



# Privacy Policy

## Contents

1. Purpose .....	2
2. Your Personal Information .....	2
3. Why we collect personal information .....	2
4. Relevant Legislation: .....	3
5. Collection .....	4
6. Use and Disclosure.....	4
7. Sensitive Information .....	5
8. What happens if you choose not to provide the information .....	5
9. Access .....	6
9.1 Form of Access.....	6
9.2 When will Access be denied? .....	6
10. Costs and charges .....	6
11. Data Quality .....	6
12. Data Security.....	7
13. How we handle privacy complaints .....	7
13.1 Who may complain under this policy? .....	7
13.2 What is a privacy complaint? .....	7
13.3 What do I do if I have a complaint about privacy practices?.....	7
13.4 Privacy Complaints Procedure .....	8
13.5 Records .....	8
13.6 Anonymous complaints .....	8

## 1. Purpose

Westgate Community Initiatives Group (WCIG) Ltd is committed to protecting the privacy of personal information in line with the Australian Privacy Principles. This Privacy Policy helps you understand the kind of personal information we collect, why and how we collect, hold and use your personal information, and what to do if you have questions, concerns or complaints.

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

By using our website or accessing one of our services, you consent to the terms and conditions of this Privacy Policy.

## 2. Your Personal Information

In order to provide you with content that is relevant and / or provide our services to you, we may need to collect personal information such as:

- Name
- Contact details, such as email, address and phone number
- Work history and areas of work you may be interested in
- Information required as part of a recruitment process
- Other information generally contained in a resume
- Communication preferences
- Statistical information regarding the use of our websites, including website users' IP addresses and the dates and times of visits

It is your choice how much information you provide, but we might not be able to fulfil a request or supply a service to you if you don't provide the information we request.

We usually collect information through:

- Online activity by visitors to our website or their use of social media
- Third party suppliers
- Requests for services
- Requests for brochures, to join a mailing list or to be contacted for further information about our services
- Employment applications

You are in control of the personal information you provide to us and you can change these details at any time by contacting us. If you request that we do not collect this information then it may affect the ability to provide services to you.

## 3. Why we collect personal information

WCIG collects, uses, and discloses the information for the purpose of referring you to other appropriate community services, finding you suitable work, work experience, education or training, a suitable candidate for employment vacancies or to provide relevant content.

WCIG services are provided from the following locations:

Footscray Head Office  
Level 1  
4-8 Parker Street  
Footscray Vic 3011  
Ph: 03 9689 3437  
Fax: 03 9923 6955

Footscray  
Level 1  
Metro West Shopping Centre  
Corner Paisley and Albert Street  
Footscray Vic 3011  
Ph: 03 9689 3437  
Fax: 03 9923 6955

Sunshine  
Shop 2, 27 – 35 Clarke Street  
Sunshine Vic 3020  
Ph: 03 9311 9411  
Fax: 03 9311 8843

Geelong  
Level 2, 65 Brougham Street  
Geelong Victoria 3220  
Ph: 03 5249 5855  
Fax: 03 5221 8875

Melton  
51 Bakery Square  
Melton Vic 3337  
Ph: 03 9743 0189  
Fax: 03 9743 0576

Werribee  
Suite 10, Level 1  
75 - 79 Watton Street  
Werribee Vic 3030  
Ph: 03 9731 0477  
Fax: 03 9743 0674

Seddon  
174 Victoria Street  
Seddon Vic 3011  
Ph: 03 9396 1078  
Fax: 03 9396 1065

St Albans  
352A Main Road West  
St Albans Vic 3021  
Ph: 03 9364 6199  
Fax: 03 9364 6425

Corio  
Level 1, Shop 1016 Corio Central  
Bacchus Marsh Road  
Corio Victoria 3214  
Phone: (03) 8652 3819

Bacchus Marsh (Library)  
215 Main St  
Bacchus Marsh Vic 3340  
Ph: 03 9743 0189 (Melton)

Doreen  
Laurimar Community Centre  
25 Hazel Glen Drive  
Doreen Vic 3754  
Ph: 03 9689 3437

Epping  
2/25 Miller St  
Epping Vic 3076  
Ph: 03 9689 3437  
Fax: 03 9923 6955

Greensborough  
Suite 2  
35 Main Street  
Greensborough Vic 3088  
Ph: 03 9689 3437  
Fax: 03 9923 6955

Healesville  
Healesville Living and Learning  
Centre  
1 Badger Creek Road  
Healesville Vic 3777  
Ph: 03 9689 3437  
Fax: 03 9923 6955

Heidelberg  
Level 2, Suite 4  
104 Burgundy Street  
Heidelberg Vic 3084  
Ph: 03 9689 3437  
Fax: 03 9923 6955

Lilydale  
2 Clarke Street  
Lilydale Vic 3140  
Ph: 03 9689 3437  
Fax: 03 9923 6955

Northcote  
239A St Georges Road  
Northcote Vic 3070  
Ph: 03 9689 3437  
Fax: 03 9923 6955

Ringwood  
Suite 103  
41 - 43 Ringwood Street  
Ringwood Vic 3134  
Ph: 03 9689 3437  
Fax: 03 9923 6955

Wantirna  
Shop 3029 Knox City Ozone  
425 Burwood Highway  
Wantirna Vic 3152  
Ph: 03 9689 3437  
Fax: 03 9923 6955

Warburton  
Redwood Community Centre  
3505 Warburton Hwy  
Warburton Vic 3799  
Ph: 03 9689 3437  
Fax: 03 9923 6955

Whittington  
Bellarine Living & Learning Centre  
20 Worden Court  
Whittington Vic 3219  
Ph: 03 9689 3437  
Fax: 03 9923 6955

**4. Relevant Legislation:**

- Privacy Act 1988 (cth)
- Privacy and Data Protection Act (2014)
- Child Wellbeing and Safety Act 2005 (vic)

## 5. Collection

In order to provide you with relevant content or services, WCIG will endeavour to collect personal information directly from you such as:

- Name
- Address
- Telephone numbers
- Employment history
- Education details
- Barriers to Employment
- Licenses held
- Vocational Interests
- Current work (if any) and pay rates
- Details of any physical or mental impairments
- Details of other professionals who are working with you

As a service provider to the Commonwealth Government of Australia and the Victorian state government contracted to provide services, we may also collect personal information from government departments and agencies.

To provide you with services we also collect personal information from other third parties such as; your previous employer(s) and referees nominated by you.

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

- WCIG'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; and
- the main consequences, if any, for you if you do not provide all or part of the information we require.

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

## 6. 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. To protect your privacy and personal information we use secure servers and trusted third-party providers with all data housed within Australia.

In order to provide you with services or relevant content, we may need to disclose your personal information to third parties such as:

- Prospective employers
- Work experience Hosts
- Other employment services providers
- Relevant training and educational institutions
- Our consortium partners
- All other reasonable parties that will assist us to provide you with an appropriate service
- Relevant contracting government departments.

Further, we may use and disclose your personal information to provide you with 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;
- that purpose is related to the purpose specified to you at the time of collection.
- WCIG reasonably believes that the use is necessary to lessen or prevent a serious and imminent threat to an individual's life or health;
- WCIG 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; or
- 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.

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

We use Google to track visits to our website and use this information to measure its effectiveness for those accessing the website. While this data is mostly anonymous, sometimes we will connect it to you, for instance in personalising a webpage or prefilling a form with your details. For more information on our analytics tools, read [Google's Privacy Policy](#).

You can also engage with WCIG through our Facebook, Instagram, Twitter and LinkedIn. You can always control how you receive content through each website or app's settings.

Our website may contain links to third party websites. These linked sites are not under our control and we are not responsible for the content of those sites nor are those sites subject to our Privacy Policy. Before disclosing your personal information on any other website we recommend that you examine the terms and conditions and privacy policy of the relevant site. We are not responsible for any practices on linked websites that might breach your privacy.

## **7. Sensitive Information**

WCIG will not collect personal 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:

- the collection is necessary to provide you with services;
- your consent has been obtained; or
- the collection is required or specifically authorised by law; or
- 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; or
- the collection is necessary for the establishment, exercise or defence of a legal claim.

Where sensitive information about you is collected, such as your disability, diagnosis, history etc. the above statements relating to personal information apply.

## **8. 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 WCIG with the necessary personal detail (at a minimum name, address, telephone number, employment history, skills, future employment plans) we may not be able to provide you with the full range of our services.

## **9. Access**

You will be provided with the opportunity to access the personal information we hold about you and, where appropriate, you may be able to correct that information if you determine that it is incorrect.

You will be required to put a request in writing in order to obtain access to your personal information.

- 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 the commercial arrangements between you and WCIG.

### **9.1 Form of Access**

WCIG will provide access by allowing you to inspect, take notes of or receive copies or print outs of the personal information that WCIG holds about you.

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.

### **9.2 When will Access be denied?**

There may be some cases where we are unable to provide you access to your personal information, however WCIG will explain the reasons why this access was 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; or
- any other reason that is provided for in the Australian Privacy Principles (APPs) set-out under the Privacy Act.

## **10. Costs and charges**

WCIG will not impose charges for the following:

- Photocopying
- Where information is stored off-site, the cost of obtaining access to the information
- Access to electronic databases

## **11. Data Quality**

WCIG 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 WCIG and informing us of any changes to your details.

## 12. Data Security

At WCIG 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:

- Individual password access to systems and databases
- Secure file cabinets

WCIG will take reasonable steps to destroy or permanently de-identify personal information if it is no longer required for any purpose.

In the event of a breach WCIG have a [Data Breach Response Plan](#).

WCIG carries out TLS traffic filtering to comply with Australian Privacy Principle 1 (Open and transparent management of personal information). This is outsourced to our IT Partner, InfoXchange. TLS inspection is a security safeguard, and not a 'big brother' control. Customers and users may be provided with information regarding any change in data flow to and from WCIG

## 13. How we handle privacy complaints

WCIG recognises the importance of privacy to the organisation, its customers and other stakeholders. WCIG is committed to protecting the privacy of the personal information that we hold.

WCIG places high priority on effectively dealing with any complaints about privacy that you may have.

- 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.

### 13.1 Who may complain under this policy?

If you have provided us with personal or sensitive information you have a right to make a complaint, have it investigated and dealt with.

### 13.2 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.

### 13.3 What do I do if I have a complaint about privacy practices?

WCIG resolves disputes at the local level if possible. If you have a complaint about privacy, please contact the Site Manager at the site where you normally receive a service from us.

Feedback and complaints can also be lodged directly through the WCIG website using the 'Contact us' link on the top right corner.

All complaints will be logged in our Quality Management System.

You may complain orally or in writing. Usually the Site Manager will be the proper person to discuss or resolve your complaint, however, if your privacy complaint is not resolved the matter will then be referred the next level of management at WCIG.

### **13.4 Privacy Complaints Procedure**

The goal of this procedure is to achieve an effective resolution of your complaint within a reasonable timeframe.

Complaint Received. Once the complaint has been made, WCIG can resolve the matter in a number of ways:

- Request further information and investigation: Your initial contact 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 appropriate person to investigate the complaint and determine an appropriate and useful solution. All details provided will be kept confidential.
- Discuss options: We will discuss options for resolution and if you have suggestions about how the matter might be resolved you should discuss these also. The relevant staff member could also suggest other solutions or give examples of how the personal information can be revised or stored in a different way.
- Refer to Senior Management (HR Manager & CEO): If your complaint is not resolved at the local level, it will be referred to the HR Manager. The HR Manager would be provided with the history and may discuss the complaint with the employees, or other parties that are involved.
- If your complaint is still not resolved, it will be referred to the CEO and the above process followed.
- 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 the WCIG Board.

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 Australian Information Commissioner - OAIC on 1300 363 992.

### **13.5 Records**

The organisation will keep a record of your complaint and the outcome. These records will be stored as per this Privacy Policy.

### **13.6 Anonymous complaints**

WCIG 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 WCIG will note the issues raised and try and resolve them appropriately. For example, WCIG may wish to conduct further training or provide assistance in a given area.