

# PRIVACY POLICY

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## Purpose

We help our customers into employment and to do this we need to ask for and use personal information. We take the privacy of our customers and team members seriously. We do what's right and keep personal and sensitive information safe and secure.

## Scope

Our Privacy Policy applies to all our customers, clients and participants, as well as Campbell Page team members and our contractors and volunteers.

There are many ways we collect information and validate the information we hold. We collect information when forms are completed, when we receive or make calls or when our customers visit our website or attend one of our sites.

## Policy Statement

This policy describes Campbell Page's requirements against the Australian Privacy Principles and how we collect and use personal and sensitive information.

'Personal Information' is information or an opinion about an identified individual, or an individual who is reasonably identifiable.

Examples of personal information include; an individual's name, signature, address, telephone number, date of birth, bank account details, employment details and commentary or opinion about an individual.

'Sensitive Information' is a subset or type of personal information.

Examples of sensitive information include; information about an individual's racial or ethnic origin, information or an opinion about an individual's criminal record and health information about an individual.

We will not collect personal information unless the information is reasonably necessary for, or directly related to, one or more of our functions or activities. We will also obtain consent prior to collecting any sensitive information.

Sometimes we need to share personal information, and like most service providers, the Privacy Act and Privacy Principles set out what we can and can't do with information. We may need to share personal information with Government Departments in relation to providing you with our services, or other services, or if required by law. When we use or share your personal information we always follow our values and 'Do What's Right'. This means we apply the 13 Privacy Principles and we do what the law tell us to do.

We may use your personal information to conduct customer research, either internally or through subcontractors, or to meet our service obligations. We may contact you with marketing material but you can tell us if you don't want this.

## Storing Information

We store information electronically and on paper. We also use Cloud technology to store data safely.

## Use and Disclosure of Protected Information

There are certain provisions in the Administration Act that enables the disclosure of protected information in some circumstances including where a Public Interest Certificate has been issued.

In the event of an emergency we may need to disclose information to services such as police, ambulance, fire service, State Emergency Service officers, emergency call service operators, health service providers and child protection agencies.

## Privacy Breaches

An eligible data breach occurs when there is unauthorised access to or disclosure of personal information held by an entity or information is lost in circumstance where authorised access or disclosure is likely to occur, and is likely to result in serious

harm to any of the individuals to whom the information relates; and the entity has been unable to prevent the likely risk of serious harm with remedial action.

Any potential breaches are assessed promptly by the Campbell Page Privacy Officer.

## Responsibilities

### Compliance, monitoring and review

- All staff are responsible for adhering to privacy requirements in relation to our customer’s personal and sensitive information
- All staff are responsible for adhering to the internal procedures and workflows for their relevant program in relation to customer privacy, requests for information, Class PIC’s and Privacy Breaches
- Contract Assurance Team are responsible for updating workflows and procedures for jobactive, DES and ParentsNext in accordance with any updated Guidelines released by Funders

### Reporting

All staff are required to contact Campbell Page’s Privacy Officer’s in relation to any privacy enquiries, potential privacy breaches, information requests and PIC’s.

### Records Management

Staff must maintain all records relevant to administering this policy in a recognised Campbell Page record keeping system.

## Definitions

Definitions and Acronyms	
<b>APPs</b>	The Australian Privacy Principles as set out at Schedule 1 of the Privacy Act
<b>Data Breach</b>	Occurs when personal information that an entity holds is subject to unauthorised access or disclosure, or is lost
<b>FOI Act</b>	Freedom of Information Act 1982
<b>PIC</b>	Public Interest Certificate
<b>Privacy Act</b>	Privacy Act 1988

## Related legislation and documents

Supporting Information	
<b>Legislative Compliance</b>	<p>This Policy supports Campbell Page’s compliance with the following legislation:</p> <ul style="list-style-type: none"> <li>• Privacy Act 1988</li> <li>• Privacy and Personal Information Protection Act 1998 (NSW)</li> <li>• Health Records and Information Privacy Act 2002 (NSW)</li> <li>• Information Privacy Act 2000 (Vic)</li> <li>• Health Records Act 2001 (Vic)</li> <li>• Freedom of Information Act 1992 (Qld)</li> <li>• Queensland Health Quality and Complaints Commission Act 1992 (Qld)</li> <li>• State Records Act 1997 (SA)</li> </ul>
<b>Supporting Documents</b>	<p><a href="#">Privacy Guideline</a> – jobactive and ParentsNext</p> <p><a href="#">Privacy Guideline</a> – DES</p>

<b>Related Documents</b>	<a href="#">Release of Information in an Emergency</a> - jobactive and ParentsNext <a href="#">Release of Information in an Emergency</a> – DES <a href="#">Notifiable Data Breaches</a>
<b>Superseded Documents</b>	Privacy Policy, created 04/10/2017

## Feedback

Campbell Page staff may provide feedback about this document by emailing [policy@campbellpage.org.au](mailto:policy@campbellpage.org.au) or contacting the Policy Sponsor.

## Approval and Review Details

Revision History				
Version	Policy Sponsor	Approval Team	Approval/Effective date	Next review
2.0	Contract & Compliance	Campbell Page Board	28 February 2020	28 February 2022
<b>Sections Modified</b>	Full Privacy Policy review in line with updates in practice and meeting Privacy Principle requirements. Policy moved to new/updated policy template			