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PRIVACY POLICY

Melbourne Occupational Therapy 4 Kids and its related entities (referred to in this document as we, us or our) recognise that your privacy is important. We are committed to protecting the personal information we collect. The National Privacy Principles (NPPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act) govern the way in which we collect, use, disclose, store and secure and dispose of personal information. A copy of the NPPs may be obtained from the website of The Office of Federal Privacy commissioner at www.privacy.gov.au.

Personal Information

Under the Privacy Act, "Personal Information" is any information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not and whether the information or opinion is recorded in material form or not. This means that, it is any information or opinion about a person which can be used to identify that person, including a person's name, address, contact number, email address.

"Sensitive information" is information or an opinion (a form of personal information) generally afforded a higher level of privacy protection. It includes, but is not limited to, an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information, genetic information or biometric information.

Types of Information Collected

Melbourne Occupational Therapy 4 Kids may collect and hold personal information about its clients and its clients' families, that is, information that can identify you and is relevant to providing you with the occupational therapy services you are seeking. This may include, but is not limited to names, gender, addresses, contact details and occupations.

Melbourne Occupational Therapy 4 Kids may also collect sensitive information, particularly in relation to health and medical information. This information will only be collected with the relevant person's consent and if reasonably necessary for assessment, intervention or any functions or activities related to occupational therapy services. This may include, but is not limited to medical, health and disability information, Medicare numbers and other identifiers used by government agencies or other organisations, financial information and billing details including information about the services individuals are funded to receive, whether under the National Disability Insurance Scheme (NDIS) or otherwise, and records of interactions and services provided to individuals.

Purpose of Collection

Melbourne Occupational Therapy 4 Kids collects, holds, uses and discloses personal information about its clients and its clients' families for the purpose of providing the highest quality occupational therapy services. This includes, but is not limited to the following:

- Identification and contact of clients;
- Assessment and relevant services to clients;
- Establish eligibility for services and/or funding schemes;
- Informing relevant third party service providers, such as client's GP, specialist, allied health provider, teacher, integration aide, insurer or solicitor involved in the client's management; and
- For administrative purposes, such as billing and lodging a claim through an insurer, compensation agency or funding scheme.



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Sensitive information will only be used by Melbourne Occupational Therapy 4 Kids for:

- The primary purpose for which it was obtained;
- The secondary purpose that is directly related to the primary purpose;
- With the relevant person's consent; and
- Where required or authorised by law.

Method of Collection

Melbourne Occupational Therapy 4 Kids collects personal information during the course of its provision of occupational therapy services. This could occur during the referral, assessment, planning and service provision process. Information may be collected though the completed application/intake forms, referrals, face to face meetings, telephone conversations, via telehealth, emails, reports, videos, photographs, Melbourne Occupational Therapy 4 Kids website and cookies. Personal information may also be collected from third parties, including but not limited to person's involved in a client's treatment and education, organisations and agencies providing a funding scheme or rebate, and organisations or agencies (or their representatives) assessing an insurance and compensation claim. There however, may be some instances where personal information will be collected indirectly because it is unreasonable or impractical to collect personal information directly from you. We will usually notify you about these in advance, or where that is not possible, as soon as is reasonably practicable after the information has been collected.

Storage and Security of Information

Melbourne Occupational Therapy 4 Kids stores personal information in hard copy and/or electronically. First and family names are used in filing and bookkeeping systems. Melbourne Occupational Therapy 4 Kids takes reasonable steps to ensure that personal information is held and stored in a manner that reasonably protects it from misuse and loss, and from unauthorised access, interference, modification or disclosure.

Melbourne Occupational Therapy 4 Kids secures stored personal information in locked filing cabinets and/or password protected computer files. Archives are maintained in locked storage and/or password protected computer files. Access to files is limited to Melbourne Occupational Therapy 4 Kids personnel. Data is stored and protected by 256-bit bank security and encryption, which means personal information and records are protected to the same level used in banks, with multiple backups in place. Melbourne Occupational Therapy 4 Kids avoids taking personal information off site. When personal information is taken off site, it is stored in a locked bag or briefcase. Personal information is shredded prior to recycling or destruction.

Personal information will be stored in client hard or digital files which will be kept by Melbourne Occupational Therapy 4 Kids for a minimum of 7 years or until a child reaches 25 years, (whichever comes first) or as is otherwise required or authorised by law. When personal information is no longer needed for the purpose for which is was obtained, Melbourne Occupational Therapy 4 Kids will take reasonable steps to destroy or permanently de-identify the personal information.

Disclosure and Use of Personal Information

Melbourne Occupational Therapy 4 Kids will not disclose personal information to any third parties (teacher, therapists, doctors) or use it for another purpose without the relevant person's consent, unless such disclosure or use is required or authorised by law. Consent forms are completed prior to commencing services and updated when necessary.

In the case of an insurance or compensation claim, it may be necessary for Melbourne Occupational Therapy 4 Kids to disclose information relevant to the client's injury, health condition or disability, treatment and prognosis to an insurer and/or its representatives.

As a result of the provision of services under a funding scheme or rebate, it may be necessary for Melbourne Occupational Therapy 4 Kids to disclose information relevant to a client's injury, health condition or disability, treatment and prognosis to the organisations or agencies providing the funding scheme or rebate.



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Melbourne Occupational Therapy 4 Kids may seek consent to disclose personal information as part of data provided to third parties who fund Melbourne Occupational Therapy 4 Kids services, or to facilitate streamlined service provision across providers. Melbourne Occupational Therapy 4 Kids will obtain consent from the relevant persons before personal information is used in these ways.

Access to and Correction of Personal Information

Persons have a right to access and/or request a correction to their personal information held by Melbourne Occupational Therapy 4 Kids under the NPPs. Parents and/or legal guardians of persons who are clients of Melbourne Occupational Therapy 4 Kids may also have right to access and/or request a correction to that client's personal information held by Melbourne Occupational Therapy 4 Kids under the NPPs.

If upon receiving access to your personal information, or at any other time, you believe the personal information Melbourne Occupational Therapy 4 Kids holds about you is inaccurate, incomplete or out of date, please notify Melbourne Occupational Therapy for Kids immediately. Reasonable steps will be taken to correct the information so that it is accurate, complete and up to date.

In order to access and/or correct personal information, please contact Melbourne Occupational Therapy 4 Kids in writing by emailing admin@melbourneot4kids.com.au We will respond to your request within a reasonable time period.

Melbourne Occupational Therapy 4 Kids will not charge any fee for an access request but may charge an administration fee for providing a copy of the personal information requested.

Melbourne Occupational Therapy 4 Kids may refuse to correct your personal information, and if so, a written notice that sets out the reasons for refusal (unless it would be reasonable to provide those reasons) and provide you with a statement regarding the mechanisms available to you to make a complaint.

Melbourne Occupational Therapy 4 Kids may decline a request for access to personal information in circumstances prescribed by the Privacy Act, and if so, a written notice will be provided that sets out the reasons for the refusal (unless it would be unreasonable to provide those reasons).

In order to protect a person's personal information, Melbourne Occupational Therapy 4 Kids may require proof of identification before releasing the requested personal information.

Failure to Provide Information

Where Melbourne Occupational Therapy 4 Kids is not provided with the personal information it requires, it may only be able to offer limited occupational therapy services.

Internet Users

The website of Melbourne Occupational Therapy 4 Kids may contain links to other websites. This privacy policy has no application to any other websites and Melbourne Occupational Therapy 4 Kids is not responsible for the privacy practices and content of any other websites, nor are any linked websites subject to the privacy policies and procedures of Melbourne Occupational Therapy 4 Kids.

Like most website operators, Melbourne Occupational Therapy 4 Kids collects non-personally-identifying information of the sort that web browsers and servers typically make available, such as: the browser type, language preference, referring site; and the date and time of each visitor request. Melbourne Occupational Therapy 4 Kids purpose in collecting non-personally identifying information is to better understand how Melbourne Occupational Therapy 4 Kids visitors use its website.



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<u>Personal Information about Employees, Contractors and Business Partners</u>

Melbourne Occupational Therapy 4 Kids collects personal information about its employees, contractors and business partners. In each case, the personal information is used only for the purpose for which it is provided, unless consent to use or disclose it to third parties is obtained, or such use or disclosure is otherwise required or authorised by law.

If any personal information is disclosed to a third party service provider, for example, to assist Melbourne Occupational Therapy 4 Kids to manage business records, the third party service provider will be bound by obligations of confidentiality. Where appropriate, Melbourne Occupational Therapy 4 Kids may rely on the employee records exception in the Privacy Act.

Overseas Recipients

Melbourne Occupational Therapy 4 Kids does not disclose information to overseas recipients except with the relevant person's consent, or unless such disclosure is otherwise required or authorised by law. It is not possible for Melbourne Occupational Therapy 4 Kids to list the specific countries to which personal information may be disclosed. Melbourne Occupational Therapy 4 Kids may not be able to take reasonable steps to prevent overseas recipients from breaching the Privacy Act. Further, the overseas recipients may not be subject to the same obligations as Melbourne Occupational Therapy 4 Kids under the Privacy Act.

Anonymity and Pseudonyms

Under the NPPs, persons have the option of dealing with Melbourne Occupational Therapy 4 Kids anonymously or through the use of a pseudonym. However, should this option be selected, Melbourne Occupational Therapy 4 Kids may not be able to treat or assist the relevant person, and may only be able to provide the relevant person with limited services.

Privacy Policy Updates

The privacy policy of Melbourne Occupational Therapy 4 Kids may be updated. Updates will be published on the website at www.melbourneot4kids.com.au

Privacy Policy Enquiries and Complaints

If you have any enquiries or complaints about this Privacy Policy or believe Melbourne Occupational Therapy 4 Kids may have breached your privacy, please email admin@melbourneot4kids.com.au A complaint in relation to this Privacy Policy must be made in writing in accordance with the requirements of the Privacy Act. Melbourne Occupational Therapy 4 Kids will respond to a complaint within 30 days.

If a complaint is unresolved or there are concerns about an interference with privacy, a complaint may be made to the Commissioner for Privacy and Data Protection (https://www.cpdp.vic.gov.au/) in accordance with the Privacy and Data Protection Act 2014.