

PRIVACY POLICY

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1 PURPOSE

Amelia Read Psychology Pty Ltd, trading as The Neurodiverse Network by Amelia Read (“we”, “our”, “the Practice”) is committed to protecting the privacy, confidentiality, and dignity of all clients, families, employees, contractors, and visitors.

We comply with:

- Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs)
- NDIS Code of Conduct and NDIS Quality & Safeguarding Framework
- AHPRA, professional ethics and registration standards
- State and Territory health records laws
- Medicare, WorkCover Queensland, and other relevant funding requirements

This Privacy Policy explains how we collect, use, store, and disclose your personal information in alignment with the above requirements and our internal policies.

2 SCOPE

This policy applies to:

- All clients and families
- Employees, contractors, and student placements
- Support coordinators and referring practitioners
- Website visitors, enquiry contacts, and individuals engaging with our services

It covers the handling of personal, sensitive, health, and NDIS-related information collected through any channel, including our website, practice management system, forms, emails, assessment tools, and internal communication.

3 WHAT INFORMATION WE COLLECT

We only collect information that is reasonably necessary to provide safe, high-quality allied health and NDIS services.

3.1 Personal Information

As defined in the Privacy Act, this includes information that identifies you such as:

- Name, date of birth, address, contact details

- Emergency contacts or next-of-kin
- Payment details, funding information (Medicare, NDIS, WorkCover, Private Health)
- Demographic information such as language, cultural background, gender

3.2 Sensitive Information

Sensitive information is only collected with consent unless required by law. This may include:

- Health information, diagnoses, developmental history
- Disability information, functional needs, NDIS plan details
- Clinical notes, assessment data, treatment goals
- Cultural, religious, biometric, or criminal history information (where relevant)

3.3 Website & Digital Information

When you visit The Neurodiverse Network by Amelia Read website or engage with our online platforms, we may collect certain information to support functionality, security, analytics, and service delivery. This section outlines what we collect, how we collect it, and how it is used.

3.3.1 Information We Automatically Collect

When you access our website, our systems may automatically collect information such as:

- Your IP address
- Browser type, operating system, and device information
- Pages viewed, and referring websites
- Approximate geographic location (not precise)
- Interactions with website features (e.g., forms, navigation, clicks)

This information is de-identified and used for website performance, security, and service improvements.

3.3.2 Cookies, Tags & Tracking Technologies

Our website uses cookies and similar technologies to:

- Enable website functionality
- Improve loading speed and responsiveness
- Maintain accessibility features
- Remember your preferences (e.g., contact details in forms)
- Analyse website traffic and user behaviour

- Support secure login to client portals, if applicable

You may disable cookies through your browser settings, although some features may not work as intended.

We do not use cookies for advertising or profiling unless you have explicitly consented.

3.3.3 Online Forms and Uploaded Information

When you submit information via online forms (e.g., enquiries, registration forms), we may collect:

- Contact details (name, email, phone)
- Information voluntarily provided in the forms
- Documents you upload (e.g., referrals, NDIS plans)

This information is transmitted securely and stored in our practice management or encrypted storage systems, consistent with our internal privacy and security policies.

Information submitted through forms becomes part of your client record.

3.3.4 Social Media Interactions

If you interact with us through platforms such as:

- Facebook
- Instagram
- LinkedIn
- Google Business

Those platforms may collect information according to their own privacy policies. We only view information you intentionally share with us.

We do not export or store your social media data unless you explicitly provide it.

4 HOW WE COLLECT INFORMATION

We collect information through:

- Client intake forms, online booking forms, and referral documents
- Direct communication via email, phone, SMS or in person
- Assessments and therapy sessions
- NDIS documents provided by clients, support coordinators, or plan managers
- Third-party healthcare providers (with consent)
- Government agencies such as Medicare or WorkCover QLD (only as authorised)

In emergencies or where required by law, we may collect information without consent.

5 HOW WE USE YOUR INFORMATION

We use personal and sensitive information only for its primary purpose – providing safe, ethical, and effective allied health and NDIS services – unless a lawful exception applies.

5.1 Primary Purposes

- Delivering therapy, assessments, and support services
- Creating clinical notes and treatment plans
- Coordinating care between internal practitioners (with confidentiality maintained)
- Managing appointments, billing, and administrative operations
- Meeting mandatory reporting, safeguarding, and duty-of-care obligations

5.2 Secondary Purposes

In lined with industry standards:

- Quality assurance and service improvement
- Training and supervision (students/trainees under strict confidentiality)
- Communication with your GP, psychiatrist, paediatrician, or referrer
- Liaising with Medicare, NDIS, WorkCover, Private Health insurers
- Sending appointment reminders and service updates

We do not use your information for marketing without your explicit consent.

6 WHEN WE MAY SHARE YOUR INFORMATION

Your information is strictly confidential and will only be used for the purposes for which you have given us this information.

We will never use or disclose your personal information to other organisations or anyone else unless:

- You have consented for us to share your personal information for this purpose
- You would reasonably expect or we have told you (including via this policy) that your information is usually or may be used or disclosed to other organisations for a related purpose
 - I.e., If you were referred by a medical practitioner on a government funded initiative (e.g., Medicare, DVA, WorkCover QLD, etc) it is usual practice to provide correspondence to the referrer, as required by the relevant funding guidelines.
- Failure to disclose the information would place you or another person in serious or imminent risk
- Where a court orders the release of information for legal purposes

- Your approval has been obtained to provide a written report to another agency or to discuss the material with another person
- If the disclosure is required by law

We will never disclose more information than reasonably necessary.

7 INTERNAL PRIVACY, CONFIDENTIALITY & COMMUNICATION

We take your privacy and confidentiality seriously. All staff, contractors, and students working within The Neurodiverse Network by Amelia Read follow strict internal policies, procedures, and professional standards to protect your personal information.

To help you understand exactly how your information is used and protected within our organisation, the following principles apply:

7.1 How We Use and Share Your Information Internally

- **Information is only shared on a ‘need-to-know’ basis.**
Only team members directly involved in your care, administration, billing, or support are permitted to access your records.
- **Practitioners may communicate with each other to support your care.**
At times, internal discussions occur between your treating practitioners (e.g., between a psychologist and a therapy assistant) to ensure your care is well-coordinated, safe, and appropriate. These communications are always:
 - purposeful
 - clinically relevant
 - aligned with your goals
 - carried out within strict confidentiality safeguards
- **Administration and reception staff access limited information only.**
They may view the information required to:
 - book your appointments
 - process payments
 - manage referrals
 - support Medicare, NDIS, WorkCover, or private health claiming

They cannot access clinical notes unless necessary for a specific operational purpose and authorised by a manager.

- **Managers may access records for compliance and quality assurance.**

This includes:

- ensuring accurate record-keeping
- auditing documentation for NDIS or Medicare requirements
- following up risk, incidents, or complaints

Managers do not use your information for any purpose unrelated to care or legal compliance.

7.2 How We Protect Your Information Internally

- **All staff are trained in privacy, confidentiality, and the NDIS Code of Conduct.**

This includes understanding:

- the Australian Privacy Principles
- limits of confidentiality
- client rights
- how to securely store, handle, and transmit information

- **Confidentiality applies to all communication forms.**

Including:

- face-to-face discussions
- phone calls
- emails
- internal messaging systems
- clinical handovers

Staff must never discuss client information in public or informal settings.

8 STORAGE, SECURITY & RETENTION

We take reasonable steps to protect information from loss, unauthorised access, modification, or misuse, including:

- Secure electronic practice management systems (restricted access)
- Encrypted digital storage
- Password-protected laptops and devices
- Secure shredding or digital deletion of obsolete files

Records are retained in accordance with:

- Health record legislation
- AHPRA and professional college guidelines
- NDIS requirements

9 DATA BREACHES

9.1 If There is a Privacy Concern or Breach

We take any potential breach of confidentiality seriously. Examples include:

- accessing records without a valid purpose
- sharing information with someone who is not authorised
- leaving confidential information unsecured

Breaches may lead to:

- retraining
- performance management
- disciplinary action
- notification to authorities if required

9.2 If a Data Breach Occurs

We will:

- Take immediate steps to secure the data
- Notify affected individuals
- Notify the Office of the Australian Information Commissioner (OAIC) as required under the Notifiable Data Breaches Scheme

10 ACCESS TO AND CORRECTION OF INFORMATION

You have the right to:

- Request access to your personal information
- Request corrections to inaccurate, incomplete, or outdated information

Requests can be made in writing and will be responded to within a reasonable timeframe.

11 NDIS PARTICIPANT INFORMATION

If you are an NDIS participant, we may collect and use information such as your:

- NDIS number
- Plan details and funding categories
- Support coordinator's contact details
- Consent preferences

In line with the NDIS Code of Conduct, we ensure:

- Information is collected with consent
- Supports are delivered in a way that respects privacy, dignity, and autonomy
- Only necessary, appropriate information is shared with relevant parties

12 INTERNATIONAL DISCLOSURE

We do not routinely send information overseas. If a third-party service provider stores data offshore (e.g., cloud storage), we will take reasonable steps to ensure compliance with the APPs.

13 COMPLAINTS AND CONCERNS

If you have concerns about how your information has been handled, please contact:

Privacy Officer

The Neurodiverse Network by Amelia Read

Email: jaimie@neurodiversenetwork.com.au

Phone: 0480 032 419

If you are unsatisfied with our response, you may contact:

- **Office of the Australian Information Commissioner (OAIC)**
- **AHPRA** (for practitioner-related concerns)
- **NDIS Quality and Safeguards Commission** (for NDIS-related concerns)

14 UPDATES TO THIS POLICY

This policy may be amended from time to time to reflect changes in legislation, practice standards, or organisational procedures. The most current version will always be published on our website.