

THE L2P PROGRAM: PRIVACY POLICY

Your privacy is important

This statement outlines The L2P Program's policy on how The L2P Program uses and manages personal information provided to or collected by it.

The L2P Program is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act and is compliant with the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

The L2P Program may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to The L2P Program's operations and practices and to make sure it remains appropriate to the changing legal environment.

What kind of personal information does The L2P Program collect and how does the program collect it?

The type of information The L2P Program collects and holds includes (but is not limited to) personal information, including sensitive information, about:

- Its volunteers – namely full name and contact details (including next of kin and medical information); DCSI, Child Protection Code of Conduct and RAN Training details.
- Volunteer Mentors – as for volunteers but in addition Driver's License and driving history. The Mentee they are paired with.
- Learner Driver [Mentees] – full name, medical information and contact details, Learner Driving License, DCSI Clearance and driving history with contact details for Driving School the learner is linked to, any contact(s) the mentee has with Social Providers, School etc. and his/her contact details with this organisation. The Mentor he/she is paired with and Log Book details/reports of practical sessions completed or booked – whether attended or cancelled.
 - If Under 18 years of age – parental/guardian contact details.
 - If 18 years of age or older – if attending sessions where Under 18's might be present, RAN Training details and Child Protection Code of Conduct

Personal Information you provide:

The L2P Program will generally collect personal information held about an individual by way of submitted forms, written reports and attendance at inductions and/or training sessions. You do have the right to seek to deal with us anonymously or using a pseudonym, but in almost every circumstance it will not be practicable for us to deal with you or provide any services to you except for the most general responses to general enquiries, unless you identify yourself.

Personal Information provided by other people:

In some circumstances The L2P Program may be provided with personal information about an individual from a third party, for example: a Registered Driving Instructor or Job Active Provider.

In relation to employee records:

Under the Privacy Act the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to The L2P Program's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between The L2P Program and employee. However, The L2P Program must provide access and ensure compliance with the Australian and South Australian Privacy Acts.

How will The L2P Program use the personal information you provide?

The L2P Program will use personal information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which you have consented.

In relation to direct marketing, The L2P Program will use your personal information for direct marketing where you have provided that information, and you are likely to expect direct marketing: only then you will be sent direct marketing containing an opt out. If we use your personal information obtained from elsewhere we will still send you direct marketing information where you have consented and which will also contain an opt out. We will always obtain your consent to use sensitive information as the basis for any of our direct marketing.

We may use video surveillance for security purposes and the footage will be used only by The L2P Program and by the providers of our security services for security purposes. Surveillance videos are not used by The L2P Program for other purposes and the footage is not publicly available. Surveillance cameras are not located in any bathrooms or change room facilities.

Job applicants, staff members and contractors:

In relation to personal information of job applicants, staff members and contractors, The L2P Program's purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

The purposes for which The L2P Program uses personal information of job applicants, staff members, volunteers and contractors include:

- for insurance purposes;
- for task suitability..
- for promotional suitability.
- to satisfy The L2P Program's legal obligations,

Where The L2P Program receives unsolicited job applications these will usually be dealt with in accordance with the unsolicited personal information requirements of the Privacy Act.

Volunteers:

The L2P Program also obtains personal information about volunteers who assist the program in its functions or conduct associated activities, such as to enable The L2P Program and the volunteers to work together.

Marketing and fundraising:

The L2P Program treats marketing and seeking donations for the future growth and development of the program as important.

Personal information held by The L2P Program may be disclosed to an organisation that assists in The L2P Program's fundraising.

Who might The L2P Program disclose personal information to?

The L2P Program may disclose personal information, including sensitive information, held about an individual to:

- government departments;
- people providing services to the program;
- .emergency services (e.g., Health Personnel etc.); and
- anyone you authorise The L2P Program to disclose information to.

Sending information overseas:

The L2P Program will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual writing; or otherwise:
- complying with the Australian Privacy Principles or other applicable privacy legislation.

How does The L2P Program treat sensitive information?

In referring to 'sensitive information', The L2P Program means:

"information relating to a person's racial ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences or criminal record, that is also personal information; and health information about an individual".

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

Management and security of personal information

The L2P Program's staff are required to respect the confidentiality of personal information and the privacy of individuals.

The L2P Program has in place steps to protect the personal information The L2P Program holds from misuse, loss, unauthorised access, modification, interference or disclosure by use of various methods including locked storage of paper records and pass worded access rights to computerised records.

When you use our website, having your cookies enabled will allow us to maintain the continuity of your browsing session and remember your details when you return. We may also use web beacons, Flash local stored objects and JavaScript. If you adjust your browser settings to block, reject or delete these functions, the webpage may not function in an optimal manner. *We may also collect information about your IP address, although this may not identify you.*

Updating personal information

The L2P Program endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update their personal information held by The L2P Program by contacting the Privacy Officer of the program at any time.

The Australian Privacy Principles require The L2P Program not to store personal information longer than necessary. In particular, the Health Privacy Principles impose certain obligations about the length of time health records must be stored.

You have the right to check what personal information The L2P Program holds about you.

Under the Commonwealth Privacy Act, an individual has the right to obtain access to any personal information which The L2P Program holds about them and to advise The L2P Program of any perceived inaccuracy. There are some exceptions to this right set out in the applicable legislation. To make a request to access any information The L2P Program holds about you, please contact the Secretary in writing.

The L2P Program may require you to verify your identity and specify what information you require. Although no fee will be charged for accessing your personal information or making a correction, The L2P Program may charge a fee to retrieve and copy any material. If the information sought is extensive, The L2P Program will advise the likely cost in advance.

How long will The L2P Program keep your information?

Under our destruction and de-identification policies, your personal information that is no longer required will be de-identified or destroyed. In many circumstances, however it will be kept for marketing purposes, as you will have consented to that in writing with us.

Enquiries and privacy complaints

If you would like further information about the way The L2P Program manages the personal information it holds, please contact the Secretary. If you have any concerns, complaints or you think there has been a breach of privacy, then also please contact us via email at admin @ L2P.org.au in the first instance including your contact telephone number. One of our managers will first deal with you usually over the phone. If we then have not dealt satisfactorily with your concerns we will meet with you to discuss your concerns further.

If you are not satisfied with our response to your complaint within 30 days from this meeting then you can refer your complaint to the Office of the Australian Information Commissioner via:

- Email: enquiries @ .gov.au
- Tele: 1300 363 992
- Fax: +61 2 9284 9666