



EMPLOYEE RELATIONS TOOLBOX

Title: PRIVACY POLICY (#16)

Date Issued: 28 March 2002

Supersedes: 14 February 2002

1.0 POLICY STATEMENT

Star Track Express policy is to protect information collected about people related to its business, including its employees and customers, and comply with the provisions of the *Privacy Amendment (Private Sector) Act 2000*.

2.0 BACKGROUND

In the course of business a company is presented with information about people associated with its activities such as job applicants, customers, employees etc. which is used to conduct that business. Concerns have arisen in the general community that this information may be used for purposes other than those for which it was originally obtained, or disclosed to a third party. Government has therefore moved to meet these concerns by legislating to regulate the management of such information. This policy explains how the company complies with legislative requirements and protects the privacy of such information.

2.1 General Terms

The company is cognisant of privacy issues in all aspects of information handling including the collection, use, retention and disclosure of personal information. Legislation provides exemptions for some types of information including employee records and outlines ten principles that will underpin privacy practice and policy. These cover:

- Collection,
- Use and disclosure,
- Data quality,
- Data security,
- Openness,
- Access and correction,
- Identifiers,
- Anonymity,
- Transborder flow of data, and
- Sensitive information.

3.0 OPERATION

3.1 Privacy Officer

The company privacy officer is the Company Secretary.

3.2 Privacy Principles

The company has adopted ten “privacy principles” developed by the federal Privacy Commission and described in the legislation, to create the following principles for use in Star Track Express.

1. Collection

Collection of personal information by Star Track Express will be fair, lawful and not intrusive. When collecting information a person will be told the company’s name, the purpose of collection, that the person can get access to their personal information and the consequences if the person declines to give the information.

2. Use & Disclosure

The company will only use information for the purpose it was collected or reasonable related purposes. Exceptions are where the person has consented otherwise, or in circumstances related to public interest such as health and safety.

3. Data Quality

The company will take reasonable steps to make sure that the personal information it collects, uses or discloses is accurate, complete and up-to date.

4. Data Security

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

5. Openness

This policy document outlining Star Track Express’s information handling practices, and information about the kind of data held and the purpose for holding it, will be made available to any interested party, upon request.

6. Access & Correction

Generally speaking, the company will give an individual access to personal information it holds about that individual upon request and will update information where evidence is presented that correction is required.

7. Identifiers

Star Track Express will not normally adopt, use or disclose, for its own purposes an identifier that has been assigned by a Commonwealth government agency, such as for example, a tax file number or Child Care Agency case number.

8. Anonymity

The company will give people the option to interact anonymously whenever it is lawful and practicable to do.

9. Trans-border Data Flows

Star Track Express will, generally speaking, only transfer personal information to a recipient in a foreign country by consent or in circumstances where the information will have appropriate protection.

10. Sensitive Information

The company will not collect sensitive information unless the individual has consented, or where required by law, or in other specified circumstances, for example, relating to individual or public health or safety. Sensitive information includes issues unrelated to employment and business transactions such as race, or political opinion. It also includes information such as medical history and criminal record which may be required in the course of business. The company has procedures in place, including this policy, to ensure the lawful collection of such information where it is required.

3.3 Employee Records Exempted

Star Track Express employee records (past and present) are exempt from the operation of the act, however this exemption does not cover contractors and sub-contractors, nor does it apply to job applicants.

3.4 Job Applicant's Information Protected

Information collected about job applicants to assess their suitability for employment is subject to the legislation. This places particular obligations on supervisors and managers with respect to the way they collect and use information about job applicants. In the event that the company hires the applicant that information immediately falls into the "Exempt" category. Until that happens however the ten principles outlined above must be observed.

Specifically with respect to job applicants supervisors and managers should provide the attached statement to the applicant.

It should be remembered that whilst job applicants may access their information, they may not change or remove it. The information belongs to Star Track Express. The provisions of the legislation allow the individual to look at their information and to request that it be updated if they can produce evidence that correction is required. No one other than a supervising manager should ever, under any circumstances, be permitted to view company job applicant records un-supervised, or make changes to them.

3.5 Employee Personnel Files Will Also Be Protected

Employee records are exempt from the legislation. However the Fair Dealing Policy imposes upon managers the same obligations of consideration and care towards

employee records as the privacy act does towards job applicant records. Sensitive information such as criminal history reports, if retained, will be held separate from personnel files to protect confidentiality.

It should be remembered that whilst employees may access their information, they may not change or remove it. The information belongs to Star Track Express. We will allow the employee to look at their information and to request that it be updated if they can produce evidence that correction is required. No one other than a supervising manager should ever, under any circumstances, be permitted to view company personnel files un-supervised, or make changes to them.

3.6 Treatment and Fate of Job Applicant Records

All records collected in the process of assessing a job applicant must be managed in accordance with the principles outlined above. If an applicant requests the opportunity to view our records of their application the request must be referred to the company Privacy Officer who will advise you how to proceed.

There is no reason to retain job applicant records after the recruitment decision has been made. Immediately a decision to not hire a person has been made they should be informed and then the application and all associated documents should be destroyed by shredding. The only record that should be kept by the branch of the applicant is a spreadsheet showing name, the date of application, the decision (without any reason being recorded) and the date they were advised that they were unsuccessful. An example of how this should be done is shown below.

Name	Birth Date	Date Applied	Result	Date Advised
Bill Jones	27/5/82	6/12/01	Declined	10/12/01
Sharon White	12/8/78	10/12/01	Declined	14/12/01

3.7 Privacy Complaints Procedure

In the event that an individual has a concern or complaint about matters of privacy they should raise the matter with the company Privacy Officer. The Privacy Officer will arrange to investigate the matter and respond to the individual. Should the individual be dissatisfied with the company's response they may take the matter up with the Privacy Commission.

Statement for Job Applicants

Your job application and the Privacy Amendment (Private Sector) Act 2000.

You are about to apply for a job with Star Track Express, Australia's pre-eminent express freight company. The information you provide to us to enable us to assess your suitability is private and confidential and we will protect it from misuse. Our commitment to protecting your interests in this regard is outlined below. Please read these guidelines before proceeding with your application.

1. Collection of personal information by Star Track Express will be fair, lawful and not intrusive. It is for the purpose of fairly assessing your suitability for the job for which you have applied. You can get access to that information if you wish, however if you decline to provide any information we have requested we may not proceed with your application. Our privacy policy is available upon request. If you are not offered employment your application and all related records will be destroyed. If you do not believe these guidelines are adequate to protect your information you should not provide it.
2. Generally speaking, your information will only be used for the purposes for which you have given it to us, and we will take reasonable steps to make sure your information is correct and is kept secure and confidential. You may request access to your information and the company will update information where evidence is presented that correction is required.
3. Star Track Express will not normally use for its own purposes an identifier that has been assigned by a government agency, such as your tax file number. The company will give people the option to interact anonymously whenever it is lawful and practicable to do, and will not, generally speaking, transfer personal information overseas unless the information will have appropriate protection.
4. Except where permitted and necessary, we will not collect sensitive information, unrelated to employment or business transactions such as race, or political opinion. The collection of some sensitive information such as medical history and criminal record is permitted and if necessary will be collected. The company has procedures in place to ensure the lawful collection of such information where it is required.