



PRIVACY POLICY

Practical responsibility & compliance	State Managers, Sector Managers, Team Leaders
Relevant legislation	Relevant federal and state privacy legislation

Intent

SEMF is committed to ensuring that the personal information is collected in a manner consistent with appropriate state, territory and federal law and that any personal information in its custody is used, stored, transmitted and shared in a manner appropriate to the prevailing legislation.

Who does this policy apply to?

This policy applies to all SEMF employees (full-time, part-time, and casual) and contractors undertaking work on behalf of SEMF.

Policy Objectives

The objectives of this policy are to:

- inform how personal information is collected, used, stored, transmitted, shared and destroyed
- outline the use of personal information
- determine the reasons for collecting personal information
- determine the authority and circumstances of sharing personal information
- ensure that SEMF complies with relevant legislation in this area.

Definitions

Personal information -

information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion. ¹

Sensitive information –

information about an individual that identifies, for example, racial origin, sexual preference, criminal record, religious beliefs and political affiliation.²

¹ Taken from the Privacy Act, 1988

² Adapted from the Privacy Act, 1988

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Policy

Why information is collected

Personal information is collected by SEMF to ensure appropriate, efficient and effective operation of the business and for decision making purposes. (e.g. recruitment and selection of staff, payroll, work allocation, promotion and succession planning, provision on client services, health and wellbeing programmes, learning and development etc) When information is sought from individuals, SEMF will provide an indication as to the use of the information.

SEMF does not collect/store information on individuals for further use that is irrelevant to the operation of the business or puts it in contravention of applicable legislation.

Information collected is only used for the primary purpose for which it is collected. For example, personal bank details are used only for payroll purposes. Personal information will not be disclosed for reasons other than its intended use without the consent of the individual or as required and allowed by law.

SEMF does not collect sensitive information from individuals unless there are genuine work related reasons for doing so (e.g. the provision of facilities to enable private prayer, recognition of culturally significant events or holidays). Sensitive information will be collected with the consent of the individual.

From whom do we collect information?

SEMF will collect information from:

- employees (e.g. payroll information for payment purposes, emergency contact details, previous work history, work performance information, professional qualifications and professional association memberships)
- potential employees (e.g. information to make a decision regarding potential employment with SEMF including reference checks)
- customers/clients (e.g. information to allow SEMF to provide services)
- contractors (e.g. contact information, past work history, references, payment details)

How information is collected

Personal information is collected with the individual's consent and knowledge by legal and fair means (e.g. Curriculum Vitae, payroll detail forms etc) and where possible SEMF will only collect personal information directly from the individual. SEMF also undertakes to make clear the reasons for collection of information.

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How is information stored?

Personal information in hard copy form such as payroll details, health records and performance records are stored by Human Resources and/or Finance in secure filing cabinets. Electronic information is password protected.

Other personal information may be stored by individual managers for work related purposes and is treated as confidential.

SEMF takes all reasonable measures to ensure that personal and sensitive information is protected from loss, misuse, disclosure or unauthorised use/access.

Access to information

Only individuals with legitimate need to access personal information will be given access to personal information of others. For example, finance may access banking and superannuation information and human resources may access personnel files for work related purposes only.

All individuals have access to their own personal information. Requests for access to personnel files should be made to Human Resources. Only the individual's own records will be made available under usual circumstances.

The Privacy Act provides for circumstances where individuals may be restricted from accessing information and is generally related to commercial-in-confidence material or where the security of identity of others may be put in jeopardy. Please see Human Resources or the Act for further information.

The Privacy Act also allows for disclosure of personal and sensitive information to be disclosed to third parties, usually with the consent of the individual. However, there are circumstances where the law requires disclosure without consent (e.g. where it is necessary to investigate suspected unlawful activity, to lessen or prevent serious threat to life, health, safety or welfare or a serious threat to public health or safety). Please see the Act or contact Human Resources for more information.

Accuracy of Information

SEMF undertakes as far as is reasonable and practical to ensure that information is kept up to date and is accurate. Where a change to personal information occurs, individuals are requested to make this known to the company (e.g. change to address, medical conditions that may impact on ability to undertake work or certain activities) so that personal information is current. Individuals are encouraged to provide current information and to request amendments where it is believed that information held about them may be out of date or incorrect.

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Destruction of Personal Information

Where personal information is obsolete or not required to be held by the company, SEMF will dispose of the information via a means that ensures that confidentiality is maintained (e.g. shredding, deletion of electronic files) or de-identify information where appropriate.

Actions contradicting this policy

Where the actions of any individual lead to a breach of this policy and/or the Privacy Act, 1988 (e.g. unauthorised access, misuse, distribution, destruction or copying of personal and /or sensitive information) the matter will be investigated by an appropriate member of management and disciplinary action may be taken. This may include termination of employment.

Related Policy

This policy should be read in conjunction with the [Internet & email usage policy \(PLIT01\)](#).

Relevant Legislation

This policy is aligned to and supports the requirements of the Privacy Act, 1988.

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