

1. Privacy Policy

Purpose:	<p>This Privacy Policy exists to outline the how OSA collects, holds, uses and discloses personal information including sensitive information.</p> <p>OSA is subject to the Commonwealth Privacy Act 1988 (Act). The Privacy Amendment (Enhancing Privacy Protection) Act 2012 which commenced in March 2014 and made significant changes to the Act. This Policy complies with the new requirements imposed by the Act.</p>
Scope:	<p>This policy applies to all employees, volunteers, contractors and visitors, subject to the following exemptions:</p> <ol style="list-style-type: none"> 1. Any act done, or practice engaged in by OSA, directly related to: <ol style="list-style-type: none"> a. A current or former employment relationship between OSA and an individual; and b. A current or historical employee record held by OSA relating to an individual. <p>Employee records are governed by the provisions of OSA's <i>Employee Records Privacy Policy</i>.</p>

1.1 Personal information collected and held by OSA

OSA collects personal information for the purposes of OSA's functions and activities. It collects personal information about clients, employees and other individuals who have dealings with OSA for administrative need in order to conduct its business.

The information may include residence and contact details, date of birth, details of next of kin, identifying information, including photographs, records of injuries, criminal checks and financial information.

Some of the personal information OSA collects and holds is sensitive information. OSA only collects sensitive information where it is necessary for the purpose for which it is being collected and with the individual's consent unless the collection is required by or authorised by law.

1.2 How OSA collects and holds personal information

OSA collects and holds information from a number of sources. Where reasonably possible, OSA will only collect information from the individual to whom it relates. Frequently this will

be collected through official administrative processes, but it may also be collected from email, letters or other forms of communication.

OSA also holds personal information about individuals that it generates in the course of its operational activities, such as recruitment information.

Personal information may be held in both paper and electronic form, including databases.

When an individual accesses the OSA website, log files (“cookies”) are created by the web server that contain certain information including the Internet Protocol (IP) address of the visitor, the previous site visited, the time and date of access and pages visited and downloaded. Cookies allow a website, such as the OSA website, to temporarily store information on an individual’s machine for later use. OSA’s website uses cookies to identify unique visitors to the site.

In order to improve OSA’s services and assist the user, OSA may store information about users of its website to create a digital profile and provide them with information specific to them.

OSA also uses Web Analytics to obtain statistics about how its website is accessed. Web Analytics relies upon cookies to gather information for the purpose of providing statistical reports to OSA. The information generated by the cookie about an individual’s use of the OSA website is transmitted to and stored by Web Analytic service providers on servers located within and outside Australia, but it does not include any personally identifying information.

Individual users generally have the option of accepting or rejecting cookies by adjusting the settings in their web browsers. However, rejecting cookies may impact upon the functionality of OSA’s website.

The OSA website may contain links to other websites. OSA cannot control the privacy controls of third-party websites. Third party websites are not subject to OSA’s Privacy Policy or Procedures.

1.3 Notification of collection of personal information

When OSA collects personal information, it will advise the individual why it is collecting that information and how it uses it, whether the collection of the information is required or authorised by law and the consequences for the individual if the personal information is not collected. It will also provide information about OSA’s Privacy Policy and about the right of individuals to access and correct personal information. If OSA collects personal information in circumstances where the individual may not be aware of the collection it will seek to advise the individual of the collection.

1.4 The purpose for which OSA collects, holds, uses and discloses personal information

OSA collects and uses personal information for a variety of different purposes relating to its functions and activities including:

- Enhancing and assessing employee experience and providing a range of services to its employees
- Maintaining contact with past, present and potential employees and other stakeholders
- Government reporting
- Commercial application of its intellectual property and professional expertise
- Undertaking employee recruitment activities
- Undertaking research
- Handling complaints
- Conducting its business and improving the way in which it conducts its business
- Purposes directly related to the above

1.5 Use or disclosure for secondary purposes

OSA does not use or disclose personal information for purposes other than the purpose for which it was collected (**the primary purpose**) unless:

- a) The individual has consented to a secondary use or disclosure, or
- b) The secondary use or disclosure is related to the primary purpose (in the case of personal information that is not sensitive information) or is directly related to the primary purpose (in the case of sensitive information), or
- c) It is otherwise required or authorised by or under an Australian law or a court/tribunal order, or
- d) A permitted general situation exists (as described in clause 8 of this policy), or
- e) OSA reasonably believes that it is necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

In ordinary circumstances, any disclosure of personal information for a secondary purpose under scenarios c), d), or e) above must be approved by the Privacy Officer.

1.6 Security

OSA applies both physical and information and communications technology (ICT) security systems to protect personal information.

In relation to electronic records, personal information is collected via OSA's systems including web-based systems. OSA has put in place measures to protect against loss, misuse and alteration of electronic information. Where necessary, OSA also uses encryption technology to protect certain information and transactions.

1.7 Unsolicited personal information

When OSA receives unsolicited personal information, it will assess whether it is personal information that it could legally collect. If it is, it will treat it accordingly to the APPs. If it is not, it will, if lawful to do so, destroy or de-identify it as soon as practicable.

1.8 Direct Marketing

OSA will only use personal information for direct marketing with the individual's consent or when authorised by law.

1.9 Destruction of information that does not need to be retained

When OSA no longer needs to retain personal information, and is lawfully able to do so, it will destroy or de-identify that information.

1.10 How an individual may access personal information about the individual that is held by OSA

Subject to the exemptions identified at the start of this Policy, anyone has a right under the Act to access personal information that OSA holds about them.

1.11 How an individual may seek the correction of personal information about the individual that is held by OSA

Subject to the exemptions identified at the start of this Policy, anyone has a right under the Act to request corrections to any personal information that OSA holds about them if they think that the information is inaccurate, out of date, incomplete, irrelevant or misleading.

1.12 How an individual may complain about a breach of the Australian Privacy Principles by OSA

Subject to the exemptions identified at the start of this Policy, anyone may complain about a breach of an APP by OSA. Complaints should be made in accordance with the *Privacy Inquiry and Complaints Procedure*.

OSA will deal with complaints about breaches of the APPs in accordance with its *Inquiries and Complaints Procedure*.

1.13 How OSA will manage an actual or suspected data breach under this Policy

OSA will manage the process of dealing with an actual or suspected breach in accordance with the *Data Breach Procedure and Response Plan*.

1.14 Disclosure of personal information to third parties

OSA may disclose information to third parties to:

- Provide services
- For purposes of research to improve its operations and services
- Facilitate surveys carried out in relation to the NFP sector
- Promote its activities
- If permitted or required by law; or
- Otherwise with the consent of the individual

Where OSA discloses information to third parties it will require restrictions on the collection and use of personal information equivalent to those required by OSA by the *Privacy Act 1988*.

1.15 Accountabilities

Role	Accountability
Board Members and Co-Founders	<ul style="list-style-type: none"> ● Communicate commitment to the Privacy policy ● Ensure the policy is amended when required ● Model appropriate behaviours ● Address potential breaches of this Policy
CEO and SLT	<ul style="list-style-type: none"> ● Ensure that there is consistent interpretation of this policy ● Monitor the work environment to ensure that acceptable standards of conduct are observed at all times ● Ensure that decisions regarding employees or volunteers and the work environment are in compliance with this policy ● Model appropriate behaviours ● Treat all complaints seriously and take immediate action to refer complaints or report conduct in breach of the policy ● Act as a first point of contact for employees and volunteers wishing to raise issues that have occurred that are contained within this policy ● Refer a complaint to another leader if they do not feel that they are the best person to deal with the case (e.g.

	if there is a conflict of interest or if the complaint is complex or serious)
Employees and volunteers	<ul style="list-style-type: none"> • Understand their obligations and rights in dealing with personal information • Comply with their responsibilities under this policy • Follow the established procedure should they be involved in collecting personal information for the organisation

1.16 Amendments

This policy may be reviewed annually. Should the review find that there is a need to change the policy, employees, who may be impacted by this proposed change, will be advised prior to the change taking place.