

# Privacy Policy

## Introduction

Leadership Victoria (LV) is committed to treating the personal information we collect in accordance with the Australian Privacy Principles in the Privacy Act 1988 (Cth) (Privacy Act). This Privacy Policy sets out how Leadership Victoria handles personal information.

The purpose of this document is to provide a framework for LV employees in dealing with privacy considerations.

## Scope

This policy applies to all LV employees, contractors, Council members and volunteers. This policy is a guide to LV management and employees on Privacy. The policy applies to all LV employees and may be varied by LV at its discretion, from time to time without prior notice to employees. This policy does not form part of employees' contracts of employment.

## Responsibilities

It is the responsibility of **Chief Executive Officer and Managers** to:

- Communicate the Privacy Policy to ensure all employees understand their obligations and responsibilities as outlined in the policy.
- Treat all breaches of the Privacy Policy seriously.
- Handle all reports promptly, confidentially and impartially.
- Fully investigate and document any alleged incidents.
- Take disciplinary action where appropriate.
- Monitor changes in Privacy legislation and amend this policy as and when the need arises

It is the responsibility of all **Employees** to:

- Be aware of and comply with the LV's Privacy Policy.
- Report any suspected breach of LV's Privacy Policy promptly.

## Policy

### 1.0 Background

#### 1.1. What is Personal Information?

Personal information means information or an opinion, whether true or not and whether recorded in a material form or not, about a living individual who is either identified or reasonably identifiable. Examples include an individual's name, address, contact number and email address.

## 1.2. Our Obligations

LV is required to comply with the Australian Privacy Principles (APPs) in the Privacy Act 1988 (Cth) (Privacy Act). The APPs regulate the manner in which personal information is handled throughout its life cycle, from collection/receipt to use and disclosure, storage, accessibility and disposal.

We are required to comply with other laws, including more specific privacy legislation in some circumstances, such as the Spam Act 2003 (Cth) and the Do Not Call Register Act 2006 (Cth).

LV collects and administers a range of personal information when reasonable and when it is necessary for its functions or activities. LV is committed to protecting the privacy of personal information it collects, holds and administers.

LV recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – protected on one hand, and made accessible to them on the other.

In broad terms this means that LV will:

- Collect only information which the organisation requires for its primary function;
- Ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered;
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- Store personal information securely, protecting it from unauthorised access; and
- Provide stakeholders with access to their own information, and the right to seek its correction.

Employees and contractors found to be in breach of LV's Privacy Policy will be subject to disciplinary action, including termination and prosecution if appropriate.

## 2.0 The purposes for which we collect, hold, use and disclose personal information

### 2.1. General

Leadership Victoria needs personal information to be able to perform its core functions, including administration of LV Programs, courses and events, admission to Alumni membership, membership administration, professional development (including by the provision of materials) and invitations to networking events. In addition, LV has functions to benefit its course participants, Alumni advisory bodies, discussion and other advisory or reference groups.

### 2.2. Direct Marketing

LV may use personal information of LV Alumni members, mentors, course participants, Council Members and Associates, specifically your name and relevant address details and information about preferences for direct marketing, both as to the preferred communication channels for receiving direct marketing from LV and the types of products and services of interest, to let people know about LV's services and benefits.

For example, where the LV has consent, we will send:

- LV publications
- information about LV program offerings and advertising of the availability of services in the classes of personal and business products and services, including LV news publications and subscriptions, professional development offerings and opportunities,

Note: LV offerings may vary from time to time.

### 3. The kinds of Personal Information we collect and hold

#### 3.1 General

The type of personal information that LV collects and holds about you depends on the type of dealings that you have with us. For example, if you:

- **Join as an Alumni** of LV, we collect information including your name, address, contact number, gender, date of birth, address, email address, place of employment, payment details and interests.
- **Undertake LV Course/s**, we collect information including your name, address, contact number, address, email address, place of employment (for billing purposes), payment details, dietary requirements and accessibility requirements.
- **Are a Mentor of LV program participants**, we collect information including your name, address, contact number, gender, date of birth, address, email address, place of employment and any other information included on the application form.
- **Are a Supplier to LV**, we collect name of organisation, address and payment details.
- **Are a Partner or Sponsor of LV** we collect contact address details, usually including but not limited to all forms of contact and address and information about the partnership or sponsorship.
- **Apply for a Job at LV** we will collect the information you include in your application for employment, including your cover letter, resume, contact details and referee reports.
- **Are a member of the general public** who contacts the LV who elects not to rely on anonymity or pseudonymity, we collect contact address details, usually including but not limited to email addresses and phone numbers and details about the reason for the contact.

In each case, we seek to keep the personal information we need updated and accurate

#### 3.2 Sensitive Information

Under Australian law, sensitive information is a subset of personal information that is generally afforded a higher level of privacy protection. Sensitive information includes health and genetic information and information about racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record and some types of biometric information.

LV's policy is only to collect sensitive information where it is reasonably necessary for our functions or activities and either:

- the individual has consented; and
- we are required or authorised by or under law (including applicable privacy legislation) to do so.

For example, we may collect:

- Information about race or ethnicity only as required as a prerequisite for participation in specified programs
- Information about dietary requirements or mobility or support needs when we conduct events such as conferences and seminars, and delivery of LV programs
- Identification as Aboriginal or Torres Strait Islander

### **3.3 What if you don't want to provide your personal information?**

LV's policy is to provide individuals with the option of not identifying themselves, or of using a pseudonym, when dealing with us if it is lawful and practicable to do so. A pseudonym is a name or other descriptor that is different to an individual's actual name.

For example, LV's policy is to enable you to access our website and make general phone queries without having to identify yourself and to enable you to respond to our surveys anonymously. In some cases, however, if you don't provide us with your personal information when requested, we may not be able to respond to your request or provide you with the product or service that you are seeking.

## **4. How we Collect and Hold Personal Information**

### **4.1 Methods of Collection**

LV is required by the Privacy Act also to collect personal information only by lawful and fair means. It is reasonable and practicable; we will collect personal information we require directly from you.

LV collects personal information in a number of ways, including:

- by email
- over the telephone
- through written correspondence (such as letters, faxes and emails)
- on hard copy forms (including event registration forms, network registration forms competition entry forms and surveys)
- in person (for example, at face to face interviews)
- through our website (for example, if you make an online purchase or complete and submit a web form)
- at programs, events and functions (for example, if you fill out an assessment form or leave us your business card)

### **4.2 Unsolicited Information**

Unsolicited personal information is personal information LV receives that we have taken no active steps to collect (such as an employment application sent to us by an individual on their own initiative, rather than in response to a job advertisement).

We may keep records of unsolicited personal information if the Privacy Act permits it (for example, if the information is reasonably necessary for one or more of our functions or activities). If not, LV's policy is to destroy or de-identify the information as soon as practicable, provided it is lawful and reasonable to do so.

## 5. Data Quality and Security

### 5.1 General

LV holds personal information in a number of ways, including in electronic databases, email contact lists, and in paper files held in drawers and cabinets, locked where appropriate. Paper files may also be archived in boxes and stored offsite in secure facilities. LV's policy is to take reasonable steps to:

- make sure that the personal information that we collect, use and disclose is accurate, up to date and complete and (in the case of use and disclosure) relevant; and
- protect the personal information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure.

You can also help us keep your information up to date; by letting us know about any changes to your personal information, such as your email address or phone number.

### 5.2. Security

The steps we take to secure the personal information we hold include ICT security (such as encryption, firewalls, anti-virus software and login and password protection), secure office access, personnel security and training and workplace policies.

#### Payment Security

LV processes payments using EFTPOS and online technologies. LV's policy is to ensure that all transactions processed by LV meet industry security standards to ensure payment details are protected.

#### Website Security

While LV strives to protect the personal information and privacy of website users, we cannot guarantee the security of any information that you disclose online and you disclose that information at your own risk. If you are concerned about sending your information over the internet, you can contact LV by [phone or post](#).

You can also help to protect the privacy of your personal information by keeping passwords secret and by ensuring that you log out of the website when you have finished using it. In addition, if you become aware of any security breach, please let us know as soon as possible.

#### Third Party Websites

Links to third party websites that are not operated or controlled by LV are provided for your convenience. LV is not responsible for the privacy or security practices of those websites, which are not covered by this Privacy Policy. Third party websites should have their own privacy and security policies, which we encourage you to read before supplying any personal information to them.

## 6. Access and Correction of your Personal Information

Individuals have a right to request access to the personal information that LV holds about them and to request its correction.

## 6.1 Alumni and Staff

LV Alumni can readily access and correct their own personal information, including changing their communication preferences, by visiting the LV website and accessing their Alumni login.

## 6.2 Non-Alumni

If you are not an LV Alumni, you can contact our Privacy Officer if you would like to access or correct the personal information that we hold about you. We may ask you to verify your identity before processing any access or correction requests, to ensure that the personal information we hold is properly protected.

### Access

The LV policy is to provide you with access to your personal information, subject to some exceptions permitted by law. We may provide access in the manner that you have requested provided it is reasonable and practicable for us to do so. We may however charge a fee to cover our reasonable costs of locating the information and providing it to you.

### Correction

If you ask LV to correct personal information that we hold about you, or if we are satisfied that the personal information we hold is inaccurate, out of date, incomplete, irrelevant or misleading, the LV policy is to take reasonable steps to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up-to-date, complete, relevant and not misleading.

If LV corrects personal information about you, and we have previously disclosed that information to another agency or organisation that is subject to the Privacy Act, you may ask us to notify that other entity. If so, LV's policy is to take reasonable steps to do so, unless this would be impracticable or unlawful.

### Timeframe for access and correction requests

Except in the case of more complicated requests, LV will endeavour to respond to access and correction requests within 30 days.

### What if we refuse your request for access or correction?

If LV refuses your access or correction request, or if we refuse to give you access in the manner you requested, LV's policy is to provide you with a written notice setting out:

- the reasons for our refusal (except to the extent that it would be unreasonable to do so); and
- available complaint mechanisms.

In addition, if we refuse to correct personal information in the manner you have requested, you may ask us to associate with the information a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading, and we will take reasonable steps to associate the statement in such a way that will make it apparent to users of the information.

## 7. Complaints

If you have a complaint about how LV has collected or handled your personal information, please contact our Privacy Officer.

Our Privacy Officer will endeavour in the first instance to deal with your complaint and take any steps necessary to resolve the matter within a week.

If your complaint can't be resolved at the first instance, we will ask you to complete a Privacy Complaint Form, which details (for example) the date, time and circumstances of the matter that you are complaining about, how you believe your privacy has been interfered with and how would you like your complaint resolved.

### Complaints Process

We will endeavour to acknowledge receipt of the Privacy Complaint Form within five business days of receiving it and to complete our investigation into your complaint in a timely manner. This may include, for example, gathering the facts, locating and reviewing relevant documents and speaking to relevant individuals.

In most cases, we expect that complaints will be investigated and a response provided within 30 days of receipt of the Privacy Complaint Form. If the matter is more complex and our investigation may take longer, we will write and let you know, including letting you know when we expect to provide our response.

Our response will set out:

- whether in the Privacy Officer's view there has been a breach of this Privacy Policy or any applicable privacy legislation
- what action, if any, LV will take to rectify the situation.

If you are unhappy with our response, you can refer your complaint to the Office of the Australian Information Commissioner or, in some instances, other regulatory bodies, such as the Victorian Health Services Commissioner or the Australian Communications and Media Authority.

## 8. Retention of Personal data

All personal data that has been collected from you by LV will only be kept for a limited duration that is relevant to the purpose for which your personal data is to be used and for as long as required by applicable law.

## 9. Further Information

Please contact LV if you have any queries about the personal information that we hold about you or the way we handle that personal information. Our contact details for privacy queries and complaints are set out below.

The privacy complaint form can be accessed [here](#).

Privacy Officer  
Leadership Victoria  
Level 7, 276 Flinders Street Melbourne VIC 3000  
Australia

E: [info@leadershipvictoria.org](mailto:info@leadershipvictoria.org)  
P: + 61 3 9651 6590

## **10. Changes to this policy**

We may amend this Privacy Policy from time to time. The current version will be posted on our website and a copy may be obtained free of charge from our Privacy Officer.



## Procedure

LV collects personal information that is necessary for our functions or activities and we do so only by lawful means. Examples of personal information that LV collects includes the home address and home telephone numbers of staff, customers and volunteers.

LV only uses and discloses confidential information for the purpose for which it was collected, or for related purposes that are likely to be expected. This may include using and disclosing confidential information in order to:

- Administer pay and employment benefits;
- Provide a safe working environment; and
- Provide employees with necessary training and development opportunities.

In addition, LV may use or disclose confidential information:

- where the individual has consented to the use or disclosure;
- to the extent that LV is required or authorised to do so by law; and
- as otherwise permitted by the Privacy Act.

### Disclosure of personal information

LV generally only discloses confidential information for a purpose that relates to employee's employment with LV or as required by law. This may include disclosures to third parties such as organisations that provide LV with professional advice (eg our accountants, auditors and lawyers), and contractors to whom LV may outsource certain functions (eg payroll or mailing houses).

### Security of your personal information

LV takes reasonable steps to keep personal information secure and to protect that personal information from misuse and loss and from unauthorised access, modification or disclosure. The information that is provided to us is kept in a secure environment accessed only by authorised persons for approved purposes.

LV will abide by the following procedures:

#### Collection

LV will:

- Only collect information that is necessary for the performance and functions of LV and the administration of your employment.
- Notify stakeholders about why we collect the information and how it is administered.
- Notify stakeholders that this information is accessible to them.

#### Use and Disclosure

LV will:

- Only use or disclose information for the purpose for which it was collected or a directly related purpose.
- For other uses we will obtain consent from the affected person.

## Data Quality

LV will:

- Take reasonable steps to ensure the information we collect is accurate, complete, up- to-date, and relevant to the functions we perform.

## Data Security and Retention

LV will:

- Safeguard the information we collect and store against misuse, loss, unauthorised access and modification.
- Only destroy records in a secure and confidential manner.

## Openness

LV will:

- Ensure stakeholders are aware of LV's Privacy Policy and its purposes.
- Make this information freely available in relevant publications and on the organisation's website.

## Access and Correction

LV will:

- Ensure individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading or not up-to-date.

## Anonymity

LV will:

- Give stakeholders the option of not identifying themselves when completing evaluation forms or opinion surveys.

## Making information available to other service providers

LV will:

- Only release personal information about a person with that person's expressed permission. For personal information to be released, the person concerned must sign a release form.
- Only release information to third parties where it is requested by the person concerned.

## Breaches of the Privacy Policy

If an employee suspects a breach of LV's Privacy Policy has occurred the breach should be reported immediately to the employee's manager who will record the incident. If the incident is substantiated disciplinary action will be taken up to and including dismissal and prosecution.

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