

PRIVACY POLICY

At Occupational Therapy Services Group we are committed to ensuring and upholding the privacy and confidentiality of our clients and stakeholders personal information in accordance with the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Privacy Act).

This policy is designed to clearly communicate how Occupational Therapy Services Group handles our clients and all other stakeholders' personal and health information. It provides a detailed outline of the type of information our practice may hold, how it is handled, how long it is kept and how you can access it.

This policy covers the following information:

- Why Occupational Therapy Services Group collect's information
- What type of information Occupational Therapy Services Group may collect and how it will be collected
- Disclosure and use of information
- How Occupational Therapy Services Group stores and protects information
- How long information is kept
- Access and changes to personal information

Personal Information as defined in the Privacy Act (1988) means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- Whether information or opinion is true or not
- Whether the information or opinion is recorded in a material form or not.

Health Information as defined in the Privacy Act (1988) is a particular subset of *personal information* and means information or an opinion about:

- The health or a disability (at any time) of an individual
- An individual's expressed wishes about the future provision of health services to him or her
- A health service provided or to be provided to an individual

Why we collect personal information:

Occupational Therapy Services Group collects personal information when it is reasonably necessary for us to provide the services that you may require.

Other reasons Occupational Therapy Services Group collects personal information is to:

- Understand you and how Occupational Therapy Services Group can meet your needs now and in the future
- Provide the best possible service to achieve maximum results
- Claim payment from external funding sources, including Department of Veterans Affairs, Medicare, National Disability Insurance Scheme and other Insurance organisations
- Comply with third party agencies information along with their needs and requirements

- Comply with reporting requirements and other obligations to third party agencies e.g. hospital support teams, medical practitioners
- Enable Occupational Therapy Services Group to send reports and all other correspondence to other health care providers.

How we collect Personal information

Information may be collected in a number of different ways. Occupational Therapy Services Group will always attempt to initially obtain the required information from the client or stakeholder directly, by means of documentation, over the phone, via email or in person. In certain circumstances information may need to be collected from a third party such as:

- General practitioner
- Family member
- Health practitioner
- Carer

Information may only be obtained from the above sources with the client or stakeholder's consent.

Type of information we may collect:

The following information may be collected by Occupational Therapy Services Group in order to assist the organisation in providing the service that is required:

- Personal information including name, address, date of birth and gender
- Family medical history and next of kin details
- Health information including medical conditions, medical records and medical results
- Occupation, employer details, payment details and financial information
- Source of initial referral
- Other health or medical practitioner's involved

Disclosure and use of information:

Occupational Therapy Services Group will only use or disclose personal information for the primary purpose for which it was collected, for a directly related secondary purpose or as permitted or required by law. Along with the uses listed in this policy or otherwise permitted under the Privacy Act (1988), using or disclosing personal information will only be done after obtaining the client's or stakeholder's consent. Outlined below is how Occupational Therapy Services Group may use or disclose personal information.

- Personal information including sensitive and health information is collected and used for the primary purpose of ensuring all clients receive a high quality of service whilst under care of Occupational Therapy Services Group employees.
- Where necessary information may be required to be disclosed to other health care providers, such as a general practitioner, home service provider or hospitals that may be involved in ongoing care and/or services
- We may provide information about medical conditions to the next of kin, relatives, guardians or legal representatives, unless previously stated by the client or stakeholder to not disclose personal or health information.

Quality assurance: On occasions we may need to collect, use or disclose aspects of personal information to monitor the standard of health services provided. This is done for processes including accreditation and evaluation, clinical audits, risk and claims management, education and training of staff and quality assurance activities, including monitoring clinical outcomes.

Client satisfaction: To ensure the organisation is providing a level of high quality services, an Occupational Therapy Services Group employee may contact the client or stakeholder in the future to request feedback on services.

Billing: For billing and invoicing purposes, Occupational Therapy Services Group may disclose relevant aspects of the client or stakeholder's personal information with third parties such as health care providers, Department of Veterans Affairs, Medicare, National Disability Insurance Scheme and other Insurance organisations.

Contractors: On occasions, Occupational Therapy Services Group may request engagement of third parties to assist in providing the services required such as building contractors, IT suppliers and professional service providers. Occupational Therapy Services Group therefore may need to disclose the relevant personal information in relation to these services. All such contractors are required to handle your personal information in accordance with the Privacy Act (1988) and this policy.

Data required by law: Occupational Therapy Services Group have a legal obligation to provide information to various entities; Occupational Therapy Services Group may provide personal and health information to government agencies where Occupational Therapy Services Group are providing health services under contracts.

How we store and protect your information:

Occupational Therapy Services Group ensures information is securely stored in a range of mediums including electronic systems, electronic instrumentation, and paper files. Occupational Therapy Services Group has a number of security measures in place to ensure information is protected. These include firewalls, administrative, physical and technical access restrictions, with only authorised personnel able to access relevant data. Occupational Therapy Services Group has a secure server and a closed network environment, data encryption and virus scanning and protection. Occupational Therapy Services Group endeavours to ensure all security programs are regularly assessed and updated as required.

How long we keep your information:

Occupational Therapy Services Group retain all personal and health information indefinitely on an internal electronic database following the conclusion of services to ensure that Occupational Therapy Services Group can provide the best possible service.

All paper copies of client or stakeholder information will be submitted to Occupational Therapy Services Group's electronic database and then securely destroyed.

Access and changes to personal information

If the client or stakeholder wishes to access the information Occupational Therapy Services Group hold (both personal and health) the client or stakeholder has the right to do so. The client and

stakeholders also have a right to request an amendment to the information Occupational Therapy Services Group hold if the client or stakeholder believes it is inaccurate. Occupational Therapy Services Group will allow access or make amendments as per the request unless there is a reason under the Privacy Act (1988) or other relevant law to refuse the request.

Occupational Therapy Services Group will allow access to personal records in a manner which is suitable to the individual's needs except when:

- Providing access would have an unreasonable impact upon the privacy of other individuals
- The request for access is frivolous or vexatious
- The information relates to an existing legal dispute resolution proceedings between Occupational Therapy Services Group and the individual
- Providing access would be unlawful
- An enforcement agency performing a lawful national security function asks Occupational Therapy Services Group not to provide access on the basis that providing access would be likely to cause damage to the national security of Australia

In order to gain access or request an amendment Occupational Therapy Services Group do require written consent from the individual. This can be in form of an email or written letter.

Contacting us:

At Occupational Therapy Services Group client care is our main priority. If you have any concerns regarding our privacy policy or services please contact us directly using the contact details provided below.

Address: 2 Gracechurch Crescent, LEEMING WA 6149 **Email:** services@otservicesgroup.com

Phone: (08) 9332 1783 **Fax:** (08) 9332 6548

Occupational Therapy Services Group welcomes complaints, compliments and ideas as it provides feedback on our services and enables us to make service improvements. We will strive to resolve your complaint internally. If we are unable to resolve your complaint satisfactorily, you may request the Federal Privacy Commissioner to have your complaint investigated. For more information about how you may lodge a complaint with the Federal Privacy Commissioner, please contact the Commissioner's hotline service on 1300 363 992.