors or associates or request assistance and services from SRAA.

We may collect your Personal Information in person via an interview or over the telephone, via email or via our website.

In certain cases we may collect your Personal Information from third parties or from publicly available sources but only if you have provided your consent to the collection or would reasonably expect us to collect Personal Information in this way. For example, we may need to collect Personal Information from your representative (such as family member or legal guardian), your employer or work colleague.

SRAA takes reasonable steps to ensure that you will be notified when Personal Information is being collected about you. Your Personal Information may also be relevant to Services and activities provided by SRAA with respect to survey data, audits or interviews conducted by SRAA for the purpose of research and development initiatives.

Your Sensitive² and Health³ Information

When SRAA is providing Services to you, we may also collect and hold records of Health Information including information about your health, wellbeing and psychosocial information (which may include your demographics, employment and educational history, presenting issue, history of presenting issues, psychosocial background, family history, medical history, psychological history and lifestyle information).

We are unable to collect your Sensitive Information without your consent, except in cases where there are risks to your life or as required by law.

4. What type of information does SRAA collect?

Collection of your Personal Information is often necessary to ensure we are able to provide the requisite Services to you including information to:

- (a) provide therapy, consultation or treatment to you or provide referral to a health practitioner;
- (b) enable development or delivery of training, supervision and consulting services to you that is consistent with the objectives and mission statement of SRAA set out in section 1 above

SRAA will only collect information that is reasonable and necessary to the provision of Services to you. With respect to collection of data for research and development, only data relevant to the research project will be collected.

Generally, SRAA can only collect your Health Information (which includes information about an individual's mental health and psychological status), when you have given your consent and the Health Information is reasonably necessary for SRAA to provide Services to you.

There are certain situations where SRAA is permitted to collect your Health Information without your consent including:

- (a) where getting your consent is not practical; and
- (b) SRAA reasonably believes that it needs the information to lessen or prevent a serious threat to the life of any individuals (including you), health or safety, or the public's health or safety.

5. Unsolicited information

If SRAA receives Personal Information about you and which SRAA did not solicit that information, SRAA may retain such Personal Information if it is deemed necessary, by way of risk assessment, to provide Services to you and the Personal Information will be handled in accordance with what is reasonably necessary to ensure the safety of those involved.

In the context of interviews or survey responses undertaken for research and development, information received without being specifically elicited will only be included in response data if it is

deemed by SRAA relevant to the research project. SRAA will also ensure that at the end of the interview to obtain your consent to that information being used for the purposes outlined.

Unsolicited information provided to SRAA that is not deemed necessary or it does not evidence any risk to self harm or others, will be destroyed.

6. The accuracy of your personal information

SRAA makes all reasonable efforts to ensure that any Personal Information collected, used or disclosed is accurate, relevant, complete and up-to-date.

If you believe your Personal Information is not accurate, complete or up to date, please contact SRAA immediately.

7. Protecting your personal information

We take reasonable steps to securely store your Personal Information so that it is protected from unauthorised use, access, modification or disclosure. We store Personal Information in:

- Paper form on SRAA premises; and
- Electronic form moderated by SRAA's outsourced IT service providers.

We take every reasonable step to ensure the practical and technical protection of your Sensitive Information is achieved, including encrypted passwords for electronic files, and ensuring any outsourced online services are appropriately protected with electronic safeguards.

Additionally, no information is available to SRAA employee or personnel unless they are legitimately engaged in the Services you are receiving. SRAA will not disclose Personal Information unless you have provided your signed written consent or that SRAA has received authorisation by other means (e.g. Guardianship Tribunal).

While SRAA has security measures in place to protect your data, no data transmission over the internet can be guaranteed to be 100% secure. As a result, while we strive to protect your Personal Information, SRAA cannot warrant or ensure the security of any information which you have provided to us or howsoever collected by us.

8. If there is identified risk of harm

SRAA is not a crisis response service. If you require emergency assistance you will be redirected to the appropriate service.

Should SRAA receive information about you that suggests you are at risk of harm or that you are at risk of perpetrating harm to others, we will notify emergency services and those reasonably identified as at risk. This may also include, but is not limited to your medical practitioner and other treatment providers, family and trusted people, manager or work colleague).

Use, transfer and sharing of your personal information

9. How we use and disclose your personal information

Use

Personal Information provided by you will be used by SRAA for the primary purpose of providing Services to you or for secondary purposes that are directly related to one of our functions or activities of SRAA.

From time to time SRAA may use your Personal Information we collect to identify particular services that we believe may be of interest to you or to promote to you other services that are related to the Service provided to you by SRAA.

This means SRAA may make contact with you about how you may benefit from those additional services provided by SRAA. We will generally only do this with your consent and we will always give the choice to opt out of receiving such information in future. SRAA will not disclose your Personal Information to third parties for marketing or other activities that do not relate to SRAA.

Disclosure

SRAA will only disclose Personal Information for a purpose that is related to the Service that we are providing you. This may include disclosures to other health service providers involved in care or treatment (e.g. treating specialists), other government agencies, private health insurers and governmental bodies.

Any information provided to us or collected by SRAA in the course of providing Services to you is kept strictly confidential. Only the assigned psychologist and SRAA representatives have access to the information, except for special circumstances set out below. No information provided to SRAA in confidence may be released to others without the written consent of the individual.

Circumstances in which we may need to disclose or give access to Personal Information are set out below:

- (a) to third parties to provide health care or treatment to you. However, we will only do so with prior consent from you or, if you are unable to provide consent then where it is necessary in order to be able to provide care or treatment to you.
- (b) to our agents and subcontractors to whom we outsource certain functions, such as electronic network administrators. However, where possible, we undertake contractual measures to ensure that they comply with this Statement and obligations under the Privacy Act.
- (c) to researchers where permitted under the Privacy Act and in respect of which, SRAA will de-identify information before we disclose it for research purposes.
- (d) to persons involved in accrediting health practitioners. For example, a person from an accreditation agency may need to review SRAA's information handling procedures which may involve accessing patient records.
- (e) in other circumstances where we are expressly permitted to do so under the Privacy Act or where we are legally required or permitted to do so.

Where appropriate, SRAA will de-identify information before disclosing it.

Your Personal Information may or may not be de-identified if gathered in the context of a workplace audit or survey, where no identifiable markers will be present given the quantitative analysis. For

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qualitative purposes, your comments or phrases may be cited in the survey analysis report, accompanied by de-identified demographic information. All reasonable steps will be made to ensure qualitative data is not identifiable if a respondent requests anonymity.

No information is available to personnel of SRAA unless they are legitimately engaged in connection with the Services you are receiving. SRAA will not disclose any Personal Information unless you have provided your signed written consent, we have received authorisation by another means (eg. Guardianship Tribunal) or security and identification questions.

While you are able to withdraw your consent at any time from participating in research, after the responses or data has been published and released (anonymity or otherwise maintained as per the initial authority or consent), it is not possible to retract this data after the fact.

In the case of individual services, such as a psychological assessment, supervision or consultation services, some Personal Information may support implementation of necessary workplace changes, where your express consent will be obtained or extensions of services.

Computer Mediated Technologies Privacy Policy

10. Introduction to the CMT Policy

Protecting your private information is our priority. This Computer Mediated Technologies Privacy Policy (**'CMT Policy'**) applies to suicideriskassessment.com.au (**'Site'**) and SRAA and governs data collection and usage collected from technologies utilised in the delivery of services. For the purposes of this CMT Policy, unless otherwise noted, all references to SRAA include suicideriskassessment.com.au and social media for SRAA and Carmen Betteridge. The SRAA website is an online training, webinars, consults, training materials and resources site. By using the SRAA website and engaging with social media activities associated with SRAA, you consent to the data practices described in this statement.

11. Collection of your Personal Information

In order to better provide you with products and services offered on our Site, SRAA may collect personally identifiable information, such as your First and Last Name and Email Address.

If you purchase SRAA's products and services, we collect billing and credit card information. This information is used to complete the purchase transaction.

Please keep in mind that if you directly disclose personally identifiable information or personally sensitive data through SRAA's public message boards, this information may be collected and used by others.

We do not collect any personal information about you unless you voluntarily provide it to us. However, you may be required to provide certain personal information to us when you elect to use certain products or services available on the Site. These may include: (a) registering for an account on our Site; (b) entering a sweepstakes or contest sponsored by us or one of our partners; (c) signing up for special offers from selected third parties; (d) sending us an email message; (e) submitting your credit card or other payment information when ordering and purchasing products and services on our Site. To wit, we will use your information for, but not limited to, communicating with you in relation to services and/or products you have requested from us. We also may gather additional personal or non-personal information in the future.

12. Use of your Personal Information

SRAA collects and uses your personal information to operate its website(s) and deliver the services you have requested.

SRAA may also use your personally identifiable information to inform you of other products or services available from SRAA and its affiliates.

13. Sharing Information with Third Parties

SRAA does not sell, rent or lease its customer lists to third parties.

SRAA may share data with trusted partners to help perform statistical analysis, send you email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from using your personal information except to provide these services to SRAA, and they are required to maintain the confidentiality of your information.

SRAA may disclose your personal information, without notice, if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on SRAA or the Site; (b) protect and defend the rights or property of SRAA;

and/or (c) act under exigent circumstances to protect the personal safety of users of SRAA, or the public.

14. Tracking User Behaviour

SRAA may keep track of the Computer Mediated Technologies and pages our users visit within SRAA, in order to determine what SRAA services are the most popular. This data is used to deliver customized content and advertising within SRAA to customers whose behavior indicates that they are interested in a particular subject area.

We may employ exit intent pop ups.

15. Automatically Collected Information

Information about your computer hardware and software may be automatically collected by SRAA. This information can include: your IP address, browser type, domain names, access times and referring website addresses. This information is used for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the SRAA website.

16. Use of Cookies

The SRAA website may use "cookies" to help you personalise your online experience. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you personalise SRAA pages, or register with SRAA Site or services, a cookie helps SRAA to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the same SRAA website, the information you previously provided can be retrieved, so you can easily use the SRAA features that you customised.

You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the SRAA services or Computer Mediated Technologies you visit and use.

17. Links

This website contains links to other sites. Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of any other site that collects personally identifiable information.

18. Security of your Personal Information

SRAA secures your personal information from unauthorized access, use, or disclosure. SRAA uses SSL Protocol for this purpose.

When personal information (such as a credit card number) is transmitted to other websites, it is protected through the use of encryption, such as the Secure Sockets Layer (SSL) protocol.

We strive to take appropriate security measures to protect against unauthorised access to or alteration of your personal information. Unfortunately, no data transmission over the Internet or

any wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, you acknowledge that: (a) there are security and privacy limitations inherent to the Internet which are beyond our control; and (b) security, integrity, and privacy of any and all information and data exchanged between you and us through this Site cannot be guaranteed.

19. Children Under Sixteen

SRAA does not knowingly collect personally identifiable information from children under the age of sixteen. If you are under the age of sixteen, you must ask your parent or guardian for permission to use this website.

20. E-mail Communications

From time to time, SRAA may contact you via email for the purpose of providing announcements, promotional offers, alerts, confirmations, surveys, and/or other general communication. In order to improve our Services, we may receive a notification when you open an email from SRAA or click on a link therein.

If you would like to stop receiving marketing or promotional communications via email from SRAA, you may opt out of such communications by Clicking on the UNSUBSCRIBE button.

21. External Data Storage Sites

We may store your data on servers provided by third party hosting vendors with whom we have contracted.

22. Changes to the CMT Policy

SRAA reserves the right to change this CMT Policy from time to time. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address specified in your account, by placing a prominent notice on our site, and/or by updating any privacy information on this page. Your continued use of the Site and/or Services available through this Site after such modifications will constitute your: (a) acknowledgment of the modified Privacy Policy; and (b) agreement to abide and be bound by that Policy.

Dealing with SRAA

23. Resolving your privacy issues

Please contact us if you have concerns about the way in which we have handled your Personal Information or if you would like to discuss any issues about our Privacy and Confidentiality Statement or the CMT Policy.

You are always welcome to speak directly with our Director, Carmen to resolve your issue. carmen@suicideriskassessment.com.au

24. Gaining access to and correcting your personal information associated with research and development

You may request access to update or amend your Personal Information. Access will generally be provided in an appropriate form within 30 days of your request. In some contexts, updating or amending your Personal Information may not be possible including:

- (a) after a survey deadline has closed and the data has been analysed and published;
- (b) that it would pose a serious threat to life, health or safety of any individual or to public health or public safety; or
- (c) it would have an unreasonable impact upon the privacy of others; or
- (d) if your reason is unlawful or contrary to the Privacy Act.

If SRAA is unable to provide access, we will provide reasons in writing for the denial of or limitation on access, but which may pertain to identified risks of harm to yourself or others.

25. Can I be anonymous or engage under a pseudonym?

Yes, but there are limitations. We are unable to provide Services including reports following personal psychological services, if we cannot identify you. Similarly, SRAA may be unable to include your data in needs analysis, audits or surveys for third parties, if we are unable to contextualise results to aspects of your work environment, health or community. If identifiable data is required, you will be expressly asked and your written consent sought.

26. Your health professional and your personal information

SRAA consultants and associates will manage your Personal Information in a manner consistent with this Statement. Your treatment providers and health professionals frequently value a collaborative approach to improving a patient's health and wellbeing, including their mental health. As such, discussing a collaborative approach with your treatment providers is highly recommended.

We rely on you having provided your designated health professional with your consent to handle your Personal Information to enable our support services to be provided to you.

27. Contact us

Suicide Risk Assessment Australia

PO Box 178, Engadine, NSW 2233

email: carmen@suicideriskassessment.com.au

Ph. 0406 935 225

28. Definitions

1. **“Personal Information”** includes 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 material form or not, and includes Health Information and Sensitive Information.
2. **“Sensitive Information”** includes:
 - (a) Personal Information about an individual’s racial or ethnic origin, religious, philosophical or political beliefs, membership of a union or a political, professional or trade association, sexual orientation or practices and criminal record; and
 - (b) Health Information about an individual.
3. **“Health Information”** includes information or an opinion about
 - (a) an individual’s health including an illness, disability or injury of an individual;
 - (b) an individual’s expressed wishes about the future provision of health services to the individual; or
 - (c) any Personal Information collected while an individual is receiving a Service including any health service provided by SRAA and any services pertaining to mental health and psychological status.
4. **“Computer Mediated Technologies”** includes communication that is facilitated through social media, virtual communities, websites and email communications.

29. Document Control and Record of Changes

Version	Effective Date	Review completed by	Summary of Change	Date of Next Review
01	May 2017	Carmen Betteridge		May 2019
02	October 2019	Carmen Betteridge	<ul style="list-style-type: none"> • Removal of contents page • Increased context for definitions 	October 2020
03	June 2020	Carmen Betteridge	<ul style="list-style-type: none"> • Inclusion of information on data collected from technology interfaces (website, email, social media etc) 	June 2021

30. Participate Publish & Consent for Research and Intervention



Authority to Participate & Publish

I _____ have read and agree to the Privacy and Confidentiality Statement in the context of engaging in Research and Development activities including participating in surveys and interviews undertaken by SRAA (“**SRAA Research and Development**”).

*[*Please cross out any text that does not apply]*

- I **do / do not** consent to participate in a personal interview for the purposes of SRAA Research and Development.
- I **do / do not** consent to identifiable information being used in the reporting of the results of this Research and Development.

I understand that SRAA takes all reasonable steps to ensure that any information collected is not identifiable if a respondent requests anonymity and that if I provide my consent, any personalised or identifiable information provided to SRAA by me may be used in publication by SRAA provided that SRAA seeks my approval prior to final publication.

I understand that after final publication (that is distributed in paper form or via internet & social media), it may be impossible to remove that publication from open public access, including my personal responses or information.

Name:

Signature:

Date:

Name of Research & Development Project:



Client Consent

I/We _____ have read the Privacy and Confidentiality Statement carefully.

I consent to SRAA:

- collecting and using my personal information in order for SRAA to provide services to me; and
- sending me information about other services provided by SRAA

Client Signature: _____ Date: