

Customer Privacy and Confidentiality

SCOPE

This policy applies to all operations of The Personnel Group Ltd, its wholly owned subsidiary Personnel Group Training & Recruitment Pty Ltd, and all associated trading names, hereinafter collectively referred to as “the Organisation.” This policy is applicable to all Responsible Persons, team members, customers, contractors, and volunteers of the Organisation.

POLICY

The Personnel Group (TPG) is committed to protecting the privacy of personal information which the organisation collects, holds or administers. Personal information is information which directly or indirectly identifies a person. Only reasonably necessary information that will directly relate to the individual for service delivery will be collected.

Personal Information kept by the organisation may include names, address, date of birth, telephone number and any other private information. It also includes information about disabilities, health, sexuality, religion and barriers that a customer may have had or are having.

All customers receiving services from our organisation will be assigned a unique, individual identifier that will enable the processing of required information to approved Government Departments without the need for providing names and addresses. Information sourced from customers shall be kept in a confidential and secure manner, and will be updated as provided by the customer to meet current needs. Provision of information by a customer is at the discretion of the customer to aid in service delivery.

Classification of Data

In delivering services, the organisation has obligations to ensure that information we collect about customers is managed correctly. This includes obligations covered in both the Privacy Act 1988 (Cth) and the Social Security Act 1991 (Cth). Under these Acts, information we collect about participants may fall into one or more of the following categories:

- Personal. Personal Information is any information that could be used to identify a person and may include a person's name, address, phone number and age.
- Sensitive. Sensitive information is information about a person that may be subject to a higher level of scrutiny such as racial or ethnic origin, sexual orientation, criminal record or health information.
- Protected. Protected information is any information about a person or organisation that is or was held in the records of a Government System.

Any information disclosed, either verbally or in written form, whether true or not is classed in the above categories.

Collection

The organisation will:

- Only collect information that can be shown to be directly relevant for specific contract requirements, effective service delivery and the organisation's duty of care responsibilities.
- Take reasonable steps to ensure the information collected is accurate, complete, up to date and relevant.
- Collect information from approved Government departments, from the person directly and from other medical specialists, schools, training providers, employers and relevant agencies or service providers with the written consent of that person.
- Collect the information through a variety of means including, reports, interviews, file notes and other relevant documented information in either documented, electronic or interview format.
- Obtain written consent prior to obtaining information from any other source.
- Obtain written consent prior to releasing information to any other source, that has not been pre-approved.

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- Ensure that personal information is stored securely and is not left on view to unauthorised TPG employees or the general public.
- Ensure that only those employees who need access to the above information are granted access.
- Respect individual needs and circumstances.
- Give customers the option of not identifying themselves when completing evaluation forms or opinion surveys.
- Ensure that personal information is held in accordance with current privacy laws and the Australian Privacy Principles 2015 (last updated).

Service Delivery

The organisation takes seriously its commitment to promoting a culture that respects the privacy and confidentiality rights of individuals. The organisation demonstrates its absolute regard for customers and team members by respecting people's rights to privacy and safeguarding any personal information that is entrusted to the organisation.

The service delivery provided by the organisation includes:

- All customers are provided with information held in this policy upon registration, a written copy of this information is provided in the customers handbook.
- Board members and team members will be informed about the privacy and confidentiality requirements and will be required to sign a confidentiality agreement relating to their role.
- Explanation to customers and advocates attending the registration interview as to why the information sought is required by the organisation.
- Privacy rights and confidentiality in relation to personal and or sensitive information will be upheld regardless of whether the information is stored and communicated through manual or electronic systems, or is communicated verbally.
- Release of Information forms will be completed and signed by customers with their full consent before information sharing between appropriate parties takes place. Customers will be explained what information will be shared.
- Files are stored in a secure location within the office buildings and files are returned to their secure location as soon as they no longer required by a team member.
- Customers names or other identifying information is not displayed on whiteboards, notice boards or similar which are located in public places in the office.
- Photographic, video or other identifying images are not displayed or aired publicly without the written prior permission of the customer.
- Prompt disposal of all personal information that was no longer essential via the internal shredder or a confidential document disposal service.
- All Organisation created information will be destroyed in line with our ISO9001, Quality Procedures for Document and Data Control.

Limiting the Disclosure of Personal Information

The organisation will not disclose personal information to anyone else including international entities except:

- With the written consent of the person.
- To prevent a serious and imminent threat to a person's life or health.
- As required or authorised by law.
- Where reasonably necessary for the enforcement of criminal or revenue laws, or
- Where the person the information is about is likely to know or has been made aware of the practice of disclosure.

The recipient of the personal information under one of the above exceptions may only use it for the purpose for which it was disclosed. Each customer has the right to review access information kept by the organisation. A participant may request this information at anytime during service or at cessation of services. Requests must be directed to the CEO in writing through the customer's team member and relevant Operations Manager. Upon receipt of the request, The Personnel Group will review the requested information and provide a response to the customer within 21 days. The Personnel Group retain the right to withhold information at our discretion for commercial and privacy reasons, particularly in the cases of third-party information being involved.

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Making a Complaint

If a customer feels that there has been a breach of this policy or any of the Australian Privacy Principles, they have the right to make a complaint.

Customers should make a complaint to The Personnel Group, by following the complaint procedure located in the Customer Handbook or through the organisations website.

If a customer feels that their complaint has not been dealt with appropriately or is unhappy with the response from The Personnel Group, The customer will be encouraged to contact the Office of the Australian Information Commissioner for Complaints on 1300 363 992 or The Complaints Resolution Referral Service on 1800 880 052, to assist with further resolution of their complaint or the NDIS Quality Safeguard Commission on 1800 035 544.

Authorised by:

John Gibbons,
CEO