

Privacy Policy

Purpose

Early Start Australia Pty Ltd (ESA) is a subsidiary of APM Human Services International Limited (APM). ESA's collection, use, disclosure and storage of your personal information is regulated by the Privacy Act 1988 (Commonwealth), the Australian Privacy Principles and related legislation.

The purpose of this Privacy Policy is to:

- Give you an understanding of the kinds of personal information that we collect and hold.
- Communicate how and when your personal information is collected, disclosed, used, held and otherwise handled by us.
- Inform you about the purposes for which we collect, hold, use and disclose personal information.
- Provide you with information about how you may access your personal information and seek correction of your personal information.
- Provide you with information about how you may make a complaint, and how we will deal with any such complaint.

Policy Statement

We are strongly committed to maintaining the privacy of personal information we collect as part of the services we offer. We place great importance on protecting the privacy of our employees/contractors, valued clients, customers and other stakeholders.

What is personal information?

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not. It includes your name, date of birth / age, gender and contact details as well as health information (which is also sensitive information). In this privacy policy, a reference to personal information includes sensitive / health information.

Collection of personal information

Personal information collected by us will usually fall into one of the following categories:

- Contact information (name, age, address, email address and telephone numbers).
- Emergency contact information;
- Commonwealth identifiers (such as your National Disability Insurance Scheme (NDIS) reference number, your Medicare number or your Tax File Number).
- Employment information (such as employment history, work performance, emergency contact details, absences and workplace incidents);
- Financial information (such as your bank account details and credit card details).
- Sensitive information (such as information about your disability, health condition, medical history, assessment questionnaires and outcomes, criminal history, religious beliefs, cultural background, trade union activity);
- With your consent, photos and video footage of your treatment with us.

We may collect personal information about:

- clients;
- parents, guardians and/or carers of clients and other family members of clients (where applicable);
- teachers of clients (where applicable);

Early Start Australia controlled document. Refer to LogiqcQMS for document management.		Page 1 of 5
Filename	Doc_028_ESA Privacy Policy.docx	
Version	5	
Published Location	Staff Intranet / ESA Website	

Privacy Policy

- healthcare professionals in the course of them referring clients to us and/or providing information to us about your condition and treatment, or in the course of us engaging them to assist us to provide services to our clients;
- third parties providing a service to us; and
- employees, contractors, students and volunteers.

We may collect your information from you in a variety of ways including when:

- we provide services to you
- you visit our website
- you submit your information in response to ESA marketing events or activities
- you contact us by any method, such as face-to-face, over the telephone, through an online form or portal, through a paper form or by email

Sometimes we will collect personal information from a third party or a publicly available source, for example where we have your consent, where we are required by law to do so, or if it is unreasonable or impracticable to collect the personal information directly from you (e.g. checking a candidate's work history, or obtaining client information from a parent, guardian or carer (where applicable), or from your treating healthcare professionals). The Client Consent Form more specifically outlines where client-related personal information might be collected from.

You may choose to deal with us anonymously or under a pseudonym where lawful and practical. Where anonymity or the use of a pseudonym will render ESA unable to provide the relevant service or reasonably conduct business, we may request that you identify yourself.

You may also choose not to provide us with your personal information. Depending on the circumstances in which you do so, however, we may be unable to provide you with our services as a result.

Where we are collecting personal information from a child or young person, we will use our judgement to determine if that person has the capacity to consent. Where we are unsure, we will seek consent from a parent, guardian or carer.

Why do we collect, use, disclose and store your personal information?

We collect, use, disclose and store your personal information to provide you with our services which include:

- speech and language pathology, occupational therapy, physiotherapy, dietetics, and psychology;
- invoicing and processing any fees payable in relation to the services rendered;
- managing our relationship with you (including if you are a health professional, client, service provider, employee, contractor, student or volunteer) and to contact you for follow up purposes;
- with your consent, providing you with information about our services (and services offered by other members of the APM Group) including our news updates and information about events;
- with your consent, for NDIS auditing purposes;
- verifying and updating personal information held by us;
- recruiting, managing, training and clinically supervising personnel (including employees, contractors, students and volunteers);
- reviewing, developing and improving our services, as well as our business, operational and IT processes and systems;
- resolving any complaints and issues;
- complying with our legal or regulatory obligations; and

Early Start Australia controlled document. Refer to LogiqcQMS for document management.		Page 2 of 5
Filename	Doc_028_ESA Privacy Policy.docx	
Version	5	
Published Location	Staff Intranet / ESA Website	

Privacy Policy

- for other purposes required or authorised by or under law, including purposes for which you have provided your express or implied consent.

You may opt out of receiving marketing information by notifying us accordingly, or by using any unsubscribe facility we provide for that purpose. If you opt out of receiving marketing information, we may still contact you in connection with the services we provide to you, such as for appointment reminders and follow-ups. Refer also to the Marketing section below.

Our services, functions and activities, as well as those of our contracted service providers, may change from time to time.

Protecting and storing your personal information

We understand the importance of keeping personal information secure and safe. Some of the ways we do this are:

- Requiring employees and contractors to enter into confidentiality agreements
- Securing hard copy document storage (i.e. storing hard copy documents in locked filing cabinets)
- Implementing security measures for access to computer systems to protect information from unauthorised access, modification or disclosure and loss, misuse and interference. .
- Ensuring data storage devices such as laptops, tablets and smartphones are password protected
- Providing discreet environments for confidential discussions
- Implementing access control for our buildings including waiting room / reception protocols and measures for securing the premises when unattended
- Implementing security protocols for our website

Personal information may be stored in documentary form but will generally be stored electronically on our software or systems.

We will take reasonable steps to ensure that personal information that is held which is no longer required, including under any contractual or legal requirement, is destroyed or de-identified in a secure manner.

Who may we disclose your personal information to?

In order to carry out our services, functions and activities, ESA may disclose your personal information to third party suppliers or contractors such as cloud computing technology and data storage service providers, legal services providers, insurance brokers, security service providers, and financial service providers.

We may also disclose your personal information to government agencies, private sector organisations or other entities where required or permitted by law, which may include the following circumstances:

- You have consented to such disclosure.
- We believe that you would reasonably expect, or have been told, that information of that kind is usually passed to those individuals, bodies or agencies, and it is being disclosed for a purpose related (or directly related, in the case of sensitive information) to the reason we collected the information.
- We are required or authorised to make such disclosure by law or the requirements of any professional bodies, including where we are required to do so in accordance with child safety obligations.
- A permitted general situation or permitted health situation (as these terms are defined in the Privacy Act) exists in relation to the disclosure.
- We believe it is reasonably necessary for enforcement related activities conducted by, or on behalf of, an enforcement body (e.g. police, ASIC, Immigration Department).

Early Start Australia controlled document. Refer to LogiqcQMS for document management.		Page 3 of 5
Filename	Doc_028_ESA Privacy Policy.docx	
Version	5	
Published Location	Staff Intranet / ESA Website	

Privacy Policy

Information is shared between APM Group Members. We may transfer or disclose your personal information to APM Group Members.

The persons and organisations which ESA may disclose your personal information to will handle your personal information in accordance with their privacy policies.

Will my personal information be disclosed overseas?

The persons to whom we disclose personal information are normally located in Australia, although personal information related to our staff and for our marketing activities may be disclosed to recipients outside Australia. We may also use data hosting and cloud based service providers whose operations are located overseas (such as to the providers of certain assessment tools in the United States of America (USA)). In all instances where this occurs, we will act in accordance with the Privacy Act and this Privacy Policy.

Marketing

We may use your personal information to contact you (including by telephone call, SMS or email) in relation to products, services or other offers we think may be of interest to you (such as plan management and support coordination services. These products and services may be offered by us, other APM Group Members, our other business partners or our service providers.

We may also market our products to you through third-party channels (such as social networking sites or digital advertising), or via other companies who assist us to market our products and services. Your personal information may be provided to other entities (including APM Group Members and third party agents, contractors or organisations) for promotional purposes, including direct marketing. Those entities may use the personal information we provide to them to market to you, including by sending you information or contacting you (by telephone, post or electronically) about our or their products and services.

You may opt-out of receiving some or all direct (marketing information from ESA or other APM Group Members by:

- calling us on 1300 372 439
- emailing us on feedback@earlystartaustralia.com.au;
- writing to us at PO Box 3265 Broadway, Nedlands, WA 6009;
- selecting the option to unsubscribe on a form when you apply for a product or service.

Please allow five working days for your request to be actioned.

How can I access or correct my personal information and contact ESA?

Please contact us if you would like to seek access to or correct the personal information we hold about you: ESA privacy officer: feedback@earlystartaustralia.com.au or PO Box 3265 Broadway Nedlands WA 6009.

ESA will generally provide you with access to your personal information if practical, and will take reasonable steps to amend any personal information about you which is inaccurate or out of date. In some circumstances and in accordance with applicable privacy laws, we may not permit you access to your personal information, or may refuse to correct your personal information, in which case we will provide you with written reasons for the decision and the mechanisms available to complain about the refusal.

Early Start Australia controlled document. Refer to LogiqcQMS for document management.		Page 4 of 5
Filename	Doc_028_ESA Privacy Policy.docx	
Version	5	
Published Location	Staff Intranet / ESA Website	

Privacy Policy

If we do not agree to make a correction to personal information, you may provide a statement about the requested corrections, and we will ensure that the statement is apparent to any users of the relevant personal information.

How do we handle complaints?

If you have any concerns or complaints about the way your personal information has been collected or handled by ESA, please advise us of your concern or complaint in writing and send it to the Privacy Officer using the contact details above. ESA will endeavour to acknowledge receipt of a written complaint within 5 business days.

ESA's Privacy Officer will investigate the complaint and attempt to resolve it within 20 business days after the written complaint was received. Where it is anticipated that this timeframe is not achievable, we will try to contact the person making the complaint to provide an estimate of how long it will take to investigate and respond to it.

It is our intention to use our best endeavours to resolve any complaint to your satisfaction. However, if you are unhappy with our response, you may contact the Office of the Australian Information Commissioner and/or the relevant privacy regulator in your State/Territory who may investigate your complaint further.

Associated Documents

Privacy Information Sheet

Your Privacy at a Glance

Client Consent Form(s)

ESDM Filming Consent and Release Form

Promotional Filming Consent and Release Form

Early Start Australia controlled document. Refer to LogiqcQMS for document management.		Page 5 of 5
Filename	Doc_028_ESA Privacy Policy.docx	
Version	5	
Published Location	Staff Intranet / ESA Website	