

PRIVACY POLICY

PURPOSE

Lalor Neighbourhood House is required to collect, use, store and disclose a range of personal information on students, employees and a range of other stakeholders. The Centre is also required to establish strict access controls to all personal information collected including IP Security management to prevent unauthorized access to this information both from within and outside the organization.

SCOPE

This policy applies to all students, employees, volunteers and independent contractors.

POLICY STATEMENT

Lalor Neighbourhood House is committed to maintaining the privacy and confidentiality of all student and personnel records. Lalor Neighbourhood House complies with

- a. the Privacy and Data Protection Act 2014 (Federal), including the 13 Australian Privacy Principles (APP) as outlined in the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Federal)
- b. Privacy Act 1988 (VIC)
- c. Information Privacy Act 2000 (Vic), including the ten Information Privacy Principles specified in Appendix 1

PROCEDURES:

1. Open and transparent management of personal information

- a. Lalor Neighbourhood House will publish this policy on its website
- b. A website link to this policy will be included in Lalor Neighbourhood House's student handbook, staff handbook and the policy made available on request

2. Anonymity and Pseudonymity

- a. Individuals have the option to not identify themselves when dealing with Lalor Neighbourhood House, for example when requesting information on a course, website enquiries or anonymous complaints/feedback
- b. Individuals who wish to undertake nationally recognised training with the Lalor Neighbourhood House will be required to disclose information of a personal nature as outlined in this policy

3. Collection of solicited personal information

- a. Lalor Neighbourhood House will collect information students provide on enrolment into a nationally accredited course. Lalor Neighbourhood House may also collect information students provide on websites, enrolment forms, course materials and assessments
- b. Lalor Neighbourhood House may sometimes collect information, with student consent, from their employer, a job services provider or other organisations where students may engage in placement for training and assessment purposes

- c. Lalor Neighbourhood House collects information of a personal and sometimes sensitive nature. Information Lalor Neighbourhood House collects may include: Full name, date of birth, residential address, contact details, demographic information, ability/disability, employment details, educational background, indigenous background, concession status, language, literacy and numeracy skills and educational/course progress.

4. Dealing with unsolicited personal information

- a. Lalor Neighbourhood House only collects, uses and stores information which is directly related to the provision of training and assessment (for students) and information directly related to the employment or engagement of contractors and/or volunteers (for employees, contractors and volunteers)
- b. Information which is received that is not related to training and assessment or employment with Lalor Neighbourhood House is destroyed in a safe and secure manner

5. Notification of the collection of personal information

- a. Students, employees and contractors are notified when information is collected or sourced from third parties. Such notifications are expressed in enrolment forms, assessment tools and other written documents or implied in circumstances such as workplace observations

6. Use or disclosure of personal information

- a. Lalor Neighbourhood House only uses information for the provision of training and assessment and is required by law to disclose this information to a number of organisations such as:
 - i. Registering bodies such as the Victorian Registration and Qualifications Authority - VRQA (Victoria)
 - ii. Government funding bodies in each state and territory and/or Commonwealth Government
 - iii. Apprenticeship Centres
 - iv. Employers and Job Services Providers
 - v. External auditors and our consultants
 - vi. The Australian Taxation Office
 - vii. Other entities required by law and in accordance with the Privacy Act 1988.
- b. Lalor Neighbourhood House will not disclose any personal or sensitive information to a third party except for the direct provision of training and assessment or in emergency and life threatening situations

7. Direct marketing

- a. Your personal information will never be sold to any marketing company or third party
- b. Lalor Neighbourhood House may use your personal information to market directly to you only for the provision of further training and assessment with Lalor Neighbourhood House
- c. Lalor Neighbourhood House will only use your information if you have provided consent to use your information for this purpose

8. Cross-border disclosure of personal information

- a. Lalor Neighbourhood House will not disclose your personal information to any entity outside Australia unless you have provided your express written consent
- b. All records will be kept in Australia

9. Adoption, use or disclosure of government related identifiers

- a. Lalor Neighbourhood House is required to collect, in some circumstances, government related identifiers. Lalor Neighbourhood House will not use these identifiers for any reason or purpose except for the explicit reason it is required (e.g. Concession numbers, Tax File Numbers, Driver's License Number, Unique Identifiers etc.) and will not use these numbers as an identifier of individuals
- b. Lalor Neighbourhood House will only disclose government related identifiers where required by law or express consent has been given to disclose this information

10. Quality of personal information

- a. Lalor Neighbourhood House will take all reasonable steps to ensure that the information provided from individuals is correct and any third party information received can be verified for accuracy, currency and completeness.

11. Security of personal information

- a. All personal and sensitive information is kept safe and secure at all times, only people who are authorised may access this information
- b. Personal and sensitive information is protected from unauthorised access, interference, misuse, loss, modification or disclosure
- c. Destruction of personal and sensitive information is carried out by commercial document destruction companies or secure shredding or secure electronic deletion
- d. Install and keep updated appropriate software and settings to prevent unauthorized outside access to personal and sensitive information stored in the Centre's computer system, and maintain a password protected separate network for staff access

12. Access to personal information

Individuals may request copies of information which is kept about them at any time free of charge. Lalor Neighbourhood House may charge for printing and postage in some circumstances

- a. All requests for access to personal information must be in writing and the individual must be able to identify themselves and verify their identity prior to any information being disclosed
- b. All requests must be made to:

The Privacy Officer

Manager
Lalor Neighbourhood House
PO Box 1144
Lalor VIC 3075
office@lalornh.org.au

13. Correction of personal information

Individuals who feel that the information used and stored is inaccurate or incomplete may request to have the information updated and corrected. Such corrections must be in writing.

Responsibility

The Manager is responsible for the control and issuance of this policy.

Definitions

As identified in the chart below.

Item	Definition
Information	In this policy a reference to 'information' is a reference to both health information and personal information.
Personal information	Information which directly or indirectly identifies a person.
Primary purpose	Is one for which the individual concerned would expect their information to be used. Using the information for this purpose would be within their reasonable expectations e.g. client enrolment in a course or employment as a staff member.
Privacy principles	As defined in the Privacy and Data Protection Act 2014 (Federal), including the 13 Australian Privacy Principles (APP – <i>See Policy and Procedure Statement</i>) as outlined in the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (C'Wlth), and the ten Information Privacy Principles specified in Schedule 1 of the Information Privacy Act 2000 (Vic – <i>see appendix below</i>). This policy is based on both Federal and State privacy principles.
Sensitive information	Typically refers to information that is health related or of a socio-economic nature e.g. racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record.
Unique Identifiers	Refers to an identifier (usually a number) assigned by an organisation to an individual uniquely to identify that individual for the purposes of the operations of the organisation, but does not include an identifier that consists only of the individual's name but does not include an identifier within the meaning of the Health Records Act 2001.

Related Documents / Forms

- Complaints and Appeals Policy and Procedure
- Complaints and Appeals Form
- Records Management Policy and Procedures
- Victorian Protective Data Security Standards

Legislation

- Privacy Act 1988 (C'wth)
- Privacy and Data Protection Act 2014 (C'wth)
- The Australian Privacy Principles (APP), 2014 (C'wth.) *See appendix*
- Information Privacy Act 2000 (Vic) Health Records Act 2001 (Vic)



Policy/Procedure name	Privacy and Procedure	Version	2
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