

| | | | |
|----------------------|----------------|-----------------------|----------|
| Policy number | P76 | Version | 6 |
| Approved by Board on | 15 August 2024 | Scheduled review date | Aug 2029 |

1. Purpose

To provide a framework for the National Institute of Organisation Dynamics Australia (NIODA) in dealing with privacy considerations.

2. Scope

The policy is relevant to the whole of the NIODA organisation.

3. Policy Statement

NIODA collects and administers a range of personal information to enable the efficient and effective operations of the organisation. In compliance with the *Privacy and Data Protection Act 2014 (Vic)* and the *Privacy Act 1988*, the organisation is committed to protecting the privacy of personal information it collects, holds and administers and is committed to maintaining confidentiality over restricted information.

NIODA recognises the essential right of individuals to have their information administered in ways that they would reasonably expect; protected on one hand and made accessible to them on the other. These privacy values are reflected in and supported by our core values and philosophies.

NIODA is bound by laws that impose specific obligations when it comes to handling information. Accordingly NIODA:

- collects only information that the organisation requires for its primary function
- ensures that stakeholders are informed as to why information is collected and how it is administered
- uses and discloses personal information only for NIODA's primary functions or a directly related purpose, or for another purpose with the person's consent
- stores personal information securely, protecting it from unauthorised access
- provides stakeholders with access to their own information, and the right to seek its correction.

4. Responsibilities

The Board of Governance is responsible for developing, adopting and reviewing this policy.

The Chief Executive Officer (CEO) is responsible for the implementation of this policy, for monitoring changes in Privacy legislation, and for advising on the need to review or revise this policy as and when the need arises.

5. Processes

5.1. Collection

NIODA:

- only collects information that is necessary for its performance and primary function
- notifies stakeholders about why information is collected and how it is administered.

5.2. Use, Disclosure and Confidentiality

NIODA:

- only uses or discloses information for the primary purpose for which it was collected or a directly related secondary purpose
- only releases personal information about a person when legally required or with that person's express permission in the form of a signed release form
- makes clear when information is to be kept confidential.

5.3. Data Quality, Security and Retention

NIODA:

- takes reasonable steps to ensure the information the organisation collects is accurate, complete and up to date
- safeguards the information collected and stored against misuse, loss, unauthorised access and modification
- ensures staff with access to sensitive information use two-factor authentication
- users avoid access to materials that contain viruses, spyware, ransomware, trojan horses, and keystroke loggers that may create a cyber security breach
- destroys records in accordance with the *Records Management and Security Policy* and in compliance with relevant legislation
- ensures compliant 'opt-in' and 'unsubscribe' are features of all mailing list communications
- ensures individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete or misleading.

5.4. Openness

NIODA ensures stakeholders are aware of this policy and its purposes and makes this information freely available in relevant publications and on the organisation's website.

5.5. Anonymity

NIODA gives stakeholders the option of not identifying themselves when completing evaluation forms or opinion surveys.

5.6. Restriction

NIODA places restrictions on the information it holds when the information:

- is commercial in confidence;
- concerns the privacy of its staff, board and committee members, clients or customers, students or candidates;
- requires protection to safeguard the intellectual property of the organisation.

This includes all administrative, financial, student, candidate, staff and client records as well as any other information which is advised as confidential. Student, staff or client lists or contact details are not shared to promote any activities outside of the NIODA program(s).

5.7. Identification

Any information on which restrictions have been placed shall be as far as possible clearly identified on the document or file. Where categories of information, rather than individual documents, are restricted this restriction is conveyed to all staff, board and committee members dealing with this information.

5.8. Protection

The staff, board and committee members dealing with restricted information, are required to sign a confidentiality agreement (<https://form.jotform.com/201258027980859>). For staff, this is a part of their employment contract and for board and committee members, this occurs during their induction.

5.9. Training

All staff, board and committee members are instructed in the requirements of this policy.

6. NIODA website

6.1 Log information (browsing)

For NIODA's online services, the servers automatically record information that a user's browser sends when the website is visited. This may include information such as server address, top-level domain name (for example, .com, .gov, .au, .uk, etc.), the date and time of the visit to the site, the pages accessed and documents viewed, the previous sites visited, the browser type, the browser language, and one or more cookies that may uniquely identify the browser.

No attempt is made to identify the individual other than in exceptional circumstances, such as an investigation into the improper use of the website.

6.2 Cookies

A cookie is a small file containing a string of characters to a visitor's computer that uniquely identifies their browser. It is information that the web browser sends back to the NIODA website server on repeat visits.

NIODA use cookies to 'remember' browsers between page visits. In this situation, the cookie identifies the browser, not the visitor personally. No personal information is stored within these cookies.

6.3 Google Analytics

NIODA uses Google Analytics to collect information about visitors to our website. Google Analytics uses first-party cookies and JavaScript code to help analyse how users use the site. It anonymously tracks how visitors interact with this website, including how they have accessed the site (for example from a search engine, a link, an advertisement) and what they did on the site. The information generated by the cookie is transmitted to and stored by Google on servers in the United States. Google uses this information for the purposes of compiling reports on website activity and providing other services relating to website activity and internet usage. Google Analytics Demographics and Interest Reporting is enabled. Demographic and interest reports may be generated including identifiers such as your age, gender, affinity categories (for example education and training interests), in-market segments and other categories based on acquisition, behaviour, and conversions metrics. These reports may be used by NIODA to assist in making policy and programme decisions. Visitors can prevent their information from being collected by Google Analytics by refusing the use of cookies by selecting the appropriate settings on their browser or by installing the Google Analytics Opt-out Browser Add-on.

6.4 Links to External Websites

NIODA's website includes links to other websites. NIODA is not responsible for the content and privacy practices of other websites. NIODA recommends that visitors examine each website's privacy policy separately.

7. Electronic communication

There are inherent risks associated with the transmission of information over the internet, including via email, which should be taken into account when sending personal information to NIODA via email or via our website or social media platforms. Alternative methods of communication may be used, such as post, or telephone (although these also have risks associated with them).

8. Accidental or unauthorised disclosure of personal information

NIODA takes seriously, and deals promptly with, any accidental or unauthorised disclosure of personal information.

Cyber security breaches are reported under the *Notifiable Data Breaches Scheme* and the *Security of Critical Infrastructure Act 2018*

9. Grievances and complaints

Grievances and complaints regarding privacy and confidentiality breaches can be made as per the NIODA *Grievance Policy*. The policy is published on the NIODA website <https://www.nioda.org.au/policies>.

10. Publication

This policy is publicly available on the NIODA website <https://www.nioda.org.au/policies>.

11. Related documents

Privacy and Data Protection Act 2014 (Vic)

Privacy Act 1988

Fair Work Act 2009 (C'th)

Security of Critical Infrastructure Act 2018 (C'th)

Records Management & Security Policy

Grievance Policy