

Privacy Policy

For Designer Life Participants

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1. Purpose

The *Privacy Act 1988* (Cth) (Privacy Act) requires entities bound by the Australian Privacy Principles (APPs) to have a privacy policy.

2. Scope

This privacy policy outlines the practices we use at Designer Life when handling personal information belonging to people who use or receive Designer Life's Services. Designer Life employees and prospective employees should refer to our Workforce privacy policy.

This policy applies only to the handling and use of information held by Designer Life and does not cover any State, Territory or Federal Government held databases.

This policy is reviewed annually and will also be updated any time there is a change in our information management practices or the relevant Legislation.

3. Definitions

Term	Definition
Privacy Act	The <i>Privacy Act 1988</i> (Cth) (as amended)
APPs	Australian Privacy Principles

4. Collection of Your Personal Information

Designer Life collects personal information to enable the delivery of Employment and Training services. Certain laws and contractual provisions relating to our services require specific information to be collected in order to deliver services on behalf of State and/or Federal Government.

Designer Life will only collect personal information where the information is necessary for one or more of its functions or activities. Information may be collected from you, or from a representative, carer or guardian who has permission to provide us with your personal information and can include information provided by third parties, including Government agencies.

4.1 Vulnerable Groups and Children

As some of our Services are specifically designed for and cater to vulnerable groups and children, we will need to collect personal information from individuals within those groups. This is for the purpose of the delivery of our services in Employment and Training and so that we can deliver a well-rounded, culturally safe, physically safe, individualised experience for all our participants.

Where a carer or guardian has access or the responsibility of providing information on behalf of someone, we ensure that this is clearly recorded on the file and that identity is verified prior to any dealings or disclosure of information in relation to someone else.

4.2 Kinds of Personal Information

The kinds of personal information we collect varies between services, however is likely to include: your name, birth date and contact details, and may include your relationship status, social welfare information and health or identity information and documentation, and more.

4.3 Sensitive Information

As an Employment Services Provider, Designer Life may also collect and handle 'sensitive information' including: information about your racial or ethnic origin, information about criminal convictions or health and medical information. Other personal information such as Job Seeker Identification Numbers, welfare payment eligibility and kinship details are also handled. We need this information to identify our participants, tailor our services, overcome obstacles, maintain compliance records, and assist you to meet related requirements such as reporting requirements mandated by Centrelink.

Designer Life will not collect sensitive and personal information unless; the individual has consented, it is required by law or a permitted general situation or health situation exists in relation to the collection of the information.

Designer Life will only collect personal information in a way that is fair, lawful, and not intrusive. The information is usually collected via forms completed by participants or through referral documentation received from referring bodies such as Community Based Organisations and referring Government Providers, with the consent of the participant.

4.4 Designer Life Website Visit Data

Various types of online data are collected, such as:

1. Visitor logs and statistics so that we know how busy our site is and which parts of the site are visited most.
2. Your device's IP address (collected and stored in an anonymised format).
3. Search terms and pages visited on our website.
4. Date and time when pages were accessed.
5. Downloads and time spent on web pages.
6. Geographic location of visitors.
7. Information provided by users through feedback forms on this site. If you complete a feedback form, we will collect your first and last name, organisation (if applicable), and email address.
8. Registration details entered in the enrolment form online.
9. Emails and Electronic Forms.

Your email address will only be recorded if you supply it to us and tick that as your preferred method of correspondence. The information collected by email or electronic forms will be used only for the purpose for which you have provided it, and we will not disclose it without your consent, except where authorised or required by law.

The main purpose of collecting your data in this way is to improve your experience when using our site. We take every possible measure to ensure your information transmitted online is secure, however we cannot guarantee the complete and total security of such information transmitted to the website.

4.5 Social Media

We use social networking sites and applications such as Facebook and Instagram to communicate widely and publicly about our services. When you engage with us using these services, your personal information is collected. The social networking service will also handle your personal information according to their own privacy policies.

4.6 Anonymity

Where possible, we will endeavour to allow you to engage in aspects of our Services anonymously or using a pseudonym, if requested. For example, within class discussions or on class lists.

However, for most of our functions and activities we usually need your personal information to efficiently and effectively offer you Employment and Training services, especially when forming part of a Government funded program.

5. Disclosure of Information

Designer Life will only use or disclose personal information for the purpose for which it was collected.

No personal information of a Designer Life program participant will be shared or disclosed to a third party, for any reason whatsoever, without the express consent of the participant, unless it is in circumstances related to public interest such as law enforcement or public health, where the required authorisation and checks have been undertaken.

Designer Life do not disclose information to overseas recipients.

5.1 Obtaining Consent

Designer Life will endeavour to receive an individual's consent for disclosure of personal information by way of writing. If necessary and appropriate, verified verbal consent will be accepted and a file note or database record taken.

5.2 Marketing

Where it is consented to or requested, we may occasionally use personal information to communicate with individuals via email or other means in order to provide updated information about Designer Life, details of newly available services or invitations to further training, seminars or events. This will not occur without consent.

An individual can opt out of receiving such information at any time after originally giving consent by simply replying "stop".

Designer Life does not ever disclose personal information to a third party for their own or others' marketing purposes, nor does Designer Life ever sell or trade personal information at any time, under any circumstances.

6. Quality of Personal Information

To ensure that the personal information we collect is accurate, up-to-date, and complete we:

- ensure that editing permissions for information databases are monitored, and used only by trained personnel;
- record information in a consistent format;
- where necessary, confirm the accuracy of information;
- add updated or new personal information to existing records;
- regularly audit our databases to check for accuracy.

We also review the quality of personal information before we use or disclose it.

7. Storage and Security of Personal Information

Designer Life uses robust storage processes and mechanisms. All reasonable steps are taken to protect personal information from misuse, loss and unauthorised access, modification, or disclosure.

Personal information stored digitally is done so with rigorous access and permissions limitations, and secure systems. Where the information is stored in hard copy, appropriate security measures are taken to avoid inappropriate access or loss.

Reasonable steps will be taken to destroy or permanently de-identify personal information no longer needed for the purpose for which the information may be used or disclosed.

The following physical and electronic storage security measures exist:

- No personal information is to be given over the phone unless it has been established that the caller has legitimate grounds and the right to access the information and has given authentication of identity that meets the authentication and verification criteria.
- Digital storage must be on secure, Government-approved IT systems and protected by password and/or encryption, as required.
- No personal information should be left on voicemail unless requested by the owner of the voicemail on the basis that the voicemail is secure.
- Mail containing personal information is labelled "Private and Confidential: Attention..."
- Only authorised individuals are to receive personal information and are not permitted to forward such information without consent.
- Paper records containing personal information should not be copied unless it is essential to do so.
- All paper records to be kept in lockable storage, in a non-communal area of the office when not in use and shredded when no longer required.
- The anonymity of participants is maintained during presentations, consultation with external parties, research activities and public events.
- Personal information must never be left unattended and must not be left in a visible, accessible way.
- Personal information must not be discussed in public areas.

7.1 Online Learning Management System

Participants undertaking online learning will have their information collected for training and assessment purposes. The information will be stored digitally and in accordance with our security measures.

7.2 Confidentiality Agreements

All employees and other persons who are directly involved with the activities of Designer Life and may come into contact with personal information, such as Contractors or visitors, are required to agree to confidentiality obligations in writing.

7.3 Records

We hold records of personal information for the period of time defined by the appropriate Government Department. After that time period, records are destroyed. Records relating to a complaint or dispute may continue to be held until the matter has been sufficiently resolved.

8. Access and Correction

Designer Life upholds the privacy rights of individuals and you may apply to access your personal information held by Designer Life. Upon a request, that we are satisfied is genuine, Designer Life will take reasonable steps to respond to the request for access to personal information. Such a request will not be unreasonably refused.

Designer Life may reasonably refuse access where the Act allows us to do so, which includes (but is not limited to) where:

- giving access would pose a threat to the life of any individual; or
- giving access would have an unreasonable impact on the privacy of other individuals; or
- the request for access is frivolous or vexatious; or
- denying access is required or authorised by or under law or court/tribunal order.

We will provide reasons for a refusal of access or a denial to amend personal information.

If an individual is able to establish that the information is not accurate, complete or up-to-date, we will take reasonable steps to correct the information so that it is accurate, complete and up-to-date.

To obtain access to your information, please make a request to Designer Life head office. Before giving access to information, we will require that you provide proof of identification and this, along with details of your request, will be recorded on your file.

9. Making a Complaint

If you wish to complain to us about how we have handled your personal information you should first complain to us in writing. If you need help lodging a complaint, you can contact us - see 'contact us' on our website.

If we receive a complaint from you about how we have handled your personal information we will determine what (if any) action we should take to resolve the complaint.

If we decide that a complaint should be investigated further, the complaint will usually be handled by a more senior personnel member than the person whose actions you are complaining about.

We will assess and handle complaints about the conduct of any personnel at Designer Life using our internal policies and procedures, including our Employee Code of Conduct.

We will advise you that we have received your complaint and then respond to the complaint within 30 days.

If we are unable to satisfactorily resolve your complaint, we will use an external dispute resolution service, or you may wish to contact the Office of the Australian Information Commissioner.

10. Summary Of Key Points

- Designer Life accepts the general principles of confidentiality and privacy and is bound by the Australian Privacy Principles set out in the *Privacy Act 1998* (Cth).
- Designer Life will only collect personal information where the information is necessary for its functions.
- Designer Life will only use or disclose an individual's personal information for the purpose for which it was collected.
- No personal information of a Designer Life program participant will be shared or disclosed to a third party without the express consent of the participant, unless a legal exemption applies.
- An individual may apply to access their personal information held by Designer Life. You may also complain about how your information has been handled.
- Designer Life uses robust storage processes and mechanisms. Physical and electronic storage security measures exist to protect information we hold.
- All employees and other persons who are directly involved with the activities of Designer Life and may come into contact with personal information, are required to agree to confidentiality obligations in writing.

11. Revision

This Procedure will be revised as required and at no later than two years from the date of last major revision.

Revision	Review / Edit Date	Reason for Review	By whom reviewed
1.0	1 / 11 / 2017	Annual Review	Anna Broadway
2.0	30/ 11 / 2018	Annual Review	Anna Broadway
3.0	1 / 4 / 2019	Annual Review	Anna Broadway
4.0	1/8/2019	Annual Review	Anna Broadway
5.0	22/6/2021	Privacy Management Framework Review	Anna Broadway