Privacy Policy

Purpose

This policy describes the personal information practices of BePositive Therapy.This policy outlines the obligations and undertakings of the business in response of the management and storage of client personal information.

BePositive Therapy are committed to protecting your privacy and ensuring the confidentiality of your personal information. We comply with the **Privacy Act 1988 (Cth)**, the **Australian Privacy Principles (APPs)**, and relevant state legislation. Maintaining privacy is a core expectation for all BePositive employees.

Scope

This policy applies to all BePositive employees, contractors and students and covers the collection, use, storage, and disclosure of personal information relating to clients and their families.

Definition

Private information is personal information obtained or opinion provided about a client which is recorded in material form (or not). Information may include but is not restricted to information that identifies a person, health and medical details, disability details, professional opinions and any current and past supports provided to you. We may collect information about your family if they provide care directly to you.

Related Policy:

- BePositive Privacy Breach Procedure
- BePositive Complaints and Feedback Policy
- BePositive Complaints and Feedback Procedure
- BePositive Code of Conduct
- BePositive Quality Management Policy
- BePositive Child and Wellbeing Policy

Our Privacy Commitments

1. Consent

- We will obtain your consent before collecting or sharing personal information, except where required by law or legal process.

- You may **withdraw consent at any time** by contacting us. Withdrawal may limit the services we can provide.

2. Collection of Information

We collect personal information to:

- Communicate with you and manage services
- Verify your identity when you contact us
- Maintain accurate records

- Comply with legal and regulatory obligations
- Ensure safety and wellbeing
- Resolve disputes

3. Identification

When contacting us, we will ask **three identifying questions** (e.g., name, date of birth, NDIS number). If you cannot verify your identity, we cannot disclose information.

4. Use and Disclosure

- We only use your information for the purpose for which it was collected.
- We may share information with relevant third parties (e.g., allied health professionals, NDIS planners) where necessary for service delivery and with your consent.
- We will not share information without consent unless:
  - Required by law
  - Necessary to prevent serious harm to you or others
  - For law enforcement purposes

5. Photography

We may take photographs to assist in representing your needs. **Consent will always be obtained before photographs are taken or used.**

Data Security

- Personal information is stored in a secure, password-protected system with two-factor authentication.
- Paper files are destroyed after being uploaded to our secure system.
- If long-term paper storage is required, documents are kept in locked cabinets.
- We retain information for **a minimum of 7 years** or as required by law, after which it is securely destroyed.
- In the event of a data breach, we follow our **Privacy Breach Procedure**.

Access and Correction

- You may request access to your personal information by emailing admin@bepositivetherapy.com.au. We will respond within **30 days**.
- You may request corrections to inaccurate information. Requests must be in writing and supported by evidence.
- If we do not agree to a correction, you may provide a statement for your file.

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Complaints

- If you believe we have mishandled your personal information, email admin@bepositivetherapy.com.au with "Complaint" in the subject line.

- Complaints are reviewed by the **General Manager – Clinical Excellence** and handled confidentially.

- If you are not satisfied, you may escalate to:
    - **Office of the Australian Information Commissioner (OAIC)**
      Privacy complaints | OAIC

    - **NDIS Quality and Safeguards Commission**
      www.ndiscommission.gov.au

    - **Aged Care Quality and Safety Commission**
      Make a complaint | Aged Care Quality and Safety Commission

Mutual Privacy Obligations

We request that clients:

- Inform us of any security cameras in use during service delivery.
- Refrain from posting therapist images on social media without explicit consent.

Breaches of employee privacy will be managed through our complaints process. Serious breaches may result in legal action.