

# Privacy & Confidentiality

In accord with our values, SAL Consulting is committed to protecting an individual's right to privacy. We will maintain the necessary internal systems and processes to ensure that information is secure. SAL Consulting is committed to protecting people's privacy and abiding by the Australian Privacy Principles.

# Australian Privacy Principles

- the open and transparent management of personal information including having a privacy policy.
- an individual having the option of transacting anonymously or using a pseudonym where practicable.
- the collection of solicited personal information and receipt of unsolicited personal information including giving notice about collection.
- how personal information can be used and disclosed (including overseas).
- maintaining the quality of personal information.
- keeping personal information secure.
- right for individuals to access and correct their personal information.

This Privacy Statement applies to personal information about our clients, learners, job applicants and members of the public. It does not apply to personal information about employees of SAL Consulting.

SAL Consulting is bound by a number of laws, which protect an individual's privacy. Depending on the context, these may include the National Privacy Principles under the Privacy Act 1988 (Commonwealth), other relevant commonwealth or state legislation, obligations imposed by government regulators, accreditation, registrations and licensing standards. SAL Consulting sometimes is required to handle personal information relying on exemptions under such laws, for example in relation to:

- related bodies corporate
- provision of services to government authorities.

In these situations, any permitted handling of personal information under such exemptions will take priority over this Privacy Statement to the extent that the relevant exemptions apply.

## **Personal Information**

In this Privacy Statement, "personal information" means information which identifies an individual or from which an individual's identity can be reasonably ascertained. Personal information is any information, view or opinion (irrespective of the source) about a client in receipt of services through SAL Consulting.

Examples of personal information includes sensitive information (see below) as well as general contact details (e.g. address and phone number).

SAL Consulting only collects personal information necessary for the purposes of processing requests and providing the agreed contracted services, offering products such as training and development supports and / or supervision or determining potential interest in involvement in programs or projects. SAL Consulting does not trade information or send information overseas.



# Sensitive Information

Sensitive information is a special category of personal information. It is information or opinion about a person's:

- racial or ethnic origin
- health or disability (at any time)
- developmental experience
- learning support needs
- personal information collected to provide a clinical service such as allied health, psychology, psychiatry or medical services
- expressed wishes about the future provision of health services
- political opinion
- membership of a political association or religious beliefs, affiliations or philosophical beliefs
- membership of a professional or trade association or membership of a trade union
- sexual preferences or practices
- criminal record.

In accordance with federal and state legislation, we will only seek to collect sensitive information (for example health information or information about your racial or ethnic origin or any criminal record), if in our view it is necessary for the delivery of your service or our business purpose (for example, complying with legislation), and/or for the inherent requirements of a position with SAL Consulting.

Sensitive information can, in most cases, only be disclosed with your consent.

Information SAL Consulting may collect, hold and use includes (but is not limited to):

- Contact information such as full name, e-mail address, current postal address and phone numbers.
- Date of birth.
- Relevant payment or billing information (including bank account details, credit card details, billing address and invoice details) if you are donating or requesting or providing goods or services from or to SAL Consulting.
- Information provided within applications for employment with SAL Consulting.
- Responses to questions or queries that SAL Consulting may ask you.
- Information required to improve the services and information we provide.

## Learners Information

- SAL Consulting is required to collect personal information from Learners in order to process enrolments and obtain information required to provide suitable training and assessment services.
- Information collected will include general personal details and may include details of any disability or health issue that may affect the Learners ability to meet the requirements of their position.
- Where applicable information may also be required to comply with AVETMISS standards as specified by government regulators.
- The RTO will only collect personal information that is required for the purposes of enrolment or in meeting government reporting requirements.
- Collection of personal information will be in writing either from an enrolment form, or directly from the Learner.
- SAL Consulting uses the personal information of its students for the purpose of meeting VET requirements for the awarding of national qualifications and to comply with reporting requirements, as specified by government regulators.
- Personal information collected will be passed on to government regulators as per legal data collection requirements.
- Personal information may also be accessed for the purposes of an audit by ASQA.



## Use and disclosure of personal information

SAL Consulting may use and disclose personal information for the primary purpose for which it is collected, or for other purposes including:

- Where the disclosure is required or authorised by law
- To enable us to assess what services are required and contracted for new clients, and assess whether SAL Consulting can provide those services

Consent for SAL Consulting, its contractors, employees, volunteers, agents and third party service providers is for the primary purpose or for the following:

- Verifying a person's identity.
- Other matters reasonably necessary to facilitate the primary purpose for which the personal information was collected.
- To support the needs of the person.
- Providing goods and services to the person.
- Requesting the persons for participation in SAL Consulting programs or projects.
- Management of any complaint, feedback, investigation or inquiry in which the person's is involved.
- Any insurance claim or proposal that requires disclosure of the person's personal or sensitive information.
- Improving our web site and any goods or services provided by SAL Consulting, including contacting the person about those improvements and asking for their participation in feedback (e.g. surveys).
- Providing information on our compliance with applicable laws.
- Where consent is given for disclosing a person's personal information to authorised SAL Consulting personnel.
- To professional or business partners, working in partnership or affiliates of SAL Consulting in order to provide services that the organisation requires.

As SAL Consulting may also outsource certain tasks involving personal information to third-party service providers, including organisations that provide project-based, archival, research, mail and delivery, auditing, legal, accounting, business consulting, security, payment processing or technology services, electronic communications, storage of data, deliveries, mail-outs, market research, public relations, debt collection agencies, and legal adviser. SAL Consulting provides its partners with personal information only as needed to perform their services and SAL Consulting imposes strict requirements of security and confidentiality on them and how they handle your personal information. SAL Consulting makes it clear that its partners are not permitted to use your personal information for any other purpose except to perform the services SAL Consulting has asked them to provide.

Some of tasks may be performed with the assistance of volunteers, and SAL Consulting may share some relevant, selected personal information with them.

SAL Consulting may need to share some or all of your personal information with government agencies, where appropriate in relation to funding arrangements or where relevant to services SAL Consulting is providing.

### Accessing and updating your personal information

If at any time an individual may wish to view or alter personal information, they should be advised to contact our office. SAL Consulting asks that as much detail as can provided about the particular information sought be given, in order to help retrieve it.

In certain circumstances, we may not be required by law to provide access or to correct your personal information. If that is the case, SAL Consulting will provide the reasons for that decision.



SAL Consulting takes reasonable steps to make sure that the personal information collected, used and disclosed is accurate, complete and up-to-date.

If an individual is able to establish that personal or sensitive information that is held by SAL Consulting is not accurate, complete and up-to-date, we will take reasonable steps to correct it so that it is accurate, complete and up-to-date. If parties are unable to agree that personal or sensitive information that is held is accurate, complete and up-to-date, the individual may request to place a statement with (affixed to) the information that claims that particular information is not accurate, complete and up-to-date. If an individual wishes to exercise rights of access and correction, please refer the request to our Business Support team.

### Security of personal information

Irrespective of whether personal information is stored electronically or in hard copy form, SAL Consulting takes reasonable steps to protect the personal information held from misuse and loss and from unauthorised access, modification or disclosure.

We will use reasonable endeavours to ensure that:

- personal information is accurate, complete and up to date and relevant for the purpose for which it was collected;
- personal information is protected from misuse, loss and from unauthorised access, modification or disclosure, and:
- personal information that is no longer needed for any authorised purpose is destroyed or permanently de-identified where it is legal and reasonable to do so.

SAL Consulting require all employees as part of their employment contract to respect the confidentiality of personal information and the privacy of individual clients, client-organisations and collaborating professionals and organisations.

SAL Consulting will take steps to protect personal information held by SAL Consulting from misuse and loss and from unauthorised access, modification or disclosure, for example, by use of physical security and restricted access to electronic records. SAL Consulting will store your personal information for a reasonable period of time necessary for us to provide services to you as required by law.

Due to the nature of the internet, SAL Consulting cannot provide any guarantee or warranty regarding the security of personal information during transmission to or by SAL Consulting or storage.

It is acknowledged that individuals and organisations provide personal information to SAL Consulting at your own risk. When we are informed of any unauthorised use of personal information on the Internet, SAL Consulting will take reasonable steps to investigate and correct the matter as warranted.

SAL Consulting does not collect personal information from users of the web site www.salconsulting.com.au other than what is supplied on a voluntary basis. SAL Consulting may analyse its web site logs, including information regarding IP addresses, to constantly improve the value of the content available on the web site, but information in our web site logs is not personally identifiable and SAL Consulting makes no attempt to link that information with the individuals that browse the web site.

SAL Consulting reserves the right to use 'cookies' or any other methods to record information that is personally identifiable such as a visitor's contact details, IP address, domain name or operating system but only within the limits of the law and unless you deny access.

Links to other third party web sites are provided on the SAL Consulting web site. SAL Consulting encourages users to always read the privacy policies/Statements on those other sites as they may



also collect your personal information. SAL Consulting is not responsible for the information on, and the contents of, those other sites or their practices or policies.

## How to contact SAL Consulting about Privacy or Confidentiality Concerns

Any queries about our Privacy Statement or required access or changes to the information we hold may be made by contacting the Business Support Team on 02 9481 7862 during normal office hours which are 9.00am – 5.00pm or by mail to: The Privacy Officer PO BOX 232 Beecroft NSW 2119 or info@salconsulting.com.au

Any person who wishes to make a complaint about privacy or confidentiality should contact our Business Support Team. A person making a complaint will receive an acknowledgment of the receipt of the complaint by letter, phone call or e-mail within 14 days of making the complaint and be advised what steps will be taken to investigate the complaint.

SAL Consulting will investigate the complaint and aim to resolve it within 28 days. You will be informed of the outcome of the complaint and the reasons for the decision.

### **Specific consents**

At times, SAL Consulting may wish to seek your consent to use personal information for special tasks or projects. When this occurs, we will obtain your specific written consent. Examples of these special tasks or projects may include:

- participation in special projects.
- Inquiry about improving the web site.
- Feedback and / or evaluation of any goods or services provided by SAL Consulting, including asking for participation in surveys.
- Direct marketing by, or on behalf of, SAL Consulting, including in relation to events, conferences and promotional activities (including by direct mail, telemarketing, e-mail, SMS and MMS messages).
- Research and evaluation.