

Privacy Policy

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ABN	39 688 009 394
Email	admin@harmoniot.com.au (working Thursdays and Fridays)
Mobile	0483 699 205 (as I work part-time, SMS is preferred)

1. About this policy

Harmoni Occupational Therapy ("Harmoni OT") is a sole practitioner practice run by Alysse Schweizer, providing occupational therapy to children, young people and their families in the Bundaberg region. In this policy, "we", "us" and "our" refer to Alysse.

We understand that families share a great deal of personal information with us throughout a therapeutic relationship. Much of it is sensitive, and some of it is difficult to talk about. We treat it accordingly.

This policy explains what information we collect, why we collect it, who we share it with, how long we keep it, and what you can do if you are unhappy with how we have handled it. It applies to the people we work with, their families and carers, referrers, and visitors to our website.

We handle personal information in accordance with the Australian Privacy Principles set out in the Privacy Act 1988 (Cth). Whilst many small businesses are exempt from this legislation, allied health providers are not: it applies to us regardless of the size of our practice.

2. What information we collect

We may collect:

- Contact details, including name, address, phone number, email address, and an emergency contact
- Date of birth and other demographic information
- NDIS participant number and funding details, including whether the plan is self-managed, plan-managed or agency-managed

- Billing and payment information for self-funded services
- Health and disability information relevant to occupational therapy, including diagnoses, developmental history and functional needs
- Information about daily routines, education or care settings, and family circumstances relevant to therapy goals
- Details of other professionals involved in the person's care, including reports if you choose to provide them to us
- Photographs of work samples, objects or environments, with your consent (we do not photograph young people except in rare cases, with separate consent)

Because we work mainly with children and young people, this information is usually provided by a parent or guardian on the child's behalf.

3. How we collect information

We collect information directly from you when you complete a webform (such as on our website, or Splose), when we speak with you by phone, email, or in person, or when you provide reports and assessments from other professionals.

We may also collect information from other people involved in the person's care, such as a GP, paediatrician, support coordinator, plan manager or another allied health provider. This can support transdisciplinary care – where professionals learn from each other to create cohesive service delivery. We do this only with your consent, and you may opt out when completing the consent form.

4. Our website

Our website collects limited technical information automatically, such as browser type and pages visited, and we do not use this information to identify individual visitors. Any information you submit through a form on our website, such as a referral or contact form, is handled in accordance with this policy.

5. Why we collect and use information

We collect, hold, use and disclose personal information to:

- Assess needs and determine whether our service is a good fit for the young people referred to us
- Provide occupational therapy assessment, therapy and support
- Coordinate care with other professionals and support people, with your consent
- Manage appointments, records and general administration
- Issue invoices and claim payment, including from plan managers
- Meet our legal, professional and regulatory obligations, including under the NDIS
- Contact or communicate with you about the service you are receiving

We will not sell your personal information, and we do not use it for marketing.

6. Who we share information with

We share information with others only where you have provided specific consent, or where we are required/authorised by law. This may include:

- Your NDIS plan manager or support coordinator
- A GP, paediatrician or other treating health professional
- Schools, kindergartens, childcare or other support settings
- The NDIA and the NDIS Quality and Safeguards Commission, where required
- Relevant authorities, where the law requires us to disclose information

Where we share information to coordinate care, we share only what is relevant to that purpose. If you would prefer that we did not contact a particular person or service, tell us and we will respect that.

7. Our reporting obligations

There are limited situations where we may share information without your consent:

- Where we believe a child is at risk of harm, we may report this to Child Safety. All adults in Queensland are also legally required to report to police in certain circumstances.
- Where we believe there is a serious and imminent risk to someone's life, health or safety.
- Where we are compelled by a subpoena, court order, or other legal requirement.

Wherever it is safe and appropriate, we will tell you if we make a report and explain why. This won't always be possible, for example where telling you could put a child at risk. We would much rather raise a concern with you directly when we can.

8. Supervision and professional consultation

As a part of our registration, occupational therapists take part in professional supervision, peer consultation and continuing professional development. This sometimes means discussing assessment findings, clinical reasoning or therapy planning with a supervisor or professional colleague, to make sure the service you receive is safe, current and effective. Identifying details are removed before these discussions, and anyone we consult is bound by the same confidentiality obligations we are.

9. Assessment tools and online platforms

Some standardised occupational therapy assessments are completed or scored through online platforms operated by the test publishers. Where we use these, questionnaire responses and scores are processed on the publisher's system and then saved into the client file in our practice management system.

We choose platforms that maintain appropriate privacy and security safeguards, and you can review their privacy policies on their websites. You can decline to use an online platform, or withdraw your consent at any time, and we will discuss the alternatives with you.

Please note that completed test forms and raw response data usually cannot be released directly to clients or families. This is a condition set by test publishers to protect the validity of the assessments, not a decision we make about your information. We can always provide the report, the scores, and a full explanation of what they mean.

10. AI-assisted documentation

We use BastionGPT, a clinical documentation tool built for healthcare, to help prepare and format clinical notes and correspondence. BastionGPT stores Australian users' data in Australian data centres, encrypts information in transit

and at rest, and does not use client information to train artificial intelligence models.

We do not record sessions. BastionGPT is used only to help draft and format notes that we have written ourselves, and we review everything it produces before it goes into the client file. We remain fully responsible for the accuracy of our clinical records. If we ever change how we use this or any similar tool, we will tell you and seek your consent first.

11. How we communicate with you

We use email, SMS and telephone to communicate with you, and email is how we usually send reports, invoices and correspondence. To reduce the risk of information reaching the wrong person, we confirm your email address before sending anything detailed, and we send reports as password-protected attachments where appropriate, with the password sent separately by SMS.

Please tell us if your email address changes, if your inbox is shared with anyone else, or if you would prefer that we contact you another way. If you would rather we did not email reports at all, we can post them or arrange collection.

12. Telehealth appointments

We offer telehealth appointments where they suit your young person and family. The same professional and privacy standards apply as for in-person sessions. If you attend a telehealth appointment, we ask that you join from a private space that is safe and comfortable. We will also need to know the address you are attending from and have current emergency contact details, so that we can respond appropriately if a safety concern arises during the session.

13. Social Media

Harmoni OT has a public presence on Instagram and Facebook (@harmoni.ot & @Harmoni OT). These accounts exist to share general information about occupational therapy and our practice. They are not a way to receive or provide clinical services.

- **What we post:** We never post photographs, videos, artwork, session details or stories about the children and young people we work with. The illustrations and examples we share are drawn by us or are general in nature.
- **Messages and Comments:** Please don't use direct messages, comments or replies to discuss a child's care, share health information, book, cancel or reschedule appointments, or raise anything urgent. Social media platforms are not secure, and we do not monitor them consistently. If you contact us there about something clinical, we will ask you to please email, text, or phone us instead. Anything posted publicly on our pages can be seen by other people and is stored by the platform. If a comment includes identifying or information about a young person, we may hide or delete it to protect their privacy. We will let you know why where we can.
- **Following and Friend Requests:** You are very welcome to follow our business pages. We will not follow you back, send friend requests, or accept requests to connect on personal accounts. This protects your privacy and ours. If we see you out in the community, we will follow you and your child's lead about whether to say hello, and we will never acknowledge that you use our service in front of anyone else.
- **Reviews and Testimonials:** As a registered health practitioner, we are bound by the National Law and Ahpra's advertising guidelines, which do not permit the use of testimonials about clinical care in advertising. This means we cannot publish, share or invite reviews about our therapy services, and we may need to remove testimonials posted on pages we control. This is a legal obligation rather than a reflection on what anyone has said – if you have kind words or critique, we'd love to hear it directly in person, by email, or phone.
- **The platforms themselves:** Instagram and Facebook are operated by Meta, not by us. When you interact with our pages, Meta collects information about you under its own privacy policy and terms, and that information may be stored overseas. We have no control over this. We do not upload client information to social media platforms, and we do not use Meta's targeted advertising.

14. Storing and protecting your information

We take reasonable steps to protect personal information from misuse, interference, loss, and unauthorised access, modification or disclosure. Client records are held electronically in Splose, our practice management system. Splose stores Australian client data in Australia, encrypts information in transit and at rest, and keeps encrypted backups off-site. Access is restricted to the practitioner and protected by two-factor authentication.

Some of the other tools we use may store information overseas, and where that is the case, we take reasonable steps to ensure it is handled consistently with the Australian Privacy Principles. These include:

- Google Workspace, for email and documents. Data may be stored in Google's data centres outside Australia. We keep clinical records in Splose rather than email, and we send reports as password-protected attachments.
- Zoom for Business, for telehealth appointments. Our account is set to store meeting content in Australia, but some technical information about calls may be processed overseas. We do not record telehealth sessions, and we do not use Zoom's AI features.
- Xero, our accounting software, which stores data in the United States. Invoices contain only the details needed for payment, not clinical information.
- Online assessment platforms, which may store information overseas. You can review each publisher's privacy policy and decline their use (see section 9).

If a data breach occurs and we believe it is likely to result in serious harm, we will act quickly to contain it, notify you, and notify the Office of the Australian Information Commissioner (OAIC), as required under the Notifiable Data Breaches scheme. We will tell you what happened, what information was involved, and what you can do next.

15. How long we keep information

We keep client records for as long as we need to, and no longer than is necessary. Our retention periods are:

- Where the client was under 18 at the time of service: until they reach 25 years of age or 7 years from the last date of service (whichever is longer).
- Where the client was an adult at the time of service: a minimum of seven years from the date of last contact.

Queensland does not set a minimum retention period for private health providers, so these periods reflect the standard applied in other Australian states and our own professional judgement rather than a specific legal requirement.

16. Accessing and correcting information

You can ask to see the personal information we hold, and ask us to correct anything that is inaccurate, out of date or incomplete. Please contact us using the details below (in Section 21 of this document). We may need to verify your identity first, and we will usually respond within 30 days.

Who can ask? Where the client is a child not yet able to make their own decisions, a parent or guardian can usually request access on their behalf. As young people become able to decide for themselves, the record becomes theirs to control. Where parents are separated, or court orders are in place, we may need to review whether releasing information to a particular person is appropriate.

How does access work? If you would like us to go through the record with you, we can arrange an appointment, and our usual fee applies for that time. We recommend this, because clinical information and assessment results are easier to make sense of with context rather than read cold. If you would prefer to simply receive a copy, we can do that instead. Where a request involves substantial copying or preparation we may charge the actual cost of that work, and we will always tell you the amount before we begin. We do not charge for making a request.

What may we withhold? In limited circumstances we may not be able to give full access (for example where it would pose a serious threat to someone's life, health or safety, or would unreasonably affect another person's privacy). Because our files record what parents, siblings, teachers and other professionals have told us, this usually means redacting other people's information rather than withholding the record. If we refuse access in whole or in part, we will explain why in writing and tell

you how to complain if you do not agree with our decision (see Section 19 of this document).

17. Consent, and dealing with us anonymously

Where we rely on your consent to collect, use or disclose personal information, you can withdraw that consent at any time by contacting us by email, by phone or in person. You are welcome to make a general enquiry about our services without identifying yourself. However, because we are required to keep accurate clinical records and to claim payment from funding bodies including the NDIA, we cannot provide occupational therapy services to someone who remains anonymous or uses a pseudonym.

18. If our practice closes or changes hands

Harmoni OT is a sole practitioner practice. If we cease practising, or the practice is transferred, we will notify you in advance wherever possible and arrange for your records to be securely transferred to another registered practitioner or held by an appointed records custodian, so that they remain available to you for the remainder of the retention period. You may ask for your records to be transferred to a provider of your choosing instead.

19. Raising a concern or making a complaint

If you have a concern about how we have handled personal information, please contact us first using the details below. We take concerns and complaints seriously, and we will not treat you or your child any differently because you have raised one. You are also welcome to go directly to an external body without contacting us first, if you would prefer:

Office of the Australian Information Commissioner

- **Phone:** 1300 363 992 (Monday to Thursday, 10am–4pm AEST)
- **Online:** www.oaic.gov.au/privacy/privacy-complaints
- **Post:** GPO Box 5218, Sydney NSW 2001

NDIS Quality and Safeguards Commission

- **Phone:** 1800 035 544 (Monday to Friday, 9am–5pm)
- **Online:** www.ndiscommission.gov.au/complaints

20. Changes to this policy

We may update this policy from time to time. The current version is always available on our website, and the date it was last updated as well as the current version number always appears at the top of the document.

21. Contact Us

If you have any questions about this policy, or want to make a request about personal information, please contact us:

Harmoni OT

- **Email:** admin@harmoniot.com.au
- **Mobile:** 0483 699 205 (as I work part-time, SMS is preferred)
- **ABN:** [39 688 009 394](#)