



Policy: Privacy, Information & Communication

Information is a corporate asset, vital both for ongoing operations and in providing valuable evidence of business decisions, activities and transactions. Information may also be given in trust to the company from individuals and must be securely and appropriately stored and handled.

Responsibilities

The board has delegated to the Information and Communications Committee the responsibility for monitoring and reviewing the information management and communication of the Company. The Terms of Reference for the committee are established in the Charter for the Information and Communications Committee. This shall include (but is not limited to):

- Development and review of the company information strategy;
- Development and review of the company communications strategy;
- Monitoring and approval of technology systems;
- Approval of training modules;
- Monitoring and review of online and/or storage systems in relation to efficiency, privacy, and security;
- Review and monitoring of communications (both internal and external) performance and sufficiency;
- Coordinating with other relevant committees in matters that relate to the Information and Communications Management, such as risk management, risk transfer (insurance), overall strategic planning, brand and privacy;

and giving mind to:

- Board intent and instruction as expressed from time to time (particularly through the overall Company Strategic Plan);
- Relevant legislation and regulation;
- Australian Privacy Principles;
- Business requirements;
- Contractual and service obligations;
- Brand and Reputation.

The Chair of the Information and Communications Committee will be responsible for monitoring and reporting to the Committee and the board as required on the sufficiency, efficiency, and consistency of the Information Management and Communications systems.

The CEO and management shall advise and report to the board, or its delegates as required, on the development and application of the relevant plans and shall be responsible for the implementation of the Policy through the development of communication and information protocols, procedures and other instruction.

All staff shall be responsible for fulfilling the will and intent of the board in relation to this policy and failure to do so may result in disciplinary or legal action.

Privacy and Security

The company is committed to managing information and communication consistent with best practice principles of privacy and security.

Information will be stored securely in accordance with the Information Strategy and in a manner that protects the interests of the company and its service users. Storage of information should, as far as is possible be electronic in nature and should avoid paper-based storage.

The company will adopt practices that are consistent with the Australian Privacy Principles and other relevant privacy legislation. The company shall

have and make available for all clients a common language information guide relevant to each service area that outlines at a minimum:

- What information is collected and how it is used;
- Whether sensitive information is collected and how it is managed;
- The manner in which the information is stored;
- To whom information may be disclosed, including overseas, and the manner of that disclosure;
- How personal information may be accessed, corrected and updated by the relevant person;
- How a privacy complaint may be made and how it is managed by the company.

Key documents:

- Strategy and Risk Policy
- Brand and Reputation Policy
- Company Strategic Plan
- Information Guide – How We Manage Privacy
- Information Strategy
- Communication Strategy
- Privacy Act 1998 (Cwth)
- State and Territory Privacy legislation
- Freedom of Information Act 1982 (Cwth)
- Taxation and record keeping legislation