



# PRIVACY POLICY

## **POLICY STATEMENT**

This Privacy Policy sets out Vocational Partnerships Group Inc. (VPG) responsibilities on the collection, utilisation and disclosure of personal information consistent with the Privacy Act 1988 and in particular the Australian Privacy Principles found in that Act. This Privacy Policy is also notification to individuals of the matters required to be notified by the Australian Privacy Principles.

VPG collects, holds, uses and discloses personal information from participants/clients, Employees and Employers to carry out its programmes and activities.

## **OPEN AND TRANSPARENT MANAGEMENT OF PERSONAL INFORMATION**

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

Examples of personal information are:

- a person's name, address, phone number or email address
- a photograph of a person;
- a video recording of a person;
- a person's salary, bank account or financial details;
- details about a person's education or education activities;
- details about a person's employment or employment activities;
- a person's medical details or health information;

VPG will not without authorisation disclose personal information held to any overseas recipients.

Upon written request applicants can access their personal information that is held by VPG to seek correction of that information.

VPG has a compliments and complaints procedure in place, if any individual wishes to submit a complaint about how their personal information has been handled they should submit a written complaint to us at:

ATT: Chief Executive Officer

PO Box 1064

Atherton Qld 4883

VPG's Privacy Policy can be accessed from;

- Requesting a copy from any VPG staff member

If you require more information on the Australian Privacy Principles you can contact the Australian Information Commission on their website at <http://www.oaic.gov.au/>

[APP Factsheet 17](#) Provides detailed information on each of the 13 APP.

## **ANONYMITY AND PSEUDONYMITY**

In the event any person requests anonymity or use of a pseudonym, VPG will assess the request in conformity with the APP and any contractual obligations VPG may have in place. Requests will be subject to certain limitations including where it is impossible for VPG to deal with any person who has not identified themselves.



# PRIVACY POLICY

## **COLLECTION OF SOLICITED PERSONAL INFORMATION**

Personal information will be collected from you directly upon receiving completed personal information forms or any other information in connection with VPG's programs and activities. Personal information collected will be checked that;

- Consent from the person has been given to collect such information;
- The information is reasonably necessary for any programs or activities VPG conduct;
- Information is Current, Complete and Accurate;
- Information is Securely held in our information record system;
- Records are archived and destroyed once VPG no longer needs it provided that it is lawful for us to do so;
- Sensitive information collected is by consent from the person.

VPG will collect personal information for our programmes and activities we provide using a variety of methods, these methods include;

- Paper based & electronic forms and correspondence
- Face to Face Meetings
- Events conducted by VPG

In some circumstances VPG will need to collect and receive personal information from third parties such as the Australian Federal Government and State and Territory Governments.

## **DEALING WITH UNSOLICITED PERSONAL INFORMATION**

As VPG collects personal information to conduct its Programs and Activities individuals may provide information that is not relevant to the services provided. This can be classed as unsolicited personal information.

In the event VPG becomes aware of information that it is not required to have to run the services and if it is lawful to do so, the information will be de-identified and destroyed.

## **NOTIFICATION OF THE COLLECTION OF PERSONAL INFORMATION**

### **Sensitive Information:**

In carrying out our programmes and activities VPG may collect personal information that is classed as *sensitive information*. As stated in the Australian Privacy Principles, VPG may only collect sensitive information from you:

- where your consent has been provided
- Where we have been required or authorised by law to do so
- When a general situation exists to prevent a serious threat to safety.

### **How we will notify you if we collect your personal information**

VPG will always notify individuals when we need to collect personal information from you. At times we will need to collect information from another source or as a requirement under Australia Law. We will always notify you the reason for the collection of personal information and make sure you are aware of any consequence of us not collecting your information.



# PRIVACY POLICY

## **Information collected by VPG contractors**

Under the Privacy Act, VPG are required to take contractual measures to ensure that contracted service providers, including Sub-contractors comply with the same privacy principles applicable to us.

## **USE OR DISCLOSURE OF PERSONAL INFORMATION**

VPG will only ever use or disclose personal information for the purposes it was provided to us. These purposes will always relate to the programmes and activities VPG provides.

VPG may also use information provided for the purpose of reference checks and any other information provided to VPG at point of enrolment, for administrative purposes and reporting purposes in connection with VPG programmes and activities.

VPG will by request of an individual disclose personal information to any other service provider. VPG may disclose personal information where we are under a legal duty to do so.

Personal information is collected for a variety of different purposes relating to our programmes and activities including:

- Performing our employment and personnel functions in relation to our staff;
- Performing our legislative and administrative obligations;
- Development of Policies and Procedures;
- Complaints investigations;
- Program and Contract management; and
- Management of correspondence with the public.

VPG will only use personal information for secondary purposes where we are able to do so in accordance with the Privacy Act.

Some examples of secondary purposes are:

- Quality Assurance
- Auditing
- Reporting
- Evaluation and Analysis
- Promotional Purposes

## **DIRECT MARKETING**

VPG will always obtain consent to use personal information for direct marketing purposes. The individual will always be given the option to opt out of direct marketing activities unless it is for the purpose required to meet an outcome for contractual obligations as part of our programmes and activities.

## **CROSS BORDER DISCLOSURE OF PERSONAL INFORMATION**

VPG will not without consent from an individual disclose personal information to an overseas recipient. If consent is provided to provide personal information to an overseas recipient VPG cannot guarantee that the recipient will protect the information to the standard that VPG does. Individuals will always be advised on the risks of overseas disclosure.



# PRIVACY POLICY

## **ADOPTION, USE OR DISCLOSURE OF GOVERNMENT RELATED IDENTIFIERS**

VPG will use government identifiers for certain contractual obligations. These are used exclusively for particular notifications and correspondence under the relevant contract.

VPG will never disclose government identifiers to third parties who are not eligible to hold such information under the relevant contract.

## **QUALITY OF PERSONAL INFORMATION**

VPG is committed to providing quality services to participants/clients, employees and employers, therefore we will do our best to ensure that personal information collected is current, accurate and relevant to the programmes and activities provided by us.

## **SECURITY OF PERSONAL INFORMATION**

### **How we keep your information secure**

VPG will take every step reasonable to protect personal information that is provided from misuse, interference, loss, unauthorised access, modification or disclosure.

VPG will take reasonable steps to protect the security of information retained that is held in both hard copy and electronically.

In the event VPG no longer requires the personal information for any purpose related to our programmes and activities the organisation will take reasonable steps to de-identify and destroy the information held in our information systems as long as the personal information is not required to be obtained for the following reasons:

- The information is contained in a Commonwealth record
- The information is required to be kept under an Australian Law, or a court/tribunal order

### **Storage**

VPG retains personal information in a range of paper-based and electronic records.

Storage and disposal of personal information is managed in accordance with VPG's Records Management Policy and Procedures which is in accordance with the Australian government records management processes. This ensures your personal information is held securely.

## **ACCESS TO PERSONAL INFORMATION**

An individual can request to have access to their personal information by contacting VPG's Privacy Officer. Individuals will be required to identify themselves to gain access to their information. Upon successful identification VPG will.

- Provide your personal information retained by VPG to you without any cost.
- Respond to your request within 7 business days

## **CORRECTION OF PERSONAL INFORMATION**

VPG understands that personal information can change and that any personal information we hold about you may become out of date, inaccurate or incomplete.

We request that if an individual becomes aware of any personal information that is inaccurate, incomplete or out of date, make contact with VPG to correct this information.



# PRIVACY POLICY

If personal information about you that is inaccurate, out of date, incomplete, irrelevant or misleading has been provided by us to a third party you can ask us to notify the third parties and update your information. VPG will take such steps to pass on the correct information unless it is impracticable, unreasonable or unlawful to do so.