



Privacy Policy

Document Number	NRGDOC-2560-4996
Reference Number	HR-POL-001
Authoring Department	Human Resources

SCOPE	All Employees, contractors and consultants of NRGGOS.		
EXCLUSIONS	None identified.		
RELATED LEGISLATION	<ul style="list-style-type: none"> • Electrical Power Industry Award 2010 ('Award') • NRG Gladstone Operating Services Pty Ltd Enterprise Agreement 2017 ('EBA') • Fair Work Act 2009 (Cth) ('FWA') • Privacy Act 1988 (Cth) ('Privacy Act') 		
RELATED DOCUMENTS	<ul style="list-style-type: none"> • Internet and Email Usage Policy • Information Security Policy • Computer External Access Policy 		
REVIEW TRIGGER	This document is to be reviewed: <ul style="list-style-type: none"> • in two (2) years' time; or • when relevant legislation is updated. 		
APPROVED DATE		REVIEW DATE	
REVISION NO.	AMENDMENT SUMMARY		COMPLETED DATE
1			
2			
3			

Policy Intent

The purpose of this Policy is to outline NRGGOS's legislative obligations and establish a framework for the responsible collection and handling of personal information by the Company.

Policy Statement

The Australian Privacy Principles (APP) contained in the Privacy Act set out the rights of privacy in relation to the collection, storage, use, disclosure and access to personal information, as well as the correction of personal information. However, the APP does not provide any rights in relation to employee records. That is, any information relating to employment of current or former employees such as wages, terms and conditions of employment, performance and conduct issues, health and medical information.

Policy Objectives

The objectives of this policy are to:

- identify what circumstances personal information may be collected by NRGGOS;
- provide the expectations and safeguarding procedures of personal information;
- outline the avenue for incorrect personal information to be corrected;
- outline what circumstances personal information may be disclosed and how.

Policy Content

Employee Records

The Company will take reasonable steps in regards to personal information kept about its present and former employees, to:

- handle and store employee records in a confidential manner, and
- only allow authorised personnel to access employee records.



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Employee personnel files may only be accessed by an employee's Immediate Manager, their Department Manager, the General Manager Gladstone Operations, and Employee Relations personnel.

Employee medical records may only be accessed by the Employee, the Occupational Health Nurse and the Company medical officer.

Employees will be able to inspect their Personal or Medical file at any time during normal business hours.

Disclosure of Information

Where the Company receives from a third party, a request for access to personal information held about an Employee, NRGGOS will obtain the Employee's approval before complying with the request, except where:

- NRGGOS is required to provide the information in accordance with the order of direction of a state or federal court, commission or tribunal; or
- the request is received from a solicitor acting on behalf of the Employee to whom the personal information relates; or
- the employee has signed a consent form permitting NRGGOS to release personal information held.

Collection of Personal Information

NRGGOS will only collect personal information necessary to its business functions and operational activities. Where it is reasonable and practicable to do so, the Company will collect personal information about an individual directly from the individual. However, if an individual applies for a job with NRGGOS, personal information about that individual may be collected from referees or others who work with, or have worked with that person.

Storage of Personal Information – Data Security

The Company will take reasonable steps to protect the personal information it holds from misuse and loss from unauthorised access, modification or disclosure.

The Company may store personnel files in hard copy or electronically in our IT systems, which may include cloud-based servers.

Reasonable steps will be taken to destroy or permanently de-identify personal information if it is no longer needed for any purpose for which the information may be used or disclosed.

The following physical and electronic measures will be implemented:

- No personal information should be given over the phone unless it has been established that the person making the request has legitimate grounds to access the information and given proof of identity.
- No personal information should be left on voicemail unless requested by the owner of the voicemail on the basis that the voicemail is secure.
- Mail containing personal information should be labelled "Private and Confidential: Attention..."
- Fax machines used for transmission of personal information should be secure.
- Only authorised individuals should receive personal information and are not permitted to forward such information without consent.
- Paper records containing personal information should not be copied unless it is essential to do so.



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- All paper records should be kept in lockable storage when not in use and should be shredded or burned when no longer required or governed by legislative time limitations.
- The anonymity of client contacts should be maintained during presentations, consultation with other clients, suppliers and other members of the public, research activities and public events.
- Personal information should not be left unattended nor should it be discussed in public areas where others may overhear.

Employees and other persons who are directly involved with the activities of the Company are required to consent to applicable confidentiality obligations in writing.

External Requests for Access to Personal Information

In accordance with the APP, the Company will provide external individuals with access to personal information it holds about them upon receipt of a written request. If an individual requires access to their personal information, they should provide a written request for access to their personal information to Manager Human Resources. The individual may be asked to provide proof of identity before they are provided access to the information. A fee may be charged to cover any costs involved in providing access to personal information.

NRGGOS will take all reasonable steps to provide access to personal information within a reasonable time from the date the request is received.

Documentation must not be removed from a file that an individual is inspecting, even where the information relates to them, unless they have prior approval of the Manager Human Resources for the collection and storage of that information.

Correction

If an individual believes that any personal information held by NRGGOS is incorrect, the Manager Human Resources should be notified in writing.

Responsibilities and Accountabilities

The following table outlines the key accountabilities of Company personnel.

Personnel	Accountability
Employee	Managing the collection, use and disclosure of personal information in accordance with this policy.
Supervisors and Superintendents	Auditing work group practices to ensure compliance with this policy.
Department Managers	The development of work instructions to ensure the long-term management of personal information in accordance with this policy and applicable legislation.
Manager Human Resources	The overall management of this policy.