

PRIVACY and CONFIDENTIALITY POLICY

1. Purpose

FAPSTC—The Financial Administrative and Professional Services Training Council Inc.

(FAPSTC) considers the privacy of your personal information to be very important. Maintaining commercial in confidence in relation to your commercially valuable information is also extremely important. This policy outlines how FAPSTC collects, uses, and discloses your personal information; how we maintain commercial in confidence; and how we ensure that all employees are aware of the need to protect private information and maintain confidentiality.

2. Scope

This policy applies to the FAPSTC Board, all FAPSTC employees, and FAPSTC's Industry Advisory Bodies.

3. Abbreviations and definitions

CEO: Chief Executive Officer

Commercial in confidence: Information that is confidential that, if disclosed, could cause damage to a party's commercial interests is termed commercial in confidence. Examples include sensitive, commercially valuable information, trade secrets and intellectual property. Commercial in confidence information cannot be released without permission from the owner, and unauthorised use of such information results in a breach of confidence.

CRM database: Customer Relationship Management database.

FAPSTC: The Financial Administrative and Professional Services Training Council Inc

Personal information: Information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not, and whether the information is recorded in a material form or not. Examples include a person's name, telephone number and email address. Personal information also includes very sensitive information such as opinions about a person's work performance, or details of a person's salary or criminal record.

4. Policy statement

FAPSTC provides advice to industry, the training sector and government policy makers about workforce development across the Property and Business Industries. This involves collaboration with a wide range of people throughout the sector and from government to gather evidence to inform government policy about strategic workforce development. It also serves to influence the development of the national and state education and training sectors.

Where it is reasonably necessary for the performance of these functions and related activities, FAPSTC collects both personal and commercial in confidence information.

FAPSTC is committed to:

- treating your personal and commercial in confidence information with respect, and taking all reasonable and legal steps to manage and protect it;
- creating a culture of privacy that values personal and commercial in confidence information; and
- meeting our legal obligations.

This policy addresses FAPSTC's collection, use and dissemination of the information it collects.

By providing information to FAPSTC, individuals and organisations agree to our collection, use and disclosure of the information in accordance with this privacy policy.

FAPSTC acknowledges the potential for information risk. While all such risks cannot be eliminated, they need to be managed to ensure they are as low as reasonably practicable. The monitoring and management of information risk is specifically addressed in FAPSTC's Risk Monitoring and Management Policy.

5. Responsibilities

Maintaining privacy and commercial in confidence is a shared responsibility between FAPSTC's Board, its Industry Advisory Networks, the CEO and all other FAPSTC employees.

6. Policy application

FAPSTC's commitment to maintaining the integrity of your personal and commercial in confidence information is demonstrated by the following.

6.1 Why information is collected

FAPSTC collects personal and/or commercial in confidence information to:

- allow us to carry out our purpose.
- manage, account for and improve our services.
- manage our relationships with our stakeholders, including government.
- provide stakeholders with news or information about topics or events.
- provide stakeholders with news or information about FAPSTC; and
- comply with our legal obligations.

6.2 The type of information collected

The type of personal information collected includes, for example, contact details—name, mailing address, phone numbers and email address, employer, and employment position.

For FAPSTC employees and Board members, as well as contact details we obtain additional personal information such as tax file numbers, emergency contact details, employment and education history, referee details and opinions, and other information as required by law.

Commercial in confidence information obtained includes information of a commercial nature disclosed to FAPSTC in writing or in discussions in meetings or at events, for example.

6.3 How information is collected

FAPSTC:

- collects personal and commercial in confidence information lawfully, through fair and reasonable means. This includes information sent to us via email or post, face to face meetings, interviews, telephone discussions, business cards, organisational web sites, media tools such as LinkedIn, event registrations, and through surveys we conduct.
- operates a Customer Relationship Management database which is stored on Microsoft's Azure server and ACT and both are accessed online only by FAPSTC's approved staff.
- collects personal information directly from the individual wherever possible; and
- takes reasonable steps to ensure the accuracy of information.

FAPSTC does not collect information from visitors to our website and does not use cookies to build profiles of those who visit the site.

6.4 Sharing and disclosing information

Any private or commercial in confidence information will not be collected, used or disclosed in any way and for any reasons other than those related to the initial purpose of collecting it.

FAPSTC will take reasonable steps to inform people and businesses of the purpose and relevance of the information collected. This information will not be distributed or forwarded to third parties without the prior consent of the individual or organisation concerned, unless required by law.

FAPSTC does not sell your personal or commercial information under any circumstances.

FAPSTC regularly conducts stakeholder surveys. Information from these is presented to third parties as aggregated quantitative and qualitative data. Survey information is also de-identified unless prior written consent to disclose personal or commercially sensitive information is obtained from the participating individuals and organisations.

6.5 How information is protected

FAPSTC takes all reasonable care to prevent unauthorised access to, or disclosure of, your personal and commercial in confidence information. This includes:

- ensuring appropriate storage and security, including password protected access to our CRM database.
- ensuring all Board members, staff and Industry Working Group members are aware of our expectations in relation to privacy and commercial in confidence information; and
- destroying or de-identifying information not needed for the intended purpose as soon as possible.

6.6 Keeping information accurate and up to date

FAPSTC aims to make sure that the information it holds is accurate, complete, and up to date.

As fair, open and transparent management of information is important, individuals or organisations can contact FAPSTC in writing to request access or corrections to their personal information. FAPSTC may require further details to verify your identity before processing your request. FAPSTC may also, under certain circumstances, refuse you access to your personal information—for example, if your identity is not satisfactorily verified, or for legal reasons.

Individuals or organisations can contact FAPSTC and ask for their details to be included in our CRM. Similarly, they may write to us requesting they be removed from the CRM.

6.7 Notification of changes to the Privacy Policy

As part of its good governance processes, FAPSTC will regularly review and, where necessary, amend this policy. The Privacy Policy is available via a link on the FAPSTC website and we encourage you to periodically visit this page for the current policy.

7. Disclosure of Information

The State Training Board (STB), under section 21(1)(b) of the *Vocational Education and*

Training ACT 1996 (VET Act) recognises Industry Training advisory bodies (ITABs or 'Industry Training Councils'). These advisory bodies provide advice on the training and workforce development needs of Western Australian industry to the STB and the Department.

These services contribute to the achievement of the Department's mission to build the Western Australian workforce to meet the State's economic and community needs, and to the State Government's *Our Priorities: Sharing Prosperity* plan to deliver better outcomes for Western Australians.

Industry Training Councils provide high level strategic information and advice to the Western Australian Government, the Department and STB on the workforce development and vocational education and training needs and priorities of industry in Western Australia following extensive industry consultation. Industry Training Councils take a leadership role within their industry sectors in this respect, and ensure that their activities, products and services align with the priorities set by the Minister for Education and Training, the STB and the Department.

8. Breaches

All Board members, employees and Industry Advisory Network members are responsible for knowing, understanding, and following the provisions of this Privacy Policy throughout the course of their involvement and/or employment with FAPSTC. Failure to comply with any aspect of this policy may constitute misconduct and may result in disciplinary action, up to and including termination of employment or engagement.

9. Associated Documents

FAPSTC Human Resources Management Policies:

- Board Charter
- Code of Conduct
- Risk Monitoring and Management Policy

10. Authorisation

This Policy has been authorised by the CEO and the Board of FAPSTC.