

PRIVACY POLICY AND PROCEDURE

1. INTRODUCTION

- 1.1** AGIL Group is committed to maintaining the privacy and confidentiality of its staff and client records. This policy and procedure is intended to inform all its staff, clients and stakeholders of this commitment and to inform of AGIL Group's practices that support respectful and confidential service provision together with information gathering and recording.

2. OBJECTIVES

- 2.1** Providing an overall framework for our privacy practices, AGIL Group has developed and implements this Privacy Policy.

3. STATEMENT

- 3.1** AGIL Group respects every individual's legal right to privacy.
- 3.2** AGIL Group complies with the Privacy Act 1988 including the 13 Australian Privacy Principles (APPs) as outlined in the Privacy Amendment (Enhancing Privacy Protection) Act 2012. Personal information will never be collected by unlawful or unfair means.
- 3.3** AGIL Group manages personal information in an open and transparent way. This is evident in the implementation of practices, procedures and system as outlined in this policy, that ensure AGIL Group's compliance with the APPs and any binding registered APP code, and provide suitable procedures for AGIL Group staff to be able to deal with related inquiries and complaints that may be received from time to time.
- 3.4** AGIL Group includes the standard privacy notice in its application procedure in line with legislative requirements which advises clients how their data may be supplied to and used by various departments, agencies and their representatives.

4. SCOPE

- 4.1** This policy and procedure applies to all to all employees, volunteers and contractors of AGIL Group, all clients, their families, carers or other client representatives, contractors and any other relevant stakeholder.
- 4.2** It is expected that the policy and procedures be adhered to and understood by all staff and relevant others. Non-compliance may result in disciplinary action.
- 4.3** This policy and procedure is intended to work in conjunction with the reference documents.

5. PROCEDURES

The following procedures are to be adhered to under this Policy:

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5.1 AUSTRALIAN PRIVACY PRINCIPLE 1 – OPEN AND TRANSPARENT MANAGEMENT OF PERSONAL INFORMATION:

5.1.1 Purposes for information collection, retention, use and disclosure

AGIL Group retains a record of personal information about all individuals with whom we undertake any form of business activity. AGIL Group collects, holds, uses and discloses information from our clients and stakeholders for a range of purposes, including but not limited to:

- Providing services to clients
- Managing employee and contractor teams
- Promoting products and services
- Conducting internal business functions and activities, and
- Requirements of government stakeholders.

AGIL Group will advise the individual of matters specifically related the personal information being collected, and will take reasonable steps to ensure that individual is aware of the following:

- That AGIL Group is the collector, and how to contact AGIL Group
- The facts and circumstances of the collection – for example, whether the information is collected over the phone, by software applications (e.g. cookies, web analytics), via social media applications (including but not limited to Facebook, LinkedIn, YouTube, etc...), or from a third party
- That the individual is able to access that information and ask for it to be corrected
- The purposes for which the information is collected, both the primary purpose, and where there is a related purpose, that secondary purpose
- Organisations (or the types of organisations) to which AGIL Group usually discloses information of the kind being collected
- Details of any Australian law or a court/tribunal order that requires the information to be collected
- Whether or not that information will be transferred overseas (including information stored in the cloud) and to what countries (if known), and
- The main consequences (if any) for the individual if all or part of the information is not provided by that individual.

As a government provider of government funded services, regulated by the ASQA, AGIL Group is required to collect, hold, use and disclose a wide range of personal and sensitive information on participants in various programs.

It is noted that AGIL Group is also bound by various State Government Acts requiring similar information collection, use and disclosure.

Individuals are advised that due to these legal requirements, AGIL Group discloses information held on individuals for valid purposes to a range of third party entities including governments (Commonwealth, State and employers (where relevant).

AGIL Group will not disclose information to a person, body or agency (other than the individual concerned unless:

- the individual concerned is reasonably likely to have been aware that information of that kind is usually passed to that person, body or agency

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- the individual concerned has consented to the disclosure
- AGIL Group believes on reasonable grounds that the disclosure is necessary to prevent or lessen a serious and imminent threat to the life or health of the client or of another person including a child
- the disclosure is required or authorised by or under law, or
- the disclosure is reasonably necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of the public revenue.

5.1.2 Kinds of personal information collected and held

The following types of personal information are generally collected, depending on the government obligations and need for service delivery (where relevant to the service):

- Contact details
- Employment details
- Educational background
- Demographic Information
- Service monitoring, client progression and achievement information
- Financial billing information.

The following types of sensitive information will be collected and held (where relevant to the service):

- Identity details
- Employee details & HR information
- Complaint or issue information
- Disability status & other individual needs
- Indigenous status.

5.1.3 How personal information is collected

AGIL Group RTO's usual approach to collecting personal information is to collect any required information directly from the individuals concerned. This may include the use of forms (such as AGIL Group's service application or enrolment forms or service delivery records) and the use of web-based systems (such as online application forms or internal operating systems).

5.1.5 How personal information is held

Individual information held across systems is linked through an AGIL Group allocated identification number for each individual (where relevant to the service).

AGIL Group's usual approach to holding personal information includes robust storage and security measures at all times. Information on collection is:

- As soon as practical converted to electronic means.
- Stored in secure, password protected systems, such as in our financial system and AGIL Group's client management system (CMS), and
- Monitored for appropriate authorised use at all times.
- Only authorised personnel are provided with login information to each system, with system access limited to only those relevant to their specific role. AGIL Group's ICT systems are hosted internally with robust internal security to physical server locations and server systems access.

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Virus protection, backup procedures and ongoing access monitoring procedures are in place (refer to AGIL Group’s ICT – Security Policy and Procedure).

- Destruction of paper-based records occurs as soon as practicable in every matter, through the use of secure external shredding and destruction services through Shred-X.

5.1.6 Retention and Destruction of Information

AGIL Group retains and destroys documents according to the legislative requirements.

Specifically, for our client records, in the event of AGIL Group ceasing to operate, the required personal information on record for individuals undertaking nationally recognised training would be transferred to the legislated department or agency.

5.1.7 Accessing and seeking correction of personal information

AGIL Group confirms all individuals have a right to request access to their personal information held and to request its correction at any time. In order to request access to personal records, individuals are to make contact in the first instance with the relevant program manager/team.

To formalise the request, the team will issue a Client File Access Request Form, for completion.

In all cases where access is requested by a third party, AGIL Group will ensure that:

- Parties requesting access to personal information are robustly identified and vetted
- Where legally possible, the individual to whom the information relates will be contacted to confirm consent (if consent not previously provided for the matter), and
- Only appropriately authorised parties, for valid purposes, will be provided access to the information.

5.1.8 Complaints about a breach of the APPs or a binding registered APP code

If any individual feels that AGIL Group may have breached one of the APPs, they are encouraged to lodge a formal complaint, using AGIL Group’s Complaints Handling and Dispute Resolution Policy and Procedure.

5.1.9 Likely overseas disclosures

AGIL Group confirms that individuals’ personal information is unlikely to be disclosed to overseas recipients, for internal business activity purposes.

5.1.10 Making our APP Privacy Policy available

AGIL Group provides its APP Privacy Policy available free of charge, with all information being publicly available from its website. This website information is designed to be accessible as per web publishing accessibility guidelines, to ensure access is available to individuals with special needs (such as an individual with vision impairment).

In addition, this APP Privacy Policy is:

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- Included within AGIL Group's various client Handbooks (in summary form with a reference to the website for access to the full policy)
- Noted within the text or instructions at all information collection points (such as informing individuals during a telephone call of how the policy may be accessed, in cases where information collection is occurring), and
- Available for distribution free of charge on request, as soon as possible after the request is received, including in any particular format requested by the individual as is reasonably practical.

If, in the unlikely event our Privacy Policy is not able to be provided in a particular format requested by an individual, we will explain the circumstances around this issue with the requester and seek to ensure that another appropriate method is provided.

5.2 AUSTRALIAN PRIVACY PRINCIPLE 2 – ANONYMITY AND PSEUDONYMITY:

AGIL Group provides individuals with the option of not identifying themselves, or of using a pseudonym, when dealing with us in relation to a particular matter, whenever practical. This includes providing options for anonymous dealings in cases of general service enquiries or other situations in which an individuals' information is not required to complete a request.

Individuals may deal with AGIL Group by using a name, term or descriptor that is different to the individual's actual name wherever possible. This includes using generic email addresses that do not contain an individual's actual name, or generic user names when individuals may access a public component of our website or application forms.

AGIL Group only stores and links pseudonyms to individual personal information in cases where this is required for service delivery (such as system login information) or once the individual's consent has been received.

Individuals are advised of their opportunity to deal anonymously or by pseudonym where these options are possible through publishing this Policy on our website.

5.2.1 Requiring identification

AGIL Group must require and confirm identification however when an individual confirms interest in participating in a government funded services, such as settlement, employment or training services. AGIL Group is authorised by Australian law to deal only with individuals who have appropriately identified themselves. For example, it is a Condition of registration for all Registered Training Organisations (RTOs) under the National Vocational Education and Training Regulator Act 2011 that the AGIL Group identifies individuals and their specific individual needs on commencement of service delivery.

Other legal requirements, as noted earlier in this policy, also require considerable identification arrangements.

There are also other occasions also within our service delivery where an individual may not have the option of dealing anonymously or by pseudonym, as identification is practically required for us to effectively support an individual's request or need. This includes lodgement of a complaint or appeal.

5.3 AUSTRALIAN PRIVACY PRINCIPLE 3 — COLLECTION OF SOLICITED PERSONAL INFORMATION:

AGIL Group only collects personal information that is reasonably necessary for our business activities. We only collect sensitive information in cases where the individual consents to the sensitive information

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being collected, except in cases where we are required to collect this information by law, such as outlined earlier in this Policy.

All information we collect is collected only by lawful and fair means.

AGIL Group only collect solicited information directly from the individual concerned, unless it is unreasonable or impracticable for the personal information to only be collected in this manner.

5.4 AUSTRALIAN PRIVACY PRINCIPLE 4 – DEALING WITH UNSOLICITED PERSONAL INFORMATION:

AGIL Group may from time to time receive unsolicited personal information. Where this occurs it promptly reviews the information to decide whether or not it could have collected the information for the purpose of its business activities. Where this is the case, AGIL Group may hold, use and disclose the information appropriately as per the practices outlined in this Policy.

Where AGIL Group could not have collected this information (by law or for a valid business purpose) it immediately destroys or de-identifies the information (unless it would be unlawful to do so).

5.5 AUSTRALIAN PRIVACY PRINCIPLE 5 – NOTIFICATION OF THE COLLECTION OF PERSONAL INFORMATION:

Whenever AGIL Group collects personal information about an individual, it takes reasonable steps to notify the individual of the details of the information collection or otherwise ensure the individual is aware of those matters. This notification occurs at or before the time of collection, or as soon as practicable afterwards.

Our notifications to individuals on data collection include:

- AGIL Group's identity and contact details, including the position title, telephone number and email address of a contact who handles enquiries and requests relating to privacy matters
- The facts and circumstances of collection such as the date, time, place and method of collection, and whether the information was collected from a third party, including the name of that party
- If the collection is required or authorised by law, including the name of the Australian law or other legal agreement requiring the collection
- The purpose of collection, including any primary and secondary purposes
- The consequences for the individual if all or some personal information is not collected
- Other organisations or persons to which the information is usually disclosed, including naming those parties
- Whether we are likely to disclose the personal information to overseas recipients, and if so, the names of the recipients and the countries in which such recipients are located
- A link to this Privacy Policy on our website or explain how it may be accessed
- Acceptance, as evidenced by signing of the AGIL Group Privacy Notice
- Advice that this Privacy Policy contains information about how the individual may access and seek correction of the personal information held by us and how to complain about a breach of the APPs, or any registered APP code, and how we will deal with such a complaint.

Personal information disclosed to other government agencies may be used or disclosed for the following purposes:

- Issuing a nationally recognised qualification, and populating authenticated VET transcripts
- Facilitating statistics and research, including surveys

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- Administering a specific service, including program administration, regulation, monitoring and evaluation.

A Client Declaration, consenting to personal information disclosure to appropriate departments, agencies and their third-party representatives, is given to students to consider and sign during all on-boarding process.

5.5.1 Collection from third parties

Where AGIL Group collects personal information from another organisation, it:

- Confirms whether the other organisation has provided the relevant notice above to the individual or
- Confirms whether the individual was otherwise aware of these details at the time of collection, and
- If this has not occurred, it will undertake this notice to ensure the individual is fully informed of the information collection.

5.6 AUSTRALIAN PRIVACY PRINCIPLE 6 – USE OR DISCLOSURE OF PERSONAL INFORMATION:

AGIL Group only uses or discloses personal information it holds about an individual for the particular primary purposes for which the information was collected, or secondary purposes in cases where:

- An individual consented to a secondary use or disclosure
- An individual would reasonably expect the secondary use or disclosure, and that is directly related to the primary purpose of collection or
- Using or disclosing the information is required or authorised by law

5.6.1 Requirement to make a written note of use or disclosure for this secondary purpose

If AGIL Group uses or discloses personal information in accordance with an 'enforcement related activity' we will make a written note of the use or disclosure, including the following details:

- The date of the use or disclosure
- Details of the personal information that was used or disclosed
- The enforcement body conducting the enforcement related activity
- If the organisation used the information, how the information was used by the organisation, and
- The basis for our reasonable belief that we were required to disclose the information.

5.7 AUSTRALIAN PRIVACY PRINCIPLE 7 – DIRECT MARKETING:

AGIL Group does not use or disclose the personal information that it holds about an individual for the purpose of direct marketing, unless:

- The personal information has been collected directly from an individual, and the individual would reasonably expect their personal information to be used for the purpose of direct marketing or
- The personal information has been collected from a third party, or from the individual directly, but the individual does not have a reasonable expectation that their personal information will be used for the purpose of direct marketing
- The individual has not made a prior request to AGIL Group to not receive direct marketing communications from AGIL Group.

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AGIL Group provides a simple method for the individual to request not to receive direct marketing communications (also known as 'opting out').

- On each of our direct marketing communications whenever used, AGIL Group provides a prominent statement that the individual may request to opt out of future communications, and how to do so.
- An individual may ask AGIL Group to stop sending direct marketing communications and AGIL Group will do that within a 14 days after receiving the request unless exceptional circumstances apply.
- An individual may also request AGIL Group at any stage not to use or disclose their personal information for the purpose of direct marketing. We comply with any request by an individual promptly and undertake any required actions for free.

AGIL Group also, on request, notifies an individual of our source of their personal information used or disclosed for the purpose of direct marketing unless it is unreasonable or impracticable to do so and AGIL Group will do so within 14 days after receiving the request (except in exceptional circumstances) unless it is impractical or unreasonable to do so.

AGIL Group will not charge any individual for the making of, or to give effect to, these requests.

5.8 AUSTRALIAN PRIVACY PRINCIPLE 8 – CROSS-BORDER DISCLOSURE OF PERSONAL INFORMATION:

AGIL Group will rarely find itself in this situation however before AGIL Group discloses personal information about an individual to any overseas recipient, it undertakes to take reasonable steps to ensure that the recipient does not breach any privacy matters in relation to that information.

5.9 AUSTRALIAN PRIVACY PRINCIPLE 9 – ADOPTION, USE OR DISCLOSURE OF GOVERNMENT RELATED IDENTIFIERS:

AGIL Group does not adopt, use or disclose a government related identifier related to an individual except:

- In situations required by Australian law or other legal requirements
- Where reasonably necessary to verify the identity of the individual
- Where reasonably necessary to fulfil obligations to an agency or a State or Territory authority, or
- As prescribed by regulations.

5.10 AUSTRALIAN PRIVACY PRINCIPLE 10 – QUALITY OF PERSONAL INFORMATION:

AGIL Group takes reasonable steps to ensure that the personal information it collects is accurate, up-to-date and complete. It also takes reasonable steps to ensure that the personal information AGIL Group uses or discloses is, having regard to the purpose of the use or disclosure, accurate, up-to-date, complete and relevant. This is particularly important:

- When we initially collect the personal information, and
- When we use or disclose personal information.

AGIL Group takes steps to ensure personal information is factually correct. In cases of an opinion, we ensure information takes into account competing facts and views and makes an informed assessment, providing it is clear this is an opinion. Information is confirmed up-to-date at the point in time to which the personal information relates.

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Quality measures in place supporting these requirements include:

- Internal practices, procedures and systems to audit, monitor, identify and correct poor quality personal information (including training staff in these practices, procedures and systems)
- Protocols that ensure personal information is collected and recorded in a consistent format, from a primary information source when possible
- Ensuring updated or new personal information is promptly added to relevant existing records
- Reminding individuals to update their personal information at critical service delivery points (such as completion) when we engage with the individual
- Contacting individuals to verify the quality of personal information where appropriate when it is about to be used or disclosed, particularly if there has been a lengthy period since collection, and
- Checking that a third party, from whom personal information is collected (such as employers), has implemented appropriate data quality practices, procedures and systems.

5.11 AUSTRALIAN PRIVACY PRINCIPLE 11 — SECURITY OF PERSONAL INFORMATION:

AGIL Group takes active measures to consider whether it is able to retain personal information we hold, and also to ensure the security of personal information we hold. This includes reasonable steps to protect the information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.

AGIL Group destroys or de-identifies personal information held once the information is no longer needed for any purpose for which the information may be legally used or disclosed.

Access to AGIL Group offices and work areas is limited to our staff only - visitors to our premises must be authorised by relevant personnel and are accompanied at all times. With regard to any information in a paper based form, AGIL Group maintains storage of records in an appropriately secure place to which only authorised individuals have access.

Regular staff training are conducted with AGIL Group personnel on privacy issues, and how the APPs apply to our practices, procedures and systems. Information is also included in our personnel induction practices.

5.12 AUSTRALIAN PRIVACY PRINCIPLE 12 — ACCESS TO PERSONAL INFORMATION:

5.12.1 Where AGIL Group holds personal information about an individual, AGIL Group provides that individual access to the information on their request. In processing requests, we:

- Ensure through confirmation of identity that the request is made by the individual concerned, or by another person who is authorised to make a request on their behalf
- Respond to a request for access within 5 calendar days and when notifying our refusal to give access, including providing reasons for refusal in writing, and the complaint mechanisms available to the individual, and
- Provide information access free of charge.

5.12.2 AGIL Group will not provide access to personal information about an individual where it reasonably believes that:

- Giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety, or
- Giving access would have an unreasonable impact upon the privacy of other individuals, or

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- The request for access is frivolous or vexatious, or
- The information relates to existing or anticipated legal proceedings between AGIL Group and the individual, and the information would not be provided by the process of discovery in those proceedings, or
- Providing access would reveal the intentions of AGIL Group in relation to negotiations with the individual in such a way as to prejudice those negotiations; or
- Providing access would be unlawful, or
- Denying access is required or authorised by or under an Australian law or a court/tribunal order, or
- both of the following apply:
 - AGIL Group has reason to suspect that unlawful activity, or misconduct of a serious nature, that relates the AGIL Group functions or activities has been or is being or may be engaged in; and
 - giving access would be likely to prejudice the taking of appropriate action in relation to the matter; or
 - providing access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
 - giving access would reveal evaluative information generated within AGIL Group in connection with a commercially sensitive decision-making process.

5.13 AUSTRALIAN PRIVACY PRINCIPLE 13 – CORRECTION OF PERSONAL INFORMATION:

AGIL Group takes reasonable steps to correct personal information we hold, to ensure it is accurate, up-to-date, complete, relevant and not misleading, having regard to the purpose for which it is held. Clients are advised of the importance of ensuring that AGIL Group has current information about each Individual, through the various client Handbooks.

5.13.1 Individual Requests

On an individual's written request (via email), we:

- Correct personal information held, and
- Notify any third parties of corrections made to personal information, if this information was previously provided to these parties.

In cases where we refuse to update personal information, we:

- Give a written notice to the individual, including the reasons for the refusal and the complaint mechanisms available to the individual
- Upon request by the individual whose correction request has been refused, take reasonable steps to associate a statement with the personal information that the individual believes it to be inaccurate, out-of-date, incomplete, irrelevant or misleading
- Respond within 14 calendar days to these requests, and
- Complete all actions free of charge.

5.13.2 Correcting at AGIL Group's initiative

AGIL Group takes reasonable steps to correct personal information AGIL Group holds in cases where we are satisfied that the personal information held is inaccurate, out-of-date, incomplete, irrelevant or misleading (that is, the information is faulty). This awareness may occur through collection of updated information, in notification from third parties or through other means.

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5.14 COMPLAINTS

AGIL Group will consider complaints made by an individual in relation to:

- A decision by AGIL Group to refuse access to personal information requested by the individual, or
- A decision not to correct an individual's personal information.

The individual will be referred to AGIL Group's Client Complaints Handling and Dispute Resolution Policy and Procedure.

Any individual may also make a complaint about how AGIL Group handles an individual's personal information to the Office of the Australian Information Commissioner (OAIC).

<http://www.oaic.gov.au/privacy/privacy-complaints>.

5.15 AGIL GROUP'S CONTACT PERSON

All queries or complaints regarding this Privacy Policy, or requests for access to, or correction of, personal information should be directed to AGIL Group's Executive Manager, Creative Industries as follows:

- **Contact name:** Evan Alexander
- **Contact phone:** 07 3412 8222
- **Contact email:** evana@acsl.org.au

5.16 REVIEW AND UPDATE OF THIS PRIVACY POLICY

5.16.1 AGIL Group reviews this Privacy Policy:

- On an ongoing basis as suggestions or issues are raised and addressed, or as government required changes are identified
- Through our internal audit processes on at least an annual basis
- AGIL Group conducts ongoing internal audits (at least annually and as needed) of the adequacy and currency of security and access practices, procedures and systems implemented
- As a part of any external audit of our operations that may be conducted by various government agencies as a part of our contracted requirements, and
- As a component of each and every complaint investigation process where the complaint is related to a privacy matter.

5.16.2 Where this policy is updated, changes to the policy are widely communicated to stakeholders through AGIL Group's staff meetings, staff training and dissemination of updated documentation, and externally through publishing of the policy on AGIL Group's website and other relevant documentation (such as our Client Handbook).

5.16.3 Any identified areas of improvement are included on its Continuous Improvement Register and remedial actions monitored through AGIL Group's Continuous Improvement Committee to ensure completion. In turn, staff are up-skilled in the amended requirements, through strategies outlined in AGIL Group's Continual Improvement Policy and Procedure.

6. ROLES AND RESPONSIBILITIES

ROLE	RESPONSIBILITY
Staff	<ul style="list-style-type: none"> • Adhere to and understand the policy and procedures

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Line/Department Manager	<ul style="list-style-type: none"> Ensure that Staff are aware and comply with the Policy an Procedure
Executive Managers	<ul style="list-style-type: none"> Ensure that Staff are aware and comply with the Policy an Procedure Ensuring the Development, implementation and management of the Policy and Procedure

7. TERMS AND DEFINITIONS

Staff:	For the purpose of this document staff refers to Board Members, Directors, Employees, Volunteers, Students, Contractors and Consultants engaged by the organisation.
AGIL Group:	Means AGIL Group International Limited, AGIL Group Community Services Limited, AGIL Group Community Enterprises Limited, AGIL Group Supermarket Pty Limited, Multicultural Centre for Mental Health and Well Being Inc (Harmony Place), Brisbane Multicultural Arts Centre Limited (BEMAC), Land & Home Realty Pty Limited, Harmony on Carmody Café Pty Limited, Work AGIL Group Pty Limited, AGIL Group Enterprise Services Pty Limited, AGIL Group Driver Training Pty Limited, Living in Constructions Pty Limited and all other organisations as nominated by AGIL Board from time to time.
Subsidiaries:	A subsidiary is partly or completely owned by the parent company, which holds a controlling interest in the subsidiary company.
Client:	Means a participant that has agreed to use the services provided by AGIL Group.
Anonymity:	Is where an individual is not required to and does not identify him or herself when engaging with AGIL Group services.
Government contract:	Can be Federal and or State. It is any funding agreement between a government agency and AGIL Group that requires AGIL Group to disclose personal and/or sensitive information about individuals to that agency.
Consent:	Is a voluntary and informed agreement by an individual to something AGIL Group does. Where AGIL Group considers that a person is unable to give this consent to the use of his or her personal information for a particular purpose, AGIL Group will ask that person's parent or guardian or person or advocate nominated by the individual to provide the consent.
Pseudonym:	Is a pet name or nickname that is used by an individual engaging with AGIL Group where AGIL Group is not obliged to collect that individual's true name.
Direct marketing:	Is the promotion of AGIL Group fundraising, direct mail appeals, wills and bequests activities, AGIL Group training, employment,

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educational resources and programs to individuals and informing individuals of issues of disability services generally.

Health records:

Are part of personal information and sensitive information, and include information or an opinion about a person's health or disability. In the case of AGIL Group, most health records that are subject to the Law are collected for the purpose of assessing clients and placing employees and volunteers in positions in Australia.

Personal Information:

Is information, or an opinion, about an individual who is reasonably identifiable, whether or not that information or opinion is recorded in some way, and whether or not the information or opinion is true. Personal information collected by AGIL Group includes contact details, educational qualifications, personal history and personal financial information.

Primary purpose:

There are a large number of AGIL Group activities that are primary purposes for which AGIL Group collects information. Some examples are:

- the provision of disability services
- assessing, placing and engaging with AGIL Group employees, contractors, Directors and volunteers;
- providing training;
- conducting assessments and reference checks such as police checks through a third party;
- soliciting donations from the public;
- collecting personal histories and images for AGIL Group archives and publications.

Secondary purpose:

Is, in the case of personal information, a purpose that is related to the primary purpose and, in the case of sensitive information, a purpose that is directly related to the primary purpose.

Sensitive information:

Is part of personal information and includes information AGIL Group may collect such as racial or ethnic origin, religious beliefs, membership of a professional or trade association, criminal record, or health information.

Solicited information:

Is personal information that AGIL Group takes active steps to collect.

Unsolicited information:

Is personal information about an individual that AGIL Group has not asked for but receives in some other way.

8. REFERENCES

8.1 AGIL GROUP DOCUMENTS:

- Client Complaints Handling and Dispute Resolution Policy and Procedure
- ICT – Security Policy and Procedure
- Client Records Management Policy and Procedure
- Various Client Handbooks

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8.2 LEGISLATION AND EXTERNAL DOCUMENTS

- Privacy Act 1988 including the 13 Australian Privacy Principles (APPs) as outlined in the Privacy Amendment (Enhancing Privacy Protection) Act 2012
- the United Nations Convention on the Rights of Persons with Disabilities
- Disability Services Act 2006

9. DOCUMENT APPROVAL

This is a managed Organisational document. For identification of amendments, each page contains a release date and version number. Changes will only be issued as a complete replacement document. Recipients should remove superseded versions from circulation.

APPROVED BY: <i>First Name and Surname (Authorised Person)</i>	Dr Derek K Lundberg
SIGNATURE: <i>(Authorised Person)</i>	Signed Copy held by Commercial, Risk and Compliance Team
ON BEHALF OF: <i>(Company)</i>	Access Group
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