ALLAY
OCCUPATIONAL THERAPY

Privacy Policy

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Table of Contents

Privacy Policy ***0***

Mission **2**

Vision **2**

Values **2**

Practice Summary **2**

Policy and Procedures in the Practice **3**

Quality and Practice Improvement **3**

Glossary of Phrases ***3***

Introduction **4**

Team Responsibilities **5**

Scope **5**

Privacy of Health Information ***5***

Collection of Information **5**

Purpose of Collection, Use, and Disclosure **5**

Retention of Information **5**

Disclosure of Information **6**

Legal and Ethical Obligations **6**

Ensuring Privacy and Compliance **6**

Access to and Correction of Information About You **6**

Up To Date Personal Information **7**

Storage and Security **7**

Privacy Breaches **7**

Resolving Your Concerns **8**

Privacy of Demographic Information ***8***

Marketing and Service Improvement **8**

Personal information for payments **8**

Resources ***9***

Changes to this Privacy Policy ***9***

Contact ***9***

Further Information ***9***

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

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.

Glossary of Phrases

Private Information Gathered

Definition: Specific personal and sensitive information collected to provide healthcare services.
Example: Collecting contact details, medical history, and other relevant data during client intake. Taking photographs and audiovisual recordings where the client is identifiable for treatment planning.

Privacy Breaches

Definition: Unauthorized access, disclosure, or loss of personal information.
Example: A cybersecurity incident leading to the release of client data.

Information Shared

Definition: Categories of information that may be disclosed to other entities as part of care coordination.

Example: Sharing client progress reports with medical specialists or insurance claims.

Collection of Information

Definition: Allay gathers personal data and other information through interactions, our website, and service provision.
Example: Collecting medical history and contact details during client intake.

Purpose of Collection, Use, and Disclosure

Definition: Allay collects information to provide tailored healthcare, manage records, and comply with laws.
Example: Developing treatment plans and sharing health data with consent.

Retention of Information

Definition: Storing personal information securely as needed for service delivery or legal compliance.
Example: Retaining therapy records in secure electronic systems.

Disclosure of Information

Definition: Sharing personal information with third parties under strict conditions for care coordination or legal requirements.
Example: Communicating client progress with physicians or legal authorities.

Legal and Ethical Obligations

Definition: Adhering to legal and ethical standards in handling personal information, particularly regarding safety.
Example: Reporting safety threats to authorities without client consent when legally required.

Audiovisual media: all types of media including but not limited to photography including still and digital photography, video/DVD recording, audio recording, and film.

Photography: still photographs using any type of camera (including but not limited to digital, film, and mobile phones).

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 how we handle the collection, use, safeguarding, retention, and disclosure of personal information, ensuring transparency and compliance with relevant privacy laws. This policy will be continuously assessed against new Regulation and Legislation, 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.

Scope

There are different people in the Allay team whom collect personal information. This may be direct supports, such as an occupational therapist or therapy assistant. It may also be other roles in our practice such as Client Services Officers, Information and Communications Management, or our Operational Management. In addition, Allay engages an external reception service, to manage our phone calls and appointments. All people in this Allay team abide by our Privacy Policy.

Privacy of Health Information

Collection of Information

Allay collects personal information through various interactions, including electronic and face-to-face engagements, interactions with our website, requests for information, and the provision of goods and services. This information is gathered not only directly from participants but also from their authorized representatives and through referrals from other service providers. The types of information collected include contact details, next of kin information, racial or ethnic origin, medical history, and other relevant data necessary to provide tailored services to our participants.

Personal information also includes photographs and audiovisual media recordings where the client is identifiable. Allay team members must not use their own personal photography or audiovisual equipment to capture client related imaging. Allay issued equipment must be used at all times. Any photography and audiovisual media recordings are undertaken with the written consent of those involved as appropriate. Consent is completed at commencement of service in your Service Agreement and in any of your sessions.

Purpose of Collection, Use, and Disclosure

The primary purpose of collecting this information is to ensure the delivery of high-quality care that meets the specific needs of each participant. By gathering comprehensive personal details, Allay is able to develop personalized treatment plans, facilitate communication between care teams, and ensure seamless service provision. Information is used internally to manage participant records, coordinate services, and improve our care offerings. Photographs and Audiovisual Media recordings support the provision of therapy services including the development of resources, training or research. Media must only be used in a way which is consistent with the purpose for which the materials were obtained.

Retention of Information

Personal information is retained in secure systems for as long as it is necessary to fulfill the purpose for which it was collected or to comply with legal obligations. The Health Records Act 2001 (Vic) requires records to be retained for a minimum of 7 years for adults and until the age of 25 for minors. Allay employs robust security measures to protect participant information from unauthorized access, alteration, or disclosure.

Disclosure of Information

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. This may include assessment information, interventions and outcomes, or engagement in our service. Other settings where information sharing may occur for example are, schools, doctors, therapists, builders, equipment suppliers.

Information will be provided to other settings for the purpose of effective service provision and with your written or verbal consent. Consent is completed at commencement of service in your Intake Form and in any of your sessions. Consent can be updated, added or withdrawn at any time during your care with Allay. Changes to consent can be communicated and then documented in your electronic file.

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

Legal and Ethical Obligations

We are committed to upholding the highest standards of confidentiality regarding your personal information. We recognise the critical importance of privacy and are dedicated to safeguarding your sensitive data. However, there are times where we or others may be concerned for yours or others safety. Such as a threat to life or health, child wellbeing, or unlawful activity.

If concerns arise regarding your safety or the safety of others either in our work with you or upon request from someone else, we have a legal and ethical obligation to report this information to the appropriate authorities. This may be without your consent. This could be Child Protection, Clinical Mental Health Services, Legal Bodies or Police. This ensures the well-being of our clients and the broader community. In such instances, we will provide only factual, objective information to facilitate necessary support.

Ensuring Privacy and Compliance

Allay is dedicated to upholding the privacy of our participants by adhering to applicable privacy laws and regulations. We are committed to continuous evaluation and improvement of our privacy practices to ensure they meet the standards of confidentiality and integrity expected by our participants and regulatory bodies.

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. An exception under the National Privacy Principles may include potential to cause harm or distress, or legally binding information.

We have two options to share information. This could be arranging a mutually agreeable time for supervised access to your personal information, or we can provide an exported PDF of your file.

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.

Up To Date Personal Information

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

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, PAR for analysis. We use other online programs such as Tali Train, ILS and TIS Interpreting Service which require demographic data.

All images taken for treatment planning purposes are to be uploaded to the client's Lumary or Sharepoint folder. Any hardcopy resources containing these images shall also be uploaded. The original electronic images or audiovisual recordings are then deleted from the camera.

Photography kept for educational/research purposes must be de-identified and securely stored.

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, any transmission by you to Allay is made 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.

Privacy Breaches

At Allay, we take the privacy and security of personal information seriously. Despite best efforts to protect data, there may be instances where a privacy breach occurs. A privacy breach happens when personal information held by us is lost, accessed, disclosed, or altered without authorization.

In the event of a privacy breach, Allay takes the following steps:

Immediate Containment and Assessment: We will promptly take steps to contain the breach and assess the potential impact on the privacy of personal information.

Notification: If we determine that the breach is likely to result in serious harm, we will notify all persons involved as soon as practicable. We will also notify the Office of the Australian Information

Commissioner (OAIC) in accordance with our obligations under the Privacy Act 1988 (Cth). For all breaches, the person's involved are notified.

Internal Processes: We view a privacy breach as an Internal Incident and will action our Incident Management review process to ensure a comprehensive review and improvement plan occurs

Mitigation and Prevention: We will take all reasonable steps to mitigate any harm that may result from the breach and will review our security measures to prevent similar incidents in the future.

Support and Assistance: We will provide guidance on steps you can take to protect affected people from potential adverse effects of the breach and offer any necessary support to help manage the situation.

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.

Privacy of Demographic Information

Marketing and Service Improvement

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.

Personal information for payments

We use a variety of payment options, such as EFTPOS, Stripe, PayPal, and Square. For payments using these, your card number will be sent to National Australia Bank to process the payment. NAB have their own Privacy Policy, contact NAB if you have concerns regarding your credit card details being entered into their facility.

Relevant Allay Resources

Further resources to support our Privacy Policy include:

- Allay Privacy Fact Sheet
- Other Allay policies such as Privacy Procedure, Information Technology Policy, Incident Management Policy, Privacy Breach Procedure and Social Media Policy

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 If you would like a copy of our Privacy Policy, please visit our website where it is shared or contact Allay directly.

Document Revision Information

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4	3 July 2023		Lauren Pattinson
5	11 July 2024		Lauren Pattinson
6	5 November 2024	Included policy for photographs and audiovisual media recordings of clients for treatment purposes	Stephanie Kelly