

## Privacy & Information Security Handout

Our participants have information about themselves that is protected under the Privacy Act 1988 and Social Security (Administration) Act 1999.

As a provider delivering employment services on behalf of the Department of Employment and Workplace Relations (DEWR), and Department of Social Services, it is important for us to provide you with information to help keep our participants' personal information safe and confidential.

EPlus is accredited under the Right Fit For Risk framework initiative governed by DEWR. This framework ensures that EPlus as the employment services provider - including any contractors and third parties used; adhere to the information and cyber security requirements used to protect the confidentiality, integrity and availability of government data (participant information).

### Who is an EPlus Participant?

An EPlus participant is an individual who is connected to The Salvation Army and receiving employment service assistance through one of our programs (Workforce Australia, Inclusive Employment Australia or Parent Pathways) and engages with your organisation to:

- obtain and gain sustainable employment,
- participate in education or training to build skills and improve employability, or
- participate in vocational or non-vocational activities.

### Personal Information to keep safe and confidential.

Any information that may identify the individual such as their name, address, phone number, Date of Birth, email address, photographs, criminal record, health information, sexual orientation, or racial/ethnic origins.

There is also some information that are deemed protected e.g., Government identifiers such as their Tax File Number, Driver's licence ID, or Police Check etc.

### How to handle participant personal information

When handling information about our participants, it is important that their personal information is not shared or discussed with recipients that may not have the appropriate authorisation.

*Example 1: An email from your company is communicated to 2 or more recipients who do not have authorisation, and those recipients (which may include EPlus participants or combination with others) will have now gained personal information (such as email address) of each other that can easily identify who they are.*

*Example 2: Your company/organisation emails EPlus a copy of the participant's government identifier such as their Tax File Number or driver's licence details.*

It is important to take all necessary precautions prior to communicating or sharing our participants' personal information.

### Tips to help protect our Participants' personal information.

*When sending bulk external emails*

- If an external email is to be sent to more than one recipient, please use the BCC function so the recipients do not see each other's contact details.
- Do not include personal information about any participant in the body of the email that can easily identify who they are.

*Bulk text*

When a text is being sent to multiple recipients, never include information that can identify an individual.

*Delivering activity, training, or information session in a group setting*

Please avoid disclosing too much personal information that can easily identify the participant in an open forum. E.g., do not divulge personal information about them such as where they live, their contact details, where they

used to work, if they have any barriers that is impeding their ability to work or whether they are a job seeker on Income Support Payments etc.

### **Information Security**

DEWR has established requirements for employment service providers to comply with based on the International Standard ISO27001 Information Security Management Systems (ISMS) and Australian Government Information Security Manual (ISM).

Specifically, when engaging subcontractors and third parties, it is important that appropriate consideration of controls and practices are implemented regarding how participant information is accessed, handled, used and protected.

These include:

#### ***Artificial Intelligence (AI) tools***

Subcontractors and third parties are requested to not share, process or input participant information into publicly available or non-directly managed AI applications and tools such as ChatGPT, Claude, Perplexity and Grok.

Sharing, processing or inputting participant information into these types of uncontrolled applications may have adverse impacts on our participants, including the risk that their information could be compromised or unlawfully disclosed.

If an AI tool is necessary to assist with Participant information management, please email [privacy.eplus@salvationarmy.org.au](mailto:privacy.eplus@salvationarmy.org.au).

#### ***Data Sovereignty***

Any participant data collected remains under the control of your organisation and must be managed with appropriate considerations.

Participant data must be stored, accessed and used in accordance with applicable legislation, organisational policies and agreements with EPlus.

Data is not freely shared across systems, with other providers, or across borders unless it complies with relevant government regulations and approved data-sharing protocols.

By following these safeguarding measures, you are helping to ensure that our participants' personal information is protected, and EPlus continues to adhere to the Australian Privacy Principles and departmental requirements.

#### **What happens if there is a suspected or actual breach?**

In an event of a suspected or actual breach relating to our participant data, please email [privacy.eplus@salvationarmy.org.au](mailto:privacy.eplus@salvationarmy.org.au)

#### **Where can I get more information?**

You can visit The Salvation Army website to locate our Privacy Policy [Privacy Policy | The Salvation Army Australia](#), or contact one of Employment Plus staff members at our local office, or via email [privacy.eplus@salvationarmy.org.au](mailto:privacy.eplus@salvationarmy.org.au)