

## 1.0 PURPOSE

The Bowen Therapists Federation of Australia (BTFA) is committed to ensuring your privacy as an individual. Information which we collect about you enables us to provide you with the services and related information which we offer. The security of your information is very important to us and we use our best endeavours to ensure the highest level of security is used in our data systems and those of companies who undertake specialist activities for us.

The BTFA is bound by the Australian Privacy Principles (APP) which are set out in the Australian *Privacy Act 1988 and APPs from Schedule 1 of the Privacy Amendment (Enhancing Privacy Protection) Act 2012, and updated in January 2014.*

## 2.0 SCOPE

This applies to:

- BTFA members in regard to client records – whether material or verbal.
- BTFA requesting and recording information from enquirers and individual members.

## 3.0 RESPONSIBILITIES

- The BTFA Administration and Committee members
- The BTFA members

The information referred to in this policy is any information which can identify you as an individual. This applies to members of the BTFA, members of Affiliated Association (clerical support), and individuals requesting information from us and employees / contractors performing tasks for us. All staff, external contractors, consultants and individuals who have access to personal information must comply with this policy.

## 4.0 DEFINITIONS

**“Personal information”** is information or an opinion (including information or an opinion forming part of a database or other record), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

**“Health information”** is personal information about an individual collected by a health or related practitioner in the course of providing a health or complementary health care service. This includes not only information about an individual’s health, disability or services received but also other information such as an individual’s employment details, financial details and next of kin, even though these details do not directly relate to the individual’s health or disability.

**“Sensitive information”** is information or an opinion about an individual’s:

- State of health and health information
- Racial or ethnic origin
- Political, philosophical or religious opinions, beliefs or affiliations
- Membership of a professional or trade association or union
- Gender identity
- Sexual preferences or practices
- Criminal record

**“Privacy Officer”** is the person responsible for the administration of this policy and can be contacted through: Phone: 1300-429-636  
Email: [info@bowen.asn.au](mailto:info@bowen.asn.au)

**“Anonymity”** When communicating with the BTFA you have a choice not to identify yourself or to use a pseudonym. We respect your choice and will provide services to the extent which is possible under these circumstances, however without full identification, the BTFA will be unable to fully and properly deliver some services and related information, which individuals might request.

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## 5.0 POLICY STATEMENT

The BTFA knows that the collection, use, exchange of personal and sensitive information is protected through legislation and regulatory requirements. We also uphold ethical and moral standards in regard to adhering to these legislative requirements.

This privacy policy is based upon the Australian Privacy Principles (APP) which are set out in the *Australian Privacy Act 1988 and APPs from Schedule 1 of the Privacy Amendment (Enhancing Privacy Protection) Act 2012*, and updated in January 2014.

## 6.0 POLICY OBJECTIVES

This policy is based upon the Australian Privacy Principles that are briefly described below:

### 6.1 Collection

BTFA will only collect information from you which is necessary for the performance of a business or organisation function.

The information will be collected using only lawful and fair means.

The content of this information will depend on your relationship with the BTFA. If you do not consent to provide the necessary information we may not be able to provide some or all of the services you request. This includes anonymity and pseudonymity.

Sensitive information (refer to definition section) will only be collected if you give consent or if it is required by law.

Examples of business functions when information is collected:

Members

- Processing membership applications and renewals
- Applications for attending training seminars
- Receipt of articles and information for publication by the BTFA
- Advice from you of clinic details
- Emails
- Information request you made from our website.
- Registration for attending a BTFA function.

Public

- Information request you made from our website.
- Email requests for information.
- Registration for attending a BTFA function.

### 6.2 Use and disclosure

BTFA only uses personal information for the purpose for which it was collected. It may also use this information for secondary purposes which directly relate to the primary purpose of collection.

The BTFA encourages, promotes, protects and facilitates self regulation of all activities affecting Bowen Therapy. The BTFA uses information acquired from individuals and Affiliated Associations to facilitate these objectives and purposes including promoting activities and functions, public education programs, research programs, professional contact with therapists and promulgation of standards and guidelines.

Members and other individuals who have consented, may be identified in BTFA publications produced in print or digital media such as website, emails and social media. Contact information held by the BTFA may also be used to inform individuals (members and public) of special offers or additional services provided by the BTFA. The individual

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contacted will be provided with the option of not receiving further communication of this nature from the BTFA.

The BTFA does engage third parties to perform certain business functions; therefore, it is sometimes necessary to disclose personal information to those suppliers. Where membership related processing is done in part overseas by selected companies, personal data will be disclosed to them, in accordance with the Privacy Act, for example in USA and United Kingdom, where privacy laws may not offer the same protection as those in Australia.

By providing your personal information to us you consent to the following disclosure conditions. Where disclosure takes place, the BTFA seeks to ensure that personal information is handled in accordance with the Australian National Privacy Principles, however when permitted by law, we are not to take such steps as may seem reasonable to ensure that any overseas recipient complies with the Australian Privacy Laws in relation to your personal details.

Information may be required to be disclosed by us if we have received a court or police order.

### **6.3 Security**

The BTFA will take reasonable steps to ensure personal information it collects, uses or discloses is accurate, complete and up-to-date.

BTFA will take reasonable steps to protect personal information from unauthorised use, access, disclosure and alteration.

Employees are only provided with access to personal information that is relevant to their roles and responsibilities, and it seeks to ensure that staff complies with BTFA's policy on the handling of personal information.

BTFA seeks to protect personal information held on IT systems to the highest standard of security available.

- Primary information is held within Australia and New Zealand.
- Specialist functions are performed by companies in USA, having stringent high level security systems.

Internal procedures are also utilised to protect the personal information held by BTFA.

Personal information will be held until there is no longer a business or legal need to retain it, when it will then be destroyed or permanently de-identified.

### **6.4 Access**

You may contact the Privacy Officer on 1300-429-636 or at [info@bowen.asn.au](mailto:info@bowen.asn.au) to access the personal information which we hold about you. BTFA may require the completion of a form to access this information. Members can view their personal information we hold in IT systems in their home page.

Access will be provided unless the request is unreasonable or the Australian National Privacy Principles permit the BTFA to decline this access. As permitted by law, a fee may be requested to cover the cost of access.

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## 6.5 Data quality

The BTFA seeks to maintain the accuracy of personal information.

If information we hold about you is incorrect, you are encouraged to contact us and request necessary changes.

You will be advised when the information has been changed.

## 6.6 Complaints and concerns

If you have any concerns about the BTFA's handling of your personal information, contact the Privacy Officer identified below. BTFA may ask that requests be in writing and will seek to resolve concerns as promptly as possible.

## 6.7 Changes to the BTFA Privacy Policy

The BTFA may modify or amend this policy at any time provided the policy still complies with the Privacy Act. The latest version of its policy can be accessed via the website at [www.bowen.asn.au](http://www.bowen.asn.au) or by contacting the Federation on 1300 426 936.

## 6.8 Availability of this Privacy Policy

A copy of this BTFA Privacy Policy is available free of charge:

- on our website  
[www.bowen.asn.au/btfa/about/](http://www.bowen.asn.au/btfa/about/)
- from our Privacy Officer  
1300-429-636 or at [info@bowen.asn.au](mailto:info@bowen.asn.au)

## 7.0 LEGISLATION RELATED (any application Federal or State legislations, Australian, Industry or other Standards)

7.1 Privacy Act 1988 (Commonwealth)

7.2 Privacy Amendment (Private Sector) Act 2000 (Commonwealth)

7.3 Australian Privacy Principle January 2014

## 8.0 LINKAGES TO OTHER BTFA POLICIES AND PROCEDURES

8.1 BTFA Code of Conduct

## 9.0 LINKAGES TO OTHER BTFA RESOURCES

9.1 BTFA Confidentiality Policy

## 10.0 DISTRIBUTION

To all BTFA member s and affiliates via the BTFA website.

Other stakeholders via direct email or hard copy mail as requested.

## 11.0 DOCUMENT CONTROL

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| Version                     | 2.0  |
| Approved by                 | BTFA Committee   |
| Approval dates              | 2013 – August 2016   |
| Scheduled review date       | By August 2019   |
| History and version changes | Version 1.0 – 2013ZZZZ<br>Version 2.0 – 20160821 updating the APPs from NPP<br>Version 3 – |