



ROLES & GOALS THERAPY SERVICES PTY LTD

PRIVACY POLICY 2025

1 Introduction

1. R & G Therapy Services Pty Ltd trading as Roles & Goals Therapy Services ABN 55 681 578 601 (“we”, “our”, and “us”) is committed to maintaining the privacy and confidentiality of personal information. This Privacy Policy is to provide information to you on how your personal information (which includes your sensitive information, including your health information) is collected and used within our practice, and the circumstances in which we may share it with third parties. The contents of this Privacy Policy are subject to change and are not intended to create a contract between us and any individual or entity that provides us with personal information.

2 Why and how your consent is necessary

When you register as our client, you provide consent for us (including our employees, agents, contractors and other representatives) to access and use your personal information so that the occupational therapists, counsellors and other staff working in our practice can provide you with the best possible therapy and support services, and so that others who provide healthcare, homecare, education or support services to you have access to information about your health and support needs where it is necessary or appropriate for those third parties to collect and hold that information. Only persons who need to see your personal information will have access to it. If we need to use your information for any other purposes, we will seek additional consent from you to do so.

3 Why we do collect, use, hold and share your personal information

We will need to collect your personal information to facilitate the provision of therapy services to you by our staff. Our main purpose for collecting, using, holding and sharing your personal information is to support the management of your health and wellbeing by our staff. We also use it for directly related business activities, such as financial claims and payments, practice audits and accreditation, and business processes (e.g. staff training).

4 What personal information do we collect?

The information we will collect about you includes your:

- (a) names, date of birth, addresses, and contact details including emergency contact and next of kin;
- (b) demographic information, including gender, cultural background, and language preferences;
- (c) health and medical information, including developmental history, diagnoses, medications, allergies, adverse events, family history, and relevant risk factors;
- (d) Medicare number (where available) for identification and claiming purposes;

- (e) NDIS number (where applicable) and other healthcare identifiers;
- (f) payment and/or financial information;
- (g) concession card or pension card details; and
- (h) private health fund details (where applicable).

5 Dealing with us anonymously

- 5.1 You have the right to deal with us anonymously or under a pseudonym unless it is impracticable for us to do so or unless we are required or authorised by law to only deal with identified individuals.
- 5.2 Please be aware that Medicare rebates, NDIS funding claims, and private health fund claims are only available where the relevant identifying information (such as your Medicare card, NDIS number, or health fund details) is provided. If you choose to deal with us anonymously or under a pseudonym, you may be required to pay for your services in full without access to these rebates or claims.

6 How do we collect your personal information?

- 6.1 We may collect your personal information in several different ways:
 - (a) You may provide us with your personal information directly (for example, when you make an appointment with us, our practice staff will collect your personal and demographic information via your registration and our Referral Form).
 - (b) Our staff members providing therapy or counselling services may also collect further personal information from you which may be disclosed to us. Information can also be collected through My Health Record, e.g. via Shared Health Summary, Event Summary, or through a Discharge Summary provided by a hospital or other healthcare service providers.
 - (c) We may also collect your personal information when you contact us via our website, send us an email or SMS, telephone us, make an online appointment, or communicate with us through social media or other digital platforms.
 - (d) In some circumstances personal information may also be collected from other sources. Often this is because it is not practical or reasonable to collect it from you directly. This may include information from:
 - (i) your guardian, parent, or responsible person;
 - (ii) other involved healthcare and education providers, such as doctors, specialists, allied health professionals, hospitals, schools, community health services, and diagnostic services;
 - (iii) the providers of support services to you (such as NDIS providers, support coordinators, or homecare providers); and/or

- (iv) your health fund, Medicare, the NDIS, or the Department of Veterans' Affairs (as necessary).

6.2 If your therapist or counsellor deems it in your best interest to discuss your clinical information with you, we will arrange for this to occur either in person, via telephone, or via videoconference.

7 **When, why and with whom do we use and share your personal information?**

7.1 We collect, use and disclose your personal information to facilitate the provision of podiatry services to our clients.

7.2 We may also share your personal information:

- (a) with other healthcare and education providers (including allied health providers, medical practitioners, schools, and any provider who has written a referral for you); with the providers of support services to you (such as NDIS providers or homecare providers);
- (b) with the providers of support services to you (such as NDIS providers, support coordinators, or homecare providers);
- (c) when it is required or authorised by law (e.g. court subpoenas, or where we are obliged to make a mandatory notification to a regulatory body);
- (d) when it is necessary to lessen or prevent a serious threat to a client's life, health or safety, or to public health or safety, or where it is otherwise impractical to obtain your consent;
- (e) to assist in locating a missing person;
- (f) to establish, exercise or defend a claim;
- (g) for the purposes of confidential dispute resolution processes;
- (h) for the purposes of uploading that information to your My Health Record, such as through the shared health summary or event summary;
- (i) to third parties who provide services to us from time to time including our practice software provider Cliniko, Adobe Acrobat, Snap Forms, Heidi Health; and/or
- (j) with third parties who work with our practices for business purposes, such as accreditation agencies or information technology providers – these third parties are required to comply with the Australian Privacy Principles (**APPs**) and this policy.

7.3 Only people who need to access your information will be able to do so. Other than in the course of facilitating the provision of therapy or support services, or as otherwise described in this policy, we will not share personal information with any third party without your consent.

- 7.4 We will not share your personal information with anyone outside Australia (unless under exceptional circumstances that are permitted by law) without your consent, other than with our third-party information technology and software providers. Where information is sent offshore, we and our offshore contractors and agents will continue to adhere to the APPs and other privacy requirements.
- 7.5 We will use your personal information for marketing our services directly to you, such as updates about therapy programs, resources, or changes to our practice. By registering as a client with us, you are providing your express consent to us doing so. You may opt out of direct marketing at any time by notifying us in writing.
- 7.6 We may use an artificial intelligence program to assist with recording and summarising your appointment, with a transcript stored in your clinical record. These notes will always be reviewed by your therapist before being relied upon to provide advice or support, to ensure they accurately reflect your appointment.
- 7.7 We cannot make any warranties or guarantees as to how third parties will collect, store, or use data. Where there has been a breach of privacy by a third party due to their own conduct, we will not be liable for any damages of any kind recognised by law. Our liability is limited to the extent of our own negligence or misconduct contributing to the breach. We will keep you informed if we receive communications from the third party in relation to any privacy breach that affects your information. Any complaints regarding third-party programs should be directed to the third party.

8 How do we store and protect your information?

- 8.1 Your personal information may be stored at our practice in various forms.
- 8.2 Our practice stores information as electronic records (including via cloud-based services), and archived paper records.
- 8.3 Our practice stores all personal information securely using physical and cloud-based servers (which may be located in Australia and overseas), with safeguards such as passwords, encrypted back-ups, confidentiality agreements for Australian employees, and secure cabinets.
- 8.4 All records will be retained until the later of 7 years from your last contact with the practice, or until you reach the age of 25 years.
- 8.5 We take steps to destroy or de-identify information that we no longer require.
- 8.6 We do not store or hold your credit card or other payment method details.
- 8.7 Our server security policy is designed to protect the servers from unauthorised access, data breaches, and other security threats. Our practices use the following security measures to ensure the personal information which it holds is secured:
 - (a) antivirus software is installed on all servers and updated regularly;
 - (b) firewalls are configured to block unauthorised traffic;
 - (c) servers are placed on their own subnet;

- (d) access to servers is restricted to authorised users;
- (e) servers are patched regularly to fix security vulnerabilities; and
- (f) backups are created regularly and stored securely both onsite and offsite.

9 How can you access and correct your personal information at our practices?

9.1 You have the right to request access to, and correction of, your personal information.

9.2 Our practice acknowledges that clients may request access to their therapy records. You can lodge this request either via email (support@rolesandgoalstherapyservices.com.au) or telephone. Our practice will acknowledge your request within 3 business days. We can post the requested information to your postal address, or we can email the information to you if you request it. If we are required to process a request for your records, we may charge for our reasonable costs incurred in complying with your request.

Our practice will take reasonable steps to correct your personal information where the information is not accurate or up to date. From time to time, we may ask you to verify that your personal information held by our practice is correct and current. You may also request that we correct or update your information, and you should make such requests in writing to support@rolesandgoalstherapyservices.com.au. There is no fee charged for making corrections to your personal information.

10 How can you lodge a privacy related complaint, and how will the complaint be handled at our practices?

10.1 We take complaints and concerns regarding privacy seriously. You should express any privacy concerns (including any breach of the APPs or any registered binding APP code) you may have in writing.

10.2 Complaints should be addressed to:

(a) Name and Position: The Director, Roles & Goals Therapy Services, P.O Box 10, Hilton Plaza, SA, 5033.

(b) Email: support@rolesandgoalstherapyservices.com.au

10.3 We will respond with acknowledgement of your complaint within 3 business days and provide a response within 30 business days.

10.4 You may also contact the Office of the Australian Information Commissioner (**OAIC**). Generally, the OAIC will require you to give them time to respond before they will investigate. For further information, visit www.oaic.gov.au or call the OAIC on 1300 363 992.

11 Privacy and our website

11.1 If you 'like' or comment on our social media pages, we will have your social media name.

Roles & Goals

- 11.2 Our website may contain links to third-party websites. We are not responsible for the content or privacy practices of websites that are linked from our website.