

# Privacy Policy

## Our organisation

Bendigo Access Employment's (BAE) management and staff is committed to delivering quality employment services, accredited training, occupational rehabilitation and labour hire services for service participants and employers in the Central Victoria region. We are a certified quality assured organisation that is subject to the Australian Privacy Principles contained in the Privacy Act 1988. BAE will take all reasonable steps to collect, retain and dispose of all relevant personal and/or sensitive information in a lawful, fair and responsible manner.

## Purpose

The purpose of this policy is to ensure that BAE complies with the following:

- Australian Privacy Principles contained in the Privacy Act 1988
- Information Privacy Act 2000 (Vic)
- Disability Services Act (1986) and the associated National Standards for Disability Services

## Policy

Your right to privacy is very important to us at BAE. This policy will explain how BAE will comply under the Privacy Act 1988. As an accredited quality assured organisation, BAE will ensure that participants, stakeholders, volunteers and all members of the public who deal with our organisation, are aware of, and understand, our privacy obligations under the Act. Document control systems, such as regular reviews by staff/management will ensure that policies such as this Act are maintained as part of our internal and external audit reviews. The policy is freely available, and accessible on BAE's website: [www.accessemployment.com.au](http://www.accessemployment.com.au)

## Australian Privacy Principles

The Privacy Amendment Act includes a set of new, harmonised, privacy principles that will regulate the handling of personal information. These new principles are called the Australian Privacy Principles (APP). Under the changes, there are 13 new APPs. BAE details each APP below and how it complies.

### 1. Open and transparent management of personal information

We are committed to continually improving our provision of a quality service. BAE will only collect information that is directly related to our business. As part of our Quality Management System, we encourage you to let us know if you have any concerns regarding our handling of your personal information. As stated above, our Privacy Policy is available on our website, and will be updated where necessary. If a participant wishes to express concern or complain about a breach in the managing of personal information, the complaints process is clearly defined and can be followed. The Complaints Procedure is accessible on BAE's website. The Privacy Policy is displayed in the main office of BAE (Mundy Street) and is also included in a service participant's introductory handbook, whilst students are advised on the privacy policy at pre-enrolment sessions.

### 2. Anonymity and pseudonymity

Services participants and stakeholders can choose to make a general enquiry anonymously or by using a pseudonym. Government contracts and conformity for both our employment services division and registered training organisation can make this request quite difficult. For instance, in the large majority of cases, BAE will require personal information from service participants on a daily occurrence.

### **3. Collection of solicited personal information**

Personal information is used for the purpose of providing employment and training services. In order to carry out these services, personal information may also be provided to government departments and agencies for funding, eligibility and mandatory reporting. Other examples of the people or organisations which may provide us with information, with the authorisation of services participants and other stakeholders, that includes; past and potential employers; family members; medical practitioners; and service providers. What we collect depends on the type of service you receive; for our job seekers this may include a current resume or a list of qualifications. When BAE is provided with personal information from a third party it is stored in a secure manner, both physically and electronically.

### **4. Dealing with unsolicited personal information**

When BAE receives unsolicited personal information, which we have not sought out, we will check that information is relevant and necessary for the service we provide. Such information will be handled in the same way as other personal information is collected. If the unsolicited information is not relevant to the service, such information will ultimately be securely disposed of as required by legislation.

### **5. Notification of the collection of personal information**

Personal information is only obtained with the approval and knowledge of the service participant. BAE will not collect sensitive information without your written consent. Service participants are notified how and why personal information has been collected and its intended use.

### **6. Use and disclosure of personal information**

The personal information held regarding our services may be observed by our Information Technical Support service providers, quality assurance certification bodies and registered auditors. When this happens, the personal information will be presented in such a way that the individual shall not be identifiable. Furthermore, BAE will only use a service participant's personal information for which it was collected, for instance, a resume is used for direct marketing purposes only to potential employers.

### **7. Direct marketing**

BAE may only disclose personal information for direct marketing purposes if certain conditions are met. For example, as part of the Department of Social Services contract obligations, BAE will directly market service participants for the purposes of employment. A disclosure of information form is signed by the service participant before any such marketing occurs. A service participant can decline direct marketing if he/she has other means of securing employment (i.e. finding own employment).

### **8. Cross-border disclosures**

BAE will ensure that the disclosure of personal information of service participants is done so with written consent. In considering cross-border disclosures (i.e. overseas disclosure), BAE will ensure that service participants fully understand and consent to the sharing of personal information, such as images or content before information is made available to another country.

## **9. Adoption, use or disclosure of government related identifies**

The use or disclose of a government related identifier of an individual will only occur with written consent of the service participant. BAE may be obliged legally to provide personal information with a government organisation, such as a Job Seeker or Student ID number.

## **10. Quality of personal information**

BAE will take all reasonable steps to ensure any personal information collected or disclosed in relation to service participants is accurate, relevant and complete.

## **11. Security of personal information**

BAE will take all reasonable steps to protect the personal information it holds. All personal information that it receives is kept in a lockable file that only authorised personnel have access to. All files are locked after hours and the premises are protected by an electronic security monitoring system. All information that is stored electronically is password protected, with access given to authorised personnel.

## **12. Access to personal information**

You are entitled, according to legislation, to access the personal information an organisation holds about you, unless the organisation is not required to do so under clause 12.3 of the Australian Privacy Principles. If you wish to view this information, BAE will make this available for you within two working days. Should you require copies of any of your personal information, *administrative charges may apply*.

## **13. Correction of personal information**

All reasonable steps will be taken to ensure that correction of personal information is done so in a timely manner, if and when identified. It is important that personal information is accurate, up to date, relevant and not misleading. BAE will work with the service participant to ensure the request correction. If BAE refuses a service participants request for correction of personal information, BAE's Complaints Procedure should be completed if a service participant feels that they have not been supported.