




# Privacy Policy

August 2024

# Publication and amendment details

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| 2.0              | Updated to comply with the <i>Privacy (Australian Government Agencies — Governance) APP Code 2017</i>  | Education Delivery Manager and Senior Business Analyst        |
| 2.1              | Updated for current identity verification tool   | Operations Executive Manager                                  |
| 2.2              | Refreshed to take into account changes brought about by SALT Platform.   | Trustwave   |
| 2.3              | Updated to correct typographical errors  | Operations Executive Manager                                  |
| 2.4              | Refreshed and updated to reflect WGEA's current collection, disclosure and storage of personal information and current identity verification tool, updated various contact details, refreshed links and formatting and various | Privacy Officers and several members of WGEA's Executive team |

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|                | other amendments to align some language with relevant laws.                    |  |
| 2.5            | Annual review of privacy policy – updated and streamlined some of the content. | Gender Equality Programs Executive Manager and Privacy Officer |
| 2.6            | Annual review of privacy policy  | Gender Equality Programs Executive Manager and Privacy Officer |

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# Part 1 – Introduction

## 1.1 About this policy

The Workplace Gender Equality Agency (WGEA) is an agency subject to the *Privacy Act 1988* (Cth) (Privacy Act) and Australian Privacy Principles (APPs).

This Privacy Policy outlines WGEA's personal information handling practices, and broadly covers personal information relating to:

- employees of organisations that provide data to WGEA in accordance with obligations under the *Workplace Gender Equality Act 2012* (Cth) (WGE Act) or on a voluntary basis;
- current, former and prospective employees and contractors of WGEA;
- our contracted service providers and their personnel (including consultants, suppliers, vendors, etc);
- persons who interact with WGEA's staff, website, online services or social media accounts;
- subscribers to WGEA newsletters, mailing lists and other communications;
- persons who register for or attend WGEA events; and
- WGEA stakeholders, including members and contact persons for industry associations, not-for-profit organisations, partners, and media organisations.

This policy may be updated from time to time by publishing a revised version on WGEA's website.

## 1.2 Interpretation

In this Privacy Policy:

- **we, us** and **our** refer to WGEA;
  - **personal information** has the meaning given in the Privacy Act; information or an opinion about an identified individual, or an individual who is reasonably identifiable:
    - (a) whether the information or opinion is true or not; and
    - (b) whether the information or opinion is recorded in a material form or not.
  - **individual** is a natural, living person;
  - **sensitive information** has the meaning given in the Privacy Act, and covers the following information:
    - information or opinion about an individual's:
      - ✓ racial or ethnic origin
      - ✓ political opinions
      - ✓ membership of a political association
      - ✓ religious beliefs or affiliations
      - ✓ philosophical beliefs
      - ✓ membership of a professional or trade association
      - ✓ membership of a trade union
      - ✓ sexual orientation or practices; or
      - ✓ criminal record
- that is also personal information; or
- health information about an individual
  - genetic information about an individual that is not otherwise health information
  - biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
  - biometric templates.

- **de-identified information** is information from which an individual is not identified or reasonably identifiable, such that it is not (or no longer) considered personal information.

## 1.3 Why we collect, use and disclose personal information

We collect personal information that is reasonably necessary, or directly related, to one or more of WGEA's functions and activities. This may include sensitive information that is collected with consent, or as otherwise authorised under the Privacy Act and APPs.

The purposes for which we collect, use and disclose personal information depends on our relationship and interactions with individuals and the public. Such purposes include:

- performing our functions under the WGE Act
- facilitating community and stakeholder engagement, including sharing information about our activities (e.g. newsletter subscriptions) and delivering webinars and other events
- facilitating access and making improvements to our website and online services
- responding to communications, enquiries and complaints
- managing our human resources functions (including recruitment, payroll and other employment related activities)
- engaging third party contracted service providers
- ordinary business functions and activities, such as financial and expense management; and
- meeting regulatory and legal obligations.

We generally only use and disclose your personal information for the primary purpose for which it was collected.

In certain circumstances, we may use or disclose personal information for a different purpose where you have consented, or the use or disclosure:

- is required or authorised by or under an Australian law (including but not limited to the WGE Act), or by a court or tribunal order; or
- is otherwise authorised under the Privacy Act and APPs.

## Part 2 - Collection

### 2.1 What we collect

The types of personal information we collect and hold about you depends on the circumstances and purpose for which we request or receive it. This may include the following:

- names, telephone numbers, email addresses, position and organisation contact details of the reporting contacts and Chief Executive Officers and Agency Heads (or equivalent) of employers that are required by the WGE Act to report to WGEA (relevant employers)
- names, telephone numbers, email addresses, position and organisation contact details of stakeholders of WGEA, including contacts at industry associations, not-for-profit organisations, partners, newsletter subscribers and media contacts
- names and contact details for individuals who subscribe to our newsletters or other communications, or register for WGEA's webinars or events
- information about our employees and contractors in relation to personnel and payroll activities (which includes, but is not limited to, their contact details and financial/payment information), recruitment and other matters such as work, health and safety
- information from prospective employees provided in their application for employment
- information about tenderers, consultants and other suppliers (or prospective suppliers) of goods and services to WGEA.

We collect employee data from relevant employers that may include an employee's gender, occupational category, manager category, employment status, postcode, year of birth, type of employment, base salary

and total remuneration. This data is generally collected in a de-identified form. WGEA have protocols to minimise the risk of identifying an individual(s) when we publish or disclose information.

## 2.2 How we collect personal information

We may collect personal information about you in different ways, including:

- directly from you when you interact with us (e.g. when you communicate with us in person, by phone, or by paper or electronic correspondence; submit a form, interact with WGEA's website, social media accounts or online services, etc)
- from relevant public sector commissions, if you are a public sector employee
- from current or former employers
- from referees
- from publicly available sources.

As part of our WGE Act functions, we collect from relevant employers information about their employees. This information is requested, and is generally provided, in a de-identified form.

In addition to the above, we track usage of the WGEA Employer Portal. Information collected includes:

- login dates and times
- upload of data files
- changes to data entered
- support requests, support request contact events, and
- information to assist WGEA resolve support requests.

## 2.3 Use of our website, online portals and social media

When you access and use our website and online services:

- our servers use cookies to automatically record information that your browser sends about your visit such as your Internet Protocol (IP) address, top level domain name (for example, .com, .gov, .au, .uk etc.), date and time of the visit to the site, pages accessed and documents viewed, previous sites visited, browser type, and the browser language, and one or more cookies that may uniquely identify your browser
- we use Google Analytics to collect information about visitors to our website. Google Analytics uses cookies and JavaScript code to help analyse how users use this site. It anonymously tracks how visitors interact with this website, including how they have accessed the site (for example, from a search engine, social media, a link, an advertisement) and what they did on the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purposes of compiling reports on website activity and providing other services relating to website activity and internet usage.

You can disable cookies through your device's browser settings, however, please note that doing so may affect the performance of our website and online services. You can opt out of Google's use of cookies via the [Google Analytics Opt-out Browser Add-on](#).

The information we collect is used to improve our website and online services.

## 2.4 Social media platforms

We use social media platforms such as Twitter, Facebook, LinkedIn, Instagram and YouTube to communicate with the public about our work.

When you communicate with us using these services, we may collect your personal information accessible on your social media platforms to communicate with you and the public.

The social media platforms will also collect and handle your personal information. Please refer to these specific social networking sites to review their privacy policies.

## 2.5 Links to third party websites

Our website includes links to other websites operated by third parties. We are not responsible for the content and privacy practices of third parties. We recommend that you examine each website's privacy policy separately.

## Part 3 - Disclosure

We only disclose personal information to third parties (including other government departments) in the following circumstances:

- where you are reasonably likely to have been aware, or made aware, that your personal information is usually passed to the relevant parties
- where you have consented to the disclosure of your personal information
- where we believe on reasonable grounds that the disclosure is necessary to prevent or lessen a serious and imminent threat to your life or health or that of another person
- where the disclosure is required or authorised by or under law
- where the disclosure is reasonably necessary for the enforcement of criminal law or a law imposing a pecuniary penalty, or for the protection of public revenue.

### 3.1 Disclosures to third parties

WGEA may disclose personal information to third parties in accordance with the Privacy Act. The kinds of third parties include:

- Government agencies. For example, de-identified data may be shared with other government agencies for the purposes of their relevant functions.
- Research bodies and organisations. For example, we may provide de-aggregated remuneration data to organisations, entities or other bodies who have a written agreement with WGEA to conduct research for, on behalf of, or together with WGEA. In such cases, we still have protocols to ensure that no individual employee can be identified.

WGEA is required to publish certain data reported by employers in accordance with the WGE Act. Data (including employer-specific data) will only be published in a de-identified, aggregated form.

### 3.2 Overseas disclosures

We do not disclose personal information to overseas recipients.

## Part 4 – Storage, security and access

We take the storage and security of personal and sensitive information very seriously and have strict controls in place to guard the data held in our possession.

WGEA holds personal information in a range of electronic and hard copy records. We take all reasonable steps to protect the personal information that we hold from misuse, interference, loss, unauthorised access, modification or disclosure by using a number of protective measures, including IT security measures and physical access restrictions to our offices and records, in accordance with WGEA and Australian Government security policies and procedures.

WGEA uses a multi-tenant security model for the storage and access of information via the WGEA Employer Portal. This prevents personal or sensitive information from one login (user, organisation, reporting customer or subsidiary) from being visible to another.

We also take contractual measures to ensure our contracted service providers comply with privacy obligations.

When no longer required, personal information is destroyed or deleted in a secure manner or transferred to the National Archives of Australia (NAA) in accordance with our obligations under the *Archives Act 1983* (Cth).

## 4.1 Accessing and correcting personal information

To access or seek correction of personal information we hold about you, please contact us using the contact details set out below. We will respond to your request within 30 calendar days.

If we refuse to give you access or make corrections to your personal information, we will provide you with written reasons for our decision.

The *Freedom of Information Act 1982* (Cth) also provides mechanisms for seeking access to and correction of your personal information, and other documents held by us. Further information about how to make a Freedom of Information request to WGEA is available at [Information Publication Scheme | WGEA](#).

## 4.2 Privacy Complaints

If you think we have breached your privacy, you may contact us to make a complaint using the contact details set out in the 'How to contact us' section below.

To ensure that we fully understand the nature of your complaint and the outcome you are seeking, we prefer that you make your complaint in writing. You may submit an anonymous complaint. However, please be aware that it may be difficult to properly investigate or respond to your complaint if you do not identify yourself or provide insufficient details about the issue.

We are committed to quick and fair resolution of complaints and will ensure your complaint is taken seriously and investigated appropriately. Please be assured that you will not be victimised or suffer negative treatment if you make a complaint.

If you are not satisfied with the way we have handled your complaint in the first instance, you may contact the Office of the Australian Information Commissioner (OAIC). Information on how to make a complaint to the OAIC is available on the [OAIC website](#). The OAIC's contact details are below.

### Office of the Australian Information Commissioner

GPO Box 5288 Sydney NSW 2001

Telephone: 1300 363 992

Online: See online forms at [Contact us | OAIC](#)

## 4.3 How to contact us

If you wish to:

- query how your personal information is collected, held, used or disclosed by us
- ask questions about this privacy policy
- request access to or seek correction of your personal information
- make a privacy complaint

please contact us via one of the methods below.

**Postal address:** CONFIDENTIAL  
The Privacy Officer  
GPO Box 4917  
Sydney NSW 2001

**By email:** For privacy-related matters, use: [wgea@wgea.gov.au](mailto:wgea@wgea.gov.au)  
For Freedom of Information-related matters, use: [foi@wgea.gov.au](mailto:foi@wgea.gov.au)

**By phone:** (02) 9432 7000 or 1800 730 233



### **Assisted Contact:**

Please note, our phone support is limited, and our recommended contact method is via email at [wgea@wgea.gov.au](mailto:wgea@wgea.gov.au)

#### National Relay Service (NRS)

- **TTY users** can phone 133 677 (or 1800 555 677 if calling our 1800 number)
- **Internet relay users** connect to the [NRS Chat](#) then ask for 02 9432 7000 or 1800 730 233.
- **All other users** can phone 1300 555 727 or 1800 555 727.

## **Part 5 - Additional references and resources**

- *Workplace Gender Equality Act 2012* (WGE Act) ([Workplace Gender Equality Act 2012 \(legislation.gov.au\)](#))
- *Privacy Act 1988* (Cth) ([Privacy Act 1988 \(legislation.gov.au\)](#))
- Australian Privacy Principles (APP) ([Privacy Act 1988 \(legislation.gov.au\)](#))
- *Freedom of Information Act 1982* (Cth) ([Freedom of Information Act 1982 \(legislation.gov.au\)](#))
- *Archives Act 1983* (Cth) ([Archives Act 1983 \(legislation.gov.au\)](#))
- *Privacy (Australian Government Agencies — Governance) APP Code 2017* ([Federal Register of Legislation - Australian Government](#))