

## Privacy Policy

### 1. ABOUT THIS POLICY

#### Purpose

Therapy Lab Group (hereon referred to as TLG) is committed to protecting the privacy of personal information we collect and hold about individuals. TLG is required to comply with the Australian Privacy Principles (APP) in the Privacy Act 1988 (Cth), the Health Privacy Principles in the Health Records Act 2001 (Vic), and other privacy laws that govern how private sector health service providers like TLG handle your personal information (including your health information). In situations where a consumer's health information is protected by both Commonwealth and Victorian privacy principles, then TLG must adhere to the Commonwealth principle as this takes precedence.

The privacy policy is to be adhered to by all TLG employees, service providers, and volunteers.

This privacy policy explains how TLG manages the personal information we collect, use and disclose.

### 2. HOW TLG HANDLES YOUR PERSONAL INFORMATION

#### TLG's Legal Obligations

In order to provide you with the healthcare services that you have requested; TLG will need to collect and use your personal information. If you provide incomplete or inaccurate information to us or withhold personal and health information from us, we may not be able to provide you with the services you are seeking.

#### What information does TLG collect?

TLG only collects personal and sensitive information that is directly related to the legitimate purposes to enable your use to the services you choose. This includes, but is not limited to, your name, date of birth, address, health fund details and information about your health history and family history. Sometimes, TLG employees, particularly clinicians, may require more information from you to ensure service planning and service matching will meet your needs and expectations. In these circumstances, TLG employees (clinicians) will discuss this with the consumer in a respectful manner and will seek written consent from the consumer prior to obtaining such information in a lawful and fair way.

Unless the third party has been authorised for disclosure at service commencement, information will not be collected from a third party. In these circumstances it must be considered unreasonable or impracticable to obtain the information or consent from the individual concerned. TLG employees (clinicians) should discuss this with their Manager prior to implementing third party information collection and must provide a written file note attached to the client's file.

TLG also collects personal information about employees during their employment. The personal information which may be collected includes name, date of birth, residency status, gender, tax file number, banking details, superannuation details, qualifications, recruitment documentation e.g. referee reports, training attended, performance management framework, and other information.

#### How does TLG use your information?

TLG uses your personal information for the purpose you have given the information to us. We will use your information to provide therapy services to you, to manage our relationship with you and to contact you in relation to matters concerning your care. We may also use your information for other purposes permitted under the Privacy Act 1988.

Who might we disclose your information to?

- Therapy Lab Group staff involved in your care
- Other service providers in Therapy Lab Group or outside Therapy Lab Group
- Other service providers, health professionals, employers, and other organisations, for Therapy Lab Group NDIS services
- Your local doctor and/or treating specialist
- Other health care agencies who may be continuing your care

#### 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 claims management, patient satisfaction surveys and staff education and training
- invoicing, billing and account management
- to liaise with your health fund, Medicare or the Department of Veteran's Affairs and where required provide information to your health fund, Medicare or the Department of Veteran's Affairs to verify treatment provided to you
- 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.

TLG employees will take all reasonable measures to ensure that the information received and held is up to date. Records shown to be inaccurate or require updating will be amended and/or updated immediately when the need is recognised.

### 3. SECURITY OF PERSONAL INFORMATION

TLG will take reasonable steps to protect personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.

Consumer management records (that may include personal, sensitive and health information) are stored securely and are accessible only to those who require the information.

Hard copy personal information will be stored securely and remain accessible only to TLG employees.

Where TLG no longer needs the personal information for any purpose for which the information may be used or disclosed, it will take all reasonable steps to destroy or ensure that it is de-identified unless the personal information is part of a State or Commonwealth record, or TLG is required by or under State or Commonwealth legislation, or a court/tribunal order, to retain the information.

### 4. ACCESS TO PERSONAL INFORMATION

If TLG holds personal information about a consumer, TLG will, on request (whether that be verbal or written) by the consumer, give the consumer access to the information within 30 calendar days unless TLG is authorised to refuse access by Section 4.12.2 as it relates to a specific State or Commonwealth legislation.

TLG may refuse access to a consumer based on any of the following:

- giving access would pose a serious threat to life, health or safety of any individual or to public health or public safety;
- giving access would have an unreasonable impact on the privacy of other individuals;

- the request for access is frivolous or vexatious;
- the information requested relates to an existing or anticipated legal proceeding;
- giving access would prejudice negotiations between the organisation and the individual;
- giving access would be unlawful;
- denying access is required or authorised by law or a court/tribunal order;
- giving access would likely prejudice the taking of appropriate action in relation to suspected unlawful activity or serious misconduct;
- giving access would be likely to prejudice an enforcement related activity conducted by, or on behalf of, an enforcement body; or
- giving access would reveal evaluative information in connection with a commercial sensitive decision-making process.

## 5. CONTACT US

Contact us to obtain further information regarding this privacy policy or to provide any comments by sending an email to [info@therapylabgroup.com](mailto:info@therapylabgroup.com).

All feedback will be managed with our Feedback and Complaints policy.

### External Complaints Agencies

If you are unhappy with how TLG staff managed your complaint, you may also contact:

#### Commonwealth Ombudsman

1300 362 072  
Indigenous – 1800 060 789

#### National Disability Insurance Agency

1800 800 110  
[feedback@ndis.gov.au](mailto:feedback@ndis.gov.au)

#### NDIS Quality and Safeguard Commission

1800 035 544

Lab



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