

Privacy Policy

For Designer Life Workforce

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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

Designer Life policy is to respect and protect the privacy of all people. This privacy policy outlines the practices we use at Designer Life when handling the personal information of our workforce. For information regarding personal information in other circumstances, refer to our other publicly available privacy policies.

This policy applies to current and prospective employees, contractors, and agents. It is designed to ensure that management of personal information for employees meets all relevant legislative and regulatory requirements.

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.

All Designer Life Privacy Policies are publicly available.

3. Definitions

Term	Definition
Privacy Act	The <i>Privacy Act 1988</i> (Cth) (as amended)
APPs	Australian Privacy Principles
Personal information	Recorded information (including images) or opinion, whether true or not, from which the identity (including those up to thirty years deceased) could be reasonably ascertained.
Sensitive information	Information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political party, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preference or practices, or criminal record.
Health information	Any information or an opinion about the physical, mental, or psychological health or ability (at any time) of an individual.

4. Policy Statement

Designer Life is committed to the transparent management of personal information.

This commitment includes protecting the privacy of personal information, in accordance with the Australian Privacy Principles (APPs) set out in the *Privacy Act 1988* (Cth) amended by the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* (Cth).

The Privacy Act authorises our collection of personal information where this is required to facilitate employment and the functions of our business.

5. Collection of your Personal Information

Designer Life collects personal information to enable us to select appropriate personnel and to maintain personnel files to allow for the appropriate engagement and management of staff and be able to operate our services and run our business effectively.

Designer Life will only collect personal information where the information is necessary for one or more of its functions or activities. Designer Life will only collect personal information in a way that is fair, lawful, and not intrusive. Information may be collected from you orally or in writing, or from a representative, carer or guardian who has permission to provide us with your personal information. This can include information provided by third parties, including Government agencies, with your consent.

5.1 Kinds of Personal Information

The kinds of personal information we collect varies, however is likely to include: your name, birth date and contact details, bank details, tax file number, employment history, citizenship/right to work status, and may include your health or identity information and documentation, should it be required, and you consent to us having that information.

5.2 Sensitive Information

As your employer, 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 or disability information. Other personal information such as kinship details are also handled.

6. Disclosure of Information

Designer Life respects the right to privacy and confidentiality, and will not disclose personal information except:

- If required for the purpose for which it was collected;
- where necessary for best practice; or
- where obligated by law.

Designer Life do not disclose information to overseas recipients.

6.1 Privacy Breach

Should a breach in privacy occur, potentially exposing information (e.g. computer system hacked or compromised) we will immediately act to rectify the breach in accordance with organisational policy and procedures. Designer Life has a stringent response procedure for any potential privacy breach.

Designer Life are required to disclose a data breach to the Office of Australian Information Commissioner if the data contains personal information that is likely to result in “serious harm”, which includes any of the following: physical, psychological, financial, or reputational harm. Personal information is information about an identified individual, or an individual who is reasonably identifiable. Designer Life also has responsibilities and reporting obligations to our overseeing Government Department in the instance of privacy breaches.

7. Quality of Personal Information

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

- Ensure that access to personnel files is limited and secure;
- Ensure that editing permissions for information databases are monitored, and used only by trained and appropriately classified 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.

8. Storage and Security of Personal Information

Designer Life staff are required to take all reasonable steps to protect personal information against loss, interference, misuse, unauthorised access, modification, or disclosure. Designer Life will destroy, or permanently de-identify personal information that is:

- no longer needed for the purpose for which the information may be used or disclosed;
- unsolicited and could not have been obtained directly; or
- not required to be retained by, or under, an Australian law or a court/tribunal order.

Designer Life has appropriate Information security measures in place to protect stored electronic and hard-copy materials. Designer Life has an archiving process for personnel files which ensures files are securely and confidentially stored and destroyed in due course. Refer to Designer Life Information Security Management Policy for further information.

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.

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.
- 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.

9. 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.

10. 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 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.

You will be advised either in writing, or in a face-to-face meeting, of the outcomes and actions arising from the investigation.

11. 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.
- 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.

12. 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	1/07/2021	Privacy Management Framework Review	Anna Broadway