

Privacy Policy

PART 1: CONSIDERATION OF PERSONAL INFORMATION PRIVACY

APP1 – Open & transparent management of personal information

APP2 – Anonymity & pseudonymity

APP1 – OPEN & TRANSPARENT MANAGEMENT OF PERSONAL INFORMATION

This privacy policy sets out how Mareeba Shire Job Training Association Incorporated (MSJTA) trading as Quality Innovation, Training and Employment (Q.I.T.E.) handles your personal information.

You can access the complete Privacy Policy from:

- Office Reception areas
- Q.I.T.E. [Internet](#)
- Upon request from any Q.I.T.E. staff member
- Q.I.T.E. Intranet for internal purposes only

Q.I.T.E. manages personal information, under the [Australian Privacy Principles Guidelines](#). As an APP entity and contracted service provider to the Federal Government, we comply with our obligations under the Privacy Act 1988 and Australian Privacy Principles.

The APPs regulate how we may collect, use, disclose and store your personal information, and how you may access and correct the personal information that we hold about you.

What is Personal Information?	Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable. Examples of personal information are: ▪ Basic Details: Name, date of birth, address, phone number, email address ▪ Identification Numbers: Tax file number (TFN), driver's license number, passport number ▪ Financial Information: Bank account details, salary information, credit history ▪ Health Information: Medical records, disability status, Medicare number ▪ Employment Information: Job title, work history, performance reviews ▪ Education Details: Qualifications, student records, academic transcripts ▪ Online Identifiers: IP address, cookies, social media profiles
Other Personal Information that people may not normally consider to be private?	Personal information includes some information that people may not normally consider to be private. For example: ▪ A work email address or phone number ▪ Opinions given as part of a person's employment ▪ The fact that a person is the author of a report ▪ A person's name appearing in work documents ▪ A letter written in a person's official capacity e.g. a letter from the president of a club
Collection of information	Q.I.T.E. will only collect information that is necessary for the proper performance of our activities or functions. These include but are not limited to being: ▪ An employment services provider ▪ Child-care service provider ▪ Passenger transport service provider If we receive personal information that we did not request, we may choose not to collect it and take steps to remove it from our systems.
Q.I.T.E. Privacy Officer	If you have any questions, please contact Q.I.T.E.'s Privacy Officer on (07) 4092 9700 or via email at privacyofficer@qite.com

APP1 – OPEN & TRANSPARENT MANAGEMENT OF PERSONAL INFORMATION

Other Privacy Requirements	Q.I.T.E. is a contracted service provider to a range of Commonwealth and State government agencies it may be necessary for us to collect and manage personal information as an Agency under a different privacy arrangement
Privacy Impact Assessment	Q.I.T.E. will complete a Privacy Impact Assessment (PIA) for those projects and changing working environments where a threshold assessment identifies that a full PIA is required. Q.I.T.E. Reference: QDPP003-A7
Further information	Further information about the application of the Privacy Act (APPs) Refer to Office of the Australian Information Commission website http://www.oaic.gov.au/

PUBLIC INTEREST CERTIFICATE - Releasing Protected Information to a 3rd Party (including Police)

As a provider of *Workforce Australia Services (WFA)*, Q.I.T.E. may in certain circumstances release job seeker protected information, in accordance with the *Social Security (Administration) Act 1999* and as outlined in the relevant *Class Public Interest Certificates*.

Who can release protected information?

<i>Workforce Australia Services</i>	Q.I.T.E. Managers or the next senior staff member on site who have completed the <i>WFA</i> 'Information Exchange and Privacy' training <u>are the only delegated staff</u> to disclose protected information for threats, offences to a Q.I.T.E. staff member or offences on premises.
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For what purpose can protect information be released?

Service	For the Purpose of:	Information may be disclosed to:
<i>Workforce Australia Services</i>	preventing or lessening a threat to the life, health, or welfare of a person	Any of the following: a) a police officer, ambulance officer, fire service officer or an officer of the State Emergency Service. b) a person employed by the operator of the emergency call service "Triple Zero" (000). c) a person employed by a health service; or d) a person employed by a State or Territory agency responsible for child protection or welfare to receive mandatory reports relating to child welfare.
	The investigation of an offence or threatened offence in premises occupied by Q.I.T.E. to provide employment services to the Department	A police officer only

Further Information?

Staff should refer to QDPP003-A2-*Workforce Australia Services for releasing information under a Public Interest Certificate (PIC)* protected information Privacy – Public Interest Certificate (PIC). If you wish to know how this applies to you, please contact:

Q.I.T.E. Privacy Officer: Phone (07) 4092 9700 - Email: privacyofficer@gite.com

APP2 – ANONYMITY & PSEUDONYMITY

Requests for anonymity & pseudonymity	Q.I.T.E. will assess an individual's requests for anonymity or use of a pseudonym in accordance with the APP, and any contractual obligations as a Commonwealth Service Provider. Requests are subject to certain limitations including where it is impracticable for Q.I.T.E. to deal with individuals who have not identified themselves.
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PART 2: COLLECTION OF PERSONAL INFORMATION
APP3 – Collection of solicited personal information
APP4 – Dealing with unsolicited personal information
APP5 – Notification of the collection of personal information

APP3 – COLLECTION OF SOLICITED PERSONAL INFORMATION

Q.I.T.E. collects personal information directly from you when you complete and submit a registration form, application form, or provide any other details related to our activities and services.

When we collect your personal information:	When Q.I.T.E. collects your personal information, we will: Check that it is reasonably necessary for any functions or activities that Q.I.T.E. may conduct Check that it is current, complete, and accurate. This will sometimes mean that we must cross-check the information that we collect from you with third parties Record and hold your information in our information record system Subject to some exceptions, we permit you to access your personal information in accordance with APP Correct or attach associated statements to your personal information in accordance with APP Only collect your sensitive information with <u>your consent</u> and if the collection is reasonably necessary for Q.I.T.E.'s functions Destroy or de-identify your personal information when it is no longer needed for any purpose for which it may be used or disclosed if it is lawful for us to do so Retrieve your information when we need to use or disclose it for our functions and activities. At that time, we check that it is current, complete, accurate and relevant. This will sometimes mean that we must cross-check the information that we collect from you with third parties once again – especially if some time has passed since we last checked
Collection of personal information using a variety of methods.	As part of our operations, we may collect your personal information through various methods, including: • Paper-based and electronic forms or correspondence • Face-to-face meetings or events conducted by Q.I.T.E. or our contractors • Interactions on our websites • Engagement on our social media platforms
Information from a 3rd Party	In certain circumstances <u>we may collect and receive personal information about you from third parties</u> including Australian Government agencies and state and territory governments.

APP4 – DEALING WITH UNSOLICITED PERSONAL INFORMATION

How we deal with unsolicited personal information.	If Q.I.T.E. receives personal information that is not required for our normal business operations, we will take steps to de-identify or securely destroy the information in accordance with our privacy obligations. We sometimes collect information from 3rd parties and publicly available sources when it is necessary for a specific purpose such as checking information that you have given us or where you have consented or would reasonably expect us to collect your personal information in this way.
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APP5 – NOTIFICATION OF THE COLLECTION OF PERSONAL INFORMATION

Collection of Personal Information	In carrying out our functions and activities we may collect personal information that is <i>sensitive information</i>. The APPs impose additional obligations on us when collecting, using, or disclosing sensitive information. We may only collect personal information from you: ▪ where you provide your consent; or ▪ where required or authorised by law; or ▪ where a permitted general situation exists such as to prevent a serious threat to safety. We also collect sensitive information where authorised to do so for the purposes of ▪ Human resource management ▪ Fraud and corruption investigations ▪ Responding to inquiries by courts / tribunals and other review bodies ▪ Taking appropriate action against suspected unlawful activity or serious misconduct
How we will notify you if we collect your personal information	If Q.I.T.E. collects your personal information, ▪ we will always make sure that you are aware of it. ▪ this includes times when we collect your personal information from another source, or it is required under Australian Law. We will always tell you why we will be or have collected your personal information and will make sure that you understand if there are any consequences of us not collecting your information. We will also tell you if we will be disclosing your personal information to any overseas recipients, including where they are and the purpose of us providing them with your personal information.
Information collected by our contractors	Under the Privacy Act, we are required to take contractual measures to ensure that contracted service providers (including sub-contractors) comply with the same privacy requirements applicable to us.
OUR WEBSITE	
Log information (browsing)	When you use our on-line services, our servers ▪ automatically record information that your browser sends whenever you visit a website ▪ these server logs may include information such as ○ IP address (Internet Protocol address) ○ Browser type and version (e.g., Chrome, Firefox, Edge) ○ Operating system and device type (e.g., Windows, macOS, mobile device) ○ Pages visited on our website ○ Date, time, and duration of your visit ○ Referral URL (the website you came from before visiting ours) ○ Clicks, scrolling activity, and interactions on the page ○ Activities flagged as suspicious (e.g., multiple failed logins, bot-like behaviour) No attempt is made to identify you through your browsing other than in exceptional circumstances, such as an investigation into the improper use of the website.
Cookies	Cookies are small text files stored on your device (computer, tablet, or smartphone) when you visit a website. They help websites recognise your device, remember preferences, and improve user experience. We use cookies to recognise your browser between page visits. These cookies help enhance your browsing experience by identifying your browser, not you personally. No personal information is stored within our cookies.
OUR WEBSITE	

Information Technology	Q.I.T.E. is committed to data sovereignty and ensures that we only engage service providers with information systems located within Australia in alignment with Australian Sovereignty requirements. We actively manage and monitor our information systems in accordance with the ISO 27001 Information Security Management System (ISMS) standards and the Department of Employment and Workplace Relations (DEWR) DESE IT Security Scheme to uphold the highest level of data security and compliance. Refer to Information Security Management System Scope QDISMS003
Links to External Websites	Our website includes links to other websites. We are not responsible for the content and privacy practices of other websites. We recommend that you examine each website's privacy policy separately.

PART 3: DEALING WITH PERSONAL INFORMATION APP6 – Use or disclosure of personal information APP7 – Direct Marketing APP8 – Cross-border disclosure of personal information APP9 – Adoption, use or disclosure of government related identifiers	
APP6 – USE OR DISCLOSURE OF PERSONAL INFORMATION	
We use or disclose your personal information only for the purposes for which it was provided , ensuring it is always aligned with Q.I.T.E.'s functions and activities .	
How we will use or disclose your personal information	Q.I.T.E. may also use information that has been provided together with results of reference checks and any other information provided to Q.I.T.E.: - → at the point of registration or enrolment → for administrative, planning & reporting purposes in connection with the provision of employment and training services Q.I.T.E. will ▪ also provide your personal information to any other employment or training service provider that you request. ▪ We will not use or disclose your personal information for any other purpose without your consent, unless it is reasonably expected to be related to Q.I.T.E.'s business functions and activities. Q.I.T.E. may disclose ▪ personal information that is obtained in the course of Q.I.T.E.'s functions and activities to the State and Commonwealth Public Sector organisations and agencies. ▪ your personal information where we are under a legal duty to do so.
How we will use or disclose your personal information Primary Purpose	We collect personal information for a variety of different purposes relating to our functions and activities including: ▪ Performing our employment & personnel functions in relation to our staff and contractors ▪ Performing our legislative and administrative functions ▪ Policy development, research, and evaluation ▪ Complaint handling ▪ Program management ▪ Contract management ▪ Management of correspondence with the public We use and disclose personal information for the primary purpose for which it is collected. You will be given information about the primary purpose of collection at the time the information is collected.

How we will use or disclose your personal information Secondary Purpose	We will only use your personal information for secondary purposes where we are able to do so in accordance with the Privacy Act. This may include where <u>you have consented to this secondary purpose</u>, or where the secondary purpose is related (or if sensitive information, directly related) to the primary purpose and you would reasonably expect us to use or disclose the information for the secondary purpose, where it is required or authorised by law or where a permitted general situation exists such as to prevent a serious threat to safety. Likely secondary purposes for which we may use or disclose your personal information include but are not limited to • Quality assurance – Ensuring effective and continuous improvement of our services • Auditing – Compliance with regulatory and contractual obligations • Reporting – Providing required data to government agencies and stakeholders • Evaluation & analysis – Assessing program performance and service outcomes • Research – Conducting studies to improve service delivery and inform policy decisions • Promotional purposes – Showcasing success stories and service benefits (with consent) • Risk management – Identifying and mitigating potential risks in service delivery • Complaint handling & dispute resolution – Managing feedback and resolving issues effectively
APP7 – DIRECT MARKETING	
Direct Marketing	Q.I.T.E. will always ▪ seek your consent prior to using your personal information for the purposes of direct marketing. If you <u>do not provide consent</u>, Q.I.T.E. will not use your personal information for direct marketing. ▪ give you the option to opt out unless the direct marketing is required for Q.I.T.E. to meet an outcome for a contractual requirement as part of our functions and activities. ▪ If you 'opt out' Q.I.T.E. will remove you from the distribution list. There are times when Q.I.T.E. may use or disclose your personal information for the purposes of direct marketing as a contracted service provider for a Commonwealth contract. In this case, Q.I.T.E. will ensure that the collection, use or disclosure of your personal information is required to meet our obligations.
When we will disclose your personal information to an overseas recipient	Q.I.T.E. ▪ is unlikely to disclose your personal information to overseas recipients. ▪ will only disclose your personal information <u>when you have consented</u>. ▪ cannot guarantee that any overseas recipient of your personal information will protect it to the standard to which it ought to be protected. ▪ will always tell you about the risks of overseas disclosure when we seek your consent.
APP8 – CROSS-BOARDER DISCLOSURE OF PERSONAL INFORMATION	
Accidental or unauthorised disclosure of personal information	Q.I.T.E. will abide by the Privacy Act 1988 Notifiable Data Breaches (NDB) Scheme and in the event of an 'eligible data breach' (or suspected breach) involving personal information, including 3rd party organisations and agencies with whom Q.I.T.E. shares personal information. An eligible data breach occurs when <u>serious harm has occurred</u>, or is likely to occur, to one or more individuals affected by the loss, or unauthorised access to, or disclosure of, their personal information in circumstances where the harm cannot be prevented or mitigated through remedial action to rectify or contain the breach.

Accidental or unauthorised disclosure of personal information	If Q.I.T.E. incurs a privacy breach, we will: 1 undertake a reasonable and prompt assessment and investigation 2 notify affected individuals and the Office of the Australian Information Commissioner where an eligible data breach is found to have occurred. 3 notify the department of the breach and provide copies issued by Q.I.T.E. Q.I.T.E. will take seriously and deal promptly with any accidental or unauthorised disclosure of personal information. We follow the OAIC's Data breach notification – A guide to handling personal information security breaches when handling accidental or unauthorised disclosures of personal information. Legislative or administrative sanctions may apply to unauthorised disclosures of personal information. In the event of accidental or unauthorised disclosure of personal information, the responsible manager and/or senior manager should refer to Privacy Breach Report Template & Privacy Breach Self-Assessment Tool (QFPP003.1)
APP9 – ADOPTION, USE OR DISCLOSURE OF GOVERNMENT RELATED IDENTIFIERS	
Government related identifiers	Q.I.T.E. <u>uses government identifiers</u> for contractual purpose, as prescribed by the Govt. These are used exclusively for certain notifications and correspondence under the relevant contract. Q.I.T.E. never disclose government identifiers to a third party who does not hold the relevant contract.

PART 4: INTEGRITY OF PERSONAL INFORMATION APP10 – Quality of personal information APP11 – Security of personal information	
APP10 – QUALITY OF PERSONAL INFORMATION	
We will do our best to keep your information up to date	As part of our functions and activities we will ask you if your personal information that we hold is up to date and complete. If your personal information requires updating, contact Q.I.T.E. to provide this information.
APP11 – SECURITY OF PERSONAL INFORMATION	
How we keep your information secure	Q.I.T.E. implements robust security measures to protect the personal information it holds from interference, misuse, loss, and unauthorised access, modification, or disclosure. Our Information Security Management Systems (ISMS) are certified to ISO 27001 and comply with the DESE ISMS framework, ensuring the highest standards of data security. We have comprehensive policies and procedures in place to safeguard your information at every stage—from collection and storage to archiving and secure disposal. There are 2 exceptions which may apply • If the personal information is contained in a Commonwealth record. • Q.I.T.E. is required by / under an Australian law or a court order to retain the information. Q.I.T.E. takes reasonable steps to ensure the security of your personal information, whether it is retained in hard copy or electronic files.
Storage	Q.I.T.E. holds personal information in a range of paper-based and electronic records, including cloud computing. Q.I.T.E. has comprehensive policies and procedures to ensure safeguarding and storage of personal information. Storage of personal information (and the disposal of information when no longer required) is managed in accordance with the Australian Government's records management regime, including the <u>Archives Act 1983</u>, Records Authorities and General Disposal Authorities. This ensures your personal information is held securely.

PART 5: ACCESS TO & CORRECTION OF PERSONAL INFORMATION APP12 – Access to personal information APP13 – Correction of personal information	
APP12 – ACCESS TO PERSONAL INFORMATION	
How to access your personal information	If you wish to obtain access to your personal information, please contact: - → Q.I.T.E.'s Privacy Officer - (07) 4092 9700 or via email at privacyofficer@gite.com You will be asked to verify your identity before access is granted. Q.I.T.E. will: ▪ Endeavour to provide your personal information without any cost to you. ▪ Respond to your request within five (5) working days
APP13 – CORRECTION OF PERSONAL INFORMATION	
How to correct your personal information	If you find that personal information that we hold about you is inaccurate, out of date, incomplete. Irrelevant, or misleading You can ask us to correct it by contacting us directly on (07) 4092 9700 or via email privacyofficer@gite.com We will take reasonable steps to correct that information to ensure that the information is accurate, up to date, complete, relevant, and not misleading. If we have disclosed personal information about you that is inaccurate, out of date, incomplete, irrelevant, or misleading, you can ask us to notify the third parties to whom we made the disclosure. Q.I.T.E. will take such steps (if any) to pass on that notification unless it is impracticable, unreasonable, or unlawful to do so.
Complaints	You have a right to complain about the way Q.I.T.E. handles your personal information if you believe that we have interfered with your privacy. You can make complaints in writing to Q.I.T.E.'s Privacy Officer → The General Manager, Q.I.T.E. 126 Byrnes Street, Mareeba Qld 4880 Email: privacyofficer@gite.com
How will we address a complaint?	When we receive your complaint: ▪ We will take steps to confirm the authenticity of the complaint and the contact details provided to us to ensure that we are responding to you or to a person whom you have authorised to receive information about your complaint. ▪ Upon confirmation we will write to you to acknowledge receipt and to confirm that we are handling your complaint in accordance with our policy. ▪ We may ask for clarification of certain aspects of the complaint and for further detail. ▪ We will consider the complaint and may make inquiries of people who can assist us to establish what has happened and why. ▪ We will require a reasonable time (usually 30 days) to respond. ▪ If the complaint can be resolved by these processes, we will suggest these to you as possible solutions. ▪ If we believe that your complaint may be capable of some other solution, we will suggest that solution to you, on a confidential and without prejudice basis in our response. For more information about our complaints process, please ask a manager to outline Q.I.T.E.'s Client Complaint / Grievance Process (QF9.1.2.5) or Q.I.T.E. Information Guide (QDINF003)
Not resolved?	If the complaint cannot be resolved by means that we propose in our response, we will suggest that you take your complaint to any recognised external dispute resolution scheme to which we belong or to the <u>Office of the Australian Information Commissioner</u> (www.oaic.gov.au)

Version	Effective Date	Document Change Details
V3.0	14 / 02 / 2022	Review: Processes check against APP requirements, re-write content for ease of flow & relevance, reformatted, inclusion of information security management systems, Privacy Impact Assessment process (QDPP003-A7), privacy breach report template (QFPP003.1).
V3.1	23 / 06 / 22	CAR47-22 – Privacy Policy (QDPP003) and Privacy – Public Interest Certificate (PIC) – Releasing Information to a 3 rd Party (QDPP003-A2) - remove jobactive and replace with Workforce Australia Services (WFA)
V3.2	08 / 11 / 2022	CAR 63-22: Removal of DES references in main policy and annexures; Annexures A4 and A5 made obsolete.
V3.3	03 / 11 / 2023	Rev94-23: Tax file number added into section 'What is Personal Information?' Hyperlinks checked for currency. Removal of sections relating to collection and disclosure of personal & sensitive Information for COVID-19.
V4.0	13/03/2025	REV114-25: Reformatted to remove tables within tables PART 1 - Updated types of personal information. Reworded Collection of Information PART 2 - Updated intro into APP3. Updated wording of various methods of collecting information. Reworded APP4 re unsolicited personal information. APP5 'sensitive information' replaced with 'personal information' & addition of 'corruption'. Updated list of server log information. Reworded Cookies section. Reworded Our Website - Information Technology. Updated policy references and certification regulations PART 3 - Updated intro into APP6. Updated using & disclosing personal information with consent. Updated list of secondary purposes PART 4 - Reworded keeping information secure. Updated policy references in Storage