

**PRIVACY POLICY**

INTEGRATED OT is bound by the National Privacy Principles (NPPs) contained in the Privacy Act 1988 (Privacy Act). INTEGRATED OT’S Privacy Policy meets the requirements of the Victorian Government’s Health Practitioner National Law Act 2009.

In this Policy, “INTEGRATED OT” refers to: Any other company or business owned and/or operated by Integrated OT.

Framed by the NPPs, the Integrated OT Privacy Policy outlines the obligations which Integrated OT has in managing the personal information it holds about its clients (parents and children), potential clients, employees, suppliers, contractors and others. Any information provided, including identification of individuals, will be used only for the purpose/s intended and where the intention includes confidentiality, information will be treated as such unless otherwise required by law.

In summary, ‘personal information’ is information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is known, or can reasonably be determined from the information or opinion.

Sensitive information is also personal information, however special protection applies to this type of information. For example, sensitive information could include details about health, racial background, religious beliefs or any criminal record.

At Integrated OT, we take the privacy and personal information of the clients and their families who visit us as well as our employees and our suppliers very seriously. We won’t discuss any client or give any client’s personal information to any individual, company or organisation outside of Integrated OT unless you’ve provided us with your written consent or we are legally obliged to under Court Order.

Importantly, for child clients with divorced or separated parents, we will only deal with the fee-paying party who engaged our services in the first instance. We will only share information relating to the assessment and treatment of the child with the other parent and/or carers if we have the written consent of the initial party or are legally obliged to disclose specified information under Court Order.

We’ll never sell or trade your personal data to third party list brokers or direct marketing companies. We’ll do our very best to ensure that your personal data is kept safe and secure for as long as your details are in our care.

When will Integrated OT collect personal information?

Integrated OT will usually gather personal information about clients and their families:

* When our services are initiated (i.e. when we receive a referral from a support coordinator)
* When an initial assessment is booked
* During the course of providing services
* When a client, parent or family uses the Integrated OT website (e.g. when they fill out an online form, enter a competition or subscribe to an online newsletter).

Why does Integrated OT collect personal information?

Integrated OT collects personal information in order to conduct its business, to provide and market its services and to meet its legal obligations. We won’t use your personal data for any purpose that you have not agreed to, without first letting you know how and why we’d like to use your details. And, of course, we’ll make sure that we have your verbal and/or written permission first.

About whom does Integrated OT collect personal information?

The type of information Integrated OT may collect and hold includes (but is not limited to) personal information about:

* Clients and potential clients
* Previous clients
* Employees, prospective employees and contractors
* Business associates
* Suppliers and their employees, and
* Other people who come into contact with a member of the Integrated OT

What kinds of personal information does Integrated OT collect?

In general, the type of personal information Integrated OT collects and holds includes (but is not limited to):

· Parents’ names, marital status, occupation(s), client’s names and dates of birth, parent and client’s home and postal address(es), parent’s and client’s email address(es), mobile number(s), home telephone number(s), work number(s) and facsimile number(s).

· General practitioner and referring doctor

· Any information relating to Federal Government Healthcare Programs (i.e. Medicare Programs for Children, NDIS, FaHCSIA and BetterStart)

\* Transaction details associated with services we have provided to you

\* Any additional information provided to us by you

\* Any information you provided to us through client surveys

\* Other information which assists us in conducting our business, providing and marketing our services and meeting our legal obligations.

How does Integrated OT collect personal information?

Integrated OT will generally collect personal information with your agreement by way of telephone conversations, forms filled out either in hard copy or on-line, in face-to-face meetings, assessments, interviews, business cards and from third parties.

In some circumstances Integrated OT may be provided with personal information about an individual from a third party – for example, a report provided by a medical professional or a referral from another professional.

How might Integrated OT use and disclose your personal information?

Integrated OT may use and disclose your personal information for the primary purpose for which it is collected, for reasonably expected secondary purposes, which are related to the primary purpose and in other circumstances authorised by the Privacy Act.

In general, Integrated OT uses and discloses your personal information for the following purposes:

\* To conduct its business

\* To provide and market its services

\* To communicate with you

\* To provide treatment and care to your child

\* To assist your treating health professionals to provide treatment and care to you

\* To assist us to provide you with information about your care, if required

\* To assist with our internal administrative requirements

\* To process Medicare, FaHCSIA, Better Start, NDIS and private health fund claims

\* To supply information to medical practitioners and other allied health professionals who provide necessary follow up treatment and ongoing care

\* To conduct research and development

\* To conduct service planning

\* To communicate offers and special events

\* For general marketing purposes

\* To help us manage and enhance our services

\* To comply with our legal obligations.

To whom might Integrated OT disclose your personal information?

Integrated OT may disclose your personal information to:

* Other members of the Integrated OT Team
* Legal practitioners, courts, tribunals and regulatory authorities, and
* Anyone else to whom you authorise us to disclose it as per the Privacy

Permission Form

Integrated OT also collects personal information from these organisations and individuals, and will deal with that information in accordance with this Policy.

Integrated OT works in partnership with a range of government departments and health services and is required by law to pass on certain information about clients. We must also adhere to the laws of Mandatory Notification, and therefore must notify relevant authorities about certain issues (e.g. child protection).

External and internal quality auditors may view a small amount of personal information to check that Integrated OT is meeting its obligations for Quality Accreditation. Auditors are bound by their own and/or Integrated OT’s confidentiality requirements. Volunteers and students on placement at Integrated OT are also bound by Integrated OT’s confidentiality requirements.

In some cases, we share stories about Integrated OT’s families through newsletters, social media, publications, media stories and fundraising activities. We will always seek your permission to do this, and will tell you exactly where and when your story will appear.

Sending information overseas

Integrated OT will not send your personal information to recipients outside of Australia without:

Obtaining your consent (in some cases this consent will be implied), or

Otherwise complying with the NPPs.

Access to information

Clients may request access to their personal information held by Integrated OT by writing to the Director (Katie Johnson) (i.e. specifically fee-paying clients to whom we are providing/have provided service) and are not required to provide a reason for requesting access. Where we hold information that clients are entitled to access, we will endeavour to provide you with a suitable range of choices as to how you may collect (e.g. post or collection).

If you believe that personal information that we hold about you is incorrect, incomplete or inaccurate, then you may request amendments. We will consider if the information requires amendment and if we do not agree, we will add a note to the personal information stating your disagreement with the information.

**Sensitive information**

Some personal information, which Integrated OT collects, is ‘sensitive information’. Sensitive information includes: information relating to a person’s racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences and criminal record, is also personal information; and health information about an individual.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or where certain other limited circumstances apply (e.g., where required by law).

**Management of personal information**

The NPPs require Integrated OT to take reasonable steps to protect the security of personal information. Integrated OT personnel are required to respect the confidentiality of personal information and the privacy of individuals. As such, all staff sign a confidentiality agreement upon employment with any Integrated OT company or business.

Integrated OT takes reasonable steps to protect personal information held from misuse and loss and from unauthorised access, modification or disclosure, for example by use of physical security and restricted access to electronic records.

Where Integrated OT no longer require your personal information for a permitted purpose under the NPPs, they will take reasonable steps to destroy it.

How does Integrated OT keep personal information accurate and up-to-date?

Integrated OT endeavours to ensure that the personal information we hold is accurate, complete and up-to-date. We encourage you to contact our admin team in order to update any personal information we hold about you. Contact details are: [admin@integratedot.com.au](mailto:admin@integratedot.com.au)

You have the ability to seek access to your personal information. Subject to the exceptions set out in the Privacy Act, you may seek access to the personal information which Integrated OT holds about you by contacting the admin team.

Integrated OT will require you to verify your identity and to specify what information you require. In some instances, a fee may be charged for providing access. We will advise you of the likely cost in advance.

**Updates to this Policy**

This Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and the changing business environment.

Enquiries

If you have any questions about privacy-related issues please contact the Director of Integrated OT Katie on 0432 866 576 or via email on katie@integratedot.com.au

**Feedback and complaints**

Integrated OT is committed to improving the health and well-being of our clients by providing outstanding care in a modern, innovative and supportive environment.

Feedback about our clients’ experiences provides valuable information about what we are doing well, and where we can do things better. Please let us know about your experiences, because we really do value your opinion.

We encourage you to provide us with feedback. At Integrated OT we believe that both positive and negative feedback can help us provide you with a better service so if you are unhappy with the service or care you are receiving, you have the right to provide this feedback and feel confident in doing so. If you prefer to make a complaint in writing, please address your complaint as follows:

Integrated OT

Director of Operations

PO BOX 2429

WERRIBEE VIC 3030

**Who do I speak to if I have a concern about Privacy?**

If you have a concern or complaint about the privacy of personal information being held by Integrated OT, you should contact Katie on 0432 866 576. Within five working days of receiving your inquiry, she will:

* Discuss your complaint with you
* Discuss the resolution you require and the available remedies
* Where appropriate, put in place an agreed solution that meets the requirements of National Privacy Principles
* Provide written notice to you of the outcome.

What if I do not feel that my complaint has been resolved?

If you feel that your complaint has not been resolved you may wish to contact the Australian Health Practitioner Regulation Agency for further assistance.

AUSTRALIAN HEALTH PRACTITIONER REGULATION AGENCY (AHPRA)

GPO Box 9958

Melbourne

VIC 3001

Telephone (within Australia): 1300 419 495

Telephone (outside Australia) +61 3 9275 9009

https://www.ahpra.gov.au/ <http://www.ahpra.gov.au>.

You can read details of the Privacy Act on the Australian Government Office of the Privacy Commissioner’s website at www.privacy.gov.au<http://www.privacy.gov.au>. You can also contact the Commission on 1300 363 992 for assistance with matters relating to privacy.