

# Privacy Policy

## Purpose

Australian Childhood Trauma Group (ACTG) is committed to respecting the right of all individuals to privacy of their personal information.

ACTG abides by the 13 Australian Privacy Principles under the Privacy Act 1988 and Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth), as amended from time to time, which cover collection, use and disclosure, data quality, data security, openness, access and correction, identifiers, anonymity, transborder data flows and sensitive information.

This Policy sets out in broad terms the way in which ACTG handles personal information about individuals.

## Responsibilities

The CEO is responsible for ensuring that this policy and procedure is implemented. The CEO can delegate the operationalisation of specific procedures to members of the Executive Leadership Team.

## Scope

The policy covers all personal information that is used by the organisation in fulfilling its vision. It includes, but is not limited to, personal information held about staff, students, volunteers, service users, and suppliers.

## Policy

ACTG collects and handles personal information about individuals as part of its business operations and management of employees. In undertaking these activities ACTG handles personal information in relation to potential, current and former employees, volunteers, contractors, and students. Such information may include an individual's name, address, date of birth, gender, occupation details, health information, salary, tax file number and any other required information. ACTG usually collects this information directly from the individual. In addition to this policy, the privacy of ACTG service users is specified in detail in the policy described in the section of the intranet entitled: [Confidentiality Policy](#)

## **Procedure – Protecting the privacy of ACF staff, students and contractors**

### **Transfer of Information**

In undertaking obligations to service users and stakeholders, current and former employees and contractors, ACTG may be required to provide information to other organisations. For this purpose, an individual's information may, as required, be accessed by, transferred to or handled by, but not limited to, the following individuals or organisations:

- HR, ACTG internal auditors, external auditors, legal and other professional advisers;
- insurance brokers, insurers and superannuation providers;
- Government regulatory bodies such as the Australian Taxation Office; and
- business support service providers such as software suppliers, archive providers and mailing houses.

### **Access to Information**

ACTG is bound by legal obligations of confidentiality which apply to its employees, contractors and students. ACTG does not sell or rent out any of the information they hold on individuals and protects the security of that information in accordance with regulatory requirements and industry practice.

### **Personnel Files**

The organisation maintains two types of files for staff, and students – Supervision and Personnel.

Supervision files record outcomes of supervision between the staff member, and student and their Supervisor, performance appraisals, professional development plans, outcomes of disciplinary procedures and any other information associated with work performance.

Personnel files record contracts, variations to contracts, qualifications, resumes, recruitment reports, and copies of any outcome of disciplinary actions and other related information about a staff member, and student. Personnel files are kept by the organisation in a secure format and are available to the relevant staff member, their Manager, Operation's Manager, Clinical Lead and CEO.

Specific administrative elements of the Personnel Files such as WWCC, Code of Conduct, salary, leave, and superannuation may be accessed by administrative officers and relevant staff who are authorised by the CEO to have access to

information about staff members in order to facilitate the HR, administrative and/or Quality requirements of the organisation.

Supervision files are maintained by the staff member's line manager. Specific elements of the Supervision Files may be accessed by senior management or relevant staff who are authorised by the CEO to have access to information in order to facilitate the HR, administrative and/or Quality requirements of the organisation.

### Breaches of This Policy

ACTG staff, and students found to be in breach of this policy will be subject to disciplinary action in accordance with the HR Guidelines, and serious offences which breach this policy and/or the law will be treated as serious misconduct leading to the potential for termination of employment or the termination of association with the organisation.

### Document Management

VERSION	DATE	SUBMITTED BY	POSITION	AUTHORISED BY	APPROVAL DATE
2	OCT 2020	Monique Blom	CEO	ELT	OCT 2020

### Revision History

VERSION	DATE	ADDITIONS/AMENDMENTS	AUTHOR	REVIEWED BY
1	JUNE 2019	Major Updates and changes (see archive)	Sophie Corbett	Monique Blom