Privacy Policy

North Therapy Solutions | ABN 39 288 350 572

Policy owner: Josie Lewis, Principal Occupational Therapist
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About this policy

North Therapy Solutions provides occupational therapy services to adults aged 18 years and over. In this policy, “we”, “us” and “our” refer to North Therapy Solutions. This policy applies to the owner and any employees or contractors who handle personal information on behalf of the practice. This policy explains how we collect, use, store and share personal and health information, and how you can access your records or raise a privacy concern.

We handle information in accordance with the Privacy Act 1988 (Cth), the Australian Privacy Principles and applicable NDIS requirements. This policy provides information about our practices. It does not replace the consent choices recorded in your service agreement or during appointments.

Information we collect

We collect information reasonably necessary to provide and manage your services. This may include your name, date of birth, address, contact details, emergency contacts, representative details, funding and billing information, health history, disability, functional abilities, goals and support needs.

Your record may include referrals, assessment findings, clinical notes, reports, correspondence, consent preferences and relevant photographs. Audio or video recordings are only made with separate consent.

How and why information is collected

Information is usually collected directly from you during enquiries, forms, appointments and correspondence. With your consent, we may also obtain relevant information from your authorised representative, treating professionals, support coordinator, support providers or funding body. Information may otherwise be collected where required or authorised by law.

We use this information to assess your needs, plan and provide therapy, recommend equipment or home modifications, prepare reports, coordinate services, arrange appointments, process payments and meet recordkeeping, quality and reporting obligations.

You may make a general enquiry anonymously or using a pseudonym where practical. We usually need your identity and relevant clinical information to provide individual assessment, reports or funded services. If you choose not to provide necessary information, we will explain any effect on the services we can provide.

Consent and your choices

We will explain information handling in a way you can understand and support you to make your own decisions. You may involve a support person, interpreter or advocate. If another person provides consent on your behalf, we will confirm their authority for that decision. A family relationship alone does not establish this authority.

You can specify who we may communicate with and any restrictions on information sharing. You may change or withdraw consent by contacting us by phone or email. We will document your preferences and explain any implications for your care.

Withdrawal applies to future activities. It does not reverse information already lawfully shared or require deletion of records that must be retained. It also does not prevent uses or disclosures required or authorised by law.

Sharing your information

With your consent, relevant information may be shared with your GP, treating professionals, support coordinator, authorised representative, support providers, equipment suppliers, home modification contractors and funding bodies. Only information relevant to the purpose is shared.

Service providers supporting practice management, communication, IT, billing and payment processing may handle information needed to perform those functions. We take reasonable steps to select appropriate providers and protect information handled on our behalf.

Information may also be disclosed where required or authorised by law, including to regulators, courts or emergency services. This can include mandatory reporting or circumstances involving a serious threat to life, health or safety where the law permits disclosure.

NDIS audits and quality activities

NDIS participants are automatically included in the audit sampling process unless they opt out. An approved quality auditor may contact you for an interview or review your files, records or plans. You may opt out by contacting us. We will document your decision and notify the auditor. Opting out will not affect your access to services.

We use relevant information to manage complaints, incidents and service quality in accordance with applicable requirements. Optional research, promotional activities or use of identifiable information for teaching require separate consent where applicable. We do not treat acceptance of services as consent to these activities.

Clinical photographs

Where relevant to your assessment or recommendations, we may photograph your home environment, equipment or you. We explain the purpose and obtain verbal consent before taking photographs, including discussing their inclusion in reports. Consent and any restrictions are documented in your clinical record. You may decline photographs or limit what is photographed, and we can discuss alternatives.

Photographs are promptly uploaded to your client record and deleted from the work device used to take them once the upload is confirmed, including from the Recently Deleted folder. Automatic cloud photo backups are disabled for clinical photographs. Relevant images may be included in reports shared with your consent or as required or authorised by law. Advertising or social media use requires separate, specific consent.

Storage and security

Your client records are stored in Splose, the online practice management system we use for appointments, clinical notes, reports, consent forms and invoices. Access to Splose accounts is protected by passwords and multi-factor authentication (MFA), which requires an additional identity check when signing in. Access is limited to authorised personnel who require the information to perform their duties. Employees and contractors must maintain confidentiality and follow our privacy and information security procedures.

Splose states that Australian client data is securely stored across multiple sites in Australia and protected by encryption during transfer and storage. Relevant information may also be held in correspondence, referral and billing systems. We take reasonable steps to protect electronic and any paper records from unauthorised access, loss, misuse or disclosure. No electronic system can guarantee complete security.

Artificial intelligence

Our use of artificial intelligence is guided by AHPRA and Office of the Australian Information Commissioner recommendations on privacy, informed consent and professional accountability.

With your informed consent, we may use Splose AI to help organise and improve the wording of clinical notes and reports based on clinical information provided by the treating occupational therapist. Splose AI is an artificial intelligence feature within the practice management system. Before use, we explain its purpose, the information involved and relevant privacy arrangements and risks.

Splose states that information processed by its AI providers is not retained by those providers or used for AI model training. Clinical notes and reports saved in Splose remain part of your client record. Splose uses third-party technology, including OpenAI, to provide some AI features.

We use ChatGPT and Claude for general templates, worksheets and educational resources. We do not enter client-specific clinical information, records or photographs into these tools.

We review and edit AI-assisted documentation and resources for accuracy and suitability. AI does not replace professional clinical judgement or make decisions about your care. The treating occupational therapist reviews and approves the final content and remains responsible for their clinical decisions.

You may decline AI processing of your information or withdraw consent for future use without affecting access to occupational therapy services. Consent to AI-assisted documentation does not include permission to record consultations. Any recording requires separate consent before it begins.

Third party systems and overseas processing

Australian storage of clinical records does not necessarily mean that every supporting service processes information only in Australia. Splose's Privacy Policy allows certain overseas disclosures associated with AI and other service providers. Some AI and supporting services may involve overseas processing.

We take reasonable steps to understand relevant provider arrangements and meet applicable privacy obligations before using services with your information. You may contact us for current information about relevant providers and processing locations. Splose's published privacy information is available at https://splose.com/privacy-policy.

Retention and disposal

We retain records for as long as needed to provide services and meet applicable legal, professional, funding and recordkeeping requirements. Some records may need to be retained after services end or consent is withdrawn. You may ask about the retention arrangements that apply to your records.

When information is no longer needed and retention is not required, we take reasonable steps to securely destroy or de-identify it. Deleting a photograph from a work device does not delete the copy retained in your clinical record.

Accessing and correcting your records

You may request access to your personal information or ask us to correct information that is inaccurate, out of date, incomplete, irrelevant or misleading. We may verify your identity or a representative's authority before providing access.

We will respond within a reasonable period, generally within 30 days. If access or correction is refused on a lawful basis, we will explain the reason, where permitted, and how to complain. Where appropriate, you may ask for a statement of disagreement to be attached to the record. There is no fee to request access or to correct your information. Any reasonable charge for providing access will be discussed in advance.

Website enquiries and communications

Information you submit through website enquiries or referral forms is used to respond to you and arrange services. Website hosting and form providers may process technical information such as IP addresses, device details and server logs to operate and secure the site. Browser settings can be used to manage cookies, although this may affect website functions.

Please provide only information relevant to your enquiry. If you need to send sensitive documents, contact us to discuss an appropriate method. You may advise your preferred contact method and any restrictions on messages. Optional marketing communications require consent, and you may opt out at any time.

Privacy concerns and complaints

For privacy questions, access requests or complaints, contact:
Privacy Officer: Josie Lewis
North Therapy Solutions
Email: admin@norththerapysolutions.com.au
Phone: 0401 398 603

We will take your concern seriously, investigate and respond within a reasonable timeframe, generally within 30 days. If more time is needed, we will explain why. You may request a copy of our Feedback and Complaints Management Policy or Incident Management and Reporting Policy. Raising a concern will not affect your access to services.

If your privacy concern remains unresolved, you may contact the Office of the Australian Information Commissioner at www.oaic.gov.au or 1300 363 992. For concerns about NDIS supports, you may contact the NDIS Quality and Safeguards Commission at www.ndiscommission.gov.au or 1800 035 544.

If a data breach occurs, we will take steps to contain it, assess the risk and respond. Where legally required, we will notify affected people and the relevant regulator.

Availability and updates

This policy is available free of charge on request and may be published on our website. Please ask if you need it explained or provided in another accessible format. We review it when information handling practices or requirements change and make the updated version available with a revised date. New consent will be sought where required.