

NeuroNest Consultancy

Privacy Policy

Effective Date: 27/08/2025

1. Purpose

The purpose of this Privacy Policy is to explain how NeuroNest Early Intervention (“we,” “our,” “us”) manages personal information. We are committed to protecting the privacy and confidentiality of participants, families, carers, team members, and partners.

We comply with the:

- Privacy Act 1988 (Cth)
- Australian Privacy Principles (APPs)
- NDIS Act 2013 and NDIS (Quality and Safeguards) Commission Practice Standards
- Notifiable Data Breaches Scheme
- Any relevant state or territory privacy legislation

This policy outlines how we collect, use, store, disclose, and protect information, and how participants and families can access their information or make complaints.

2. Scope

This policy applies to:

- All participants, families, carers, and guardians who engage with NeuroNest services.
- All team members, contractors, volunteers, and students.
- All personal, sensitive, and health information collected, stored, or shared by NeuroNest.

It covers information in all forms — written, verbal, and electronic.

3. Definitions

- Personal information – Information that identifies, or could reasonably identify, an individual.
- Sensitive information – A type of personal information that includes health details, disability-related information, cultural background, or support needs.
- Team member – Any person working with NeuroNest, including employees, contractors, students, and volunteers.
- Direct manager – The person a team member reports to (e.g., supervisor, People Lead, or Director).

4. Policy Commitment

NeuroNest Early Intervention will:

- Only collect information necessary for service delivery or as required by law.
- Explain to participants why information is collected, how it is stored, and when it may be shared.
- Ensure all records are accurate, respectful, and professionally written.
- Keep conversations and meetings involving sensitive information private and confidential.
- Train all team members on privacy responsibilities and require written acknowledgment.
- Protect data with secure technology, restricted access, and safe storage.
- Treat unauthorised access or disclosure by staff as a serious breach which may result in disciplinary or legal action.

5. Collection of Information

We collect information directly from participants, families, or guardians, and with consent from others such as health professionals, schools, or NDIS representatives.

We may collect:

- Personal details (name, date of birth, contact details, gender).
- NDIS participant number, funding details, and Centrelink/Medicare identifiers.
- Health and developmental history.
- Medical information, immunisation history, and support needs.
- Family/guardian contact details.
- Emergency contact information.
- Payment and billing details.
- Records of services provided, including progress notes, reports, and assessments.
- Photos, audio, or video (with explicit consent).
- Employment-related information (for staff and applicants).

Sensitive information will only be collected when necessary for service delivery, with consent, or as required/authorised by law.

6. Use and Disclosure of Information

We use personal information to:

- Provide safe, effective, and individualised supports.
- Communicate with participants, families, and authorised representatives.
- Coordinate with health, education, and community services (with consent).
- Meet NDIS reporting and compliance obligations.
- Conduct quality assurance, audits, and staff supervision.
- Manage accounts, payments, and debt recovery.
- Fulfil mandatory reporting obligations (e.g., child protection, risk of harm).
- Improve our services and resources.

We may disclose information:

- To family members, guardians, or emergency contacts, if authorised or necessary in urgent situations.
- To health or education professionals directly involved in care.
- To the NDIS Commission or other authorities, as required by law.
- To IT, cloud, or telehealth providers, who are bound by confidentiality obligations.
- During mergers, acquisitions, or business transfers (with protections in place).

We do not sell personal information.

We do not use personal information for marketing without consent.

Some providers we use may store data outside Australia. We take reasonable steps to ensure overseas recipients comply with Australian law.

7. Storage, Security, and Retention

We protect records by:

- Using password-protected and encrypted electronic systems.
- Storing paper files in locked cabinets.
- Limiting staff access to only what is necessary for their role.
- Securely destroying or de-identifying records when no longer required.

Retention requirements include:

- Participant records must be kept for at least three (3) years, in line with the NDIS Act 2013.
- Health information collected about children must be retained until they are 25 years old.

8. Data Quality and Correction

We take reasonable steps to ensure information is accurate, up to date, and complete. Participants and families may request access to their information and ask for corrections. If we disagree with a correction, a note of the request will be attached to the record.

9. Data Breaches

If a breach of personal information occurs that is likely to result in serious harm, NeuroNest will act in accordance with the Notifiable Data Breaches Scheme, by:

- Assessing the breach.
- Notifying affected individuals.
- Reporting to the Office of the Australian Information Commissioner (OAIC).

10. Complaints

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

Privacy Officer
NeuroNest Early Intervention
Email: [Insert email]
Phone: [Insert phone]

We will respond within 30 days.

If you are not satisfied, you may contact:

- Office of the Australian Information Commissioner (OAIC): www.oaic.gov.au
- NDIS Quality and Safeguards Commission: www.ndiscommission.gov.au
- [Insert relevant state privacy commission, if applicable]

11. Staff Responsibilities

- All team members must follow this policy and confidentiality requirements.
- Sensitive conversations must occur in private settings.
- Records must be accurate, respectful, and professional.
- Staff are trained on privacy at induction and through regular refreshers.

12. Privacy Statement (for Participants)

NeuroNest Early Intervention respects your privacy. We collect only the information we need to provide services and supports. Your information is stored securely, only shared with your consent or when required by law, and kept for as long as legally required. You can see and correct your information at any time. If you have a concern, you can make a complaint and we will work with you to resolve it.

13. References

- NDIS Act 2013
- Privacy Act 1988 (Cth)
- Australian Privacy Principles (APPs)
- NDIS (Quality and Safeguards) Commission Practice Standards
- Notifiable Data Breaches Scheme
- Relevant state privacy laws