



# Privacy Policy

VERSION 4.0

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## Table of Contents

<b>Privacy Policy</b>	<b>0</b>
<b>Privacy Policy</b>	<b>2</b>
Mission	2
Vision	2
Values	2
Practice Summary	2
Policy and Procedures in the Practice	3
Quality and Practice Improvement	3
<b>Introduction</b>	<b>3</b>
<b>Team Responsibilities</b>	<b>3</b>
<b>Scope</b>	<b>4</b>
<b>Privacy Statement</b>	<b>4</b>
Information Collection	4
Use of personal information for marketing and service improvement purposes	4
Disclosure of Personal Information to Third Parties	4
Use of personal information for payments	5
Occasions where limits to consent can be breached for lawful reasons to ensure safety of people under legal requirements	5
Access to and Correction of Information About You	5
Keeping Your Personal Information Up To Date	5
Storage and Security of your Personal Information	5
Resolving Your Concerns	6
Changes to this Privacy Policy	6
Contact	6
Further Information	6

# Privacy Policy

## Mission

Empowering people to lead independent and meaningful lives, with sustainable, satisfying daily activities and relationships.

## Vision

To provide quality therapy services, as a leader in innovation and sustained by strong relationships with our clients, communities, and within our team.

## Values

Collaborative – Innovation – Sustainable – Empowered

## Practice Summary

Allay Occupational Therapy's policies underscore our commitment to quality occupational therapy services. Our values of Collaboration, Innovation, Sustainability, and Empowerment guide us in empowering individuals to lead independent, fulfilling lives. We strive to be a catalyst for positive change, fostering autonomy, well-being, and community involvement.

We prioritize client service by providing evidence-based interventions tailored to the needs and objectives of individuals across all life stages. Our occupational therapists and allied health assistants work closely with clients and their support networks, using innovative strategies to maximize outcomes and foster sustainable well-being. We value strong relationships with our clients, communities, and team, aiming to be a leader in innovative therapy services.

Our clients remain central to our service delivery, practice management, and policy development. We are dedicated to creating a respectful, responsive, safe, inclusive, and welcoming environment for all. The Allay community is inclusive of all cultures and identities. We maintain a safe and inclusive environment, welcoming individuals from all backgrounds, and appreciate their contributions to our practice.

We are committed to continuous quality and practice improvement, reflecting lived experiences, current research, knowledge, and strategies. Our Allay Policy and Procedure Guidelines, aligning with relevant legislation, support our team in implementing these practices.

We value our team's well-being and professional growth, and provide a supportive environment for personal and career development. Our policies and procedures, coupled with a professional development program, guide best practices, uphold standards, and ensure a safe and ethical environment, propelling us to the forefront of the occupational therapy field.

Legislation and practice principles considered were:

- Disability Act 2006
- National Disability Insurance Scheme Act 2013
- National Disability Insurance Scheme Quality and Safeguarding Framework 2017
- National Disability Insurance Scheme Rules 2018
- The Health Records Act 2001 (HR Act)
- The Privacy Act (1988)
- The Freedom of Information Act (1982)

## Policy and Procedures in the Practice

We value the well-being and resilience of our team members. We prioritize their professional growth and ensure a supportive environment that promotes personal and career development. By investing in their well-being and ongoing education, we empower our team to provide the highest quality of care.

Our policies and procedures are designed to guide best practice and provide clear direction to our team. They serve as a roadmap for delivering exceptional care, upholding professional standards, and ensuring a safe and ethical practice environment. They are supported by a professional development program through policy training, case studies and reflective activities.

## Quality and Practice Improvement

To maintain the relevancy and effectiveness of our policies and procedures, a thorough review is conducted every two years. This review involves the active participation of the Principal Occupational Therapist, Associate Principal Occupational Therapists, Policy and Procedure Working Party, leadership team, and individual team members. By engaging in this collaborative effort, we can make necessary adjustments, incorporate new insights, and remain aligned with best practices and regulatory standards. Via policy training, case studies and reflective activities Allay leadership and the team are aware of the application of this policy and procedure in practice.

## Introduction

Allay Health Services Pty Ltd Trading as Allay Occupational Therapy has created this privacy statement in order to demonstrate our firm and continuing commitment to the privacy of personal information provided by those visiting and interacting with Allay. We hold the privacy of your personal information in the highest regard. The following discloses our information gathering, dissemination and safeguarding practices. This policy will be continuously assessed against new technologies, business practices and our customer needs.

Allay is subject to the National Privacy Principles under the Privacy Act 1988 as amended from time to time. This Privacy Statement applies to any personal information you provide in connection with our service.

## Team Responsibilities

To read, understand and follow the Privacy Policy and relevant Procedures.

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Allay Occupational Therapy  
Privacy Policy  
Page | 3

## Scope

This applies to anyone that comes in to contact with private medical records and/or personal information such as email addresses or phone numbers of Allay clients in the business of their work including; Allay Occupational Therapy team members, receptionists, volunteers, students and clients.

## Privacy Statement

### Information Collection

Allay gathers personal information through a variety of methods including electronic or face to face interactions, interaction with our website, requests for information, and provision of goods and services. We may also collect personal information directly from individuals, or their authorized representatives, and through referrals from other service providers.

We only gather information that is essential or beneficial in ensuring quality of service, such as contact details, next of kin, racial or ethnic origin, medical history, and/or other information that is deemed relevant to the services sought by the individual or referring party.

### Use of personal information for marketing and service improvement purposes

The Allay Occupational Therapy website, like most, collects non-personally identifying information of the sort that web browsers and servers typically make available, such as the browser type, language preference, and the date and time of each visitor request. The data that Allay collects from this is non-identifiable (unable to be tracked to a particular person) and is used to understand how our visitors use the website for service improvement. By using the Allay website, you consent to the data practices described in this statement.

Allay uses this non identifiable information gathered for the purposes of administering our business activities, providing the products and services you request, processing your payments, monitoring the use of the service, marketing and promotional efforts, and overall continuous improvement of our service offerings and systems efficiency.

You can consent or not consent to Allay contacting you directly to conduct research about your opinion of current services or of potential new services that may be offered. You have the choice to engage in this or not.

Information gathered for marketing and service improvement processes is held securely and confidentially, and is only used for the purpose of marketing or service improvement.

### Disclosure of Personal Information to Third Parties

An integral aspect of holistic, integrated Occupational Therapy care is the need to liaise with and coordinate care across the various settings in which our clients and their families live and engage. Allay values the sharing of this information across settings with the goal of maximising therapeutic interventions. However, Information will only be provided to such third parties (e.g. teachers, doctors, therapists, builders, equipment suppliers) for the purpose of effective service provision and with your

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Allay Occupational Therapy  
Privacy Policy  
Page | 4

written or verbal consent. Consent forms are completed prior to commencing service (*Separate Consent Form*) and can be updated (consent added or withdrawn) at any time during your care with Allay. Changes to consent can be communicated either verbally and then documented in your electronic file or via written consent.

Allay does not use or disclose sensitive personal information, such as race, religion or political affiliations, without your explicit consent.

#### Use of personal information for payments

During direct debits or credit card transactions, your credit card number and expiry date will be entered into our EFTPOS facility. This is operated by National Australia Bank. They will have their own Privacy Policy so we advise you to contact NAB if you have concerns regarding your credit card details being entered into their facility. We do not store credit card information.

#### Occasions where limits to consent can be breached for lawful reasons to ensure safety of people under legal requirements

Other than the above and as otherwise expressly stated elsewhere in this Privacy Statement, we will not disclose your personal information without your consent unless disclosure is either necessary to prevent a threat to life or health, authorised or required by law, reasonably necessary to enforce the law or necessary to investigate a suspected unlawful activity. For more information on when this may be required refer to the included legislation and practice documents mentioned above.

#### Access to and Correction of Information About You

According to the Freedom of Information Act (1982), Allay will, on request, provide you with access to the information we hold about you, unless there is an exception, which applies under the National Privacy Principles, including for the purpose of correcting or updating that information. We will arrange a mutually agreeable time for supervised access to your personal information. We may recover from you our reasonable costs of supplying you with access to the information we hold about you. Your request must be in writing to the leadership team and will be addressed within a reasonable time. If we refuse to provide you with access to the information we hold about you, we will provide you with reasons for the refusal and inform you of any exceptions relied upon under the National Privacy Principles.

#### Keeping Your Personal Information Up To Date

We take reasonable steps to ensure that the personal information we hold about you is accurate, complete, and up-to-date whenever we collect or use it. If the personal information we hold about you is inaccurate, incomplete or out-of-date, please contact us and we will take reasonable steps to either correct this information, or if necessary, discuss alternative action.

#### Storage and Security of your Personal Information

Information that may be collected is stored securely in our cloud based practice management software, Lumary. Hard copies of some documents are also stored in a single client file. Assessment scores with name and age data, are also entered into online programs, Q- Global, Pearson and WPS Publish, for analysis. We use other online programs such as Tali Train, ILS and TIS Interpreting Service

which require demographic data. We take reasonable steps to protect the security of your personal information in accordance with this Privacy Statement. Unfortunately, no data transmission over the Internet can be guaranteed to be totally secure. While we strive to protect such information, we cannot ensure or warrant the security of any information you transmit to us accordingly, use it at your own risk. Programs used also have their own Privacy Policy which we recommend you read if you have concerns about this practice management software and program. Once any personal information comes into our possession, we will take reasonable steps to protect that information from misuse and loss and from unauthorised access, modification or disclosure.

### Resolving Your Concerns

If you wish to gain access to your personal information, have a complaint about a breach of your privacy or you have any query on how your personal information is collected or used please forward your request via post, email or phone. We will respond to your query or complaint as soon as possible. If there is a data breach, we will act according to the Privacy Act 1988 guidelines, act to remedy the breach immediately and notify you with the actions required. If it is a Notifiable Data Breach, we will do these aforementioned steps as well as notify the Office of the Australia Information Commissioner.

### Changes to this Privacy Policy

We may amend this Privacy Policy as our business requirements or the law changes. Any changes to this Privacy Policy will be updated on our website, please re-visit the Statement to ensure that you are aware of our most current privacy statement.

### Contact

Should you need to contact Allay, please email via our website, phone on (03) 5201 0527 and request to speak to the leadership team, or post a letter informing of your request. We will respond to your request as soon as possible.

### Further Information

For further information about the protection of your privacy, please visit the Australian Federal Privacy Commissioner's website at [www.privacy.gov.au](http://www.privacy.gov.au) If you would like a copy of our Privacy Policy, please request one via our Contact page, phone or post.