



PRIVACY POLICY

Policy number	POL0201	Version	1
Approved by board on	11/02/2020	Scheduled review date	11/02/2022

Introduction

What is Personal Information and why do we collect it?

Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect include: names, addresses, email addresses, phone and facsimile numbers.

This Personal Information is obtained in many ways including:

- during therapy sessions
- correspondence by forms, telephone and facsimile, by email
- via our website www.fullcircle.org.au,
- from your website,
- from media and publications,
- from other publicly available sources,
- from third parties including other agencies, schools etc.

(We do not guarantee website links or policy of authorised third parties)

Your Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure.

You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing. When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

Sensitive Information

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent, or where required or authorised by law.

Third Parties

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.



Purpose

To identify how Full Circle Therapies handles Information and protect Privacy of clients.

Policy

Full Circle Therapies is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The NPPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at www.aaic.gov.au

Disclosure of Personal Information

Your Personal Information may be disclosed in a number of circumstances including the following:

- Third parties where you consent to the use or disclosure; and
- Where required or authorised by law.

Security of Personal Information

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

Access to your Personal Information

You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.

Full Circle Therapies will not charge any fee for your access request but may charge an administrative fee for providing a copy of your Personal Information.

In order to protect your Personal Information, we may require identification from you before releasing the requested information.

Maintaining the Quality of your Personal Information

It is an important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.



Policy Updates

This Policy may change from time to time and is available on our website www.fullcircle.org.au

Privacy Policy Complaints and Enquiries

If you have any queries or complaints about our Privacy Policy please contact us at 08 9022 9881 or admin@fullcircle.org.au or via our website at www.fullcircle.org.au

PRIVACY PROCEDURE

Policy number	PRO0201	Version	1
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Responsibilities

It is the responsibility of the Chief Operating Officer to ensure that:

- Board Members, Employees, Contractors and Volunteers and are aware of this policy.
- any breaches of this policy coming to the attention of management are dealt with appropriately.

Processes

At all times all Board Members, Employees, Contractors and Volunteers will act in a manner that is respectful to client privacy.

On enrolment clients and parents/carers/advocates are advised of our privacy policy by receiving a copy of our Privacy Statement.

During enrolment process a consent to release/obtain information form is obtained. All information will be kept private and secure in client database and will not be shared to anyone except for those approved on the consent to release/obtain information form.

All Employees/contractors and volunteers are informed during induction and receive professional development training on how to protect privacy and confidentiality in line with this policy.

All Employees/contractors and volunteers are required to complete a Privacy & Confidentiality Agreement before commencement.

Related Documents

- Acceptable Use of Vehicles & Equipment Policy
- Credit Card and Financial Transaction Cards Policy
- Board Delegations Policy
- Privacy Statement
- Privacy & Confidentiality Agreement

Appendix A

Privacy Statement - Located at S:\Full Circle\FORMS\Enrolment Forms



PRIVACY STATEMENT

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Paediatric Allied Health Services

Phone: 9022 9881 | admin@fullcircle.org.au | 21B Ward Street, Kalgoorlie WA 6430 | www.fullcircle.org.au

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Appendix B

Privacy and Confidentiality agreement - Located at S:\Full Circle\FORMS\Enrolment Forms



PRIVACY & CONFIDENTIALITY AGREEMENT

It is the policy of Full Circle Therapies Inc. that all employees/contractors/volunteers agree to sign and adhere to a Privacy & Confidentiality Agreement.

Each new employees/contractors/volunteers will be presented with a Privacy & Confidentiality Agreement to sign and be witnessed upon employment as all employees, some contractors and volunteers may have free access to confidential clinic information in whole or in part.

ALL employees/contractors/volunteers will be required to sign an Acknowledgment of Privacy and Confidentiality Statement. This signed document of the agreement to uphold the provisions of this policy will be kept on file in the employees/contractors/volunteers file.

ACKNOWLEDGMENT OF PRIVACY & CONFIDENTIALITY STATEMENT

I have received a copy of read, understand and agree to uphold the written policies on matters of privacy and confidential information provided during induction. I also understand that in my duties I will/may be privy to confidential information.

Confidential information is defined as any information found in a client database, personal information, and work-related information and organisational information.

Employees/contractors/volunteers shall never discuss a private and confidential information to any non-employee of FCT, friends or family members. Employees/contractors/volunteers are to be aware at all times that conversations regarding private and confidential information s are not to be overheard by others and take appropriate steps to ensure this confidentiality.

Any unauthorised disclosure of privacy and confidential information by employees/contractors/volunteers could render the organisation liable for damages. Any employees/contractors/volunteers who violates the confidentiality of organisation, client or employee related information is subject to disciplinary action up to and including termination from employment/contract or volunteering

Signed: _____ Date: _____

Name: _____

FCT Representative: _____ Date: _____

FCT Name: _____

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