

Privacy Policy

Effective date: September 2026

Last updated: September 2026

1. About this Privacy Policy

Integrated Wellbeing is committed to protecting the privacy, confidentiality and dignity of every person who engages with our counselling, wellbeing and yoga services.

This Privacy Policy explains how Integrated Wellbeing collects, holds, uses, discloses, protects and manages personal information and health information.

Integrated Wellbeing is committed to complying with:

- the *Privacy Act 1988 (Cth)* and the Australian Privacy Principles (APPs);
- applicable Australian privacy and confidentiality requirements;
- the Australian Counselling Association (ACA) Code of Ethics and Practice;
- applicable child protection and reporting obligations;
- applicable requirements relating to the security and management of client records; and
- other Australian laws that apply to the provision of counselling, wellbeing and yoga services.

The Australian Counselling Association recognises confidentiality as fundamental to the counselling relationship and requires counsellors to clearly explain the level and limits of confidentiality and to securely maintain client records, including digital records.

This Privacy Policy should be read together with your counselling agreement, informed consent information and any other information provided to you before or during counselling.

2. Who we are

Integrated Wellbeing is operated by **Heidi Richards**, a qualified counsellor and yoga professional.

For privacy purposes, Integrated Wellbeing is responsible for the personal information collected and held in connection with its counselling, wellbeing and yoga services.

Privacy contact: Heidi Richards

Email: info@integratedwellbeingbrisbane.com.au

Website: integratedwellbeingbrisbane.com.au

Phone: 0405 772 840

3. What information we collect

Depending on the services you access, Integrated Wellbeing may collect personal information including:

Identification and contact information

This may include:

- your name;
- preferred name;
- date of birth or age;
- address;
- telephone number;
- email address;
- emergency contact details;
- relevant demographic information; and
- information required to confirm your identity or manage your appointment.

Health and counselling information

Counselling involves the collection of sensitive and health information that is reasonably necessary to provide safe and appropriate services.

This may include:

- information about your mental and emotional wellbeing;
- relevant physical health information;
- medical history where relevant to counselling;
- information about medications where relevant;
- information about previous or current treatment;
- information about relationships, family circumstances and significant life events;
- information about trauma, grief, loss or other experiences discussed during counselling;
- information concerning risk or safety;
- counselling goals and progress;
- information provided by another health professional with your consent; and
- counselling notes and other records relating to your sessions.

Health information is sensitive information under Australian privacy law and is subject to additional privacy protections. The Privacy Act applies to private-sector health service providers, including small businesses that provide health services and hold health information.

Information relating to children and young people

Where counselling or wellbeing services are provided to a child or young person, Integrated Wellbeing may collect information about the child or young person and, where appropriate, information from a parent, guardian or other authorised person.

Privacy and confidentiality arrangements for children and young people will take into account their age, maturity, capacity and applicable legal requirements.

4. How we collect information

We may collect information:

- directly from you during an enquiry or counselling session;
- through the Integrated Wellbeing website;
- through online enquiry or contact forms;
- when you make or manage an appointment;
- through email, telephone, SMS or other communication;
- through documents or forms you provide;
- through Halaxy when you book or access counselling services;
- through Clovo when you book yoga services;
- from another health professional or service provider where you have provided appropriate consent;
- from a parent, guardian or authorised representative where appropriate; or
- where collection is authorised or required by law.

Where reasonably practicable, we will collect personal information directly from you.

Before or when we collect personal information, we will take reasonable steps to explain relevant matters including why the information is being collected, how it may be used and whether it is likely to be disclosed to other parties. This reflects the requirements of Australian Privacy Principle 5 (APP 5).

5. Why we collect information

Integrated Wellbeing collects personal information for purposes including:

- providing counselling, wellbeing and yoga services;
- understanding your circumstances and counselling needs;
- developing and reviewing your counselling goals;
- maintaining appropriate counselling and service records;
- communicating with you about appointments and services;
- responding to enquiries;
- arranging referrals where appropriate and authorised;

- communicating with other health professionals where you have provided appropriate consent;
- managing bookings, payments and accounts;
- meeting professional, ethical and legal obligations;
- managing risks to your safety or the safety of another person;
- responding to lawful requests from courts, government agencies or other authorised bodies;
- improving our services and professional practice; and
- managing the operation and administration of the business.

We will generally only collect information that is reasonably necessary for these purposes.

6. Confidentiality

Confidentiality is a fundamental part of the counselling relationship.

Integrated Wellbeing will take reasonable steps to ensure that information disclosed during counselling is treated confidentially and that client records are securely maintained.

Confidentiality applies to information provided during counselling as well as information contained in client records.

The ACA Code of Ethics and Practice requires counsellors to explain the level and limits of confidentiality and recognises that confidentiality extends to client records.

However, confidentiality is **not absolute**.

There are circumstances in which information may need to be disclosed without your consent.

7. Limits to confidentiality

Information may be disclosed without your consent where disclosure is:

- required or authorised by law;
- necessary to respond to a serious risk to your safety;
- necessary to respond to a serious risk to another person's safety;
- necessary to comply with a court order or other lawful requirement;
- necessary to meet applicable child protection or reporting obligations;
- necessary to prevent or respond to serious unlawful conduct; or
- otherwise permitted under applicable privacy legislation.

Where possible and appropriate, Integrated Wellbeing will discuss a proposed disclosure with you before making it.

Where disclosure is necessary because of a serious safety or legal concern, Integrated Wellbeing will seek to limit the disclosure to information that is reasonably necessary for the relevant purpose.

The ACA Code provides that where a client's safety is in jeopardy, confidentiality agreements that would interfere with safety may be overridden by relevant legal or ethical considerations.

8. Child protection and reporting obligations

Integrated Wellbeing takes the safety and wellbeing of children and young people seriously.

Where information is received indicating that a child may be at risk of harm, the circumstances will be considered in accordance with applicable Queensland legislation, professional ethical obligations and the circumstances of the individual case.

Queensland mandatory reporting laws apply to specified categories of professionals. Counsellors are not automatically mandatory reporters solely because they provide counselling services.

However, other legal reporting obligations may apply in particular circumstances, including obligations relating to child sexual abuse.

Accordingly, confidentiality will always be subject to applicable child protection, reporting and other legal obligations.

Where disclosure is required, Integrated Wellbeing will disclose only information reasonably necessary for the relevant legal or safety purpose where it is lawful and practicable to do so.

9. Use and disclosure of personal information

Integrated Wellbeing will generally only use or disclose your personal information:

- for the purpose for which it was collected;
- for a related purpose that you would reasonably expect;
- with your consent; or
- where otherwise permitted or required by law.

Examples of circumstances in which information may be disclosed include:

- to you;
- to a person you have authorised to receive information;
- to another health professional where you have provided appropriate consent;
- to a service or organisation involved in your care where disclosure is authorised and appropriate;
- to a professional supervisor or consultant where necessary for ethical professional practice;
- to technology and information-storage providers used to operate the practice;
- to payment and booking service providers where necessary to administer your service;

- to government agencies or law enforcement where legally required or authorised;
- to courts or tribunals where legally required; or
- where disclosure is necessary because of a serious safety or reporting obligation.

Integrated Wellbeing does not sell your personal information.

10. Professional supervision and consultation

Professional supervision is an important component of ethical counselling practice.

Relevant counselling matters may be discussed with a professional supervisor or consultant for the purpose of supporting safe, ethical and effective counselling practice.

Where client matters are discussed, Integrated Wellbeing will take reasonable steps to protect your identity and confidentiality.

Identifying information will not be disclosed unnecessarily.

The ACA Code of Ethics and Practice requires counsellors to take care to protect client identity and confidentiality when client information is discussed or used for professional purposes.

11. Counselling records

Integrated Wellbeing maintains records that are reasonably necessary for the provision of safe and appropriate counselling services and for meeting professional, legal, insurance and administrative obligations.

Records may include:

- intake and consent information;
- contact details;
- counselling notes;
- risk and safety information;
- counselling goals and progress;
- appointment information;
- relevant correspondence;
- referral information;
- information provided by other professionals with appropriate authority or consent; and
- administrative and financial information.

Halaxy is the primary electronic system used by Integrated Wellbeing for counselling bookings, client administration, invoicing and counselling records, including clinical notes.

Client records are treated as confidential and are securely maintained.

The ACA Code of Ethics and Practice require counsellors to securely maintain client records, whether records are held in hard copy or digitally.

12. Information systems used by Integrated Wellbeing

Integrated Wellbeing uses third-party technology providers to assist with the delivery and administration of its services.

Halaxy

Halaxy is used for:

- counselling bookings and appointments;
- client administration;
- intake and consent information;
- counselling records and clinical notes;
- invoicing and payment administration; and
- other information reasonably required to provide counselling services.

Halaxy's own privacy and security arrangements apply to its handling of information within its platform.

Google Workspace

Google Workspace is used for business email and may also be used for business administration, including Google Drive and Google Calendar.

Personal information may therefore be contained in emails, attachments, calendar entries and other business documents.

Google states that Google Workspace customer data is protected through security and privacy controls and that Google Workspace provides a Cloud Data Processing Addendum addressing data-processing obligations.

Google operates infrastructure globally and states that information may be processed on servers outside the country in which a person lives.

Integrated Wellbeing therefore does not represent that information held within Google Workspace will remain exclusively in Australia.

Google Meet

Google Meet is used for online counselling sessions.

Integrated Wellbeing does not routinely record counselling sessions.

Counselling sessions will not be recorded unless recording has been specifically discussed and appropriate consent has been obtained.

Clients are encouraged to participate from a private location and to take reasonable steps to prevent other people from overhearing the session.

Clovo

Clovo is used for yoga class bookings and related administration.

Information collected through Clovo may include:

- name;
- email address;
- telephone number;
- booking information; and
- information entered into the yoga booking form.

Clovo is an Australian group fitness booking and payment platform, it hosts all of its data storage infrastructure in AWS Sydney.

Accordingly, information provided when booking yoga through Clovo will be processed and stored inside Australia.

Clovo information is used for yoga booking and administration and is not used as a counselling clinical record.

13. Keeping counselling and yoga information separate

Integrated Wellbeing recognises that participation in a yoga class does not create a counselling relationship.

Information collected for yoga bookings will generally be used only for purposes associated with providing and administering yoga services, unless:

- you provide consent for another use;
- the information is reasonably necessary for another related purpose; or
- disclosure or use is authorised or required by law.

Where a person accesses both counselling and yoga services, information will be handled according to the purpose for which it was collected.

Counselling records will be maintained separately from general yoga booking information wherever reasonably practicable.

Information disclosed during counselling will not be shared with yoga participants, yoga teachers, other clients or other persons merely because they attend the same yoga service.

14. Electronic communication

Integrated Wellbeing uses Google Workspace for business email.

Email, SMS and other electronic communications may be used for:

- appointment administration;

- responding to enquiries;
- providing information requested by clients;
- invoices and receipts;
- referrals and professional communication where appropriate; and
- other communication relating to the provision of services.

Electronic communication cannot be guaranteed to be completely secure.

Clients are encouraged not to send highly sensitive counselling information by ordinary email or SMS where it can reasonably be discussed during a counselling session or communicated through a more appropriate secure method.

Where a client chooses to communicate sensitive information electronically, Integrated Wellbeing will handle that information in accordance with this Privacy Policy and applicable privacy and confidentiality obligations.

15. Online counselling

Where counselling is provided online, reasonable steps will be taken to protect the privacy and confidentiality of the counselling environment.

Clients are encouraged to:

- participate from a private location;
- use a private and secure internet connection where possible;
- use headphones where appropriate;
- ensure other people cannot overhear the session;
- avoid recording sessions unless recording has been discussed and agreed in advance; and
- take reasonable steps to secure their own device.

Integrated Wellbeing does not routinely record online counselling sessions.

16. Recording, transcription and artificial intelligence

Integrated Wellbeing does not routinely record, transcribe or use artificial intelligence tools to analyse counselling sessions.

No counselling session will be recorded or transcribed without prior consideration of the privacy, confidentiality, ethical and legal implications and, where required, informed consent.

Client information will not be entered into publicly available generative artificial intelligence tools for the purpose of analysing or generating counselling records.

If Integrated Wellbeing introduces any technology involving recording, transcription, automated analysis or artificial intelligence in the future, its privacy, security, professional and ethical implications will be reviewed before it is used with client information.

17. Overseas disclosure and cloud storage

Some technology providers used by Integrated Wellbeing may store or process personal information outside Australia.

This may include information processed through Google Workspace.

Integrated Wellbeing will take reasonable steps to comply with Australian Privacy Principle 8 when personal information is disclosed to an overseas recipient. APP 8 generally requires an Australian entity to take reasonable steps to ensure that an overseas recipient does not breach the Australian Privacy Principles, subject to applicable exceptions.

Where practicable, Integrated Wellbeing will identify the countries in which relevant overseas recipients are likely to be located.

Because technology providers may change their infrastructure, subprocessors and processing locations, the locations identified in this Privacy Policy may change from time to time.

18. Website information and cookies

When you visit the Integrated Wellbeing website, limited technical information may be collected automatically.

Depending on the website and services used, this may include:

- IP address;
- browser type;
- device information;
- pages visited;
- approximate location;
- referring website; and
- information collected through cookies or similar technologies.

Cookies and analytics technologies may be used to understand how visitors use the website, improve website functionality and maintain website security.

Where third-party analytics, advertising or embedded services are used, those providers may collect information in accordance with their own privacy policies.

19. Marketing communications

Integrated Wellbeing may use your contact information to communicate with you about services, appointments and relevant practice information.

Direct marketing will be undertaken in accordance with applicable privacy and electronic marketing laws.

You may request not to receive marketing communications at any time.

Counselling information will not be used for marketing purposes in a way that compromises confidentiality or reveals that you are or have been a counselling client.

20. Access to your information

You may request access to personal information Integrated Wellbeing holds about you.

You may also request information about how your information has been used or disclosed where applicable.

Requests should be made using the contact details in this Privacy Policy.

Integrated Wellbeing will generally provide access unless an exception under applicable law applies.

There may be circumstances in which access to particular counselling information cannot be provided, or can only be provided in a modified form, where permitted or required by law.

The Australian Privacy Principles provide individuals with a right to request access to personal information held about them, subject to applicable exceptions.

21. Correcting your information

You may request that your personal information be corrected if you believe it is inaccurate, incomplete, out of date, irrelevant or misleading.

Integrated Wellbeing will take reasonable steps to correct information where appropriate.

You will not be charged for making a correction request.

22. Requesting access or correction

To request access to or correction of your information, please contact:

Heidi Richards

Integrated Wellbeing

Email: heidi@integratedwellbeingbrisbane.com.au

Phone: 0405 772 840

Please provide sufficient information to enable us to identify you and locate the relevant information.

We may need to verify your identity before providing access to personal information.

23. Privacy complaints

If you believe Integrated Wellbeing has not handled your personal information appropriately, you are encouraged to raise the matter directly with us in the first instance.

Privacy complaints can be made to:

Heidi Richards

Integrated Wellbeing

Email: heidi@integratedwellbeingbrisbane.com.au

Phone: 0405 772 840

Your complaint will be treated seriously and handled confidentially where possible.

Integrated Wellbeing will investigate the complaint and provide a response within a reasonable period.

If you are not satisfied with the response, or if you prefer to make an external complaint, you may contact the **Office of the Australian Information Commissioner (OAIC)**.

The OAIC provides information about privacy complaints and the Australian Privacy Principles.

24. Data breaches

Integrated Wellbeing takes reasonable steps to prevent unauthorised access to, loss of or disclosure of personal information.

If a suspected or actual data breach occurs, Integrated Wellbeing will take reasonable steps to:

1. contain the breach;
2. assess the nature and extent of the breach;
3. determine whether personal information has been affected;
4. assess whether the breach is likely to result in serious harm;
5. take steps to reduce or prevent harm;
6. notify affected individuals where required; and
7. notify the Office of the Australian Information Commissioner where required.

Where the Notifiable Data Breaches scheme applies and a breach is likely to result in serious harm, Integrated Wellbeing will comply with applicable notification requirements.

Private-sector health service providers are covered by the Notifiable Data Breaches scheme regardless of their annual turnover.

25. Retention and destruction of information

Integrated Wellbeing will retain personal and counselling information for as long as reasonably necessary to provide services and meet applicable legal, professional, insurance, taxation and record-keeping obligations.

Information will be securely destroyed or de-identified when it is no longer required, unless there is a legal, professional or other legitimate reason to retain it.

The ACA Code of Ethics and Practice requires counsellors to have arrangements for the secure disposal of client records.

Integrated Wellbeing will also maintain appropriate arrangements for the protection and management of records in circumstances where the practice is no longer operating or the counsellor is unable to continue providing services.

26. Confidentiality after counselling ends

The obligation to maintain client confidentiality does not automatically end when counselling ends.

Information will continue to be handled confidentially after the counselling relationship has ended, subject to applicable legal and ethical obligations.

The ACA Code of Ethics and Practice recognises that confidentiality agreements continue after a client's death, unless overriding legal or ethical considerations apply.

27. Research, teaching and publication

Integrated Wellbeing may engage in professional education, research, professional reflection or publication.

Client information will not be used in a way that identifies a client without appropriate consent, unless otherwise permitted or required by law.

Where client experiences or case material are used for professional purposes, reasonable steps will be taken to remove identifying information.

Where required, specific consent will be obtained before identifiable client information is used for research, teaching, publication or other purposes outside the provision of counselling services.

28. Your choices

Where lawful and reasonably practicable, you may choose not to provide particular personal information.

However, some information may be necessary for Integrated Wellbeing to provide counselling safely and appropriately.

If you choose not to provide information that is reasonably necessary for the provision of counselling, this may affect our ability to provide the service.

29. Changes to this Privacy Policy

Integrated Wellbeing may update this Privacy Policy from time to time to reflect changes in legislation, professional standards, technology, services or business practices.

The most recent version will be published on the Integrated Wellbeing website.

30. Contact

If you have questions about this Privacy Policy or how your personal information is handled, please contact:

Heidi Richards

Integrated Wellbeing

Email: heidi@integratedwellbeingbrisbane.com.au

Phone: 0405 772 840

Website: integratedwellbeingbrisbane.com.au

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