

PRIVACY AND CONFIDENTIALITY AT FORESTWORKS

POLICY

As an organisation, ForestWorks complies with the Privacy Act 1988 (Commonwealth) Privacy Amendment (Enhancing Privacy Protection) Act 2012.

INTRODUCTION

ForestWorks LTD is a not-for-profit industry-focused organisation working with the forest, wood, paper and timber products industry. We work with individuals, employers, training providers and governments to support a range of industry initiatives that focus on industry development, structural adjustment and building workforce capacity.

Our work is driven by our mission to ensure our industry is able to adapt to a constantly changing operating environment by fully utilising the capabilities of a diverse workforce.

ForestWorks ISC is the Industry Skills Council for the forest, wood, paper and timber products industry. As one of 11 Industry Skills Councils that represent all industries right across Australia, we work with industry, government and the VET sector to develop and maintain a skilled workforce

As an organisation, encompassing both of the above entities, ForestWorks complies with the Privacy Act 1988 (Commonwealth).

This policy describes how ForestWorks collects, manages, uses, discloses, protects, and disposes of personal information in accordance with the thirteen Australian Privacy Principles (APPs) outlined in Schedule 1 of the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

DEFINITIONS

Under the Privacy Act 1988 and Privacy Amendment (Enhancing Privacy Protection) Act 2012 personal and sensitive information is defined as follows:

- *Personal information:* “information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not.”
- *Sensitive information:* “(a) information or an opinion about an individual’s: (i) racial or ethnic origin, or (ii) political opinions, or (iii) membership of a political association, or (iv) religious beliefs or affiliations, or (v) philosophical beliefs, or (vi) membership of a professional or trade association, or (vii) membership of a trade union, or (viii) sexual preferences or practices, or (ix) criminal record, that is also personal information; or (b) health information about an individual; or (c) genetic information about an individual that is not otherwise health information; or (d) biometric information that is to be used for the purposes of automated biometric verification or biometric identification; or (e) biometric templates”.

COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

ForestWorks collects personal information, either directly or indirectly, that is reasonably necessary for, or directly related to its functions and activities. Some of the information collected may be regarded as 'sensitive' as defined by the Privacy Act.

In broad terms the kinds of personal information and purposes for which it is collected are:

Solicited information

- Contact information such as name, organisation or company, position, address, telephone, and emails and general notes are collected for ForestWorks activities including databases and records for programmed services, communicating with stakeholders and suppliers as part of day to day business.
- Information for research topics, including names and addresses collected for data collections, surveys, and for research and consultancies.
- Names, addresses, phone numbers, emergency contact details and other employment related information is collected from employees for the purpose of managing human resources. The management of staff personal information complies with this policy.

Collection Methods

- *Surveys*—this may include surveys of individuals involved in a ForestWorks funded project whereby data is collected via questionnaire (including telephone interview), online surveys or by written communications.
- *Data requests*—Personal contact information is collected directly from individuals who make requests either by telephone and email or make contact at events and provide details directly (e.g. Business cards).
- *Research*—ForestWorks' research component encompasses the management of research grants projects which on occasion request personal information from individuals, either by telephone, surveys, database records or written communications.
- *Marketing*—Personal information is collected directly from individuals via subscription to marketing material (such as Skills update newsletter); from individuals registering for events (such as the Industry conference), ForestWorks hosted webinars and from stakeholders for day-to-day business and information dissemination.
- Personal information is collected from individuals on employment commencement.

Sensitive information

Personal information collected by ForestWorks that may be regarded as 'sensitive' under the Privacy Act includes:

- 'Disability' and 'long-term impairment status' (health); and 'indigenous status', 'language spoken at home', 'country of birth' (implies ethnic/racial origin).
- Dietary requirements' (health-related) are collected for event catering purposes only.
- Biographical information, which may contain information on 'affiliations' and 'membership of a professional or trade association' are obtained for event purposes.
- 'Memberships of professional associations' and 'health and work injury information' is collected from employees for HR management purposes.

Direct marketing

- ForestWorks respects an individual's right not to receive marketing material, and provides an option within communications and on its website for individuals to unsubscribe from receiving marketing material. ForestWorks conducts its marketing communications and dissemination of research and statistics in accordance with Australian Privacy Principle 7 (Direct marketing), the Spam Act 2003 (in respect of electronic communications), and the Do Not Call Register Act 2006. It is not, however, ForestWorks' practice to 'cold call' for the purpose of marketing its products and services.

Google Analytics and cookies

- ForestWorks uses Google Analytics, a web service provided by Google Inc., for improving the workplace website.
- Cookies are used to generate data on website activity and usage. The cookies, which include IP addresses, are transmitted to and stored in Google servers in the United States where they are used to compile web-use reports. Google may transfer this information to third parties, where required by law, or for information processing on its behalf. Google will not associate IP addresses with any other data held by Google.¹
- It is possible to disable cookies by adjusting web-browser setting and to opt-out of Google Analytics. Doing so, however, may affect web-site functionality.
- ForestWorks websites automatically log information such as server address, date and time of visits and web pages accessed. No personal information is recorded. These logs are used for website management and improvement.

¹ More information on Google's privacy policy can be found at: <https://www.google.com.au/intl/en/policies/privacy/>.

Unsolicited Personal Information

If ForestWorks receives unsolicited personal information, it will be treated and managed according to the Australian Privacy Principles if found to be related to one of its collections, otherwise it will be destroyed or de-identified if lawful to do so.

Anonymity and Pseudonymity

As far as practicable, ForestWorks aims to offer individuals the options of anonymity and pseudonymity when collecting personal information.

It is possible to offer pseudonymity for marketing subscriptions and other online forms such as feedback, general contact queries, queries and requests, webinars, and one-off surveys.

Anonymity of individuals can be offered for general telephone enquiries about ForestWorks business.

It is not practicable for ForestWorks to offer the option of anonymity or pseudonymity for the following activities:

- Collection of data for surveys, however, the data is de-identified for all other data administration, analysis, and reporting activities.
- Resolving a general query which requires investigation or assistance from ForestWorks IT department, or requires information to be sent to the requester, or requires any form of online assistance.
- Research requiring communication with specific individuals.
- Registration for forums, conferences and other events where fees and payments are required.
- Document delivery requests as copyright law requires a record of the requester.
- HR management.

Notification of Collection

ForestWorks will aim to notify individuals of the collection of their personal information before, or at the time of collection, or as quickly as possible thereafter. Notifications are usually in writing, but may be verbal for telephone help-desk services, or research conducted by telephone interview.

- *Marketing* – notification is provided on email for subscription to ForestWorks marketing communications. Individuals are also notified at the time of collecting personal information for events or webinars. A privacy notice will be provided in all ForestWorks marketing communications.
- *Surveys* – notification is provided in the letter of invitation to participate in the surveys and also at the time of collecting the information (online or by telephone).
- *Customer Service and Help-desk* – notification is provided verbally by telephone when names and contact details are recorded in providing assistance.

- *Research and consultancy* – Notification is provided ahead of conducting research interviews or at the time of inviting individuals to participate in a survey.
- *ForestWorks staff* – Notification is provided on employment commencement.

Disclosure of personal information

ForestWorks does not disclose personal information other than for the purpose for which it was collected, or an individual has consented to a secondary purpose, or an individual would reasonably expect this (such as receiving communications about upcoming events), or if required by law.

ForestWorks may share personal information with the Commonwealth government in accordance with Commonwealth contractual obligations. In these circumstances ForestWorks will take reasonable steps to inform and seek consent from the individuals concerned and take all reasonable steps to ensure that the recipient handles the personal information according to the APPs.

ForestWorks does not sell its mailing lists to third-parties for marketing purposes. ForestWorks does not disclose personal information to overseas recipients. While people around the world can access material published on the ForestWorks website, no statistical or research publications contain identifiable personal information.

Government identifiers

ForestWorks does not adopt or disclose a government related identifier of an individual as its own identifier, unless ForestWorks is authorised by law and prescribed by regulations to do so.

ForestWorks may use a government related identifier to identify an individual in relation to ForestWorks business activities; for example requiring an ABN number for the purpose of contracting services to suppliers and researchers, or asking for an organisations number for verifying credentials before providing assistance, or requiring staff tax file numbers for payroll and tax purposes.

MANAGEMENT OF PERSONAL INFORMATION

Quality of personal information

ForestWorks endeavours to ensure the personal information it collects and uses or discloses is accurate, up to date, complete and relevant. ForestWorks routinely updates the information held in its Stakeholder Database, in addition to periodically checking with stakeholders if their personal contact details have changed.

Access to and correction of personal information

Individuals may, subject to the exceptions prescribed by the Australian Privacy Principles, request access to and correction of their personal information where this is collected directly from individuals by ForestWorks.

ForestWorks does not charge for giving access to or for correcting personal information. Requests for access to, or correction of, personal information should be emailed to forestworks@forestworks.com.au. Requests will be addressed within 14 business days.

Individuals with direct access to our web-based database can access the site at any time to make corrections to their personal information or to unsubscribe.

Information Retention and Disposal

Personal information at ForestWorks held in electronic and paper format may include:

- Information collected for surveys is held electronically within Survey monkey, or in the ForestWorks SharePoint secure document management system. Any printed copies of survey results will be kept in locked cupboards.
- Names and contact details of stakeholders are held in stakeholder Database system and email contact lists.
- Names and contact details collected during a research project may be held either in electronic form in the ForestWorks SharePoint document management system or in paper documents which are locked in cupboards and filing cabinets.
- Names and contact details collected for data and help-desk requests are held in electronic form in SharePoint ForestWorks document management system.
- In accordance with copyright requirements, a paper copy of personal information provided is kept in locked cupboards.
- Names and contact details collected for event registrations and webinars are held in the databases.
- Personal staff information is held in a Finance management record.
- Backup copies of all electronic files held in ForestWorks' systems are kept in the event of system failure/loss. All backup copies of system files are secured.

ForestWorks retains personal information for as long as it is required for its business activities and functions, and for as long as we are legally required to retain the information or are required by or under a court/tribunal order to retain the information.

When personal information is no longer necessary for ForestWorks' business functions, and it is lawful to do so, ForestWorks will destroy or take reasonable steps to de-identify the information.

Information Security

ForestWorks takes active steps to protect personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure.

- Any information collected for ForestWorks projects will have limitations to the staff provided with access, so that only those individuals working on a project and the contract manager can access the information. All documents containing such information will be saved in electronic format will be located in a restricted area and will be password protected.

- ForestWorks systems and internal network are protected from unauthorised access using appropriate technologies. The inherent risks associated with data transmission over the internet are, however, commonly acknowledged. Individuals, who do not wish to provide their personal information via the online website forms, have the option of mailing this information to ForestWorks.
- Access to databases is protected through user log-on and password, and assignment of user access rights.
- Third-party stakeholders used by ForestWorks for consultancy, event management, webinar hosting and other business services are all located within Australia and are required to be compliant with the Australian Privacy Principles and offer appropriate safeguards to protect personal information.
- ForestWorks' premises and server room are secured. A current business continuity and disaster recovery plan is in place and is reviewed regularly.
- ForestWorks follow a practices of locking workstations when working with personal information. Paper documents containing names and addresses are required to be locked away and shredded in confidential bins when destroyed.

COMPLAINTS AND CONCERNS

Complaints or concerns about ForestWorks' management of personal information should be directed in writing to forestworks@forestworks.com.au.

ForestWorks will respond in writing within 14 business days.

POLICY REVIEW

This policy is effective from May 1st 2014.

It will be reviewed once annually or more frequently as necessary.