



Australian Government

Office of the Registrar of Indigenous Corporations



Privacy

Policy	PS-15: Privacy
Relevant legislative provisions	<i>Privacy Act 1988</i> CATSI Act, sections 421-1, 604-5, 604-25 CATSI Regulations, regulation 604-25.01
Last updated	12 March 2014
Other relevant policies	PS-12: Registers and use and disclosure of information held by the Registrar

PS-15: Privacy

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PS-15: Privacy

1 Purpose

- 1.1 The *Privacy Act 1988* (the Privacy Act) aims to protect the privacy of individuals who have dealings with government agencies. It regulates collection, storage, use and disclosure of ‘personal information’ held by government agencies.
- 1.2 In this policy statement, the Registrar of Aboriginal and Torres Strait Islander Corporations (the Registrar) sets out the obligations imposed on him or her by the Privacy Act and the *Corporations (Aboriginal and Torres Strait Islander) Act 2006* (the CATSI Act).
- 1.3 References to sections in this policy statement are references to sections of the CATSI Act unless otherwise specified. References to corporations in this policy statement are references to Aboriginal and Torres Strait Islander corporations unless otherwise specified. In addition, references in this policy statement to the Registrar are also references to a delegate who is lawfully exercising the powers of the Registrar.

2 What is ‘personal information’?

- 2.1 The Privacy Act’s wide definition of personal information includes any information or opinion about an individual whose identity is obvious or can reasonably be discovered from that information or opinion.
- 2.1 Examples of personal information include an individual’s address and phone number, records of complaints made about a person or by a person, and file notes of discussions with people who are identified in the file notes.
- 2.2 Information about corporations that does not identify an individual is not ‘personal information’. Corporations do not have privacy rights because they do not fall within the definition of individual in the Privacy Act. Therefore, the Privacy Act does not cover any information about a corporation that does not contain any ‘personal information’ of an individual.

3 What is ‘sensitive information’?

- 3.1 The Privacy Act also defines ‘sensitive information’ and higher standards apply to the collection and handling of sensitive information of individuals. Sensitive information includes information or an opinion about an individual’s racial or ethnic origins, political opinions, religious or philosophical beliefs, criminal record and health, genetic and biometric information.

4 The Australian Privacy Principles

4.1 The Privacy Act has 13 Australian Privacy Principles (APPs). The APPs set the minimum standards for government agencies handling personal information. The APPs and what they cover are set out below.

Part 1—Consideration of personal information privacy

- APP 1—Open and transparent management of personal information
- APP 2—Anonymity and pseudonymity

Part 2—Collection of personal information

- APP 3—Collection of solicited personal information
- APP 4—Dealing with unsolicited personal information
- APP 5—Notification of the collection of personal information

Part 3—Dealing with personal information

- APP 6—Use or disclosure of personal information
- APP 7—Direct marketing
- APP 8—Cross-border disclosure of personal information
- APP 9—Adoption, use or disclosure of government related identifiers

Part 4—Integrity of personal information

- APP 10—Quality of personal information
- APP 11—Security of personal information

Part 5—Access to, and correction of, personal information

- APP 12—Access to personal information
- APP 13—Correction of personal information

4.2 In undertaking its functions the Registrar's office will follow the APPs and be guided by the *Australian Privacy Principles (APP) Guidelines* published by the Office of the Australian Information Commissioner (OAIC).

4.3 For further information about the APPs see the OAIC's website:
<http://www.oaic.gov.au>.

5 The Registrar's contractors

5.1 The Registrar's contractors (and subcontractors) must also comply with the APPs. Under the Privacy Act (section 95B), the Registrar contractually requires his/her contractors and subcontractors to comply with the APPs.

6 Kinds of personal information collected and held by the Registrar's office

- 6.1 The Registrar maintains a personal information digest (PID) which sets out the various types of records of personal information kept by the Registrar's office and related details, such as purpose for which and how the records are kept. The PID also contains other information required by the Privacy Act. For example, it contains information about whether the Registrar's office is likely to disclose information to overseas recipients and, where practical, the countries in which such recipients are likely to be located.
- 6.2 Information about how an individual may seek access to personal information held by the Registrar's office or seek correction of such information is set out later in the policy statement.
- 6.3 From 12 March 2014 onwards the current PID will be attached to this policy statement. The Registrar has appointed a Privacy Contact Officer (PCO). The PCO maintains the PID.
- 6.4 The OAIC formerly collated PID information from Commonwealth agencies each year and published it on their website: <http://www.oaic.gov.au>. OAIC holds PID reports for Commonwealth agencies, including the Registrar, to 2013.
- 6.5 Information about gathering and dissemination practices in relation to the Registrar's website is outlined in the website's privacy statement.

7 Requirements under the CATSI Act

- 7.1 The Registrar must also comply with protected information provisions in the CATSI Act. These provisions prescribe authorised uses and disclosures of 'protected information' obtained in connection with the CATSI Act. They also require all reasonable measures to be taken to protect such information from unauthorised use or disclosure.

A. Definition of 'protected information' in the CATSI Act

- 7.2 Protected information is defined in section 604-5.
- 7.3 Protected information includes all information that is disclosed to the Registrar's staff in confidence, in connection with the Registrar's powers and functions—section 604-5(1).
- 7.4 Protected information also includes all information that:
- is disclosed to, or obtained by, a person or
 - is included in a document given or produced to a person
- for the purposes of the CATSI Act and about a corporation or related body corporate (including an officer or member of a corporation or related body

corporate or a person who has had or proposes to have a dealings with a corporation or a related body corporate)—section 604-5(2).

- 7.5 Protected information does not include information that has been lawfully made public from other sources—section 604-5(2).

B. Authorised uses and disclosures under the CATSI Act

- 7.6 Under APP 6 some uses and disclosures of personal information are excepted from the requirements of the Privacy Act, including where the use or disclosure is required or authorised by or under an Australian law.

- 7.7 Authorised uses and disclosures of protected information includes a use or disclosure that is:

- made for the purposes of the CATSI Act—section 604-25(1)(a)
- required or authorised by a law of the Commonwealth, a state or territory—section 604-25(1)(b)
- made by the Registrar or a delegate of the Registrar while performing a duty or the exercise of a power of the Registrar—section 604-25(2)(b)
- made by a special administrator of an Aboriginal and Torres Strait Islander corporation while performing a function or duty, or exercising a power as a special administrator of the corporation—section 604-25(2)(c).

- 7.8 In some circumstances, the Registrar may share protected information with government agencies and officers specified in section 604-25 and regulation 604-25.01 of the Corporations (Aboriginal and Torres Strait Islander) Regulations 2007.

C. Access to statutory registers required under the CATSI Act

- 7.9 The CATSI Act specifies that certain information provided by corporations must be made available on the Register of Aboriginal and Torres Strait Islander Corporations or the Register of Disqualified Officers (the public registers).

- 7.10 Any person may inspect any document lodged with the Registrar (except an exempt document) and inspect or search the public registers for prescribed information. This right is not restricted and is available to overseas persons.

- 7.11 Information on the public registers includes members' and directors' names and addresses. The CATSI Act authorises disclosure of this personal information and therefore is an exception to the protections that might otherwise apply to personal information under the Privacy Act.

- 7.12 The Registrar has the power to remove personal information from documents on the public registers—section 421-1(1A). Usually, a person must formally ask the Registrar to remove personal information from these documents.

D. Registrar’s policy—protected information under the CATSI Act

- 7.13 Guidance on protected information under the CATSI Act and on the removal of personal information from the public registers is provided in ‘PS-12: Registers and use and disclosure of information held by the Registrar’.

8 General privacy enquiries, requests for access to or correction of personal information or complaints

- 8.1 The Registrar has appointed a Privacy Contact Officer (PCO) who is the first point of contact for privacy issues within the Registrar’s office.

- 8.2 All privacy related matters, including general enquiries, requests for access to or correction of personal information and complaints of any alleged breaches of the Privacy Act should be referred to the Registrar’s PCO.

- 8.3 The Registrar’s PCO can be contacted as follows:

Post	32 Corinna Street, Woden ACT 2606
Email	info@oric.gov.au
Telephone	freecall number 1800 622 431 (not free from mobiles)
Fax	(02) 6133 8080

- 8.4 In undertaking these functions the PCO will be guided by the *Australian Privacy Principles (APP) Guidelines* published by the OAIC.

- 8.5 The PCO will investigate all privacy-related complaints and determine whether the APPs have been breached and what steps must be taken to address the concerns of the individual making the complaint.

- 8.6 All complaints will be acknowledged within 14 days of receipt, and will be resolved quickly and efficiently.

- 8.7 Complaints about our handling of personal information can also be made to the Office of the Australian Information Commissioner.

END OF POLICY STATEMENT

9 Attachment— Office of the Registrar of Indigenous Corporations 2014 Personal Information Digest

32 Corinna Street
WODEN ACT 2606

PO Box 2029
Woden ACT 2606

Freecall: 1800 622 431 (not free from mobiles)

Fax: (02) 6133 8080

Email: info@oric.gov.au

Website: www.oric.gov.au

The Office of the Registrar of Indigenous Corporations (ORIC) also has regional offices in Alice Springs, Broome, Cairns, Coffs Harbour, Darwin and Perth. Contact details for these regional offices are published on the Registrar's website.

ORIC is within the Department of the Prime Minister and Cabinet (PM&C).

ORIC uses Department of Social Services (DSS) IT systems. In particular, ORIC uses FIRSt. FIRSt is the electronic document management system for DSS. It provides a single repository for the storage of corporate documents and business related emails.

ORIC holds sixteen classes of personal information, including one class of personnel records.

A. Personnel records

- A.1 Personnel records for staff of ORIC are held by PM&C. See Appendix 1 (attached below) for a generic description of personnel records.

B. Operational records

- B.1 The purpose of these records is to enable the Registrar of Indigenous Corporations (Registrar) to administer the *Corporations (Aboriginal and Torres Strait Islander) Act 2006* (CATSI Act), to maintain statutory registers and to assist and regulate corporations registered under the CATSI Act.
- B.2 Content of these records may include the following: corporation name and Indigenous Corporation Number, public and non-public documents relating to the operations of the corporation, contact details of the officers and

members of the corporation, details of complaints or enquiries relating to the corporation, documents relating to dispute management services provided to corporations by ORIC, documents relating to the examination of corporations, documents regarding special administration and other forms of external administration of the corporation and documents relating to handling of property from deregistered corporations.

- B.3 The personal information on these records relates to contact details of corporation officers and members, and details of any complaints or enquiries in regards to people that are part of, or connected to the corporation in some way.
- B.4 The following agency staff have access to this information: all ORIC staff, ORIC contractors as required, and PM&C and DSS systems programmers, developers and IT support.
- B.5 The personal information contained in these records may be disclosed to: corporation external administrators and examiners appointed under the CATSI Act and staff from other Commonwealth, state and territory agencies and other prescribed bodies. This information is not usually disclosed to other persons or organisations, other than required by law, for example in compliance with a subpoena. Protected information may only be disclosed through authorised use or disclosure under Part 15.2 of the CATSI Act.
- B.6 Many of these records form part of the Register of Aboriginal and Torres Strait Islander Corporations which can be accessed by the public. Parts of the Register are published on the Registrar's website.
- B.7 There is no restriction on persons who may access the statutory registers kept by the Registrar. Any overseas person may access these registers.
- B.8 The records relate to an unknown number of individuals and are kept in electronic format on the Electronic Register of Indigenous Corporations registered under the CATSI Act (ERICCA), its predecessor the Electronic Register of Indigenous Corporations (ERIC), in FIRSt and/or on paper files.
- B.9 Completed application forms and other reports may be lodged online by corporations through the ORIC online forms lodgment system, a secure website. These records also form part of ERICCA.
- B.10 Personal information contained in records of confidential dispute resolution processes (e.g. formal mediations conducted by ORIC) may only be disclosed on a 'need to know' basis to the Registrar, ORIC senior managers and staff within the Dispute Management Team. This information is not disclosed to other persons or organisations, other than as required or authorised by law. The records relate to an unknown number of individuals and are kept on paper files which are classified and managed using the TRIM recordkeeping system.

- B.11 Individuals can obtain information regarding access to personal information in this class of records by contacting ORIC on (freecall) 1800 622 431 (not free from mobiles).

Location: 32 Corinna Street Woden, regional offices and Recall (document storage)

C. Mail register

- C.1 ORIC maintains an electronic register of incoming mail for tracking purposes.
- C.2 Content may include but is not limited to: name, address and description of correspondence.
- C.3 The personal information on these records relates to ORIC functions.
- C.4 All staff within ORIC have access to this information.
- C.5 The records are kept in electronic format in a Microsoft Access database and, since July 2008, in ERICCA.
- C.6 The personal information contained in these records may be disclosed as provided in the other described records systems.
- C.7 Personal information is not released unless authorised by law or the affected individual provides consent.
- C.8 The records relate to an unknown number of individuals.
- C.9 Individuals can obtain information regarding access to personal information in this class of records by contacting ORIC on (freecall) 1800 622 431 (not free from mobiles).

Location: 32 Corinna Street Woden, and Recall (document management).

D. Training management

- D.1 The purpose of these records is to maintain a national electronic database to assist staff to deliver training, training materials and publications to individuals from boards, organisation membership and key staff positions.
- D.2 Content may include but is not limited to: name, address, telephone number, date of birth, gender, Indigeneity, education and experience on boards.
- D.3 The personal information on these records relates to current and former board members and staff of Aboriginal and Torres Strait Islander corporations and other individuals and organisations.

- D.4 The following agency staff have access to this information: relevant ORIC managers, training staff, IT systems and information staff within ORIC, and PM&C and DSS systems programmers, developers and IT support.
- D.5 The current records are kept in electronic format in the Training and Publications System (TAPS) within ERICCA. Data is also available from the former TAPS database in a Microsoft Access database. New records are not being added to the former TAPS database. It is no longer maintained. Its data is being migrated to ERICCA.
- D.6 The personal information contained in these records may be disclosed to training providers conducting ORIC's training programs and educational institutions such as TAFE, with the consent of the person.
- D.7 Personal information is not released unless authorised by law or the affected individual provides consent.
- D.8 The records relate to over 815 individuals in ERICCA and over 1075 in the former TAPS database. As individuals participate in training events, the number of records in ERICCA will rise accordingly.
- D.9 Individuals can obtain information regarding access to personal information in this class of records by contacting ORIC on (freecall) 1800 622 431 (not free from mobiles).

Location: 32 Corinna Street Woden, regional offices and Recall (document storage).

E. Consultants and contractors

ORIC panels of service providers

- E.1 ORIC holds personal information regarding members of two former service provider panels—training panel (with four sub panels) and regulatory panel.
- E.2 This information includes requests for tender (RFT), tender responses, deeds of standing offer, official orders, correspondence with panel applicants, details of panel members working on matters relating to the panels and performance evaluation.
- E.3 The content of these records may also include but are not limited to: name, company name, Australian Business Numbers, address, telephone number, occupation, gender, referees, payment details, financial viability checks undertaken during RFT processes and pricing schedule.
- E.4 The personal information on these records relates to but is not limited to consultants and individual contractors.
- E.5 Records are stored on paper and in electronic form. The panels databases assisted ORIC administer the panel orders and evaluate performance. The information is now historical.

ORIC non-panel service providers

- E.6 ORIC also holds personal information regarding non-panel service providers.
- E.7 This information may include requests for quotes or requests for tender, quotes or tender responses, quotation or tender evaluation, contracts, purchase orders, correspondence with contractors or consultants, details of contractors or consultants working on matters and invoices.
- E.8 The content of these records may also include but are not limited to: name, company name, Australian Business Numbers, address, telephone number, occupation, referees, payment details, financial viability checks and quotation or pricing information.
- E.9 The personal information on these records relates to but is not limited to consultants and individual contractors.
- E.10 Records are stored on paper and in electronic form.

Generally

- E.11 Personal information is not released unless authorised by law or the affected individual provides consent.
- E.12 Some information may be disclosed to auditors, Parliamentary inquiries and Senate Estimates Committees.
- E.13 Individuals can obtain information regarding access to their personal information by contacting ORIC on (freecall) 1800 622 431 (not free from mobiles).

Location: 32 Corinna Street Woden, and Recall (document storage).

F. Publications and media management

- F.1 The Registrar maintains the following personal information in relation to ORIC publications (including the yearbook and the ORIC Oracle newsletter): case studies and photographs for use in ORIC publications/website; consent forms for the use of case studies and photographs in ORIC publications/website; mailing and subscription lists and their maintenance. The mailing and subscription lists are derived from ERICCA data and other subscribers who have requested to be added to the list. The lists are adjusted and maintained by telephone or written subscriber requests.
- F.2 The Registrar also maintains the following personal information in relation to ORIC media engagement and news distribution: mailing and subscription lists and their maintenance. The mailing and subscription lists are derived from media engagement activities and other subscribers who have requested

to be added to the list. The lists are adjusted and maintained by telephone or written subscriber requests.

- F.3 The content of these records may include: name, gender, address and other contact details, photographs, and information relating to a particular corporation.
- F.4 The following agency staff have access to this information: the Registrar, staff in the Communications and Research Section, relevant managers and record keeping staff.
- F.5 The personal information in these records (other than published photographs) is not usually disclosed to other persons or organisations, other than as required by law.
- F.6 The records relate to an unknown number of individuals and are stored electronically in FIRSt in a restricted workspace and/or kept on paper files which are managed using the TRIM recordkeeping system.
- F.7 Individuals can obtain information regarding access to personal information in this class of records by contacting ORIC on (freecall) 1800 622 431 (not free from mobiles).

Location: 32 Corinna Street Woden, and Recall (document storage).

G. Investigations and prosecutions

- G.1 ORIC holds personal information regarding the investigation and prosecution of alleged contraventions of the CATSI Act and other laws by individuals and organisations.
- G.2 Content may include but is not limited to: name, alias, address, telephone numbers, fax numbers, email addresses, date and place of birth, Indigeneity, occupation, gender, qualifications, marital status, next of kin, family details, name and addresses of associates, financial information, employment history, property information, and other third party personal information depending on the case.
- G.3 Sensitive content may include but is not limited to: details of complainants, nature of the contraventions, criminal intelligence, method of detection, employer/employee relationships and activities, physical or mental health, records of interview (with and about the person), witness statements, opinions on the veracity, intent, strength of evidence and possibility of success in prosecution, criminal history, investigation outcome, communications with the prosecuting authority, and any other type of information obtained during the investigation processes and subsequent actions.
- G.4 Authorised ORIC staff in the Investigations and Prosecutions Section have access to this personal information. It may also be disclosed on a 'need to know' basis to the Registrar, ORIC senior managers and selected staff,

corporation examiners, special administrators, investigating agencies, police forces, legal advisers, prosecuting authorities and courts.

G.5 This information is not usually disclosed to other persons or organisations, other than as required or authorised by law.

G.6 The records relate to an unknown number of individuals and are stored on classified paper files and managed using the TRIM recordkeeping system and/or electronically stored in FIRSt in secure workspaces restricted to the Investigations and Prosecutions Section and/or standalone electronic devices restricted to the Investigations and Prosecutions Section.

G.7 Individuals can obtain information regarding access to their personal information by contacting ORIC on (freecall) 1800 622 431 (not free from mobiles).

Location: 32 Corinna Street Woden, and Recall (document management).

H. Information management files

H.1 The Registrar maintains information management files for recording the receipt and processing of requests received under the *Freedom of Information Act 1982* (FOI Act).

H.2 The content of these records may include: name, gender, address and other contact details, processing information about the applicants and third parties, and information sought under the FOI Act (including information relating to a particular corporation or complaint).

H.3 The following agency staff have access to this information: the Registrar, legal staff, relevant managers and recordkeeping staff.

H.4 The personal information in these records is not usually disclosed to other persons or organisations, other than as required by law. (Note in certain circumstances the FOI Act requires consultation with third parties about the potential release of documents to the applicant.)

H.5 The records relate to an unknown number of individuals and are kept on paper files which are managed using the TRIM recordkeeping system and/or electronically stored in FIRSt.

H.6 Individuals can obtain information regarding access to personal information in this class of records by contacting ORIC on (freecall) 1800 622 431 (not free from mobiles).

Location: 32 Corinna Street Woden, and Recall (document storage).

I. Legal services

Legal services files

- I.1 The Registrar maintains legal services files for the purpose of recording the progress of litigation to which the Registrar is a party.
- I.2 The content of these records may include names, genders, addresses, dates of birth, occupations, and details relating to particular litigation.
- I.3 The following people have access to this information: the Registrar, legal staff, relevant managers, and records management staff.
- I.4 The personal information on these files may be disclosed to the courts, opposing parties in litigation and legal professionals engaged for the purpose of carrying out litigation.
- I.5 These records relate to an unknown number of individuals and are kept on paper files which are managed using the TRIM recordkeeping system and/or electronically stored in FIRSt.
- I.6 Individuals can obtain information regarding access to personal information in this class of records by contacting ORIC on (freecall) 1800 622 431 (not free from mobiles).

Location: 32 Corinna Street Woden, and Recall (document storage).

Legal services—legal advice databases

- I.7 The purpose of these databases is to maintain an electronic register of legal opinions provided to ORIC by various legal service providers relevant to ORIC's work. One database holds 622 opinions obtained before 1 July 2007 under the former *Aboriginal Councils and Associations Act 1976*. The other database contains approximately 300 opinions obtained more recently.
- I.8 Content may include but is not limited to: name, address, background details and advice.
- I.9 Sensitive content may include but is not limited to: complaint details, allegations about individuals and details of legal proceedings being taken against individuals, as well as criminal and bankruptcy histories of individuals.
- I.10 The personal information on these records relates to individuals relevant to the advice sought.
- I.11 The following agency staff have access to this information: all staff within ORIC and legal services providers as required.
- I.12 The records in these databases are kept in electronic form.
- I.13 The personal information contained in these records is protected by legal professional privilege and unless the Registrar waives this privilege, generally is not shared outside ORIC.

- I.14 Personal information is not released unless authorised by law or the affected individual provides consent.
- I.15 The records relate to an unknown number of individuals.
- I.16 Individuals can obtain information regarding access to personal information in this class of records by contacting ORIC on (freecall) 1800 622 431 (not free from mobiles).

Location: 32 Corinna Street Woden, and Recall (document storage).

J. Complaints resolution files

- J.1 The Registrar maintains files for the purpose of recording and handling complaints made against ORIC either from an individual or organisation, or through the Commonwealth Ombudsman or the Australian Human Rights Commission.
- J.2 The content of these records may include names, addresses, occupations, gender and details relating to the particular complaint.
- J.3 The following people have access to these files: the Registrar, legal staff, relevant managers and records management staff.
- J.4 This information is not usually disclosed to other persons or organisations, other than as required by law.
- J.5 The records relate to an unknown number of individuals and are stored on paper files and managed using the TRIM recordkeeping system and/or electronically stored in FIRSt.
- J.6 Individuals can obtain information regarding access to their personal information by contacting ORIC on (freecall) 1800 622 431 (not free from mobiles).

Location: 32 Corinna Street Woden, regional offices and Recall (document management).

K. LawHelp

- K.1 The Registrar maintains files for the purpose of recording and processing applications made by not-for-profit Aboriginal and Torres Strait Islander corporations for pro bono legal assistance under its LawHelp scheme and handling enquiries about the scheme.
- K.2 The content of these records may include names, addresses and details relating to the particular application or enquiry.
- K.3 The following people have access to these files: the Registrar, the LawHelp secretariat and its supervisor and records management staff.

- K.4 This information may be disclosed to the LawHelp assessment panel and to legal firms providing pro bono legal assistance to a successful applicant. Otherwise this information is not usually disclosed to other persons or organisations, other than as required by law.
- K.5 The records relate to an unknown number of individuals and are stored on paper files and managed using the TRIM recordkeeping system and/or electronically stored in FIRSt.
- K.6 Individuals can obtain information regarding access to their personal information by contacting ORIC on (freecall) 1800 622 431 (not free from mobiles).

Location: 32 Corinna Street Woden, and Recall (document management).

L. Corporation jobs

- L.1 The Registrar maintains files for the purpose of recording and processing:
- applications to display corporation job advertisements on the Registrar's external website
 - applications for assistance with the recruitment of senior staff to Aboriginal and Torres Strait Islander corporations through the ORIC recruitment assistance program (ORA).
- L.2 The content of these records may include names, addresses, email address, telephone number(s) and details relating to the particular application (including advertisements, position descriptions and personal details of persons who applied for jobs through ORA).
- L.3 The following people have access to these files: the Registrar, relevant managers, the Special Projects Delivery Section staff, the Communications and Research Section staff and records management staff.
- L.4 The advertisement, position description and contact information at the corporation are displayed on the Registrar's website. Otherwise this information is not usually disclosed to other persons or organisations, other than as required by law.
- L.5 The records relate to an unknown number of individuals and are stored on paper files and managed using the TRIM recordkeeping system and/or electronically stored in FIRSt.
- L.6 Individuals can obtain information regarding access to their personal information by contacting ORIC on (freecall) 1800 622 431 (not free from mobiles).

Location: 32 Corinna Street Woden, regional offices and Recall (document management).

M. Online client surveys

- M.1 The Registrar conducted online client surveys to assess the services provided by ORIC and obtain feedback from directors, officers, members and employees of Aboriginal and Torres Strait Islander corporations who have used ORIC services. The data was collected by an online survey tool conducted by a third party online survey service. Written survey responses posted, faxed or emailed directly to ORIC were uploaded to the online survey. The online survey data is downloaded to ORIC. ORIC did not collect electronic address information. A survey report was provided to ORIC senior managers. A general summary of the survey results is published in ORIC's yearbook.
- M.2 The content of the survey records may include: the corporation, the survey respondent's role in the corporation, use of particular ORIC services, their rating between one and five of the service and any comment that the client wishes to make. The data is de-identified in any survey reports.
- M.3 The following agency staff have access to the survey records: the Registrar, designated staff in the Communications and Research Section and record keeping staff.
- M.4 The personal information in the survey records is not usually disclosed to other persons or organisations, other than as required by law.
- M.5 The survey records are gathered by a third party online survey service and downloaded to ORIC. The records relate to an unknown number of individuals and are stored electronically in FIRSt in a restricted workspace.
- M.6 Individuals can obtain information regarding access to personal information in this class of records by contacting ORIC on (freecall) 1800 622 431 (not free from mobiles).

Location: 32 Corinna Street Woden.

N. Online staff surveys

- N.1 The Registrar conducted online staff surveys to collect and consider staff views on office structures, and staff rewards and recognition. The data was collected by an online survey tool conducted by a third party online survey service. The online survey data was downloaded to ORIC. The surveys are anonymous. ORIC did not collect electronic address information. A survey report was provided to an ORIC staff committee.
- N.2 The content of the survey records include staff views on office structures, and staff rewards and recognition. The data is de-identified.
- N.3 The following agency staff have access to the survey records: the Registrar, designated staff in the Communications and Research Section and record keeping staff.

- N.4 The personal information in the survey records is not usually disclosed to other persons or organisations, other than as required by law.
- N.5 The survey records are gathered by a third party online survey service and downloaded to ORIC. The records relate to an unknown number of individuals and are stored electronically in FIRSt in a restricted workspace.
- N.6 Individuals can obtain information regarding access to personal information in this class of records by contacting ORIC on (freecall) 1800 622 431 (not free from mobiles).

Location: 32 Corinna Street Woden.

O. Research data

- O.1 The Registrar publishes research data, including:
- *The top 500 Aboriginal and Torres Strait Islander corporations 2011–12* (September 2013), *The top 500 Aboriginal and Torres Strait Islander corporations 2010–11* (September 2012), *The top 500 Aboriginal and Torres Strait Islander corporations 2009–10* (August 2011), *The top 500 Aboriginal and Torres Strait Islander corporations 2008–09* (April 2010), *The top 500 Aboriginal and Torres Strait Islander corporations 2007–08* (November 2009)
 - *Remuneration—a report benchmarking the salaries of Aboriginal and Torres Strait Islander corporations* (March 2013)
 - *At the heart of art* (June 2012)
 - *Strong corporations, strong stores, strong communities* (August 2011)
 - *Analysing key characteristics in Indigenous corporate failure* (April 2010).

The Registrar maintains the following personal information in relation to ORIC research data: data derived from ERICCA, case studies and photographs for use in ORIC research publications and information provided by corporations; and consent forms for the use of case studies and photographs in ORIC research publications.

- O.2 The content of these records may include: name, gender, address and other contact details, photographs, data derived from ERICCA, existence of contracts and workplace agreements, remuneration and other payments and benefits, and information relating to a particular corporation. (ERICCA data is described in paragraph 2.2 above.)
- O.3 The following agency staff have access to this information: the Registrar, staff in the Communications and Research Section and record keeping staff. Access to sensitive research data is further restricted to designated staff.
- O.4 The personal information in these records is not usually disclosed to other persons or organisations, other than as required by law.

- O.5 The records relate to an unknown number of individuals and are stored electronically in FIRSt in a restricted workspace and/or kept on paper files which are managed using the TRIM recordkeeping system.
- O.6 Individuals can obtain information regarding access to personal information in this class of records by contacting ORIC on (freecall) 1800 622 431 (not free from mobiles).

Location: 32 Corinna Street Woden, and Recall (document storage).

P. Structural adjustment and support program (SASP)

- P.1 The Registrar maintains files for the purpose of the Structural Adjustment and Support Program (SASP) which may contain and process personal information relating to applications by former CDEP organisations for structural adjustment support, application assessments, engagement of service providers to review and report on applicants and professional advice to assist with business planning or restructuring and action plans.
- P.2 The content of these records in relation to SASP applicants may include: names, addresses, e-mail addresses, telephone number(s) and other contact details, details relating to particular SASP applications, application assessments, and details in action plans, reports and advice by service providers.
- P.3 The content of these records in relation to service providers may include: names, addresses, e-mail addresses, telephone number(s) and other contact details, requests for quotes, quotes, quotation evaluation, contracts, purchase orders, correspondence with service providers, details of service providers working on matters and invoices.
- P.4 The following agency staff have access to this information: the Registrar, the Deputy Registrar, staff in the Regulation Section, selected staff in the Regulation and Reporting Branch and record keeping staff. ORIC is working collaboratively with DSS to deliver the SASP and source professional advice for these organisations. DSS also have access to this information.
- P.5 The personal information in these records is not usually disclosed to other persons or organisations, other than as required by law.
- P.6 The records relate to an unknown number of individuals and are stored electronically in FIRSt in a restricted workspace.
- P.7 Individuals can obtain information regarding access to personal information in this class of records by contacting ORIC on (freecall) 1800 622 431 (not free from mobiles).

Location: 32 Corinna Street Woden.

APPENDIX 1—Personnel records

Due to the commonality of these classes of records between agencies, they have been grouped in one entry. This necessarily reduces the amount of detail provided. Current and former employees can obtain details of specific agency record handling practices by contacting personnel staff in that agency.

It should not be assumed that all records described are kept in a common storage facility. Separate security arrangements will typically apply, depending on the sensitivity of the information.

The purpose of these records is to maintain employment history and payroll and administrative information relating to all permanent, contract and temporary staff members and employees of an agency.

Personnel and payroll

The records may include any one or more of the following:

- records relating to attendance and overtime
- leave applications and approvals
- medical and dental records
- payroll and pay related records, including banking details
- tax file number declaration forms
- declarations of pecuniary interests
- personal history files
- performance appraisals, etc
- records relating to personal development and training
- trade, skill and aptitude test records
- completed questionnaires and personnel survey forms
- records relating to removals
- travel documentation
- records relating to personal welfare matters
- contracts and conditions of employment
- EEO Data
- next of kin details
- awards and honours.

Recruitment

The records may include any one or more of the following:

- recruitment records and dossiers
- records relating to relocation of staff and removals of personal effects
- records relating to character checks and security clearances.

Other

The records may include any one or more of the following:

- records of accidents and injuries
- compensation case files
- rehabilitation case files
- records relating to counselling and discipline matters, including disciplinary, investigation and action files, legal action files, records of criminal convictions, and any other staff and establishment records as appropriate
- complaints and grievances
- recommendations for honours and awards
- Talking About Performance (TAP) and Individual Performance Management System (IPMS) records.

The content of personnel records may include: name, address, date of birth, occupation, AGS number, gender, qualifications, equal employment opportunity group designation, next of kin, details of pay and allowances, leave details, work reports, security clearance details and employment history.

Staff are required to provide evidence of their identity in order to obtain a PM&C credit card—records are held in the State Office. Staff are also required to provide a copy of their current drivers licence prior to driving PM&C and DSS vehicles. Only authorised staff have access to this information.

Personnel records may include information which employees may consider sensitive such as: physical and mental health, disabilities, racial or ethnic origin, disciplinary investigation and action, criminal convictions, adverse performance and security assessments, tax file numbers, relationship details and personal financial information.

Personal information on personnel records relates to current and former staff members and employees including contract and temporary staff.

The following agency staff have access to personnel records: executive and senior personnel management staff, supervisors and members of selection committees (if appropriate), the individual to whom the record relates and, as is appropriate, personnel staff, security officers and case managers.

All records are managed in accordance with PM&C and DSS Records Disposal Authority.

Information held in personnel records may be disclosed, as appropriate, to: Comcare, Commonwealth Medical Officers, Attorney-General's Department, Australian Public Service Commission, ComSuper and other superannuation administrators, Australian Taxation Office, and the receiving agency following movement or re-engagement of an employee.

Individuals can obtain information regarding access to their personal information by contacting the personnel section of the employing agency.

Records relate to all current and former employees of an agency and are stored on paper, microfiche and in electronic form.

Location: the appropriate central, state, regional office of the employing agency.