

Head Office:

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Eighty9 Limited and its wholly owned subsidiaries Status Works Pty Ltd and Allied Services Worldwide Pty Ltd

PRIVACY POLICY

1. Protecting Your Privacy

Eighty9 Limited and its wholly owned subsidiaries Status Works Pty Ltd and Allied Services Worldwide Pty Ltd, collectively and hereinafter referred to as “the Organisation”, is committed to protecting the privacy of your personal information. This policy sets out the way we handle your personal information including the use and disclosure of your personal information, as well as your right to access your personal information.

This policy only applies to our databases and files and does not cover any Commonwealth State or Territory Government database or file. You are advised to contact the relevant government agency for a copy of their privacy policy.

In relation to our participants receiving services from the Organisation that have been contracted from the Australian Government, the Organisation is bound by the conditions of its contracts with the relevant Government Authority in addition to the Australian Privacy Principles.

2. Your Personal Information

In order to provide you employment, training and related services, we may need to collect personal information such as name, address, work history, qualifications, career details or other information generally contained in a resume.

Employment and related services includes the following:

- Marketing job seekers to employers;
- Assisting to identify employment options;
- Providing job search skills training;
- Identifying training options;
- Providing vocational training and work placements;
- Providing Language, Literacy and Numeracy training and ;
- Providing Traineeship and Apprenticeship services.

3. Collection

Where practicable, the Organisation will endeavour to collect personal information directly from you. We will need to collect personal information from you such as:

- Your name
- Your address
- Your telephone number
- Your qualifications
- Your current and previous education and employment history
- Your employment preferences
- Gender
- Date of Birth
- Country of Birth
- Interests and hobbies
- Career plans
- Results of aptitude and other tests
- Referees
- Your ability to speak another language other than English
- Health issues
- Reason for study
- Wage details
- If you are an Aboriginal or Torres Strait Islander. In order to provide you with employment and associated services.

When, or as soon as practicable after, the Organisation collects your personal information, we will take reasonable steps to ensure that you are made aware of:

- The Organisation's identity and how you can contact us
- Your rights with regard to accessing your personal information
- The purpose for which your personal information was collected
- To whom we usually disclose your personal information
- Any law that requires us to collect particular personal information
- The main consequences, if any, for you if you do not provide all or part of the information we require.

The Organisation will only collect personal information by fair and lawful means and not in an unreasonably intrusive manner.

As a contracted service provider to the Commonwealth and State Governments of Australia to provide employment and associated services, we may also collect personal information from other Commonwealth and State Government Departments and Agencies such as:

- Services Australia
- The Department of Employment and Workplace Relations
- The Department for Education, South Australia

- The Department of Social Services
- The Department of Training and Workforce Development
- The National Disability Insurance Agency

To provide you with employment, training and associated services we also collect information from third parties such as:

- Your previous employers
- Referees (nominated by you)
- SA Police (as authorised by you)
- Medical Practitioner (as authorised by you)
- Contract Trainers
- Educational and Training Institutions
- The National Disability Insurance Agency (as authorised by you)
- Workplace Employers
- Current Employers

4. Sensitive Information

The Organisation will not collect information revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, or details of health, disability or sexual activity or orientation unless:

- Your consent has been obtained
- The collection is required or specifically authorised by law
- The collection is necessary to prevent or lessen a serious and imminent threat to the life or health of any individual, where the subject of the information is physically or legally incapable of giving consent
- The collection is necessary for the establishment, exercise or defence of a legal claim.

What happens if you choose not to provide the information? You are not obliged to give us your personal information. However, if you choose not to provide the Organisation with your personal details, as detailed under "collection", we may not be able to provide you with the full range of our training and employment services.

5. Use and Disclosure

We will use our best efforts to ensure that the information you provide to us remains private and is used only for the purposes you agree to.

The Organisation will not reveal, disclose, sell, distribute, rent, license, share or pass your personal information on to a Third Party, other than those that are required to receive your personal information in order to assist us to provide training, disability and employment services. We will advise the Third Party of the requirements of The Privacy Amendment (Private Sector) Act 2000.

The Organisation does not use or disclose your personal information for the purposes of direct marketing unrelated products or services.

In order to provide you with employment, training, disability and associated services, we may need to disclose your personal information to Third Parties such as:

- State and Commonwealth Government Departments and Agencies to whom we are contracted

- Services Australia
- The National Disability Insurance Agency
- National Centre for Vocational Education Research (NCVER) via AVETMISS submissions
- Australian Skills Quality Authority - on request (e.g. survey details, student lists during audit)
- Employers
- Referees (people that you have nominated to provide a reference check for you);
- Other Organisations that we may refer you to for services (e.g. other Training and Employment Agencies)
- All other reasonable parties that will assist us to place you in appropriate employment

Further, we may use and disclose your personal information to provide you with employment, training, disability and associated services specified to you at the point of collection or for another purpose if:

- You would reasonably expect us to disclose it for that purpose and that purpose is related to the purpose specified to you at the time of collection
- The information is reasonably required for reporting to the National Disability Insurance Agency and/or the NDIS Quality and Safeguards Commission
- The Organisation reasonably believes that the use is necessary to lessen or prevent a serious and imminent threat to an individual's life or health
- The Organisation has reason to suspect that unlawful activity has been, or is being engaged in, and uses the information as part of its investigation, or in reporting its concerns to the relevant authority
- The use and disclosure is specifically authorised by law
- The use and disclosure is reasonably necessary for the enforcement of the criminal law, a law imposing a pecuniary penalty, or for the protection of the public revenue

6. Data Quality

The Organisation will take reasonable steps to ensure that your personal information is accurate, complete and up-to-date.

You are encouraged to help us keep your personal information accurate, complete and up-to-date by contacting your consultant or this Organisation and informing us of any changes to your details.

7. Data Security

At the Organisation we are committed to protecting the privacy of your personal information. We take reasonable steps to protect your personal information from misuse, loss and from unauthorised access, modification or disclosure. We ensure this by having such security measures as:

- Lockable storage systems
- Individual password access to systems and databases
- Secure filing cabinets

We will also take reasonable steps to destroy or permanently de-identify personal information if it is no longer required for any purpose. Files are archived in accordance with requirements with our various Government contracts, the National Disability Insurance Scheme rules and the VET Quality Framework.

8. Access and Collection

You will be provided with the opportunity to access the personal information we have on record and, where appropriate, you may be able to correct that information if you think that it is incorrect.

There may be some cases where we are unable to provide you access to your personal information; however our Privacy Officers will explain the reasons why this access was denied.

Our Privacy Officers are:

- Transition to Work: Simone O'Neill
- Disability Employment Services: Simone O'Neill
- Status RTO: Yvonne Christophides
- BlueSky Mind Studio / NDIS: Hamish Robertson

At all times the conduct under this Policy will be governed by the following principles:

- All requests for access will be treated seriously
- All requests will be dealt with promptly
- All requests will be dealt with in a confidential manner
- Your request to access your personal information will not affect your existing obligations or effect the commercial arrangements between you and the Organisation

The Organisation will provide access by allowing you to inspect, take notes of or receive copies or print outs of the personal information that the Organisation holds about you. All requests in writing should be sent to the Organisation's Head office – PO Box 75, Oaklands Park, SA, 5046. Please mark it attention to the relevant Privacy Officer:

- Transition to Work: Simone O'Neill
- Disability Employment Services: Simone O'Neill
- Status RTO: Yvonne Christophides
- BlueSky Mind Studio / NDIS: Hamish Robertson

To obtain access you will have to provide proof of your identity. This is necessary to ensure that personal information is provided only to the correct individuals and that the privacy of others is not undermined.

9. When will Access be denied?

Access will be denied if:

- The request does not relate to the personal information of the person making the request
- Providing access would pose a serious and imminent threat to life or health of a person
- Providing access would create an unreasonable impact on the privacy of others
- The request is frivolous and vexatious
- The request relates to existing or anticipated legal proceedings
- Providing access would prejudice negotiations with the individual making the request access would be unlawful
- Denial of access is authorised or required by law
- Access would prejudice law enforcement activities

- Access discloses a 'commercially sensitive' decision making process or information any other reason that is provided for in the Australian Privacy Principles (APPs) set out under the Privacy Act

Where possible, the Organisation will favour providing access. It may do so by providing access to the appropriate parts of the record or by using an appropriate 'intermediary'.

Where there is a dispute about the right or forms of access these will be dealt with in accordance with the Organisation's Complaints Procedure.

We will take all reasonable steps to provide access within 30 days of your request. In cases where the request is not complicated or does not require access to a large volume of information, we will provide information within 14 days.

10. Privacy Complaints: How we handle privacy complaints (for individual participant)

The Organisation sees the importance of privacy to the Organisation, its participants and other stakeholders. As such the Organisation is committed to protecting the privacy of the personal information that we hold. This is part of our Organisation's:

- Legal obligations under the Privacy Act 1988
- Ethical and business obligations
- Service to you

The Organisation places high priority on dealing effectively with any complaints about privacy issues that you may have. At all times the conduct under this policy will be governed by the following principles:

- All complaints will be treated seriously
- All complaints will be dealt with promptly
- All complaints will be dealt with in a confidential manner
- The privacy complaint will not affect your existing obligations or the commercial arrangements that exist between this Organisation and you

Who may complain under this policy? If you have provided us with personal information you have a right to make a complaint, have it investigated and dealt with under this policy.

What is a privacy complaint? A privacy complaint relates to any concern or dispute that you have with our privacy practices as it relates to your personal information. This could include matters such as:

- How personal information is collected
- How personal information is stored
- How this information is used or disclosed
- How access is provided

What to do if you have a complaint about privacy practices. The Organisation resolves grievances at the local level if possible. If you have a complaint about privacy please contact our Privacy Officers. Their names and phone numbers are:

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| • Transition to Work | Simone O'Neill | Ph. (08) 8445 2931 |
| • Disability Employment Services | Simone O'Neill | Ph. (08) 8445 2931 |
| • Status RTO | Yvonne Christophides | Ph. (08) 8346 5662 |
| • BlueSky Mind Studio / NDIS | Hamish Robertson | Ph. (08) 8377 0101 |

All complaints will be logged on a database/complaints register. You may complain orally or in writing. Usually your contact with the Organisation will be to the Privacy Officer to discuss or resolve your complaint however; if your privacy complaint is not resolved the matter will then be referred to the Executive Manager: Human Resources and Quality Assurance.

11. Information Sharing

The Organisation will work closely with other agencies to coordinate the best support for you and others. This means your informed consent to share information about you, including audio/visual material, will be sought and respected in all situations unless:

- (1) *disclosure is authorised or required by law, or*
- (2) (a) *it is unreasonable or impracticable to seek consent; or consent has been refused; and*

(b) *the disclosure is reasonably necessary to prevent or lessen a serious threat to the life, health or safety of a person or group of people.*

When sharing information, employees of the Organisation will ensure the information shared is secure, timely, accurate, and relevant.

You can find more information regarding information sharing guidelines on www.dpc.sa.gov.au/

12. Complaints Procedure

The goal of this policy is to achieve an effective resolution of your complaint as soon as practicable. Once the complaint has been made, the Privacy Officer can then resolve the matter in a number of ways:

- Request further information and investigation: The Privacy Officer may request further information from you. You should be prepared to give as many details as possible including details of any relevant dates and documentation. This will enable the contact to investigate the complaint and determine an appropriate and useful solution. All details provided will be kept confidential. The complaint may be investigated. The Organisation will try to do so as soon as possible. It may be necessary to contact others in order to proceed with the investigation. This may be necessary in order to progress your complaint.
- Discuss options: We will discuss options for resolution and if you have suggestions about how the matter might be resolved you should discuss these with the Privacy Officer. The Privacy Officer could also suggest other solutions or give examples of how the personal information can be revised or stored in a different way.
- Refer to the Executive Manager: Human Resources and Quality Assurance: If your complaint is not resolved at the local level, it will be referred to the Executive Manager: Human Resources and Quality Assurance. The Executive Manager: Human Resources and Quality Assurance would be provided with the history and may discuss the complaint with the employees, or other parties that are involved.
- Resolution: You will be informed of the outcome and the reasons for the decision. If this does not resolve the complaint, the matter will be referred to a mutually agreed intermediary.
- If after the above steps have been followed you are still dissatisfied with the outcome you may refer the complaint to the Federal Office of the Privacy Commissioner.

13. Records

The Organisation will keep a record of your complaint and the outcome.

14. Anonymous complaints

The Organisation is unable to deal with anonymous complaints as we are unable to investigate properly and follow-up such complaints. However, in the event that an anonymous complaint is received, the Organisation will note the issues raised and try and resolve them appropriately. For example, the Organisation may wish to conduct further training or provide assistance in a given area.

15. Information

For any further information about this policy please contact the Privacy Officers. Their names and phone numbers are:

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|----------------------------------|----------------------|--------------------|
| • Transition to Work | Simone O'Neill | Ph. (08) 8445 2931 |
| • Disability Employment Services | Simone O'Neill | Ph. (08) 8445 2931 |
| • Status RTO | Yvonne Christophides | Ph. (08) 8346 5662 |
| • BlueSky Mind Studio / NDIS | Hamish Robertson | Ph: (08) 8377 0101 |

16. Identifiers

The Organisation will not adopt as its own identifier, an identifier that has been assigned by a government agency. Where practicable the Organisation will not use or disclose an identifier assigned to an individual by a government agency.

17. Anonymity

Whenever it is lawful or practicable, you will have the option of not identifying yourself when dealing with the Organisation. Due to the nature of the services being provided to you, this will be in very limited cases.

18. The Internet and Your Privacy

The Organisation uses the World Wide Web in order to assist you in providing employment, training, disability and associated services. The following statement outlines how in the context of our web site your information is protected and recorded. By using the site you consent to the uses and disclosures outlined previously in this privacy policy.

19. Security

The Organisation will take all reasonable steps to protect your security when using the site but you should be aware that no transmission of information to and from a website is ever totally secure.

Whilst we will strive to ensure the personal information transmitted to or from our website is secure and protected from unauthorised access, we cannot fully guarantee the security of your information. Transmission is at your own risk.

It is important to remember that if you are using a computer in a public place, such as the Jobs Information Centres or training rooms, you must remember to log-off, otherwise others may be able to access your personal information.

The Organisation website uses cookies. Cookies are pieces of information that a website can transfer to an individual's computer for record keeping. Cookies can make using our website easier by storing your individual preferences. This will enable you to take full advantage of the services that www.Status.net.au offers. The use of cookies is widely used and you'll find most major websites use them. You can configure your hard-drive to not accept cookies, however you may lose some functionality.

20. Website Analytics

To improve your experience on our site, we may use 'cookies'. Cookies are an industry standard and most major web sites use them. A cookie is a small text file that our site may place on your computer as a tool to remember your preferences. You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not be able to use the full functionality of this website.

Our website may contain links to other websites. Please be aware that we are not responsible for the privacy practices of such other sites. When you go to other websites from here, we advise you to be aware and read their privacy policy.

www.status.net.au uses Google Analytics, a service which transmits website traffic data to Google servers in the United States. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand website traffic and webpage usage.

By using this website, you consent to the processing of data about you by Google in the manner described in [Google's Privacy Policy](#) and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or [use the opt-out service provided by Google](#).

Our website may also utilise other third-party analytics software to help us understand website traffic and webpage usage.

www.status.net.au and www.blueskymindstudio.com.au also use interfaces with social media sites such as Facebook, LinkedIn, Twitter and others. If you choose to "like" or "share" information from this website through these services, you should review the privacy policy of that service. If you are a member of a social media site, the interfaces may allow the social media site to connect your visits to this site with other Personal Information

21. Capturing Information for Remarketing & Other Online Advertising

- The Organisation captures information about its website visitors for remarketing & capturing information about similar audiences to advertise online.
- Third-party vendors, including Google, Facebook and others, may show ads for the Organisation on various sites across the Internet
- The Organisation uses third-party vendors, such as Google, to use [cookies](#) to serve ads based on past visits to www.status.net.au and www.blueskymindstudio.com.au
- Visitors to www.status.net.au and www.blueskymindstudio.com.au can opt out of Google's use of cookies by visiting Google's [Ads Settings](#). Alternatively, visitors can opt out of a third-party vendor's use of cookies by visiting the [Network Advertising Initiative opt out page](#).
- Your www.status.net.au and www.blueskymindstudio.com.au website user data may also be used by the Organisation for advertising campaigns on other platforms such as Facebook & Instagram from time to time. For additional up-to-date detailed information on Facebook's data policy, see here: <https://www.facebook.com/policy.php>

Approved by: Gary Hatwell

Signature:



Date: 1/7/2023