

Privacy and Confidentiality Policy

The Little Sanctuary Support Services PTY LTD

The Little Sanctuary Support Services Pty Ltd (“the Organisation”) is committed to providing a safe, respectful, and inclusive environment for all participants, families, carers, staff, and volunteers.

This policy outlines how The Little Sanctuary Support Services protects the privacy and confidentiality of children, participants, families, and others who engage with our services.

It ensures compliance with:

- The **Privacy Act 1988 (Cth)** and Australian Privacy Principles
- The **Child Protection Reform and Other Legislation Amendment Act 2024 (Qld)** (commencing October 2025)
- The **NDIS Act 2013** and **NDIS Quality and Safeguards Commission requirements**
- The **Human Rights Act 2019 (Qld)**

It also explains our use of **Heidi, an AI note-taking tool**, to enhance service quality.

This policy is directly linked to our Code of Conduct and reflects our values of respect, integrity, empowerment, and empathy.

1. Scope and applicability

This policy applies to:

- The Director
- All staff
- Contractors (including allied health professionals engaged by us)
- Volunteers and students (if any in the future)

It covers **all activities** of The Little Sanctuary Support Services that involve or may involve contact with children and young people.

2. Responsibilities

Director: Ensures compliance with all privacy and confidentiality requirements, oversees secure systems, and leads annual reviews.

Staff: Follow this policy, maintain confidentiality, and complete mandatory privacy and child safety training.

Contractors: Must comply with this policy, the Code of Conduct, and confidentiality agreements.

3. Commitment to Privacy and Confidentiality

The Little Sanctuary Support Services is committed to:

- Protecting the dignity, privacy, and confidentiality of all people we support.
- Only collecting information that is relevant and necessary for service delivery.
- Storing information securely and restricting access to authorised personnel.
- Ensuring children, participants, and families understand how their information will be collected, used, and shared.
- Complying with mandatory reporting obligations while balancing confidentiality.
- Psychology Board of Australia's Code of Conduct for psychologists

4. Collection of Information

We collect personal and sensitive information necessary to provide safe and quality services. This may include:

- Contact details and emergency information
- NDIS plan information, assessments, and reports
- Health and medical information relevant to supports
- Feedback, complaints, and incident records
- Notes from consultations (including those documented with Heidi)

Information is collected directly from participants and families wherever possible, and always with consent unless required by law.

5. Use and Disclosure of Information

Personal information will only be used or disclosed for:

- Providing agreed supports and services
- Meeting our legal and regulatory obligations
- Responding to emergencies or safety concerns
- Reporting child protection concerns where a child is at risk of harm
- Sharing information with authorised parties (e.g., NDIS Commission, Queensland Police, Child Safety Services) when required by law

We do not disclose personal information to third parties without consent, unless legally required.

6. Storage and Security

- Records are stored securely in password-protected digital systems and/or locked filing systems.
- Access is limited to the Director and authorised staff/contractors.
- Information will be retained in line with legal and NDIS requirements, then securely destroyed.

7. Use of Heidi AI Note-Taking Platform

The Little Sanctuary Support Services uses *Heidi*, an AI note-taking tool, to improve the accuracy and efficiency of consultation records.

Purpose: Heidi transcribes consultations in real time to assist with note-taking. This allows staff to focus on participants and families during appointments.

Data Protection:

- No audio recordings are stored.
- Only the clinician's final notes are saved into the Electronic Health Record.
- Data is securely processed in compliance with Australian privacy laws.
- Data undergoes de-identification to remove personal identifiers.

Consent:

- Participants are fully informed about Heidi's use.
- Consent is obtained before Heidi is used.
- Participants may opt out at any time without affecting the quality of their supports.

8. Participant and Family Rights

All children, participants, and families have the right to:

- Access their personal information held by us.
- Request corrections to inaccurate information.
- Be informed about how their information is collected, used, and stored.
- Withdraw consent for information sharing or the use of Heidi (unless disclosure is legally required).

9. Confidentiality Obligations for Staff and Contractors

- All staff and contractors must sign a confidentiality agreement as part of their employment/contract.
- Confidentiality is discussed in induction and reinforced through training.
- Information access is limited to those directly involved in a client's care, on a "need-to-know" basis. This includes our booking platform Halaxy where access is restricted so staff can only access their own clients' information.
- Breaches of confidentiality will result in disciplinary action and may be reportable to the NDIS Commission or other authorities.

10. Child Safety and Privacy

In line with Queensland's child safe laws (October 2025):

- Children's privacy is respected at all times.
- Information is shared with children and families in age-appropriate, accessible formats.
- If a child discloses harm or risk, confidentiality may be broken to protect their safety and comply with mandatory reporting obligations.

11. Complaints and Feedback

Concerns about privacy, confidentiality, or the use of Heidi can be raised through our **Complaint Handling Policy**.

Complaints can also be directed to:

- **Office of the Information Commissioner Qld** – 1800 642 753
- **NDIS Quality and Safeguards Commission** – 1800 035 544

We support participants and families to make complaints if needed.

12. Policy Status and Review

This policy will be reviewed annually or sooner if required by legislative or regulatory changes.

Feedback from participants, families, staff, and children will be sought to improve the process.

This policy will be:

- Displayed on our website and available within our service environments.
- Provided to all staff, participants, families, and carers via our website.
- Incorporated into staff induction and ongoing training.

Reviewed: 13th September 2025

Next review date: 13th September 2026

Responsible officer: Elizabeth Spash

(TLS Director)