

## **Flying Start Children's Therapy - Privacy Policy**

At Flying Start Children's Therapy, we respect your privacy and are committed to protecting the personal information of children, people and families we support.

We understand that the information you share with us is sensitive. This may include sensitive information such as health information, developmental history, assessments, reports, and information about supports and services. We will take reasonable steps to ensure it is collected appropriately, used only for its intended purpose, stored securely, and not kept longer than necessary.

Personal information is stored securely and accessed or disclosed only where necessary to support you or your child's services and participation, where consent has been provided, or where required or authorised by law. We do not sell, rent, or trade personal information. Personal information is only used or shared for purposes directly related to you or your child's services, participation, and service delivery, or where required or authorised by law.

This policy applies to current and prospective clients, and to their parents, carers, and family members who provide or receive personal information in connection with our services, including during enquiries, intake, and service delivery.

This policy explains how we manage personal information in accordance with the Privacy Act 1988 (Cth) including the Australian Privacy Principles and the Notifiable Data Breaches scheme.

### **Privacy risks and safeguards**

We recognise that children and families may be more vulnerable to privacy risks, including misuse or unintended disclosure of personal information. The primary risks arise from the collection, storage, and sharing of sensitive information, as well as from everyday communication, use of mobile devices, and assumptions about who information can be shared with.

We collect only what is necessary, prioritise dignity and respect, support parent or carer involvement, and consider the child's voice and participation where appropriate.

We take steps to reduce these risks by limiting access to authorised team members, ensuring consent is informed and current, using secure systems and communication methods, supporting staff training and awareness, and responding promptly to any actual or suspected data breach.

### **How we collect information**

We collect information directly from you through forms, conversations, and service delivery wherever possible to ensure accuracy and transparency. In some cases, we

may also collect information from other professionals or organisations involved in you or your child's services (with your consent), such as treating professionals, referrers, plan managers, or funding bodies. Where appropriate, we will explain why information is being collected and how it will be used.

### **Why we collect and use information**

We use personal information to support you or your child's services, participation, and outcomes.

We use information to assess needs and goals, plan and deliver services, support continuity and safe decision-making, track progress, and prepare reports and summaries.

We also use information to manage appointments, communicate with you about services and updates, collaborate with other professionals (with consent), and provide information about relevant services, programs, groups, or events. You can opt out of general updates at any time.

Information is also used for administrative purposes, including processing invoices and payments (such as NDIS, Medicare, and private services), managing funding arrangements, and communicating with plan managers, referrers, or funding bodies where required.

We may also use information to meet legal and professional obligations, including maintaining records and meeting regulatory requirements.

We only use information for purposes that are directly related to you or your child's services and are reasonably expected.

### **Consent**

We seek consent to collect, use, and share personal information where required. Consent is informed, specific to the purpose, and kept current. Consent may be obtained verbally, in writing, or electronically, depending on the situation, and we document consent where appropriate.

You may withdraw or update your consent at any time. Where appropriate, consent may be provided by a parent, carer, or authorised representative. In some situations, if we are unable to obtain the information needed or consent for its use, we may not be able to provide some or all services or may need to adjust how services are delivered to ensure they are safe and appropriate.

### **Sharing your information**

We may share personal information where it is necessary to support you or your child's services, participation, or to manage your services.

This may include sharing information with other professionals, referrers, funding bodies, plan managers, or relevant organisations, as well as within our clinical and administrative team.

In some situations, information may be disclosed to external organisations such as regulatory or funding bodies where required or authorised by law, or where necessary to support services and participation. This includes situations where there are concerns about the safety or wellbeing of a child or person, and information may be shared with relevant authorities.

We will seek your consent before sharing information unless an exception applies. Information may also be disclosed where required or authorised by law, where consent has been provided or can reasonably be inferred, where necessary to prevent or lessen a serious risk to health or safety, or where otherwise permitted under the Privacy Act 1988 (Cth).

We only share the minimum information necessary for the specific purpose and take care to ensure information is only shared with authorised individuals.

### **Digital systems and service delivery**

We use secure digital systems to support service delivery, including systems for scheduling, clinical documentation, communication, and billing. We take reasonable steps to ensure these systems meet appropriate privacy and security standards.

### **Website and online information**

We may collect limited non-identifiable information when you visit our website to help us understand how it is used and improve its performance. This may include information such as pages visited, time spent on the site, general location, device type, and IP address, and the use of cookies or similar technologies.

We collect personal information through our website when you choose to provide it, such as through enquiry forms, waitlists, or registrations. We take reasonable steps to ensure that information provided through our website is protected. However, no method of transmission over the internet is completely secure.

### **Overseas data storage**

Some of our service providers may store or process information outside Australia. Where this occurs, we take reasonable steps to ensure appropriate safeguards are in place and that information is handled in line with Australian privacy obligations.

### **Data minimisation and retention**

We only keep personal information for as long as it is required to provide services and meet legal and professional obligations. For children's records, this is generally until the child turns 25 years old or 7 years from the last service, whichever is longer.

We take reasonable steps to securely destroy or permanently de-identify information when it is no longer required.

### **Access and correction**

You can request access to the personal information we hold about you or your child, and ask for corrections if it is inaccurate, incomplete, or out of date. We take reasonable steps to ensure the information we hold is accurate and current.

In some circumstances, we may not be able to provide access, such as where this would impact the privacy or safety of others. If this occurs, we will explain why where required. We may take reasonable steps to verify your identity before providing access.

### **Data breaches**

If a privacy breach occurs, we will assess and contain the issue, take steps to reduce harm, notify affected individuals where required, and comply with the Notifiable Data Breaches scheme. All team members are expected to report any actual or suspected privacy breach promptly.

### **Complaints**

If you have concerns about how your information is handled, please contact us first.

If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner:

Website: <https://www.oaic.gov.au>

Phone: 1300 363 992

### **Contact us**

Flying Start Children's Therapy

03 5264 7430

info@flyingstarttherapy.com.au

### **Updates to this policy**

We may update this policy to reflect changes in law, technology, or our practices. The most current version will be available on our website.