

PRIVACY POLICY

February 2026

1. PART 1 – ABOUT THIS POLICY

1.1 Purpose

Holistic Speech Pathology is committed to protecting the privacy of personal information we collect and hold about individuals.

Holistic Speech Pathology complies with the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth), the Notifiable Data Breaches scheme, other privacy laws that govern how private sector health service providers handle your personal information (including your health information), and Speech Pathology Australia's Code of Ethics (2020).

This Privacy Policy explains how Holistic Speech Pathology manages the personal information we collect, use and disclose.

Holistic Speech Pathology is a private speech pathology practice under the ownership of Rachel Kelly.

2. PART 2 – HOW HOLISTIC SPEECH PATHOLOGY HANDLES YOUR PERSONAL INFORMATION

2.1 Legal Obligations

In order to provide you with the health care services that you have requested, Holistic Speech Pathology will need to collect and use your personal information. If you provide incomplete or inaccurate information to us or withhold personal and health information from us we may not be able to provide you with the services you are seeking.

2.2 What information does Holistic Speech Pathology collect?

We will only collect the information we need for the particular function or activity we are carrying out.

We collect information from you that is necessary to provide you with speech pathology services and to manage our relationship with you. The information we collect includes: your name, date of birth, address, health fund details and information about your health history and family history. We require this information to assist the speech pathologist to diagnose and treat you.

2.3 How does Holistic Speech Pathology collect health information?

We will usually collect your health information directly from you. Sometimes, we may need to collect information about you from a third party (such as a relative or another health service provider).

2.4 How does Holistic Speech Pathology use your information?

Holistic Speech Pathology uses your personal information for the purpose you have given the information to us. We will use your information to provide speech pathology services to you, to manage our relationship with you and to contact you in relation to matters concerning your care. We may also use your information for other purposes permitted under the Privacy Act 1988.

Who might we disclose your information to?

We may disclose your information to the following people:

(a) Disclosure to other health professionals involved in your treatment

Your personal information will generally only be used by the speech pathologist involved in your care, however on occasion your care may be provided by a number of health professionals (for example, speech pathologist, occupational therapist and/or psychologist) working or consulting together. We may disclose your information to these health professionals as part of the process of providing your care and to other health professionals involved in your care.

(b) The referrer

Holistic Speech Pathology will usually send a discharge summary to the referrer (i.e., your medical practitioner) following discharge from Holistic Speech Pathology or at other times, as required for your care. We also provide reports to referrers where required to, under the Medicare Rebates Scheme.

If you do not wish us to provide a copy of your discharge summary to the referrer you must let us know. Also, if the referrer's details have changed please let us know.

(c) Relatives, guardian, close friends or legal representative

We may provide information about your condition to your parent, child, other relatives, close personal friends, guardians, or to a responsible person for you, unless you tell us that you do not wish us to disclose your health information to any such person.

Other uses and disclosures

In order to provide the best possible environment in which to treat you, we may also use or disclose your personal and health information where necessary for:

- activities such as quality assurance processes, accreditation, audits, risk and claims management, patient satisfaction surveys and staff education and training;
- invoicing, billing and account management;
- to liaise with your health fund, Medicare or the Department of Veteran's Affairs and where required provide information to your health fund, Medicare or the Department of Veteran's Affairs to verify treatment provided to you;
- the purpose of sending you standard reminders, for example for appointments and follow-up care, by text message or email to the number or address which you have provided to us.

(f) Other uses with your consent

With your consent we may also use your information for other purposes such as including you on a marketing mail list, or research.

Please note, however, that unless you provide us with your express consent for this purpose, we will not use your information in this way.

We will not disclose your personal information to any individual who is outside Australia. Our practice management and communication systems store data within Australia. If this changes, we will update this policy and advise you accordingly.

2.4A Use of Artificial Intelligence (AI) Tools

Holistic Speech Pathology may use artificial intelligence (AI) tools, including generative AI, to support aspects of clinical practice such as analysis of speech and language samples, development of therapy resources, report writing, and research into evidence-based approaches.

In accordance with Speech Pathology Australia's position statement on Artificial Intelligence in Speech Pathology: Ethical Considerations, any use of AI in our practice is guided by the following ethical principles:

- **Safety and accuracy:** AI tools are only used where the information generated is safe and accurate.
- **Benefit to the service user:** AI is used to support, not replace, clinical reasoning and professional judgement.
- **Transparency:** We will inform you when AI tools are used as part of your care.
- **Privacy and data protection:** We take reasonable steps to de-identify information before entering it into AI tools. We do not enter identifying personal information into AI platforms unless the platform meets our privacy and data security requirements. Information entered into AI tools is managed in accordance with this Privacy Policy.
- **Accountability:** The speech pathologist retains full clinical responsibility for all decisions made regarding your care.

Your consent for the use of AI tools in your child's care is obtained separately through the Consent and Agreement Form. You may withdraw this consent at any time.

2.5 Access to and correction of your health information

You have a right to access the personal and health information that we hold about you. You can also request an amendment to your personal and health information should you believe that it is inaccurate.

If we do not agree to change your medical record/personal information in accordance with your request, we will permit you to make a statement of the requested changes and we will enclose this with your record.

Should you wish to obtain access to or request changes to your health record you can ask for our Privacy Officer (see details below) who can give you more detailed information about Holistic Speech Pathology's access and correction procedure.

Please note that Holistic Speech Pathology may recover reasonable costs associated with supplying this information to you.

2.6 Data Quality

Holistic Speech Pathology will take reasonable steps to ensure that your personal information which we may collect, use or disclose is accurate, complete and up-to-date.

2.7 Data Security

Holistic Speech Pathology will take reasonable steps to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure. We use technologies and processes such as access control procedures, network firewalls, encryption and physical security to

protect your privacy. Our practice management system (Splose) uses encryption and access controls to protect stored information.

2.8 Record Retention

Holistic Speech Pathology retains clinical records for a minimum of 7 years from the date of last service. For clients who were children (under 18) at the time of treatment, records are retained until the individual reaches 25 years of age, or for 7 years from last service, whichever is longer. This is consistent with Australian best practice and the WA Department of Health guidance for health records retention.

Holistic Speech Pathology will destroy or permanently de-identify any of your information which is in its possession or control and which is no longer needed for the purpose for which it was collected, provided Holistic Speech Pathology is not required under an Australian law or court/tribunal or otherwise to retain the information.

2.9 Notifiable Data Breaches

Holistic Speech Pathology is subject to the Notifiable Data Breaches (NDB) scheme under Part IIIIC of the Privacy Act 1988. If we become aware of an eligible data breach that is likely to result in serious harm to any individual whose personal information is involved, we will:

- take reasonable steps to contain the breach and assess the risk of serious harm;
- notify the Office of the Australian Information Commissioner (OAIC) as soon as practicable; and
- notify affected individuals as soon as practicable, including information about the breach and recommendations about the steps they should take in response.

2.10 What to do if you have a complaint about privacy issues

If:

- a. you have questions or comments about this Privacy Policy;
- b. Holistic Speech Pathology does not agree to provide you with access to your personal information; or
- c. you have a complaint about our information handling practices,

You can lodge a complaint with or contact our Privacy Officer on the details below. We will promptly review your complaint and provide a response to you.

2.11 How to contact us if you have a complaint about privacy issues

By letter: Privacy Officer, Rachel Kelly, Holistic Speech Pathology, 50b Angove Street, North Perth WA 6006

By email: complaints@holisticsp.com.au

By telephone: **[insert phone number]**

PART 3 – HOW HOLISTIC SPEECH PATHOLOGY HANDLES YOUR PERSONAL INFORMATION WHEN YOU VISIT OUR WEBSITE

This section of our Privacy Policy explains how we handle your personal information which is collected from our website: www.holisticsp.com.au.

This Privacy Policy applies to your use of our website and the use of any of the facilities on our website.

3.1 Collection

When you use our website, we do not attempt to identify you as an individual user and we will not collect personal information about you unless you specifically provide this to us.

Sometimes, we may collect your personal information if you choose to provide this to us via an online form or by email, for example, if you:

- submit a general enquiry via our contacts page;
- register to receive eNewsletters; or
- send a written complaint or enquiry to our Privacy Officer.

When you use our website, our Internet Service Provider (ISP) may record and log for statistical purposes the following information about your visit:

- your computer address;
- your top level name (for example, .com, .gov, .org, .au etc.);
- the date and time of your visit;
- the pages and documents you access during your visit; and
- the browser you are using.

Our website management agent may use statistical data collected by our ISP to evaluate the effectiveness of our website. We may also use analytics tools to understand how visitors use our website. These tools collect information such as which pages are visited most frequently and are used to improve the website experience. No personally identifiable information is collected through these tools.

3.2 Cookies

A “cookie” is a device that allows our server to identify and interact more effectively with your computer. Cookies do not identify individual users, but they do identify your ISP and your browser type.

This website uses temporary cookies. This means that upon closing your browser, the temporary cookie assigned to you will be destroyed and no personal information is maintained which will identify you at a later date.

Personal information such as your email address is not collected unless you provide it to us. We do not disclose domain names or aggregate information to third parties other than agents who assist us with this website and who are under obligations of confidentiality.

You may be able to configure your browser to accept or reject all cookies and to notify you when a cookie is used. We suggest that you refer to your browser instructions or help screens to learn more about these functions. However, please note that if you configure your browser so as not to receive any cookies, a certain level of functionality of the Holistic Speech Pathology website and other websites may be lost.

3.3 Links to third party websites

We may create links to third party websites. We are not responsible for the content or privacy practices employed by websites that are linked from our website.

3.4 Use and disclosure

We will use any personal information collected via our website in accordance with our Privacy Policy.