

## Privacy Policy

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## 1 INTRODUCTION

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### 1.1 PURPOSE

The purpose of this Privacy Policy is to outline how Gem Complete Health Services (“we”, “us”, “our”) collects, uses, stores, discloses, and protects personal and sensitive information in accordance with the *Privacy Act 1988 (Cth)*, the Australian Privacy Principles, and other relevant legislation.

This policy aims to ensure that all personal information, including health and child-related information, is handled lawfully, ethically, and respectfully, and that individuals understand their rights in relation to their personal information.

Gem Complete Health Services is committed to safeguarding privacy, promoting transparency, supporting individual choice and control, and protecting the safety and wellbeing of all participants, including children and young people.

### 1.2 SCOPE

This Privacy Policy applies to all personal and sensitive information collected, held, or managed by Gem Complete Health Services in the course of providing services or operating our business.

This includes information relating to:

- Participants, including children and young people
- Families, carers, and guardians
- Employees, contractors, students, and volunteers
- Referrers, professionals, and stakeholders
- Website users and individuals making enquiries or referrals

This policy applies to all forms of information, whether written, electronic, verbal, or visual, and covers information collected through service delivery, intake and assessment processes, referrals, employment processes, and website interactions.

All staff, contractors, and representatives of Gem Complete Health Services are required to comply with this Privacy Policy as part of their professional and legal responsibilities.

## 2 COMMITMENT TO PRIVACY AND CHILD SAFETY

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We recognise that much of the information we manage is sensitive, including health, disability, and child-related information. We take all reasonable steps to ensure that personal information is handled lawfully, ethically, and securely.

We are committed to child safe practices and to protecting the privacy, safety, and wellbeing of children and young people. Information relating to children is managed with heightened care and confidentiality, and is only accessed or shared where lawful, necessary, and in the child's best interests.

## 3 USE OF INFORMATION

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### 3.1 WHAT INFORMATION WE COLLECT

We may collect personal and sensitive information including, but not limited to:

- Name, date of birth, address, phone number, and email
- Emergency contact and next of kin details
- Health, disability, and support-related information
- Information relating to children and families we support
- NDIS details and service agreements
- Assessments, case notes, and progress records
- Referral and intake information
- Website enquiries and online form submissions

Sensitive information is only collected where it is reasonably necessary for service delivery, safeguarding, or where required by law.

### 3.2 HOW INFORMATION IS COLLECTED

We collect information through lawful and fair means, including:

- Website forms and online referrals
- Phone calls, emails, and in-person meetings
- Intake, assessment, and service documentation
- Incident, feedback, and complaint processes

- Third parties such as referrers, allied health professionals, or government agencies (with consent or where authorised by law)

Where practicable, we collect personal information directly from the individual or their authorised representative.

### **3.3 WHY INFORMATION IS COLLECTED**

We collect and use personal information to:

- Deliver and manage support services
- Assess needs and develop support plans
- Communicate with participants, families, carers, and professionals
- Meet NDIS, safeguarding, and legal obligations
- Promote the safety and wellbeing of children and vulnerable people
- Manage incidents, complaints, and feedback
- Improve service quality and operations

Information is only used for the purpose it was collected, unless otherwise required or authorised by law.

## 4 DISCLOSURE OF PERSONAL INFORMATION

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We may disclose personal information where necessary and lawful, including to:

- Employees and contractors involved in service delivery
- Allied health professionals, support coordinators, and referrers
- Government and regulatory bodies (including the NDIS Quality and Safeguards Commission)
- Child protection authorities where required to protect a child or young person
- Emergency services where there is a serious threat to life, health, or safety
- IT and administrative providers bound by confidentiality obligations

We do not sell personal information.

## 5 SECURITY OF INFORMATION

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We take reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification, or disclosure. Safeguards include:

- Secure electronic record systems
- Access controls and password protection
- Staff confidentiality obligations
- Secure storage of physical records
- Ongoing review of privacy and data protection practices

Personal information is retained for seven (7) years as required by law and operational needs.

## 6 INDIVIDUAL RIGHTS

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Under the Privacy Act, individuals have the right to:

- Request access to their personal information
- Request correction of inaccurate, incomplete, or outdated information
- Make a privacy-related complaint

Requests can be made using the contact details below. A response will be given within a reasonable timeframe and in accordance with legislative requirements.

## 7 PRIVACY COMPLAINTS

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If you believe your privacy has been breached, you may contact us directly. We take all privacy concerns seriously and will investigate promptly.

## 8 WEBSITE INFORMATION

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Our website may collect limited personal information such as form submissions, cookies, and IP addresses for functionality, security, and service improvement purposes.

## 9 CONTACT US

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For privacy enquiries, access requests or complaints:

**Gem Complete Health Services**

Email: [enquiries@gemcompletehealth.com.au](mailto:enquiries@gemcompletehealth.com.au)

Phone: (02) 9262 1010

Address: 1011/31C Lasso Rd, Gregory Hills NSW 2557

## 10 REFERENCES

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This Privacy Policy has been developed in accordance with the following legislation, standards, and guidelines (as amended from time to time):

- *Privacy Act 1988 (Cth)*
- Australian Privacy Principles (APPs)
- *Notifiable Data Breaches Scheme* (Part IIIC of the Privacy Act 1988)
- *National Disability Insurance Scheme Act 2013 (Cth)*
- NDIS Quality and Safeguards Commission – Practice Standards and Code of Conduct
- *Health Records and Information Privacy Act 2002 (NSW)* (where applicable)
- *Children and Young Persons (Care and Protection) Act 1998 (NSW)*
- National Principles for Child Safe Organisations (Australian Human Rights Commission)

Gem Complete Health Services monitors relevant legislative and regulatory changes to ensure this policy remains current and compliant.