



Last update: October 2026

1. Privacy Policy

This policy explains how Full Life collects, holds, uses and discloses personal information, including health information, when providing occupational therapy, rehabilitation counselling and related services. It also explains how Full Life uses artificial intelligence and automated systems.

Full Life handles personal information in accordance with:

- the Privacy Act 1988 (Cth);
- the Australian Privacy Principles (APPs);
- the Notifiable Data Breaches scheme;
- applicable NDIS legislation, rules, Practice Standards and Quality Indicators;
- binding NDIS requirements and regulatory guidance concerning artificial intelligence;
- applicable professional standards; and
- other applicable Commonwealth and State laws.

2. Definitions

In this policy:

- AI system means an artificial intelligence, machine-learning, generative AI or automated decision-making system.
- Health information includes information about a person's health, disability, injuries, treatment, supports and health services.
- Personal information means information or an opinion about an identified individual or an individual who is reasonably identifiable.
- Sensitive information includes health, disability, genetic, biometric, racial or ethnic, religious, sexual orientation and criminal-record information.

3. Information Full Life collects

Full Life may collect:

- names, dates of birth and contact details;
- emergency contact and representative details;
- Medicare, NDIS, funding and private health insurance information;
- health, disability, developmental and medical information;
- assessments, clinical notes, therapy plans and progress records;
- information about daily activities, behaviours, goals and support needs;

- photographs, video or audio recordings where authorised;
- reports from health practitioners, support providers, schools or government agencies;
- appointment, billing and payment information;
- feedback, complaints and incident information; and
- technical information generated when a person uses Full Life's website or online services.

Full Life will not collect sensitive or health information unless the individual consents or the collection is otherwise permitted or required by law.

4. How information is collected

Full Life may collect information:

- directly from the individual;
- from a parent, guardian, nominee, plan nominee or authorised representative;
- from health practitioners, support coordinators, schools, carers and other service providers;
- from the National Disability Insurance Agency, plan managers, government bodies or insurers;
- through forms, assessments, telephone calls, emails, telehealth and online portals;
- during appointments, home visits and workplace or school assessments; and
- through approved digital systems used to deliver or administer services.

Where practicable, information will be collected directly from the individual. If information is collected from another person, Full Life will take reasonable steps to notify the individual unless an exception applies.

Website and cookies

Full Life may collect personal information through its website, including through online forms, online queries and emails. Full Life may use third parties to analyse traffic on its website, which may involve the use of cookies. Individuals can control their browser settings to limit the collection of cookies; however, if cookies are disabled, some features of the website may not work.

5. Why information is collected and used

Full Life may collect and use information to:

- assess occupational therapy needs;
- plan, provide, monitor and review services;
- communicate with clients, participants, representatives and authorised support providers;
- prepare assessments, reports and recommendations;

- arrange appointments and manage referrals;
- claim payment from the NDIA, plan managers, insurers or other funding bodies;
- maintain clinical and business records;
- manage safety, incidents, complaints and service quality;
- meet professional, safeguarding, NDIS and legal obligations;
- train and supervise staff, using de-identified information where practicable; and
- undertake another purpose for which consent has been given or which is permitted by law.

If necessary information is not provided, Full Life may be unable to provide some or all requested services.

6. Anonymity and pseudonyms

Individuals may deal with Full Life anonymously or by using a pseudonym where this is lawful and practicable.

Full Life may require a person's identity where it is necessary to provide safe clinical services, process NDIS or insurance claims, keep legally required records or comply with the law.

Government related identifiers

Full Life will not use or disclose a government related identifier, such as an NDIS or Medicare number, unless the use or disclosure is reasonably necessary to verify the individual's identity for the purposes of Full Life's services, to fulfil Full Life's obligations to the NDIA, Medicare or another agency, or is otherwise required or permitted by law.

7. Disclosure of information

Full Life may disclose information, where authorised or permitted, to:

- parents, guardians, nominees and authorised representatives;
- treating health practitioners and members of an authorised support team;
- support coordinators, recovery coaches, plan managers and service providers;
- the NDIA and the NDIS Quality and Safeguards Commission;
- Medicare, private insurers and other funding bodies;
- schools, employers or community organisations where authorised;
- professional advisers, auditors and accreditation bodies;
- approved technology, cloud, transcription and practice-management suppliers;
- courts, tribunals, law-enforcement bodies or regulators; and
- another person where disclosure is required or permitted by law.

Full Life will seek consent before sharing information unless consent is not required by law, including where disclosure is necessary to address a serious threat to health or safety.

8. Use of artificial intelligence

Permitted use

Full Life may use approved AI systems to assist with limited tasks such as:

- appointment and administrative processes;
- preparing draft correspondence;
- transcribing authorised clinical discussions;
- organising or summarising clinical information;
- preparing draft clinical notes or reports;
- analysing service data; and
- supporting clinical research, assessment or decision-making.

AI supports, but does not replace, the professional judgement of an occupational therapist.

9. AI safeguards

Before using an AI system, Full Life will take reasonable steps to:

- assess its privacy, security, clinical safety, accuracy, accessibility and discrimination risks;
- confirm how the system stores, uses, retains and discloses information;
- approve the system for its intended purpose;
- minimise the personal information entered into the system;
- de-identify information where reasonably practicable;
- restrict access to authorised persons;
- verify material AI-generated content before it is used; and
- maintain appropriate records of significant uses and decisions.

Identifiable client or participant information must not be entered into a publicly available or unapproved AI system.

Full Life will not permit a supplier to use identifiable client information to train a general-purpose AI model unless the individual has given separate, express consent and the use is otherwise lawful.

10. Clinical and significant decisions

An AI system will not independently:

- diagnose a client;
- prescribe or determine treatment;
- determine whether a person may access services;
- make a final recommendation concerning NDIS supports; or
- make another decision that could significantly affect a person's rights, interests, safety or wellbeing.

A suitably qualified person must meaningfully review any AI output used for a clinical or significant decision. That person must be able to correct, reject or depart from the output.

Where AI materially assists with a significant decision, Full Life will provide, where required or reasonably appropriate:

- notice that AI was used;
- an understandable explanation of the role of the AI system;
- the identity or position of the person responsible for the final decision; and
- an opportunity to provide further information and request human reconsideration.

Automated decisions: Full Life does not make decisions about clients solely by the operation of a computer program. Full Life may use approved AI systems or other computer programs to substantially and directly assist staff to make decisions that could reasonably be expected to significantly affect an individual's rights or interests, such as preparing draft assessment findings, reports or recommendations about NDIS supports. The kinds of personal information used by these programs may include identity and contact details, health, disability and developmental information, assessment results, clinical notes, and information about goals, daily activities and support needs. A suitably qualified practitioner reviews the output and makes the final decision.

11. Consent and optional AI use

Full Life will obtain consent where consent is legally required for an AI-related use. Consent must be voluntary, informed, specific and current.

An individual may decline an optional use of AI or withdraw consent by contacting Full Life. This will not affect access to services unless the processing is reasonably necessary to provide the requested service or is required by law. Any material consequence will be explained.

Protecting dignity during services

Full Life will respect each client's personal space and dignity at all times. During face-to-face services, Full Life staff will explain and ask for permission before any procedure that involves physical contact or personal space, provide timely support such as assistance with toilet breaks or continence needs, and ensure dignity and privacy during activities such as showering and dressing.

12. Direct marketing

Full Life will use personal information for direct marketing only where permitted by law. Individuals may opt out at any time by using the unsubscribe facility or contacting Full Life.

Full Life will not use health or other sensitive information for direct marketing without consent.

13. Overseas storage and disclosure

Some technology or cloud-service providers may store or access information outside Australia.

Before disclosing personal information overseas, Full Life will take reasonable steps to comply with APP 8 and assess the recipient's privacy and security arrangements.

Information may be stored or accessed in Australia, the United States of America and member countries of the European Union.

The countries involved may change if Full Life changes suppliers. Updated information may be obtained from Full Life's Privacy Officer.

14. Security

Full Life uses reasonable technical and organisational measures to protect information from misuse, interference, loss and unauthorised access, alteration or disclosure. These measures may include:

- secure clinical and practice-management systems;
- access controls and multi-factor authentication;
- encryption and secure transfer methods;
- device and network security;
- physical security for paper records;
- confidentiality obligations;
- staff privacy and cybersecurity training;
- supplier assessments and contractual controls;
- audit logs and monitoring;
- incident-response procedures; and
- secure destruction or de-identification.

No electronic system is completely secure. Full Life regularly reviews its safeguards having regard to the sensitivity of the information and changes in technology and risk.

15. Records and retention

Full Life keeps personal and clinical information only for as long as required for the purpose for which it was collected or as required by applicable health, NDIS, taxation, insurance and professional record-keeping obligations. Client records are kept for a minimum of 7 years or, if the client is a child, until they reach the age of 25.

When information is no longer required, Full Life will take reasonable steps to securely destroy or de-identify it, unless retention is required or permitted by law.

16. Data breaches and AI incidents

Full Life will assess and respond to any suspected:

- loss or unauthorised access, use or disclosure of personal information;
- cybersecurity incident;
- disclosure through an AI or technology system; or
- unsafe, discriminatory, inaccurate or unauthorised AI operation.

Full Life will take reasonable steps to contain the incident, reduce possible harm, investigate its cause and prevent recurrence.

Where required, Full Life will notify affected individuals, the Office of the Australian Information Commissioner, the NDIS Quality and Safeguards Commission and any other relevant authority.

17. Access to personal information

An individual may request access to personal information held about them. A request should be made using the contact details below.

Full Life will respond within a reasonable period. Access may be refused or limited where permitted by law. If this occurs, Full Life will generally provide written reasons and information about available complaint options.

Full Life may require proof of identity before providing access. Full Life will not charge for making an access request. Any charge for giving access will not be excessive, and the likely cost will be advised in advance.

18. Correction of information

An individual may ask Full Life to correct information that is inaccurate, incomplete, out of date, irrelevant or misleading.

Full Life will take reasonable steps to correct the information where appropriate. If a correction is refused, Full Life will generally provide written reasons and explain how the individual may make a complaint or request that a statement be associated with the record.

19. Complaints

A privacy or AI-related complaint may be made to:

Privacy Officer

Email: feedback@full-life-ot.com

Telephone: 0480 162 857

Full Life will:

- acknowledge the complaint promptly;
- investigate it fairly and confidentially;
- request further information where necessary; and
- provide an outcome within a reasonable period, generally within 30 days.

If the complaint is not resolved, the individual may contact:

Office of the Australian Information Commissioner

GPO Box 5288

Sydney NSW 2001

Website: www.oaic.gov.au

Telephone: 1300 363 992

National Relay Service: ask for 1300 363 992

NDIS Quality and Safeguards Commission

Website: www.ndiscommission.gov.au

Telephone: 1800 035 544 (TTY 133 677)

National Relay Service: ask for 1800 035 544

Aged Care Quality and Safety Commission

Website: www.agedcarequality.gov.au

Telephone: 1800 951 822

National Relay Service: ask for 1800 951 822

20. Accessibility

Full Life will provide this policy in an accessible format or explain it using an appropriate communication method on request. Interpreters, advocates, communication aids or representatives may be used where appropriate and authorised. People who are deaf or hard of hearing, or who have a speech or communication impairment, can contact Full Life through the National Relay Service, and Auslan interpreters can be arranged on request.

Staff information

Full Life also collects personal information about employees and prospective employees, including work experience and history, police clearances and character references. This information is used to consider the suitability of prospective employees and to meet Full Life's legal obligations.

21. Changes to this policy

Full Life may update this policy to reflect changes to its services, technology, AI systems or legal obligations. The current version will be available at Full Life's website or from Full Life on request.