



SPINE & STRENGTH

Chiropractic Craigieburn

PRIVACY POLICY

A full statement of how Spine & Strength Chiropractic Craigieburn collects, holds, uses, discloses and protects personal and sensitive health information, including closed-circuit television (CCTV) surveillance records, in accordance with the *Privacy Act 1988* (Cth), the Australian Privacy Principles (APPs), and the *Health Records Act 2001* (Vic).

Document status:	Current
Effective from:	1 June 2026
Version:	2.1
Applies to:	Spine & Strength Chiropractic Craigieburn, Unit 14/119 Highlander Drive, Craigieburn VIC 3065
Review cycle:	Annually, or earlier if legislation or practice operations change

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1. Introduction and Scope

Spine & Strength Chiropractic Craigieburn ("the Clinic", "we", "us" or "our") is committed to protecting the privacy of patients, prospective patients, visitors and staff. This Privacy Policy explains how we collect, hold, use and disclose personal information, including sensitive health information and surveillance data, and describes the rights available to you under the *Privacy Act 1988* (Cth) (the Privacy Act), the thirteen Australian Privacy Principles (APPs) set out in Schedule 1 to that Act, and the *Health Records Act 2001* (Vic) (the Health Records Act).

This policy applies to all personal and health information collected by the Clinic in the course of providing chiropractic and allied health services, whether collected in person, by telephone, in writing, online, or via CCTV recording on our premises. By providing your personal information to us and by attending the Clinic, you acknowledge that you have read and understood this policy and consent to the collection, use, storage and disclosure of your information as described in it.

If you do not agree with any part of this policy, please raise your concerns with our Clinic Manager before providing personal information or receiving treatment, so that we can discuss alternative arrangements where reasonably possible.

2. Definitions

Personal information	Information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not, and whether recorded in a material form or not.
Sensitive information	A subset of personal information that includes health information, and information about racial or ethnic origin, and similar categories requiring a higher standard of protection under APP 3.
Health information	Information or an opinion about a person's physical, mental or psychological health, disability, treatment, or health services provided, including notes, imaging, and test results.
CCTV data	Video and, where applicable, audio recordings captured by the Clinic's closed-circuit television system installed in reception and treatment areas.
Third-party service provider	Any organisation engaged by the Clinic to support its operations, such as practice management, billing, cloud storage, or diagnostic imaging providers.

3. Why We Collect Your Information

We collect personal and health information for the primary purpose of providing safe, effective and appropriately documented chiropractic care. This includes assessment, diagnosis, treatment planning, delivery of care, and ongoing clinical management. We also collect information for a range of related secondary purposes that support the delivery of that care, including:

- Scheduling, confirming and managing appointments, including reminders by SMS or email;
- Processing accounts, payments, Medicare, DVA and private health fund claims;
- Communicating with other treating practitioners involved in your care, with your consent;
- Practice administration, quality assurance, clinical audits and staff training;
- Maintaining the health, safety and security of patients, visitors and staff, including through CCTV monitoring of common and treatment areas; and
- Complying with our legal, regulatory, insurance and professional obligations.

We will not use or disclose your information for a purpose other than the primary purpose for which it was collected unless you would reasonably expect that use, you have consented, or the use or disclosure is otherwise permitted or required by law.

4. What Information We Collect

4.1 Contact and Identity Information

Full name, date of birth, residential and postal address, phone numbers, email address, emergency contact details, and, where relevant, Medicare, DVA and private health fund membership details.

4.2 Health Information

Presenting complaints, relevant medical and family history, medications and allergies, examination findings, orthopaedic and neurological test results, diagnoses, treatment notes, progress records, diagnostic imaging (such as X-rays and associated reports), and correspondence with referring or treating practitioners.

4.3 Billing and Claims Information

Payment details, invoices, Medicare and DVA claim numbers, private health fund membership and claim information, and HICAPS or Tyro transaction records processed at the time of payment.

4.4 Surveillance (CCTV) Information

Video, and where fitted, audio recordings captured by cameras located in the reception area and treatment rooms during business hours, for the purposes described in Section 8 of this policy.

4.5 Website and Digital Information

Information submitted through our online booking forms or website enquiry forms, and limited technical information such as IP address and browser type where our website uses standard analytics tools.

5. How We Collect Information

We collect personal and health information directly from you wherever reasonably possible, through:

- New patient intake forms, completed online or on paper at the Clinic;
- Our practice management software, Cliniko, used for bookings, clinical notes and billing;
- Verbal information you provide during consultations, examinations and telephone or email correspondence;
- Diagnostic imaging and reports obtained in the course of your treatment;
- CCTV recording, which operates continuously during business hours in reception and treatment areas; and
- Correspondence from third parties such as referring practitioners, specialists or health funds, where you have consented to that exchange of information.

Where it is unreasonable or impracticable to collect information directly from you — for example, in an emergency, or where a family member provides information on behalf of a patient who is unable to do so — we may collect personal information from a third party such as a relative, carer, referring practitioner, or another treating provider.

6. How We Use Your Information

We use your personal and health information to provide clinical care, manage your account, communicate with you about your treatment and appointments, and to meet our legal and professional obligations, including record-keeping obligations imposed by chiropractic registration standards. Clinical notes and imaging are used by your treating chiropractor, and where relevant, other clinicians involved in your care within the Clinic, strictly on a need-to-know basis.

We do not use your sensitive health information for purposes unrelated to your care, and we do not sell your personal information to any third party.

7. Disclosure of Your Information

We only disclose your personal and health information in the following circumstances:

- **With your consent** — for example, when we send clinical correspondence to your GP or a specialist you have been referred to;
- **For claims processing** — to Medicare, the Department of Veterans' Affairs, HICAPS, Tyro, or your private health insurer, as needed to process rebates and payments;
- **To service providers** — including Cliniko and other secure IT, hosting and administrative providers engaged to support practice operations, who are contractually required to protect your information and only use it for the purposes we specify;
- **Where required or authorised by law** — including in response to a subpoena, court order, or a lawful request from a regulatory body such as the Chiropractic Board of Australia or AHPRA;
- **To prevent a serious threat** — where we reasonably believe disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety; and
- **Business operations** — to our accountant, insurer, or legal advisers where reasonably necessary for the operation of the Clinic, subject to confidentiality obligations.

We do not disclose your information to third parties for their own marketing purposes, and we do not disclose more information than is reasonably necessary for the relevant purpose.

8. CCTV and Surveillance

The Clinic operates a closed-circuit television (CCTV) system covering the reception area and treatment rooms during business hours. CCTV is used solely for the safety and security of patients, staff and visitors, to deter and investigate theft or misconduct, and to support incident management. Signage is displayed at the Clinic entrance to notify visitors that CCTV recording is in operation.

Access to CCTV footage is restricted to authorised personnel, primarily the Clinic Manager and, where necessary for an investigation, senior practitioners. Footage is not routinely monitored in real time and is only reviewed where there is a specific operational, safety or security reason to do so. Footage involving a treatment room is treated as health information and afforded the same level of protection as your clinical records.

CCTV footage is retained only for as long as reasonably necessary for the purposes described above, after which it is automatically overwritten or securely deleted, except where specific footage has been retained for an active investigation, insurance claim, or legal proceeding.

9. Storage, Security and Retention

9.1 Security Measures

We take reasonable technical and organisational steps to protect the personal information we hold from misuse, interference, loss, and from unauthorised access, modification or disclosure. These measures include encrypted cloud storage for clinical records via Cliniko, password-protected access controls, restricted staff access on a need-to-know basis, secure disposal of paper records, and password-protected storage of CCTV footage.

9.2 Retention Periods

Health records are retained for a minimum of seven (7) years from the date of your last attendance at the Clinic, consistent with our obligations under the Health Records Act and professional record-keeping standards. Where a patient was a minor at the time of treatment, records are retained until that person reaches the age of twenty-five (25), or for seven years from last attendance, whichever is longer. CCTV footage is retained only for a short operational period unless required for a specific investigation, as described in Section 8.

9.3 Secure Disposal

When personal information is no longer required to be retained by law or for the purposes described in this policy, we take reasonable steps to destroy it or ensure it is de-identified, using secure disposal methods appropriate to the format in which it is held.

10. Data Breach Notification

We maintain procedures to identify, contain and assess any suspected data breach. Where we become aware of an eligible data breach that is likely to result in serious harm to an individual whose personal information is involved, we will notify affected individuals and the Office of the Australian Information Commissioner (OAIC) in accordance with the Notifiable Data Breaches scheme under Part IIIC of the Privacy Act, as soon as practicable.

11. Access, Correction and Anonymity

11.1 Access to Your Information

You may request access to the personal and health information we hold about you, including your clinical records and, where applicable, CCTV footage in which you appear. Requests should be made in writing to our Clinic Manager. We will respond within a reasonable period, generally within 30 days, and may charge a reasonable administrative fee for retrieving and copying records where permitted by law.

11.2 Correction of Your Information

If you believe any personal information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, you may ask us to correct it. We will take reasonable steps to correct the information, or, where we do not agree a correction is warranted, we will note your request for correction on the record.

11.3 Anonymity and Pseudonymity

Where lawful and practicable, you may interact with us anonymously or using a pseudonym — for example, for a general enquiry. However, because chiropractic care requires accurate identification for clinical safety, billing and record-keeping purposes, we are generally unable to provide clinical treatment on an anonymous or pseudonymous basis.

12. Direct Marketing

From time to time we may send you appointment reminders, recall notices, or information about services offered by the Clinic. You may opt out of receiving non-essential marketing communications at any time by contacting reception or using the unsubscribe function included in electronic communications. Opting out of marketing communications will not affect appointment reminders or clinically necessary correspondence.

13. Children and Young People

Where we provide care to a child or young person, personal and health information is typically collected from, and disclosed to, a parent or guardian, unless the young person has the maturity to make their own healthcare decisions in accordance with accepted legal principles. As noted in Section 9.2, records relating to minors are retained until the patient turns twenty-five (25), or seven years from last attendance, whichever is longer.

14. Overseas Disclosure

Some of our third-party service providers, including elements of our cloud-based practice management and IT infrastructure, may store or process data using servers located outside Australia. Where this occurs, we take reasonable steps to ensure that any overseas recipient handles your personal information in a manner consistent with the Australian Privacy Principles, including through contractual protections with our service providers. We do not knowingly disclose your health information to an overseas recipient for marketing purposes.

15. Complaints

If you have a concern or complaint about how we have handled your personal information, please contact our Clinic Manager in the first instance, either in person, by phone, or in writing using the details in Section 17. We will acknowledge your complaint within seven (7) days and aim to resolve it within thirty (30) days.

If you are not satisfied with our response, you may refer your complaint to:

Office of the Australian Information Commissioner (OAIC)	www.oaic.gov.au · 1300 363 992
Health Complaints Commissioner (Victoria)	www.hcc.vic.gov.au · 1300 582 113

16. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or the services we offer. The most current version of this policy will always be available on our website and a printed copy is available at reception on request. We encourage you to review this policy periodically.

17. Contact Us

Clinic name	Spine & Strength Chiropractic Craigieburn
Address	Unit 14/119 Highlander Drive, Craigieburn VIC 3065
Phone	(03) 7302 1240
Website	https://spinestrengthchiropractic.com.au
Attention	Clinic Manager — Privacy Enquiries

This document is a policy template prepared for Spine & Strength Chiropractic Craigieburn based on material supplied by the practice. It is provided for general business use and does not constitute legal advice. Before publishing or relying on this policy, the Clinic should have it reviewed by a qualified Australian privacy or health law practitioner to confirm it accurately reflects the Clinic's actual data handling practices and current legal obligations.