

Privacy Policy

What is this policy about?

Stepping Stones Speech Pathology is committed to protecting your privacy.

This policy explains how we manage personal information, what kinds of personal information we hold, why we hold it, and how we collect, store and handle it.

We are bound by both the [Privacy Act 1988](#) (including the [Australian Privacy Principles](#)) and the [Health Records and Information Privacy Act 2002](#) (NSW). Together, these are the Privacy Laws. This Policy is intended to reflect our obligations under the Privacy Laws.

You may request an electronic copy via email.

When we refer to 'clients' below, we mean both former and current clients, as well as people who make inquiries about our products and services (i.e., potential clients).

What kinds of personal information do we collect and hold?

"Personal information" means information or an opinion about an individual whose identity is apparent or can reasonably be ascertained. To provide evidence-based speech pathology services to our clients, we need to know personal information about them and others, including:

- names, ages, genders, and other identifying information
- Medicare and health fund details (including Medicare numbers and health fund insurers and the extent of their coverage)
- developmental, medical, ethnic, language, cultural and social histories (including medications, diagnoses, surgeries, and allergies)
- disabilities and impairments
- family histories, to the extent they may be relevant to our assessment, diagnosis and/or treatment of clients
- work and education histories
- hobbies, motivations, interests, and activities in which clients and their families participate; and
- financial information concerning the ability of clients to pay for our products and services.

For sensitive information – such as information about your health that is reasonably necessary for us to provide you with services or products – we will seek your consent.

How do we collect personal information?

We collect personal information by telephone (e.g. when you first call us to book an appointment for yourself or your child), via our website, pages on our social media sites (i.e. Facebook), through our client questionnaires (which are usually filled in by a client or carer as part of our assessment process), by written letters, reports and other documents (e.g. through doctors reports you provide to us), through emails, sms and other forms of electronic communication, and in interviews and other

interactions in our clinic (including face-to-face interviews and interviews conducted electronically, such as Zoom).

Who do we collect personal information from?

We collect personal information from clients, or someone authorised to act on a client's behalf (e.g., their parents, carers or guardians). Wherever practicable, we will ask for the information directly. However, we may need to contact others when relevant to a client's circumstances (e.g., when working with clients who cannot communicate their needs without the assistance of others). In these cases, we will, where practicable, make you aware of the fact that we have collected this information and the circumstances of the collection.

When you give us information about other people, we rely on you to have obtained their prior consent and on you to tell them of the types of third parties we may provide the information to and why.

Why do we collect personal information?

We collect personal information to deliver, review and improve the products and services that we provide. Generally, these services and products relate to speech-language pathology. If we didn't collect this information, we wouldn't be able to carry out our business or provide our products and services to you in accordance with the standards required by law and the [Speech Pathology Australia Code of Ethics](#). If you do not provide the personal information that we request, we would not be able to carry out our business and provide our products or services to you.

More specifically, we need personal information (including health information) to provide clients with assessment, diagnosis and management services and products related to their speech, language, fluency, and/or literacy-related issues. We also need this information:

- for administrative purposes of managing our business
- when necessary, to fulfil our obligations under law, regulation and/or Speech Pathology Australia's Code of Ethics
- for billing management (either directly or through insurers or other compensation agencies)
- discussions between speech pathologists and others working at our clinic (including other speech pathologists and sub-contractors) related to the care of clients
- discussions and other communications with your doctors, other health professionals, and education professionals in relation to your care
- discussions with insurers; and
- any insurance or compensation or other claims or litigation (including threatened litigation).

From time to time, we may use personal information (but not sensitive health information) to provide you with news or offers about our products or services that may be of interest to you. These products and services will be related to our speech pathology business described above and will be products

and services that we believe will be relevant to you. **You have a right, at any time, to tell us that you don't want to receive this type of material.**

Can people access our products and services anonymously?

No. Due to the nature of our services and products, we cannot offer them to people who wish to be anonymous, wish to use a pseudonym or who do not provide us with enough information to properly identify them for the purposes of providing services and products.

Who will see or have access to your personal information?

Your information may be seen or used by people working for or on behalf of Stepping Stones Speech Pathology and other service providers including (without limitation):

- Other health/education professionals involved in your treatment

Your personal information will generally only be used by the speech pathologist involved in your care, however on occasion your care may be provided by a number of health/education professionals (for example speech pathologist, occupational therapist, psychologist, teacher) working or consulting together. We may disclose your information to these health/education professionals as part of the process of providing your care and to other health/education professionals involved in your care.

- The referrer

Stepping Stones Speech Pathology will usually send a discharge summary to the referrer (i.e. your medical practitioner) following discharge from Stepping Stones Speech Pathology or at other times, as required for your care.

If you do not wish us to provide a copy of your discharge summary to the referrer you must let us know. Also, if the referrer's details have changed, please let us know.

- Relatives, guardians, legal representative

We may provide information about your condition to your parent, child, guardians, or to a person responsible for you, unless you tell us that you do not wish to disclose your health information to any such person.

- Other uses and disclosures

In order to provide the best possible environment in which to treat you, we may also use or disclose your personal and health information where necessary for:

- Activities such as quality assurance processes, accreditation, audits, risk and claim management, patient satisfaction surveys and staff education and training
 - Invoicing, billing and account management
 - To liaise with your health fund or Medicare
 - The purpose of sending you standard reminders, for example for appointments and follow-up care, by text message or email to the number or address which you have provided to us.
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- Other use with your consent

With your consent we may also use your personal information for other purposes such as including you on a marketing mail list, or research. Please know, however, that unless you provide us with your express consent for this purpose, we will not use your information in this way. We will not disclose your personal information to any individual outside Australia.

We will not rent, sell, trade or otherwise disclose to any other third parties any personal information about you without your consent, or unless we are required by law (including pursuant to a court or tribunal order), or where a permitted general situation (including a permitted health situation) exists within the meaning of the *Privacy Act 1988*, or if we reasonably believe disclosure is necessary for enforcement-related activities.

Important note: To promote the safety, welfare and wellbeing of vulnerable children in NSW, the *Children and Young Persons (Care and Protection) Act 1998 (NSW)* requires NSW speech pathologists who are members of Speech Pathology Australia to take reasonable steps to proactively exchange information, and co-ordinate the delivery of services, with NSW Health, schools, non-government organisations, the Family and Federal Courts, the police and other prescribed bodies in NSW. These obligations generally override confidentiality and privacy rights.

Security of your personal information and data retention

We know that you are concerned about your personal information – especially your health information. We will use reasonable endeavours to prevent unauthorised access to, modification of, disclosure, misuse or loss of that information as required by law.

Our directors and staff have reviewed the requirements of the Privacy Laws and our third-party service providers have been made aware that they are required to comply with the requirements of the *Privacy Act 1988*.

We have data protection measures in place (including password-locked computers) when we store personal information electronically. Our hard copy health records are stored in a locked filing cabinet on site accessible only to authorised staff.

If we no longer need personal information about you for any purpose described above, then we will take reasonable steps to destroy the information or to ensure that such information is de-identified.

This obligation is subject to an important exception – under the [Health Records and Information Privacy Act 2002](#) (NSW), we are obliged to retain health information:

- (a) about adults for 7 years from the last time we provided them with a service or product; and
- (b) about children, until the individual has attained 25 years of age.

Access to and accuracy of your personal information

We take reasonable steps to ensure that personal information we collect about or from you is accurate, complete, up-to-date and relevant whenever it is used, collected or disclosed. Subject to the recognised exceptions to access for organisations contained in the [Australian Privacy Principles](#) (APP12.3), you have a right to access your information if you wish (subject to any privilege or legal restrictions); and, if it is reasonable and practicable to do so, we will give you access to the information in the manner requested by you. By law, we may charge you a reasonable fee to cover the cost of retrieving and processing the information.

If you believe personal information that we hold about you is inaccurate, out-of-date, incomplete or misleading, we will, on receipt of your request, take steps that are reasonable in the circumstances to correct the information.

What happens if personal information is disclosed outside Australia?

Given the increasing globalisation of electronic information systems and the businesses of service providers, it is likely that personal information may be disclosed to a person or entity outside Australia (e.g., to a third-party service provider managed outside Australia). For the same reason, it is not practicable to specify the countries in which such recipients may be located.

If your personal information is disclosed by us to an overseas recipient (e.g., to an insurer or IT-service provider), we will take reasonable steps in the circumstances to ensure the overseas recipient does not breach the Australian Privacy Principles in relation to the information.

Complaints

If you have questions or comments about this Privacy Policy or you believe your privacy has been prejudiced by something we have done or failed to do, you have a legal right to lodge a complaint or contact us.

We will respond to you in writing within 15 days of receiving your complaint or question.

By letter: 1.09, 320 Annangrove Road, Rouse Hill NSW 2155

By email: info@steppingstonessp.com.au

Collection

When you use our website, we do not attempt to identify you as an individual user, and we will not collect personal information about you unless you specifically provide this to us.

Sometimes, we may collect your personal information if you choose to provide this to us via an online form or by email, for example, if you:

- Submit a general enquiry via our contact pages
- Send a written complaint or enquiry to our Directors

When you use our website, our Internet Service Provider (ISP) may record and log for statistical purposes the following information about your visit:

- Your computer address
- Your top-level name (for example: .com, .gov, .org, .au etc.)
- The date and time of your visit
- The pages and documents you access during your visit; and
- The browser you are using.

Our website management agent may use statistical data collected by our ISP to evaluate the effectiveness of our website.

Cookies

A “cookie” is a device that allows our server to identify and interact more effectively with your computer. Cookies do not identify individual users, but they do identify your ISP and your browser type.

This website uses temporary cookies. This means that upon closing your browser, the temporary cookie assigned to you will be destroyed and no personal information is maintained which will identify you at a later date.

Personal information such as your email address is not collected unless you provide it to us. We do not disclose domain names or aggregate information to third parties other than agents who assist us with this website and who are under obligations of confidentiality. You may be able to configure your browser to accept or reject all cookies and to notify you when a cookie is used. We suggest that you refer to your browser instructions or help screens to learn more about these functions. However, please note that if you configure your browser so as not to receive any cookies, a certain level of functionality of the Stepping Stones Speech Pathology website and other websites may be lost.

Links to third party websites

We may create links to third party websites. We are not responsible for the content or privacy practices employed by websites that are linked from our website.

Want more information?

If you have any questions about this policy or have any concerns about the personal information you or others have given us about you, please contact us.

More information on the *Privacy Act 1988* can be found on the website of the [Office of the Australian Information Commissioner](#).

Last updated: April 2021.