



My Mirror

Clinical Governance Framework

For further enquiries please contact: clinical@mymirror.com.au

Document History

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Statement of Acknowledgement of Aboriginal Peoples

We respectfully acknowledge the Aboriginal peoples as traditional owners on the land on which we live and work across Australia, we acknowledge the continued cultural and spiritual connection that Aboriginal and Torres Strait Islander peoples have with country and waters. We respectfully acknowledge Aboriginal and Torres Strait Islander people as two unique and diverse peoples with their own rich and distinct cultures. We pay our respects to Elders past and present as well as emerging leaders who walk together in partnership on this journey.

We acknowledge the impact that historical policies that were harmful and have contributed to intergenerational trauma. This includes policies and practices of colonisation that have had a profound impact on Aboriginal and Torres Strait Islander people's connection to country, culture, and one another. We aim to continue to work together to promote self-determination, choice and healing while valuing Aboriginal and Torres Strait Islander people as strong, resilient people and decision makers in their own lives.

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1. Background

1.1 Introduction to My Mirror

“After I began working as a fully trained specialist in the Intensive Care Unit, I came to realise that whilst I could save the lives of many patients coming through the doors to our ICU each day, I was essentially a blunt instrument when it came to being able to effectively support the psychological distress faced by our trainees, my colleagues and the allied health people everywhere in the hospital around me. Burnout, Bullying, Harassment and Emotional distress are commonplace in our industry and in parallel to this a lot of people I encountered at work were also dealing with some form of psychological distress arising from the stress of their family and social lives as they struggled to find a healthy balance between the two. I developed the Mirror concept to provide a highly accessible digital mental health solution that would dramatically reduce stigma and provide convenient, cost-effective sessions for those in need- anywhere, anytime and for all Australians (not just those in my direct field of work).” – Dr Matthew Zoeller – Founder

My Mirror is an online stepped care psychology service to support all Australians. When you want. Where you want. At My Mirror, our mission is to maximise our social impact to reduce statistics suggesting more than half of Australians never obtain support over the life of their mental health issue.

We believe the mental health crisis is as much a systems crisis as it is a modern behavioural human problem with deep biological, psychological, social, and existential roots. We provide an evolving, purpose built, high access, end to end ‘tele-tech’ healthcare service dedicated to constant evolution and value-based care, to provide the foundation for what needs to become a paradigm shift in the prevailing modern thought on how we obtain what we need or want. We hope to address and normalise seeking psychological help by eliminating the stigma, geographical, financial, and time-related accessibility barriers that often make it difficult to seek therapy conveniently.

Our founding philosophy comes from the symbolism of the Japanese Kintsugi sound mirror where it is believed that when something has become damaged it should not simply be thrown away or disregarded. It should instead, attract our attention and be repaired with enormous care – this process symbolising a reconciliation with the flaws and accidents of time, thereby becoming stronger and more beautiful with the right treatment.

Kin = golden

Tsugi = joinery

‘To join with gold’

When we use some words in this Framework, we use them in the broad sense. For example when we refer to our “people”, we usually mean each person who is employed or engaged or contracted to provide services to, or for, or on behalf of My Mirror. Because our Framework is how we do things, every one of our people is expected to observe this Framework.

1.2 Our Vision

Be an industry leader in mental health services by focusing on outcomes for the individual and incorporating functional health digital tools and services. We will focus on providing individually meaningful health outcomes at scale.

1. To provide meaningful impact in addressing the mental health crisis in Australia, we created a high-access, tele-tech, digital clinical services business.
2. We realised that the healthcare system has an access issue and is supply limited, thus unable to provide meaningful outcomes to the individual at scale.
3. The problem with regards to meaningful outcomes for the individual includes a problem with access, centralisation, insight / awareness & health literacy.
4. It isn't enough to get people into care, the goal is to achieve meaningful resolution.
5. We also recognised that an individual's mental health is contingent on general health variables.
6. Planned for and progressed a Digital Functional Health (DFH) solution complementary to clinical services, that facilitates our goal of providing individually meaningful mental health outcomes at scale.

1.3 Our Values

- We have a **passion for providing genuine value** through high access, high-quality, holistic & functional, digital health care.
- We recognise that mental & physical health are interdependent and inseparable, our job is done when we have **delivered vibrant health to the individual** with the knowledge of how they got there.
- We combine the best of **ancestral and evidence-based healthcare** with **functional and mainstream health science**.
- We believe that **simplicity, agility, and accountability** in our planning & implementation are key to our success.
- We strive to have **engaged & aligned** people & service providers.

2. Overview

2.1 Purpose of the Clinical Governance Framework

The Clinical Governance Framework ensures that robust processes and clear organisational systems are in place to ensure the safe, effective, integrated, evidence-based, high quality and continuously improving delivery of care. Good clinical governance will provide a clear overview of how safe and high-quality care will be provided, and will ensure the following outcomes are achieved:

- **Clients and their support people** are confident that they are receiving appropriate and high-quality care, provided by competent and skilled people. They can be assured that practice occurs within an environment of continuous learning and improvement.
- **People** (including permanent, casual, contractors etc) are expected to understand and be accountable for their individual roles and responsibilities (including delivery of evidence-based

care), as well as participating actively in performance monitoring and improvement activities. People can expect to be supported to provide quality care to clients.

- **Partnering organisations** will understand their roles and responsibilities.
- **Members of governing bodies** will understand their roles and responsibilities, demonstrate effective leadership, monitor, and respond to performance and ensure risk is identified and managed.

2.2 Principles

The principles of effective Clinical Governance at My Mirror include:

- **Accountability** – for individual people and teams
- **Transparency** – including the delivery of timely and constructive feedback up and down within reporting lines and structures, as well as transparency and openness when reporting of risk, failures, errors.
- **Lack of fear** – reporting errors, failures and risk can be done so without fear or blame, but with an attitude of learning and improvement.
- **Continuous improvement** – from a risk and quality perspective, but also attitudinally in relation to professional learning and development
- **Innovation to improve services** – constant development of technology to improve quality of service delivery.

2.3 Legislation

The My Mirror Clinical Governance Framework is derived from the following standards and legislation:

- National Safety and Quality Health Service (NSQHS) Standards second edition¹
- National Safety and Quality Digital Mental Health (NSQDMH) Standards²
- The Victorian Clinical Governance Policy Framework³
- National Standards for Mental Health Services (NSMHS)⁴
- Australian Health Practitioner Regulation Agency – Psychology Board - Code of Conduct⁵

2.4 Corporate Governance

The rigours of corporate governance will equally apply to clinical governance, where the emphasis is on safety and quality of service delivery.

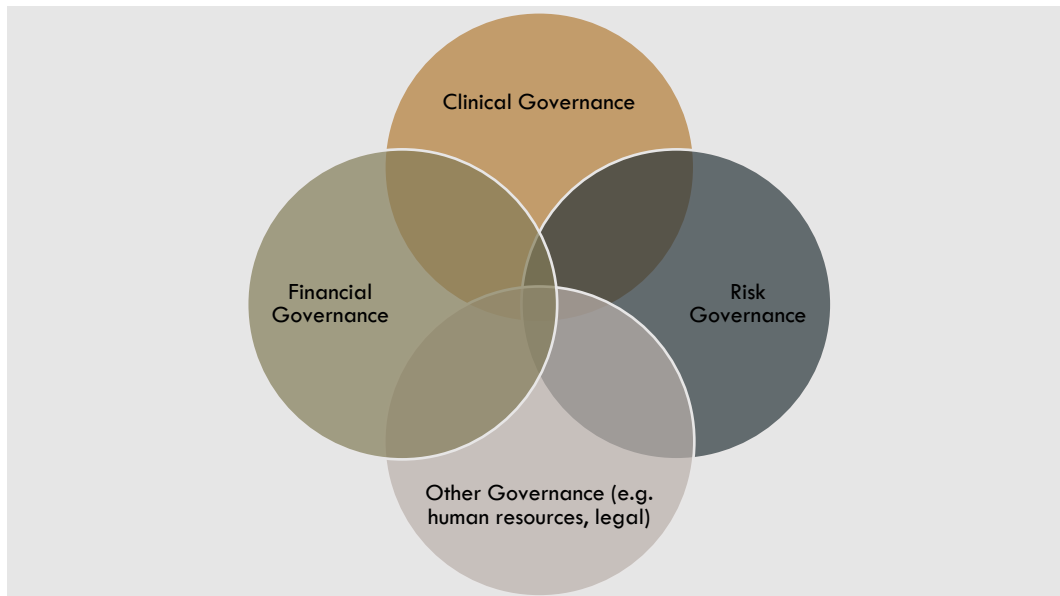


Figure 1. Clinical Governance is a component of a broader system of corporate governance and has an interrelationship to other governance systems. Adapted from the National Safety and Quality Health Service Standards¹

The Framework is a part of the overall operational framework which includes corporate governance and service-based policies and procedures. This framework details the five components of Clinical Governance at My Mirror and describes the mechanisms required for consistent and sustainable implementation.

2.5 Governance Systems

My Mirror has adopted five domains that underpin the National Model Clinical Governance Framework, published by the Australian Commission on Safety and Quality in Health Care (ACSQHC) in 2017, as the foundation of our Clinical Governance Framework⁶. The National Model Clinical Governance Framework is based on the National Safety and Quality Health Service (NSQHS) Standards (second edition), particularly the Clinical Governance Standard (Standard 1) and the Partnering with Consumers Standard (Standard 2)¹.

As part of the complete set of NSQHS Standards, these two standards constitute a complete and robust Clinical Governance Framework. Standard 1 describes the safety and quality systems that are required to improve outcomes for clients and their support people, as appropriate. Standard 2 describes the systems and strategies to create person-centred health care including involving the people we work alongside in shared decision making, to enable clients to be partners in their care. My Mirror has also adopted relevant components of the National Safety and Quality Digital Mental Health Standards (NSQDMH) developed by ACSQHC in 2020².

The five domains of Clinical Governance at My Mirror that have been adapted to reflect our context are:

- 1) Leadership and culture
- 2) Client safety and quality improvement systems
- 3) Clinical performance and effectiveness
- 4) Safe environment for the delivery of care
- 5) Partnering with clients and their support people

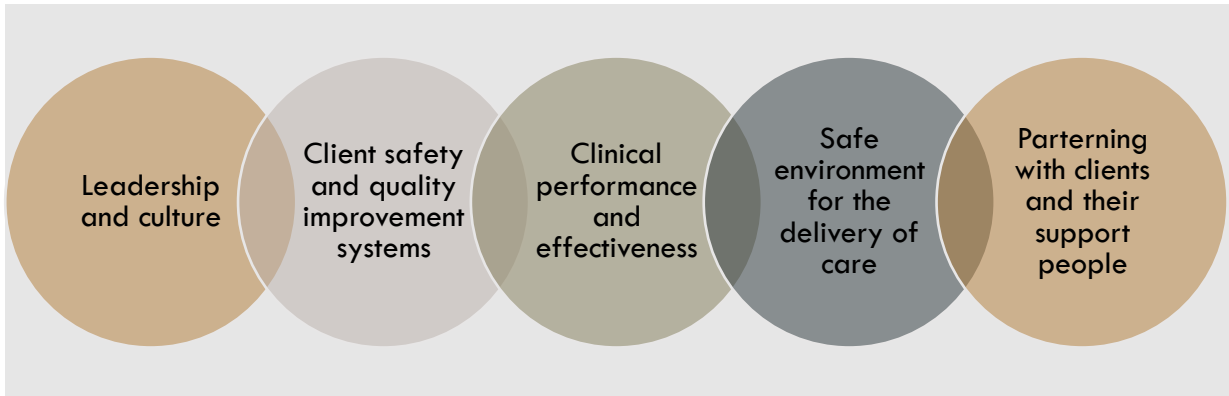


Figure 2. Domains of Clinical Governance at My Mirror.

2.6 Expected Outcomes

Organisational adoption of the framework should support a range of positive outcomes including but not limited to:

- The Framework is supported by the Board and supports the integration of corporate and Clinical Governance systems at all levels.
- The My Mirror workforce understand their roles and responsibilities for the delivery of safe and quality care to clients in accordance with Clinical Governance Framework.
- Client feedback is used for the continuous improvement of My Mirror’s services.
- Workforce onboarding and training including clear expectations and responsibilities for the delivery of safe, high-quality care.
- Clinical safety and quality performance data informs the My Mirror strategic direction including the promotion of quality improvement.
- Effective quality improvement, risk, incident, feedback, and complaint systems are robust and are actively monitored to drive the continuous improvement of the services provided by My Mirror.
- The workforce feels supported to achieve their potential and reports high job satisfaction.

3. Roles and Responsibilities

3.1 Key Clinical Governance Responsibilities

3.1.1 Clients and their Support People

- Actively participate and collaborate in their care, to the extent that they choose.
- Provide feedback on the care provided and, where possible, suggest improvements.
- Consider sharing experiences through avenues such as client testimonials, surveys, and further feedback channels.
- Provide informed consent for interventions after understanding the risks, benefits, and any alternatives.

3.1.2 All My Mirror People

- Actively take part in the development of a culture that enables, and gives priority to, client safety and quality.
- Maintain awareness for opportunities to improve systems at My Mirror and ensure that these are reported through relevant feedback channels.
- Take part in the ongoing improvement and design of My Mirror services.
- Be committed to lifelong learning and regularly update skills and knowledge.
- Contribute to the development and sustainability of safe, transparent, collaborative, and accountable culture by speaking up and raising concerns regarding issues and risks at My Mirror.
- Adhere to all My Mirror policies and procedures.
- Contribute to relevant organisational policies and procedures when opportunities exist

3.1.3 All Clinicians

- Maintain awareness for opportunities and take part in the ongoing improvement and design of My Mirror services.
- Maintain all personal professional skills, competence, and performance.
- Comply with all professional regulatory requirements.
- Understand the importance of client engagement, and its contribution to the safety and quality of health care.
- Understand how health literacy might affect the way a client gains access to, understands and uses health information.
- Support clients to have access to, and use, high-quality, easy-to-understand information about their care.
- Support clients to share decision-making about their own care, to the extent that they choose.
- Assist clients in how they can access their own health information, making complaints and/or being involved in feedback processes.
- Maintain accurate and comprehensive clinical documentation, including but not limited to thorough notetaking and records of all communication with clients and relevant stakeholders.
- Ensure that clinical notes adhere to legal and ethical standards, including client confidentiality and data protection.

3.1.4 Clinical Management/Leadership Team

- Create opportunities for all people, contractors, or partnering organisations to receive education in safety and quality care.
- Model the safety and quality values of My Mirror in all aspects of leadership and management.
- Lead, coordinate and oversee the development of organisational policies and procedures relevant to safety and quality that reinforce compliance with required legislation, best practice, and safe clinical service delivery.
- Set up effective relationships with relevant health care services and further stakeholders to support good clinical outcomes for clients.
- Encourage, mentor and guide clinicians in the delivery of safe, high-quality care to clients.
- Engage with clinicians on system design issues.

- Implement and resource effective systems for management of – quality improvement and measurement – risk management – incident management – open disclosure – feedback and complaints.
- Ensure that the following safety and quality systems are in place, involve all clinical people and are subject to periodic review of performance – quality improvement and measurement – risk management – incident management – open disclosure – feedback and complaints management.
- Implement and resource effective systems for management of – credentialing and defining scope of clinical practice – clinical education and training – performance monitoring and management – clinical, and safety and quality education and training.
- Ensure that clinicians meet the minimum credentialing requirements for their roles, have appropriate supervision in place and receive comprehensive orientation, feedback, training, and development.
- Ensure that there are effective processes to address indications of clinical underperformance.
- Provide assurance to the Board and Senior Leadership Team that clinicians are supported to actively deliver high quality care to clients and their support people.
- Ensure that there are robust and transparent reporting, analysis, and discussion of the safety and quality of care and is informed by any data that is captured.
- Evaluate clinical governance systems periodically to ensure ongoing effectiveness.
- Understand the barriers for clients to understand and use My Mirror services and develop strategies to improve the health literacy environment of My Mirror.
- Collect and review client experience information as part of quality improvement processes.
- Ensure that all clinical services are guided by current best practice (evidence-based practice) in accordance with relevant legislation (federal, state/territory), mental health acts and relevant legislation, including the National Mental Health Statement of Rights and Responsibilities.

3.1.5 The Board and Senior Leadership Team (CEO, Operations, Founders)

- Be satisfied that an effective culture of safety and quality exists at My Mirror.
- Lead My Mirror towards achieving a ‘blame-free’ culture including reporting errors, failures and risks being reported without fear or blame, but with an attitude of learning and improvement.
- Are aware of how My Mirror sits within a network of other health services and providers across Australia.
- Ensure that there are effective relationships between people, founded on a mutual commitment to safety and quality of care.
- Ensure that organisational resources are allocated to support safety and quality of care.
- Ensure that there is adequate and relevant education, resources, and training opportunities for all people.
- Monitor organisational culture and identify and capture improvement opportunities and ensure that they are acted on in a timely fashion.
- Ensure that all systems for the delivery of care are regularly reviewed for their ability to support safe, high-quality care.
- Ensure availability of data and information to support quality assurance and review across My Mirror.
- Monitor system performance and consider implications for system design and opportunities for improvement.
- Positions, roles, duties, and any relevant Key Performance Indicators (KPIs) are clearly articulated.
- There are clear delegations within My Mirror relating to reporting lines and key responsibilities.

-
- High quality care is supported by training, professional development and performance reviews that are aligned with role expectations.
-
- Auditing and review of key expectations within roles is conducted and relevant feedback or performance discussions are provided in a timely manner.
-
- Show leadership and commitment to partnerships with clients and their support people.
-
- Ensures that My Mirror’s safety and quality priorities address the specific health needs of Aboriginal and Torres Strait Islander people.

3.1.6 Referral, Service Delivery Partners and Subcontractors

- All potential partners or subcontractors who will be responsible for delivering services to My Mirror clients have been screened and due diligence undertaken to ensure alignment with core clinical governance principles (relating to service delivery, quality and safety).
-
- That any referral options endorsed formally by My Mirror have been screened and due diligence undertaken to ensure alignment with appropriate service or industry minimum standards relating to quality and safety).
-
- Any and all services, organisations or individuals delivering services on behalf of, or in conjunction with My Mirror commit to adhering to standards that are appropriate to the service type and funding stream (and subsequent reporting, quality, safety or other service standards)
-
- Any and all services, organisations or individuals delivering services on behalf of, or in conjunction with My Mirror commit to mutually agreed upon service level agreements
-
- Agree to be credentialled and follow the My Mirror credentialling policy as appropriate based on the role, service type, client type and qualifications of the person delivering the services
-
- Engage in collaboration, provide feedback and data to My Mirror as appropriate, contractually or mutually agreed upon, and in a timely manner or in agreement with service level agreements
-
- Are aware of how My Mirror sits within a network of other health services and providers across Australia.

4. Clinical Governance Domains

4.1 Leadership and culture

My Mirror is committed to establishing an effective culture of accountability, transparency, lack of fear, continuous improvement, and innovation through collective leadership to ensure clients receive high quality and safe care.

4.2 Client safety and quality improvement systems

My Mirror is focused on ensuring they deliver a high quality, safe service for all clients and accountability for safety and quality will sit at all levels of the organisation.

All My Mirror people are required to understand and enact their role safely and be supported by relevant policies and procedures.

4.2.1 The Australian Charter of Healthcare Rights⁵

In 2008, Australian Health Ministers endorsed the Australian Charter of Healthcare Rights which states that “everyone who is seeking or receiving care in the Australian Health System has certain rights regarding the nature of that care”. There are seven key components in the Charter which underpin service delivery at My Mirror:

- Access – A right to health care
- Safety – A right to safe and high-quality care
- Respect – A right to be shown respect, dignity and consideration
- Communication – A right to be informed about services, treatment, options and costs in a clear and open way
- Participation – A right to be included in decisions and choices about care
- Privacy – A right to privacy and confidentiality of provided information
- Comment – A right to comment on care and having concerns addressed

My Mirror services are also delivered in accordance with appropriate Federal, State/Territory mental health legislation and relevant acts, Registration body requirements, the National Mental health Statement of Rights and responsibilities and all are enacted under the premise of informed consent.

Every client (or responsible party, including legal guardian, carer etc) is made aware of their rights, what they can expect from the service (including from contracts or other people at My Mirror) and understand the expectations on them (as clients and consumers of the service).

Continuous and quality improvement activities are essential to ensuring that service delivery is appropriate and meets the needs of clients engaged with My Mirror.

4.2.2 Commonwealth Child Safe Framework 7

In August 2017 the Australian Government committed to the development and implementation of a new Commonwealth-wide framework to protect children and young people who may have contact with Commonwealth entities: the Commonwealth Child Safe Framework (the Framework). The Framework sets minimum standards for Commonwealth entities to create and maintain behaviours and practices that are safe for children. The four principles which underpin My Mirrors service delivery for children and their families are:

- Risk assessment and mitigation
- Training and compliance
- National Principles for Child Safe organisations
- Annual Child Safety Statement

By following these principles My Mirror works to ensure the safety, wellbeing, and human rights of children and young people accessing our psychological services. My Mirror has a [Child Safety policy](#) which outlines our commitment to safeguarding children under 18 and ensuring that services provided are safe, secure, and compliant with Australian laws.

4.2.3 Australian Health Practitioner Regulation Agency Psychology Board – Code of Conduct 5

In December 2025, the Psychology Board of Australia Code of Conduct was released. It sets out the **minimum standards of professional behaviour** expected of psychologists to protect the public and uphold safe, ethical, and effective practice. Within a clinical governance framework, the Code operates as a **foundational risk, quality, and accountability standard** that informs all clinical, supervisory, operational, and organisational decisions. Particularly across these key areas:

- **Public Safety and Quality of Care** - Psychologists are required to practise in a way that prioritises client safety, delivers competent care, and minimises risk of harm. This includes working within scope of practice, maintaining professional competence, recognising limits, and responding appropriately to risk, vulnerability, or deterioration in client wellbeing.
- **Ethical Practice and Professional Integrity** - The Code reinforces honesty, transparency, and integrity in all professional conduct. Psychologists must avoid misleading behaviour, conflicts of interest, and inappropriate influence, including in communication, advertising, and business practices.
- **Informed Consent and Client Autonomy** - Psychologists must obtain and document informed consent for assessment, treatment, information sharing, and any secondary use of client information. Clients have the right to understand, choose, pause, or discontinue care.
- **Privacy, Confidentiality, and Information Handling** - The Code strengthens expectations around the protection of personal information, including clinical information and images. Disclosure, sharing, or access to client information must be limited, justified, and consented, except where legally required or necessary to prevent serious harm.
- **Professional Boundaries and Relationships** - Psychologists must maintain appropriate therapeutic boundaries and manage dual relationships, power imbalances, and dependency risks. Decisions must always prioritise client welfare over organisational, financial, or personal interests.
- **Supervision, Consultation, and Support** - Psychologists are expected to seek supervision, consultation, and peer support when clinically indicated, particularly when managing complexity, ethical uncertainty, or risk — while maintaining confidentiality and using only the minimum necessary information.
- **Cultural Safety and Respect** - The Code requires culturally safe, respectful, and inclusive practice, recognising the impact of power, systems, and individual differences on care quality and outcomes.
- **Practitioner Wellbeing and Sustainability** - The Code acknowledges that practitioner impairment, burnout, or distress can compromise client safety. Psychologists have a responsibility to monitor their wellbeing and seek support when needed.

4.2.4 Legislation, regulations, policies, and procedures

- Policies and procedures relating to service quality are fit for purpose. There is a central database of quality related policies and procedures. Policies and procedures are reviewed periodically to ensure currency, effectiveness, and adherence.

4.2.5 Measurement and quality improvement

- Quality is measured systematically with a focus on assessing performance, identifying risks, and continuously improving services.

4.2.6 Risk Management

- Risk assessment and management systems support people to monitor, assess, report on, and improve service delivery, including minimising risk to clients engaged with My Mirror, as well as people employed by My Mirror (including contract people and allied organisations).
- My Mirror support and encourages all people to report risks, incidents and near misses.
- All people (including contractors) are responsible for the creation of safe environments for people and clients and do this in a proactive way.
- There will be no judgement, or reprisals for the reporting of such risks, incidents or near misses.
- A risk register has been developed and will be maintained as a way of identifying, monitoring, controlling, and responding to risks.
- It is understood that clinical practice carries an inherent level of risk, including potential for adverse outcomes from both a client and practitioner perspective. This could include incorrect treatment, maleficence or duty of care concerns relating to treatment, aggression/violence, self-harm, harm to others (including homicide, criminal activity, child protection or domestic violence issues) or suicide.
- My Mirror people at all levels acknowledge the state/territory/federal laws relating to the mandatory reporting of severe abuse, neglect, risk of harm or actual harm as well as the ethical requirements to report these issues, even when not legally mandated to do so.
- My Mirror as a national company delivering interstate services understands that each state/territory has minimum duty of care requirements relating to risk (as outlined above) but expectations are that people use ethical considerations, as well as seeking support or guidance from the My Mirror Clinical Team in accordance with duty of care/mandated reporting to ensure adherence with each state/territory requirements.
- My Mirror and all people understand the need to also report (as above) impaired practice, including instances of drug and alcohol abuse, sexual misconduct, or maleficence/harm/potential for harm associated with suboptimal practice. At all times, the safety of the client must be at the forefront of reporting.
- All practice must adhere to the Australian Health Practitioner Regulation and Medicare guidelines.
- The National Act (section 140) requires that an individual registered with AHPRA must notify the Board if they suspect, or form a reasonable belief (in the course of undertaking their practice) that another practitioner has engaged in behaviour which may constitute “notifiable conduct”, including; practicing whilst under the influence of alcohol or other drugs, participating in sexual misconduct either in direct line with professional duties, they have placed any member of the public at risk of substantial harm because they have an impairment, they have placed any member of the public at risk of substantial harm because their practice has departed from minimum professional expectations. Reporting of notifiable acts also includes students and interns. Exemptions exist in relation to mandatory notification obligations, and as such each practitioner should be aware of their Board specific exemptions should they exist.
- A record of notifiable events/incidents will be recorded on the My Mirror risk register, including monitoring, investigation and reporting of outcomes. This will inform service delivery and quality improvement activities to mitigate future risk.

4.2.7 Quality improvement

- A quality improvement register is maintained to capture and monitor quality improvement activities and initiatives through performance monitoring or from other sources, e.g., clinical audits, feedback, complaints.

- Quality improvement activities focus on enhancing the effectiveness, efficiency, safety, and patient-centredness of delivery service at My Mirror to ensure the best possible outcomes for clients.

4.2.8 Incident, feedback, and complaint management

- All feedback provided to My Mirror is managed within the parameters of My Mirror's Complaint's Policy and associated procedures. The management of open disclosures is consistent with the Australian Open Disclosures Framework⁸
- All incidents are recorded in the relevant register.
- Incident, feedback, and complaints are regularly reviewed and monitored at My Mirror to drive quality improvement activities.
- My Mirror's website provides guidance on how to provide feedback that is easily locatable.

4.3 Clinical performance and effectiveness

- Our People have the right qualifications, skills, and supervision to provide safe, high-quality, and evidence-based care to clients.
- Research and evidence should form the basis of service provision, coupled with people who are competent and appropriately credentialed.
- My Mirror has both quality assurance and quality control activities as per the [Quality Assurance Policy](#) that contribute to their overall performance management strategy and [Performance Management Policy](#).

4.3.1 Consumer experience, service outcomes and effectiveness

- My Mirror services are regularly evaluated for quality using both qualitative and quantitative research methods e.g., client feedback and surveys and clinical audits.
- My Mirror has a [Performance Management Policy](#) to support performance and encourage excellence whilst monitoring, evaluating, and delivering intervention processes to support achievement of expected standards of service delivery, including managing underperformance and misconduct.

4.3.2 Safety and quality training

- Induction and onboarding training includes an orientation to people joining the organisation that describes the Clinical Governance Framework and the roles and responsibilities of people at all levels of the organisation.
- Clinical governance responsibilities relevant to each role are documented in the job description.
- My Mirror provides training and support to enable people to fulfill their clinical governance roles and responsibilities.
- People participation in training are monitored to ensure compliance.
- Quality assurance measures are in place to ensure that people are well-trained, competent, and capable of providing safe and effective care.

4.3.3 Skilled and qualified people

- The job descriptions for My Mirror people clearly articulate the skills and qualifications required for the role

- Clinicians comply with their registration board requirements, professional association(s) and adhere to the My Mirror Credentialing Policy

4.4 Safe environment for the delivery of care

My Mirror promotes an environment of safe and high-quality care for clients and their support people through the design of its service.

4.4.1 Safe environment

- My Mirror ensures that their terms and conditions for use of service are fair and transparent and in no way mislead clients and where relevant, their support people
- Processes are in place to ensure the prompt implementation of relevant legislative and regulatory changes

4.4.2 Secure and reliable technology that is fit for purpose

- My Mirror's platform delivers telehealth services that are fit for purpose
- All My Mirror data is managed within Australian borders
- Rigorous specification, testing and quality assurance processes are in place
- All services are monitored 24 hours and any outages are rectified within 2 – 8 hours.
- Cyber security is monitored 24 hours a day. Incident reporting policies and procedures are in place and any incidents are reported and investigated

4.4.3 Privacy and data security

- My Mirror has a privacy policy that is easily accessible, easy to understand, compliant with privacy laws, principles and best practice and transparent for clients and their support people
- Any changes to privacy policies are communicated to clients and their support people in a timely and comprehensible way
- Client's personal, sensitive and health data is appropriately protected aligned with Australian law, legislation, and registration body requirements, including the Psychology Board Code of Conduct.

4.4.5 Transparency

- My Mirror has systems for the collection, use, disclosure, storage, transmission, retention, and destruction of data and provide information to clients and their support people, where relevant, on the types of data collected and how the information is used.

4.4.6 Costs

- My Mirror provides clear and transparent information on the costs associated with the services provided

4.4.7 Continuity and updates

- My Mirror effectively manages any platform updates including the continuity of services and effectively communicates any major changes or interruptions to clients and where relevant, their support people

4.5 Partnering with clients and their support people

Client-engaged care forms the foundation of effective and efficient service delivery and is a key contributor in My Mirror achieving its strategic goals.

My Mirror believes that client participation is essential to the delivery of safe and quality care and seeks to provide opportunities for clients and their support people to directly participate in their care through treatment planning, decision making, and providing feedback.

This requires the active pursuit of respectful partnerships with clients, their support people, partnering organisations and the broader community.

Partnering with clients and their support people, where relevant, should be promoted across My Mirror in planning, policy development, quality improvement, guidelines, training, and service delivery.

5. Implementation

Collaboration and commitment by the all people at My Mirror are required to implement the Clinical Governance Framework's five domains.

All people should demonstrate an understanding, implement the relevant clinical governance elements, and are expected to:

- Understand the key components of the framework
- Understand individual responsibilities and align behaviours in accordance with legislative, regulatory and policy requirements, and
- Demonstrate personal accountability and a commitment to the delivery of safe, high-quality care to clients.

6. Related Documents

- [Performance Management Policy](#)
- [Quality Assurance Policy](#)
- [Child Safety](#) Policy

7. Review

This policy is a living document that will be continually reviewed and updated to remain relevant and adapt to changing circumstances. At a maximum, it will be reviewed every two years.

8. References

1. Australian Commission on Safety and Quality in Health Care. (2017). *National safety and quality health service standards* (2nd ed.).
<https://www.safetyandquality.gov.au/sites/default/files/migrated/National-Safety-and-Quality-Health-Service-Standards-second-edition.pdf>
2. Australian Commission on Safety and Quality in Health Care. (2022). *National Safety and Quality Digital Mental Health Standards – Guide for service providers*.
<https://www.safetyandquality.gov.au/sites/default/files/2020-11/National%20Safety%20and%20Quality%20Digital%20Mental%20Health%20Standards%20%282%29.pdf>
3. Victorian Government Department of Human Services. (2017). *Victorian Clinical Governance Policy Framework*.
<https://www.safercare.vic.gov.au/sites/default/files/201803/SCV%20Clinical%20Governance%20Framework.pdf>
4. Commonwealth Australia. (2010). National Standards for Mental Health Services.
<https://www.health.gov.au/sites/default/files/documents/2021/04/national-standards-for-mental-health-services-2010-and-implementation-guidelines-national-standards-for-mental-health-services-2010.pdf>
5. Australian Health Practitioner Regulation Agency Board of Psychology (2025). *Code of Conduct. Psychology-Board---Code-of-conduct-for-psychologists---Advance-copy (1).PDF*
6. Australian Commission on Safety and Quality in Health Care. (2020). *The Australian Charter of Healthcare Rights*.
<https://www.safetyandquality.gov.au/publications-and-resources/resource-library/australian-charter-healthcare-rights-second-edition-a4-accessible>
7. Australian Government. National Office for Child Safety (2019). *Commonwealth Child Safe Framework*.
[Commonwealth Child Safe Framework policy document | National Office for Child Safety](https://www.nocs.gov.au/child-safe-framework)
8. Australian Commission on Safety and Quality in Health Care (2013). *Australian Open Disclosure Framework*.
<https://www.safetyandquality.gov.au/sites/default/files/migrated/Australian-Open-Disclosure-Framework-Feb-2014.pdf>