

Privacy Policy

1. Background & Reasons for Policy

WorkVentures is committed to respecting the confidentiality of personal and business information of all those who are connected with us in any way, whether client, customer, consultant, contractor or employee. WorkVentures was, by virtue of its government contracts, required to adhere to the Privacy Act (1988) in respect of many operations. The policy requires amendments with the coverage having been extended to all operations with effect from 21 December 2001, along with the adoption of the National Privacy Principles.

Client files need to be accessed by a range of staff if we are to provide a quality service. We are also required to disclose certain information as part of our service provision requirements. Therefore we need procedures on the handling and management of information.

2. Principles

The principles applied in this policy are as per the Information Privacy Principles of the Privacy Act 1988 and the National Privacy Principles of the Privacy Amendment (Private Sector) Act 2000. The policy has been built around the right established in law for clients to know why their personal information is being collected, what personal information WorkVentures holds about them, how the information will be used by the company and to whom it will be disclosed.

3. Policy

WorkVentures Ltd will recognise and respect the confidentiality of any information relating to staff, or clients to which they have access. Underpinning these principles is the notion that any information pertaining to any person remains the personal and private property of the individual until such time as they give permission to become otherwise.

Unauthorised disclosure of such information is unlawful and may seriously undermine the relationship between staff members, and between staff members and clients. It may contribute to the development of pre-conceived ideas or judgements about individuals that may influence future relationships or interactions.

4. Definitions

All references to *staff* will also apply to contractors, consultants and volunteers.

Sensitive information is information or an opinion about an individual's:

- Racial or ethnic origin
- Political opinions
- Membership of a political association
- Religious beliefs or affiliation.
- Philosophical beliefs
- Membership of a professional or trade association
- Membership of a trade union
- Sexual preferences or practices
- Criminal record or
- Health information about an individual.

Personal information is information about an individual whose identity is apparent or can be readily ascertained.



5. Procedure

Collecting Information

Information about any staff member or person accessing services offered by WorkVentures will be collected:

- only if it is necessary for the functions and activities of the organisation
- using lawful and fair means
- by a person whose functions or nature of duties is directly related to the purpose for which it is being collected
- for the purpose for which it is needed
- with the individual's informed consent
- after taking reasonable steps to ensure that it is accurate, complete and up-to-date
- in a manner that is not unduly intrusive

When seeking information from a person, it is necessary to inform that person prior to the collection, or as soon as practicable after, of:

- The purpose for requiring the information
- That the collection of it is authorised/required under law
- Any agency that it is WorkVentures' usual practice to disclose such personal information to e.g. Centrelink, DEWRSB, DET, employers.

This can be ensured by obtaining a signed permission from the client to disclose information to stated bodies for the purpose of the service being received.

Sensitive information

WorkVentures will not collect sensitive information about an individual unless the individual has consented or the information will prevent serious threat to the life or health of an individual.

Confidentiality of information

Staff are only permitted to have access to information about individuals for professional and administrative purposes. Such information must be used with the utmost respect for the dignity and privacy of the person(s) concerned.

Staff shall not discuss customers outside the worker/customer relationship or confidential, professional information outside the appropriate work situation.

Use and disclosure

1. Information collected about an individual will not be used for any other purpose than that to which the individual has consented.
2. Individual customer information cannot be given to another agency without the written consent of the client. Exceptions are:
 - i. If WorkVentures believes on reasonable grounds that disclosure is necessary to prevent or lessen a serious and imminent threat to the life or health of the individual concerned or of another person;
 - ii. If the disclosure is required by/under law;
 - iii. If the disclosure is required for some law enforcement reasons
3. All customer records shall be protected, by such security safeguards, as it is reasonable in the circumstances, to prevent unauthorised access, use, modification or disclosure, and to guard against other misuse.



4. Information about any client which is not relevant to a purpose, is out-of-date or excessively personal shall be culled.
5. Use of identifier: WorkVentures will not adopt as its own identifier, an identifier that has been assigned by a Commonwealth Government agency to that individual.
6. Trans border data flows: Any transfer of data to an organisation outside Australia will be made only if the individual has consented to the transfer.

Files and Access

- Only information which is relevant to administration and service provisions is to be recorded in files.
- Customers/Clients will have access to all information pertaining to themselves (except in circumstances dictated by any Commonwealth law provisions)
- Staff will be able to see all information pertaining to themselves as above (except in circumstances dictated by any Commonwealth law provisions)
- All files held and maintained by WorkVentures are the property of the organisation.
- Client files relating to government contracts will be handled as required by the particular contract.
- Unsuccessful candidates for a position are entitled to access the records of their interview.

Records Management

Hard copy client files will be

- Kept in filing cabinets when not in use
- Locked away at the end of each day
- Shredded when no longer needed

All personal and confidential information will be shredded prior to disposal.

Computer files about client will be protected by

- Passwords on all staff computers
- Passwords on screen savers if the computers are in areas accessible to clients and visitors
- Limited number of access attempts on computers

Only staff with direct service needs will have access to computerised client data bases.

Client files will be retained while clients continue to access the service, or where it is required of us by legislation (eg qualifications attained from our training).

Client files which are retained will be archived as per the company archiving policy and procedure and the retention schedule will be followed.

Client files will be returned to government bodies where required under the contract.

Complaints Management

All Staff/Customers/Clients should approach the Privacy Officer for any complaints with regard to Privacy rights.

Staff Obligations

All staff members of WorkVentures and contractors will be required to sign an undertaking to abide by the Information Privacy/National Privacy Principles under the Privacy Act 1988 and Privacy Amendment (Private Sector) Act 2000 and will be trained in the requirements.