



APAC Policy No 3: Privacy and Confidentiality Policy

1. Purpose and scope

- 1.1. This Privacy and Confidentiality Policy is intended to assist the Australian Psychology Accreditation Council (APAC), its staff, other individuals and the organisations and institutions we deal with to understand our practices for the collection, use, storage, disclosure and related handling of information and how personal information may be accessed and corrected.
- 1.2. APAC is committed to managing personal and Confidential information held or collected by us in ways which fully respect the confidential basis on which it is provided, and in the case of personal information, in accordance with the National Privacy Principles set out in the *Privacy Act 1988*.

2. What is personal information?

- 2.1. Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not. Personal information provided to APAC may include Information relating to individual academic staff, their academic credentials, their responsibilities and the nature of their work.
- 2.2. Personal information held by APAC may include:
 - (a) names
 - (b) positions or roles in an educational institution
 - (c) contact details (including mail and email address, telephone numbers)
 - (d) academic qualifications, academic transcripts and curriculum vitae.
- 2.3. APAC does not intend to collect sensitive personal information such as credit information, health or medical information and other information that could form the basis of unlawful discrimination.

3. Why do we collect personal Information?

- 3.1. Personal information is received and stored by APAC in the course of carrying out its accreditation functions. It is not practical or possible to de-identify all information received by us in the course of carrying out our functions, and so personal information is collected.

- 3.2. Personal information received in the accreditation process is not stored in any way that isolates the personal information from the accreditation materials.

4. How do we collect personal information?

- 4.1. As an accreditation organisation, APAC does not actively seek out or collect personal information, although we receive personal information as part of carrying out our accreditation functions.
- 4.2. APAC collects personal information directly from the public via:
- (a) correspondence and telephone calls
 - (b) contact via our website
 - (c) order forms for APAC products and materials
- 4.3. APAC also collects personal information in the course of carrying out its functions via:
- (a) accreditation application materials
 - (b) materials collected or prepared during assessments and site visits to educational or other institutions
 - (c) enquiries from educational institutions

5. What is confidential information?

- 5.1. Confidential information includes:
- (a) all information about education providers, Academic Organisational Units, and individuals provided by educational institutions for purposes of assessment of applications for accreditation or re-accreditation
 - (b) all information provided or collected in relation to notifications or complaints about alleged non-compliance with or breaches of standards
- 5.2. All information provided by educational institutions for purposes of assessment for accreditation is treated by us as 'commercial-in-confidence' information.

6. Security of personal and confidential information

- 6.1. APAC is careful with personal and confidential information and secures it from unauthorised access, use or disclosure to the best of our ability.
- 6.2. Information collected by APAC is stored locally in Australia. APAC works with established and reputable information technology contractors to maintain its IT systems and manage the security of those systems. Electronic system backups are also stored locally in Australia.
- 6.3. Hard copy information is stored securely onsite. Archived hard copy information is stored locally in Australia with a reputable and experienced archiving firm. Any personal and confidential information that APAC holds that is no longer required will be disposed of safely and securely. APAC uses secure document destruction providers for document disposal.

- 6.4. APAC monitors the services provided by its contractors to ensure systems remain secure and current.
- 6.5. APAC will use its reasonable endeavours to protect all personal and confidential Information from misuse, unauthorised access, disclosure, modification or loss.
- 6.6. Despite its reasonable endeavours, APAC is unable to ensure or warrant the security of any personal and confidential Information transmitted to APAC and all personal and confidential information disclosed by you to APAC is at your own risk.

7. Use of personal or confidential information

- 7.1. APAC will only use personal or confidential information for the purpose for which it has been collected unless we are required to disclose the information by law.

8. When we disclose personal or confidential information

- 8.1. Personal or confidential information is not disclosed to persons or organisations external to APAC except to:
 - (a) our professional advisers, including legal advisers and auditors
 - (b) government authorities, as required or authorised by law
- 8.2. If your personal or confidential information is being disclosed in this way, we will make reasonable efforts to let you know.

9. Access to personal information

- 9.1. You have a right to access your personal information held by APAC. If you would like to do so please contact APAC at apac@psychologycouncil.org.au. Your request must be in writing for security and recording purposes and to help us to find the information you are looking for.
- 9.2. APAC will provide a summary of the personal information that we hold, rather than copies of individual documents. APAC does not provide direct access to evaluative information or information related to accreditation assessment or decision-making processes.
- 9.3. In the event that copies of individual documents are requested and APAC agrees to meet that request, the fee for provision of documents via post, fax or email is \$1.00 per page, payable prior to delivery.
- 9.4. We may refuse you access to personal information if an exception as described in Australian Privacy Principle 12 applies. If APAC refuses access, we will tell you why.

10. Accuracy of personal information

- 10.1. Personal information collected by APAC is usually ancillary to the carrying out of our functions and is not kept in database formats. As a result, we do not review or seek to update historical data. Accuracy depends on the information provided to APAC. If you wish to query the accuracy of personal information held by APAC please contact us at apac@psychologycouncil.org.au

11. How to complain about our handling of your personal information

- 11.1. If you are not happy about what we have done with your personal information, please contact us first and let us know your concerns. We will respond to you within 30 days of the date of receiving your request. We will do what we can reasonably do to address your concerns.
- 11.2. If you are not satisfied with our response, you may complain to the Office of the Australian Information Commissioner (OAIC), which has a website at: <http://www.oaic.gov.au>.