
PRIVACY POLICY

PURPOSE

To provide guidance for MRAEL staff to meet statutory obligations with regard to the Information Privacy Principles under the Privacy Act 1988.

Compliance with Standard 2 and 4 of the National Standards for Group Training Organisations.

Compliance with Condition 3 of the Australian Quality Training Framework (AQTF 2007), Conditions of Registration.

SCOPE

In summary, 'personal information' is information or an opinion relating to an individual which can be used to identify that individual.

Due to an exemption in the Privacy Act, this Policy does not apply to MRAEL Limited's treatment of an employee record, where that treatment is directly related to the current or former employment relationship between MRAEL and the individual (s7B(3)).

ABOUT WHOM DO WE COLLECT PERSONAL INFORMATION?

The type of information we may collect and hold includes (but is not limited to) personal information about:

- Training participants and training providers
- Staff, apprentices and trainees
- Suppliers and their employees
- Prospective employees, employees and contractors
- Host businesses
- Directors
- Officers of Government departments
- Other people who come into contact with us

WHAT KINDS OF PERSONAL INFORMATION DO WE COLLECT?

In general, the type of personal information MRAEL collects and holds includes (but is not limited to): names, addresses, contact details, date of birth, salary, bank and credit details and other information which assists us in providing our services.

In most cases, if personal information we request is not provided, we may not be able to supply our services.

Personal information you provide: MRAEL will generally collect personal information by way of forms filled out by people, face-to-face meetings, interviews, business cards and telephone conversations.

Personal information provided by other people: MRAEL collects personal information about an individual from a third party (eg. a reference from another person, from a Group Training Organisation, from an employer).

POLICY

MRAEL only collects personal information in order to perform its core business activities and functions and to meet legal obligations.

The personal information must be collected in a lawful and fair way and not in an unreasonably intrusive way. It must be kept accurate, stored securely and destroyed when it is no longer needed.

HOW MIGHT WE USE AND DISCLOSE YOUR PERSONAL INFORMATION?

MRAEL may use and disclose your personal information for the primary purpose for which it is collected, for reasonably expected secondary purposes which are related to the primary purpose, such as direct marketing, and in other circumstances authorised by the Privacy Act.

In general, we use and disclose your personal information for the following purposes:

- To conduct our business
- To provide and market our services
- To communicate with you
- To comply with our legal obligations
- To help us manage and enhance our services

TO WHOM MIGHT WE DISCLOSE YOUR PERSONAL INFORMATION?

We may disclose your personal information to:

- Other companies or individuals who assist us in providing services or who perform functions on our behalf (such as mailing houses, consultants)
- Government departments
- Where disclosure is required by law, or where reasonably necessary for the enforcement of a law or for the protection of public revenue
- Anyone else to whom you authorise us to disclose it

We may also collect your personal information from these companies and individuals, in which case we will deal with this information in accordance with this policy.

The personal information may not be disclosed to other persons except where provided for by the legislation.

SENDING INFORMATION OVERSEAS

We will not send your personal information to recipients outside of Australia without:

- Obtaining your consent (in some cases this consent will be implied); or
- Otherwise complying with the National Privacy Principles.

SENSITIVE INFORMATION

Some personal information which we collect is 'sensitive information'. Sensitive information includes: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences and criminal record, that is also personal information, and health or genetic information about an individual.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or where certain other limited circumstances apply (eg. where required by law).

MANAGEMENT OF PERSONAL INFORMATION

The National Privacy Principles require us to take reasonable steps to protect the security of personal information. MRAEL personnel are required to respect the confidentiality of personal information and the privacy of individuals.

MRAEL takes steps to protect personal information held from misuse and loss and from unauthorised access, modification or disclosure (eg. by use of physical security and restricted access to electronic records).

Where we no longer require your personal information for a permitted purpose under the National Privacy Principles, we will take reasonable steps to delete, de-identify or destroy it.

HOW DO WE KEEP PERSONAL INFORMATION ACCURATE AND UP-TO-DATE?

MRAEL endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. We encourage you to contact us in order to update any personal information we hold about you.

YOU HAVE THE ABILITY TO GAIN ACCESS TO YOUR PERSONAL INFORMATION

Subject to the exceptions set out in the Privacy Act, you may gain access to the personal information which MRAEL holds about you by contacting us.

We will require you to verify your identity and to specify what information you require.

However, in the case of personal information we collect from our clients for the purposes of providing our services to those clients, access to that personal information will usually be the responsibility of the relevant client.

SOME NOTES ON THE PRACTICAL APPLICATION OF THE PRIVACY LEGISLATION FOR MRAEL STAFF

A duty of confidentiality extends to all records and information on current and former customers and staff.

Staff must not divulge information concerning a customer to anyone other than the customer, unless the customer has requested in writing the release of the information.

Remember that a breach of the Privacy Act may embarrass customers and could result in legal action, attract unfavourable publicity, damage our brand and create unease about our ability to keep customer information secure.

Collection of personal information must be fair, lawful and not intrusive.

MRAEL should only use the information for the purpose it was collected.

MRAEL must make certain that the information it collects, uses and discloses is accurate, complete and up-to date.

MRAEL must have a policy document outlining its information handling practices and make this available to anyone who asks.

MRAEL must give an individual access to personal information it holds about that individual upon written request except under special circumstances outlined in the legislation.

As customers may see comments or remarks on files or correspondence you must not make frivolous or derogatory notations on any records. Stick to factual statements and no damage or embarrassment will result.

TIPS FOR COMPLIANCE:

- Check fax numbers carefully to avoid inadvertently sending a fax message containing customer information to the wrong number.
- Make sure you effectively destroy waste paper which contains customer information.
- Dispose of old records in a secure way.
- Do not divulge information to outside parties.
- Be especially careful when being asked for information from family members of the customer.
- Do not act on any changes unless notified in writing with the authorisation signed and dated.
- Never discuss information in public places, especially where there is a risk of being overheard.
- Do not provide information over the telephone unless the person has been correctly identified.

UPDATES TO THIS POLICY

This policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and the changing business environment. The most current version of this policy can be obtained by contacting us.

INQUIRIES

If you have any questions about privacy-related issues please contact our Quality Manager:

E-mail: privacy@mrael.com.au
Phone: (07) 49579800
Facsimile: (07) 49577564
Postal address: PO Box 643, Mackay Qld 4740

LINKS

The following websites may be of interest should you require further information:

The Office of the Privacy Commissioner

<http://www.privacy.gov.au/>

Guidelines to the National Privacy Principles

http://www.privacy.gov.au/publications/nppgl_01.html