

# INTOWORK PRIVACY POLICY

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## Policy Scope & Context

The purpose of this Privacy Policy is to ensure the IntoWork Group and its subsidiary businesses comply with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs) when handling personal information.

We are committed to protecting the privacy of all workers, clients, contractors, and stakeholders. This policy applies to all businesses within the Group.

The IntoWork Group is a diversified organisation providing services across:

- Employment Services – including apprenticeships, traineeships, disability employment services, and training support.
- Education & Training – delivering nationally recognised qualifications and skills programs.
- Community & Support Services – disability support, community care, and allied workforce services.

This policy applies to:

- All IntoWork Group companies, workers, contractors, volunteers, and board members.
- All personal information collected from workers, clients, host employers, suppliers, and other stakeholders in connection with business operations.
- All physical and digital records maintained by the Group.

## Policy Statement

It is recognised that the management of business and personal information includes the collection, maintenance, security, use and disclosure of the information.

IntoWork Australia acknowledges the obligation to protect the privacy and information of our clients and staff in accordance with privacy legislation and the Australian Privacy Principles.

It is the policy of IntoWork Australia and our businesses that:

1. Personal and business information is managed in accordance with the privacy legislation, the Australian Privacy Principles and the IntoWork Information Security Management System
2. Privacy risk is included in the risk register of each business and the risk managed with the implementation of a risk treatment plan to achieve the objectives of this policy
3. A person with appropriate knowledge and experience in the requirements of the Australian Privacy Principles has a defined role to act as the businesses' Privacy Officer
4. A Privacy Statement is implemented and maintained by businesses to achieve the objective of this policy and the management of personal information specific to their operations
5. The IntoWork Australia Privacy Policy and the Privacy Statement are made available on the business's website
6. Documented procedures are implemented and maintained by businesses for providing access to an individual's personal information and for making a privacy inquiry or complaint

7. Management and staff involved in the management of information are provided with appropriate information and instruction for the implementation of the Australian Privacy Principles
8. The personal information management systems are periodically reviewed as a basis for continual improvement of its suitability and effectiveness

Implementation of this policy at each IntoWork Australia business is the responsibility of their senior management. The maintenance and review of this policy is the responsibility of the Group CEO. The review will be conducted in consultation with the senior management of IntoWork Australia businesses.

This policy has been developed in consultation with interested parties and with consideration to access and equity principles and legislative requirements.

## Definitions

Personal Information	Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable	Examples include (but are not limited to): name, address, email address, date of birth, phone number, employment details, and financial details
Sensitive Information	Sensitive information is a subset of personal information that requires a higher level of protection. It includes information or an opinion about an individual	<ul style="list-style-type: none"> <li>• racial or ethnic origin;</li> <li>• political opinions or associations;</li> <li>• religious beliefs or affiliations;</li> <li>• philosophical beliefs;</li> <li>• membership of a professional or trade association;</li> <li>• membership of a trade union;</li> <li>• sexual orientation or practices;</li> <li>• criminal record.</li> </ul> <p>It also includes health information and certain types of biometric information (such as fingerprints or facial recognition data).</p>
Health Information	Health information is a specific form of sensitive information that relates to: <ul style="list-style-type: none"> <li>• the health (including an illness, injury, or disability) of an individual, at any time;</li> <li>• an individual's expressed wishes about the future provision of health services;</li> <li>• a health service provided, or to be provided, to an individual;</li> <li>• other personal information collected in providing a health service;</li> <li>• information collected in connection with the donation of body parts, organs, or substances;</li> <li>• genetic information about an individual that is predictive of the health of the individual or a genetic relative</li> </ul>	Examples include medical records, workers' compensation certificates, injury management reports, and information collected for WHS or wellbeing purposes

## Supporting Policies

- IntoWork Code of Conduct Policy
- IntoWork Performance and Disciplinary Management policy.

## Enforcement

Any user found to have violated this policy (or part thereof) may be subject to disciplinary action based on the IntoWork Performance and Disciplinary Management policy.

## Document Approval

The policy has been approved by the Group CEO and is reviewed annually or sooner should a significant change occur to ensure its continuing suitability, adequacy, and effectiveness. Where possible the review will be conducted in consultation with the senior management of IntoWork Australia businesses.

By approval of this policy, all associated supporting policies automatically obtain management approval for implementation.



Poul Bottern  
Group Chief Executive Officer

27 March 2026

## Review and Approval

Rev.	Date	Description of Amendments	Amended By	Approved By
0	14 Aug 2018	Original release.		
1	31 Aug 2021	ISMS added to the first policy point requirement.		
2	12 Sep 2023	Updated to latest policy template. Policy point 2 added and renumbering of points. Inclusion of business information throughout the policy. Guidance Notes amended to include additional policy point. Review period changed from 3 years to annual review.	Dr Paul Scofield	Group CEO
3	27 Mar 2026	<ul style="list-style-type: none"> <li>• Updated to current template.</li> <li>• Policy Scope and Context added</li> <li>• Policy Statement defined</li> <li>• Added definitions</li> <li>• Removed guidance notes not part of the policy from policy document</li> <li>• Recommend review period revert to 3 yearly</li> </ul>	Group Manager QA&R	Group CEO