



# Artificial Intelligence Usage Policy

**Watkins Therapy Group | UrSpace EAP**

**Effective from:** 1 May 2026

**Review date:** 1 January 2027

## 1. Purpose

Watkins Therapy Group, including any brands within, recognises that artificial intelligence, or AI, is becoming part of everyday business, healthcare, communication and administration.

We believe AI can be a helpful tool when used carefully, ethically and transparently. We also believe that counselling, therapeutic support, and workplace wellbeing services must remain human, confidential, clinically appropriate and grounded in professional judgement.

This policy explains how we may use AI, how we protect client information, and what clients, organisations and referral partners can expect from us.

## 2. Our position on AI

AI may assist our team with some administrative, educational, communication and business tasks. It does not replace counsellors, therapists, clinical judgement, supervision, ethical decision-making or human connection.

At Watkins Therapy Group and UrSpace EAP:

- AI is used as a support tool only.
- AI does not make clinical decisions.
- AI does not diagnose clients.
- AI does not determine treatment plans.
- AI does not replace professional supervision, case review or risk assessment.
- AI does not replace the therapeutic relationship between client and counsellor.

Any AI-assisted work that relates to client care, written communication, reporting or public information must be reviewed by an appropriate human team member before it is used or shared.

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### 3. How we may use AI

We may use AI tools to assist with:

- Drafting general educational content, such as blogs, handouts, newsletters, workplace wellbeing resources and social media captions.
- Improving readability, structure, grammar or formatting of documents.
- Creating general workplace wellbeing resources for employers and teams.
- Developing internal policies, templates, training resources and administrative documents.
- Supporting research into general wellbeing, counselling, workplace mental health and EAP-related topics.
- Creating de-identified examples, scenarios or resources for training and education.
- Assisting with business planning, service improvement and communication.
- Supporting clinical administration, including AI-assisted note-taking, transcription or scribing tools where clinically appropriate and consent requirements are met.

Some therapists may choose to use AI scribe or clinical note-taking tools, such as Heidi Health, NovoNote or other similar platforms. These examples are not an exhaustive list and may change over time as technology, privacy requirements and professional guidance continue to develop.

Therapists are responsible for making their own professional decision about whether to use an AI scribe or similar tool. This decision may depend on their role, clinical needs, registration requirements, professional obligations, client consent, privacy considerations and the suitability of the tool for their way of working.

Where AI is used to assist with public or client-facing material, clinical administration or documentation, our team remains responsible for checking the accuracy, tone, appropriateness and professional suitability of that material.

### 4. How we will not use AI

We will not knowingly use AI to:

- Replace a counsellor or therapist.
  - Provide counselling or therapy without human involvement.
  - Make clinical decisions about a client.
  - Diagnose a mental health condition.
  - Assess risk without human clinical judgement.
  - Make decisions about whether a client should receive support.
  - Share identifiable client information with public or unsecured AI tools.
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- Create, edit or submit clinical notes without appropriate human review.
- Record or transcribe counselling sessions using AI without prior informed consent.
- Generate EAP reports that identify individual employees.
- Impersonate a therapist, client, employer or third party.
- Make automated decisions that significantly affect a client without human oversight.

## 5. Client confidentiality and privacy

Confidentiality is central to our work.

We treat client information as private and sensitive. This includes names, contact details, appointment history, personal circumstances, clinical information, workplace information and anything shared during counselling or EAP support.

We do not enter identifiable client information into public or unsecured AI tools.

Where AI is used for administrative, educational or drafting purposes, we aim to use de-identified, general or fictionalised information wherever possible. This means removing details that could reasonably identify a client, employee, organisation or third party.

We manage personal information in line with our privacy obligations, professional ethical responsibilities and internal confidentiality standards.

## 6. Use of AI in counselling sessions

Counselling sessions are provided by qualified human counsellors.

AI is not used as a substitute for the counselling relationship. Your counsellor is responsible for their own clinical judgement, therapeutic approach, notes, referrals, safety planning and professional decision-making.

Some therapists may choose to use AI-assisted transcription, note-taking or scribing tools to support clinical administration. This may include tools such as Heidi Health, NovoNote or similar platforms.

The use of AI-assisted transcription, note-taking, scribing or recording within a counselling session will only occur with clear prior notice and your informed consent. You can decline this without it affecting your access to support.

Session attendance does not automatically mean you consent to AI recording, AI transcription, AI scribing or AI note-taking.

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## 7. Use of AI for clinical notes, letters and reports

Clinical notes, letters and reports must remain accurate, professional and appropriate.

AI may assist with structure, formatting, transcription, note-taking or general drafting in some circumstances, but any document relating to a client must be reviewed, checked and approved by an appropriate human team member before it is finalised.

This may include:

- GP letters
- NDIS-related letters or reports
- workplace support letters
- EAP communication
- general client resources
- internal clinical templates
- clinical notes and summaries

We remain responsible for the final content of any document we create or provide.

## 8. EAP reporting and workplace confidentiality

UrSpace EAP provides organisations with de-identified and aggregated reporting only.

AI may assist with formatting, structuring or summarising general EAP trends, but it must not be used to identify individual employees or disclose personal counselling information to an employer.

Employers do not receive:

- individual counselling notes
- details of what an employee discussed
- names of employees who attended counselling
- personal mental health information
- information that could reasonably identify a person without consent

Any EAP reporting remains subject to our confidentiality standards and privacy obligations.

## 9. Human review and responsibility

All AI-assisted work must be reviewed by a human before it is relied upon.

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This is important because AI can produce information that is inaccurate, incomplete, biased, outdated or unsuitable for a particular client or situation.

Our team is responsible for checking:

- accuracy
- privacy
- confidentiality
- professional tone
- ethical suitability
- clinical appropriateness
- cultural sensitivity
- readability
- risk or safety concerns

AI may support the work, but people remain accountable for the work.

## 10. Data security

We aim to use AI tools responsibly and cautiously.

When considering or using AI tools, we consider:

- whether the tool is appropriate for the task
- whether client information is involved
- whether information can be de-identified
- whether the tool has suitable privacy and security settings
- whether data may be stored, reviewed or used for training
- whether the use aligns with our professional and legal obligations

We will continue to review our use of AI as technology, privacy expectations and professional guidance develop.

## 11. Client choice and questions

Clients have the right to ask how AI may be used in relation to their care, documents or communication.

Where reasonable and practical, clients may request that AI not be used in relation to their personal information or client-specific documents.

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If you have concerns about AI, privacy or confidentiality, we encourage you to speak with your counsellor or contact our administration team.

## **12. Website, resources and public content**

Some website content, blogs, newsletters, social media posts, resources or educational material may be drafted or edited with AI assistance.

Where this occurs, the material is reviewed before publication. AI is used to support clarity, structure and accessibility, not to replace professional knowledge or responsibility.

Public content is general information only. It is not personal counselling, clinical advice, diagnosis or a substitute for professional support.

## **13. Crisis and urgent support**

AI tools are not a crisis service.

Watkins Therapy Group and UrSpace EAP are not emergency services. If you are in immediate danger or need urgent mental health support, please contact emergency services on 000 or attend your nearest emergency department.

For crisis support in Australia, you can also contact:

- Lifeline: 13 11 14
- Suicide Call Back Service: 1300 659 467
- Beyond Blue: 1300 22 4636

## **14. Policy review**

This policy will be reviewed at least annually, or sooner if there are significant changes to AI tools, privacy requirements, professional obligations or the way we use technology.

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## 15. Contact

For questions about this policy, privacy or confidentiality, please contact:

**Watkins Therapy Group**

Phone: (03) 8765 2477

Email: [admin@watkinstherapygroup.com.au](mailto:admin@watkinstherapygroup.com.au)

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