

**MY MIRROR
STANDARD OPERATIONAL
POLICY AND PROCEDURES**

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| TOPIC | Psychologists Temporarily Operating Overseas Policy |
| RESPONSIBILITY | Clinical Team |
| AUTHORISATION | Rachel Tomlinson |
| DATE | 3/9/25 |
| VERSION | 1 |

PURPOSE

To outline the conditions and limitations under which psychologists registered with AHPRA and contracted with My Mirror may temporarily provide telehealth services while physically located outside Australia. This policy ensures compliance with legal, ethical, clinical, and insurance obligations, while prioritising client safety.

SCOPE

This policy applies to all psychologists contracted or employed by My Mirror who intend to deliver telehealth services while temporarily overseas. This policy is not intended for psychologists planning to permanently relocate. All requests must be made in advance notice and will need to be approved by the Clinical Team prior to undertaking any sessions while overseas.

DEFINITIONS

- *Temporary Overseas Practice*: Delivering telehealth services to Australian-based clients while the psychologist is physically outside Australia for a defined, short-term period.
- *Risk Presentation*: Any client presentation involving self-harm, suicidal ideation, harm to others, child protection concerns, or other safety issues.
- *New Client*: Any client who has not previously had a session with the psychologist.

POLICY STATEMENT

1. Psychologists may request to work overseas for a defined temporary period, subject to approval.

2. Psychologists must comply with AHPRA standards, APS Code of Ethics, Medicare rules, insurer obligations, and contractual obligations of external funders (e.g., WorkCover, NDIS, EAP).
3. No permanent practice relocation is permitted under this policy.

PROCEDURES

1. ADMINISTRATIVE REQUIREMENTS

- Psychologists must notify the Clinical Team/Clinical Director of intended overseas dates with a minimum 4 weeks' notice where possible and include tentative return date. If the psychologist needs to handover their client (even temporarily) they must adhere to the My Mirror Handover Policy (link below).
- Psychologists must retain access to their Australian mobile number to enable two-factor authentication for secure logins.

2. CLIENT ELIGIBILITY

- **No new clients while overseas:** Psychologists cannot see new clients while they are overseas. This is due to the absence of a pre-existing therapeutic relationship, lack of risk history, and no clear pathway to escalate emergencies back to Australian authorities.
- **Existing clients without identified risk:** May continue to be seen.
- **Existing clients with risk presentations:**
Psychologists must not continue with any client where:
 - There is a **moderate or higher level of risk** (suicidal ideation, self-harm, risk to others, child protection concerns).
 - A client presents as “low risk” but has additional complicating factors such as **history of attempts, impulsivity, volatility, or lack of reliable supports.**

3. RATIONALE – WHY AT RISK CLIENTS CANNOT BE SEEN WHILE OVERSEAS

- **Emergency Response Limitations** – If a client becomes acutely unsafe in session, the psychologist cannot call 000 or other local emergency services in the client’s country, meaning there is no reliable escalation pathway. This represents a significant clinical and ethical breach.
- **Jurisdictional Constraints** – Psychologists practising under AHPRA are regulated within Australia. Attempting to intervene and engage services in another country (e.g., by contacting police or hospitals overseas) is often impractical, delayed, or legally restricted.
- **Duty of Care and Clinical Safety** – AHPRA’s standards require psychologists to provide services only where safe and clinically appropriate. Attempting to manage moderate/high risk while outside the country compromises client safety, increases liability, and may constitute a breach of professional standards.
- **Insurance and Liability** – Insurers may not cover claims arising from unmanaged risk scenarios overseas, exposing both the practitioner and the organisation.

- **Exception**
Only existing clients deemed *low risk* may be seen, and only if:
- The psychologist has negotiated a **clear written risk plan** with the client (next of kin, support network) and has notified and received approval to continue working with this client from the Clinical team
- The client's supports have confirmed their availability.
- The psychologist documents the rationale and safeguards in the client's record.

4. SERVICE TYPE EXCLUSIONS

- **Medicare:** No sessions can be billed to Medicare while the psychologist or client is overseas. Psychologists must:
 - Inform Medicare clients of their temporary leave.
 - Offer handover to another psychologist.
- **Private Health Insurance Sessions:** Psychologists may see clients while overseas **only if** the client understands that private health insurance rebates are unlikely to apply. Each insurer sets its own rules, and most require services to be provided from within Australia. Psychologists must:
 - Inform clients upfront that they should check directly with their fund before proceeding.
 - Offer to handover to another psychologist.
- **EAP:** Sessions may not be delivered while the psychologist is overseas. Psychologists must:
 - Inform clients of the period of absence
 - Offer to handover to another psychologist.
- **WorkCover/NDIS:** May proceed only with case manager and client consent, recorded in client notes.

5. INSURANCE

Psychologists must confirm with their professional indemnity insurer that cover extends to temporary overseas practice.

6. RESPONSIBILITIES

- **Psychologist:** Compliance with all requirements, accurate communication with clients, and appropriate risk management. Compliance with My Mirror Handover Policy for those clients who need to transition to a new clinician.
- **Clinical Team/Admin:** Oversight of approvals, client support, and ensuring compliance with Medicare/EAP/insurer rules.

7. COMPLIANCE

Failure to comply with this policy may result in withdrawal of approval to practise while overseas, contractual review, or escalation to AHPRA if standards are breached.

8. RELATED DOCUMENTS

[Credentialing Policy V1.0.pdf](#)

[Client Handover Process V1.0.pdf](#)

[Client Handover Form Template V1.0.docx](#)

[Performance Management Policy V1.1.pdf](#)

[Quality Assurance Policy V1.0.pdf](#)

[Risk Management Policy V.10.pdf](#)

9. REVIEW

10. REFERENCES

[Managing performance & warnings - Fair Work Ombudsman](#)

<https://psychology.org.au/about-us/what-we-do/ethics-and-practice-standards/aps-code-of-ethics>

[Psychology Board of Australia - Code of conduct](#)