



Privacy Policy

Child Development SPOT (ABN 33 149 654 812) is committed to providing quality speech pathology, physiotherapy and occupational therapy services to its clients. This policy outlines its ongoing obligations with respect to how it manages personal information associated with its provision of therapy services.

Child Development SPOT has adopted the National Privacy Principles (NPPs) contained in the *Privacy Act 1988 (Cth)* (the Privacy Act). The NPPs govern the way in which Child Development SPOT will collect, use, disclose, store, secure and dispose of personal information.

A copy of the NPPs may be obtained from the website of The Office of the Federal Privacy Commissioner at www.privacy.gov.au.

What is Personal Information?

Personal information is information or opinion about a person which can be used to identify that person. This includes information such as a person's name, address, contact number, email address, etc.

Sensitive information is a form of personal information and includes, but is not limited to, a person's racial or ethnic origin, political beliefs, religious beliefs, sexual orientation and criminal record. It also includes health, genetic and biometric information.

Information Collection

What kind of personal information does Child Development SPOT collect and hold?

Child Development SPOT collects and holds personal information about its clients and its clients' families including but not limited to names, addresses, contact details, occupations and dates of birth.

Child Development SPOT also collects sensitive information, particularly in relation to its clients' health and medical history, but only with the relevant person's consent, and only if the specific information is reasonably necessary for one or more of Child Development SPOT's functions or activities.

Child Development SPOT does not collect personal information (other than sensitive information) unless the information is reasonably necessary for its functions and activities.



What is the purpose for which Child Development SPOT collects, holds, uses and discloses personal information?

Child Development SPOT collects, holds, uses and discloses personal information about its clients and its clients' families for the purposes of providing the highest quality therapy services. This includes, but is not limited to, the following:

- To enable Child Development SPOT to identify its clients and ensure it can be in contact with its clients;
- To enable Child Development SPOT to assess, diagnose and provide relevant services to its clients;
- To enable Child Development SPOT to establish eligibility for services and/or funding schemes;
- To enable Child Development SPOT to communicate with clients and third party service providers to inform them of relevant functions, activities and promotions.
- Informing other relevant third party service providers such as a client's doctor, specialist, teacher, insurer or solicitors who are 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.

Sensitive information will only be used by Child Development SPOT:

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

If Child Development SPOT is not provided with the personal information it requires, it may only be able to offer limited therapy services.

How does Child Development SPOT collect personal information?

Child Development SPOT collects personal information during the course of its provision of therapy services. This could occur during the referral, assessment, planning and service provision process.

Information may be collected through completed application/intake forms, referrals, face-to-face meetings, telephone calls, emails, reports, videos, photographs, Child Development SPOT's website (www.childdevelopmentspot.com.au), cookies, and third parties including but not limited to persons involved in a client's treatment and education, organisations or agencies providing a funding scheme or rebate, and organisations or agencies (or their representatives) assessing an insurance or compensation claim.



Child Development SPOT's website may contain links to other websites. This Privacy Policy has no application to any other websites and Child Development SPOT is not responsible for the practices or content of any other websites.

How does Child Development SPOT hold information?

Child Development SPOT stores personal information in hard copy and/or electronically. First and family names are used in filing and bookkeeping systems.

Child Development SPOT 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, modification or disclosure.

Child Development SPOT secures stored personal information in the following ways:

- Personal information is stored in locked filing cabinets and/or password protected computer files;
- Personal information is shredded prior to recycling or destruction;
- Archives are maintained in locked storage; and
- Access to files is limited to Child Development SPOT personnel.

Most personal information will be stored in client files which will be kept by Child Development SPOT for a minimum of 7 years, or as is otherwise required or authorised by law.

When personal information is no longer needed for the purpose for which it was obtained, Child Development SPOT will take reasonable steps to destroy or permanently de-identify the personal information.

Disclosure and Use of Personal Information

Child Development SPOT will not disclose personal information to any third parties or use it for another purpose without the relevant person's consent, unless such disclosure or use is required or authorised by law.

In the case of an insurance or compensation claim, it may be necessary for Child Development SPOT to disclose information relevant to a client's injury, treatment and prognosis to an insurer and/or its representatives.

As a result of the provision of services under a funding scheme or a rebate, it may be necessary for Child Development SPOT to disclose information relevant to a client's injury, treatment and prognosis to



organisations or agencies providing the funding scheme or rebate.

Child Development SPOT may seek consent to disclose personal information as part of data provided to third parties who fund Child Development SPOT's services, or to facilitate streamlined service provision across providers. Child Development SPOT 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 Child Development SPOT under the NPPs.

Parents and/or legal guardians of persons who are clients of Child Development SPOT may also have a right to access and/or request a correction to that client's personal information held by Child Development SPOT under the NPPs.

In order to access and/or correct personal information, please contact Child Development SPOT in writing by sending correspondence to 180 Lava Street, Warrnambool, 3280 or by email to admin@childdevelopmentspot.com.au

Child Development SPOT will not charge any fee for an access request, but may charge an administrative fee for providing a copy of the personal information requested.

In order to protect a person's personal information, Child Development SPOT may require proof of identification before releasing the requested personal information.

Personal Information about Employees, Contractors and Business Partners

Child Development SPOT 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 help Child Development SPOT to manage business records, the third party service provider will be bound by obligations of confidentiality. Where appropriate, Child Development SPOT may rely on the employee records exception in the Privacy Act.

Overseas Recipients



Child Development SPOT does not disclose personal 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 Child Development SPOT to list the specific countries to which personal information may be disclosed.

Child Development SPOT 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 Child Development SPOT under the Privacy Act.

Anonymity and Pseudonyms

Under the NPPs, persons have the option of dealing with Child Development SPOT anonymously or through the use of a pseudonym. However, should this option be selected, Child Development SPOT 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

Child Development SPOT may change its Privacy Policy from time to time and, updates will be published on Child Development SPOT's website (www.childdevelopmentspot.com.au)

Privacy Policy Complaints and Enquiries

Please contact Child Development SPOT with any enquiries or complaints about this Privacy Policy at:

Child Development SPOT
admin@childdevelopmentspot.com.au

A complaint in relation to this Privacy Policy must be made in writing in accordance with the requirements of the Privacy Act. Child Development SPOT will respond to a complaint within 30 days of receipt.

If a complaint is unresolved, or there are concerns about an interference with privacy, a complaint may be made to the Australian Information Commissioner in accordance with Part V of the Privacy Act.

This document was last updated: June 2019.