

Australian Association of Social Workers

# Privacy Policy

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**AASW**

Australian Association  
of Social Workers

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## 1. OUR COMMITMENT

The Australian Association of Social Workers (AASW), is committed to collecting and handling personal information in accordance with all applicable privacy laws including the Australian *Privacy Act 1988* (Cth) ('Privacy Act') and the Australian Privacy Principles ('APPs') and will take all reasonable steps to secure the personal information it holds.

The AASW is also committed to complying with the EU General Data Protection Regulation ('GDPR') to the extent that we collect the personal information of individuals who are resident in the European Union.

This Privacy Policy describes how the AASW handles your personal information in accordance with the Privacy Act and applicable privacy laws.

If you are based in the EU, **Schedule A** sets out additional privacy information applicable to you under the GDPR.

## 2. TYPES OF INFORMATION WE COLLECT AND HOLD

**Personal Information** is information or an opinion about an identified individual, or an individual who is reasonably identifiable: whether the information or opinion is true or not; and whether the information or opinion is recorded in a material form or not.

**Sensitive Information** is a sub-set of Personal Information and is afforded a higher level of privacy protection. In the list below, sensitive information is identified by **(S)**.

**AASW does not collect sensitive information other than set out in this section, and only with your informed consent.**

Personal and Sensitive information held by the AASW may include:

**General:** Name, Gender, Date of Birth, preferred language

**Contact Details:** Home address, Work address, Mail address, Email address, Phone numbers, Social media handles and any other ways to contact you.

**Our Interactions with you:** Enquiries, feedback, Compliments, Complaints **(S)**, Responses to surveys, Records of any correspondence and interactions with us and our staff (including in person, online, by telephone or email and via social media), event attendance.

Your use of our website and applications: Your IP address and how you use our website and applications.

For **Members** (including lapsed members) or applicants for membership, the personal and sensitive information held by AASW may also include:

**Identification:** Passport, Drivers' licence, Medicare card, Birth certificate, Marital Status documentation or other identification details (which may include your image)

**Cultural heritage:** Country of birth, indigenous heritage **(S)**

**Education and Employment:** student or employer identification, academic qualifications, education transcripts, scores or other evidence, employer information, position title, resume, work experience or other relevant employment information, statutory declarations of self-employment, Visa details, Continuing Professional Development activities and outcomes, Special interests, disciplinary actions relating to professional misconduct matters

**Health and Dietary:** Next of Kin, Medical conditions that relate to fitness to practice (**S**), other requests for specific assistance in connection with your use of our products and services, e.g. dietary requirements or physical access.

**Your use of our Products and Services:** Information on whether you have purchased, used or indicated interest in any of our products or services, Requests for special consideration in relation to membership and/or professional development requirements, which may involve information concerning your financial details or health, Your stated or likely preferences.

At times, your use of some of our products and services may require us to collect additional information from you. This information will only be used to provide you with those services or to support your use of those services.

**Payment Information:** Bank account details, credit card information may be collected by AASW and is processed using a secure third party gateway. Where we hold credit card information, we redact / destroy as soon as the transactional use is complete.

**Ethics and Complaints (S):** Information relating to any complaints raised against you and resulting investigations and outcomes.

**Criminal Record (S):** Information of all current convictions.

### 3. WHY WE COLLECT PERSONAL INFORMATION

AASW collects and may use the personal information of **non-members** for the purposes of:

- correspondence with individuals interested in the work of the AASW, including representatives of peak bodies and government departments
- ensuring AASW meets strategic goals of advocacy and raising the profile of AASW in the community, including submissions
- managing events and training courses, including managing and processing event registrations (including dietary requirements), maintaining attendance and training records, contacting guests and students in regard to the event, including enquiries, and seeking post-event feedback, communicating with you in relation to future events, training courses, services promotions or other products and services that AASW reasonably thinks may be of interest to attendees, and conducting research to improve our products and services in future
- to provide information that you have subscribed to (e.g. newsletters)
- to provide you with information and updates about AASW and its activities
- to verify your identity for purposes of communicating and providing services to you
- to provide you with information about sponsoring and / or partnering with AASW.

Personal information that is collected from your website visits is used solely for the purposes of gauging visitor traffic, trends and delivering personalised content to you.

AASW collects and may use the personal information of its **Members** for the purposes of:

- ensuring members maintain the requirements to be a member and meet the AASW Code of Ethics, including the management of complaints
- administer, manage and develop our services, providing members with a comprehensive range of membership products and services (including advocacy services), information regarding relevant products and services (or changes to these products and services) from AASW and appropriate

AASW contracted third parties, and to help you keep up to date with industry changes and developments

- seeking a better understanding of member needs in order to continually develop and improve membership products and services
- providing and offering professional development courses, conferences, seminars, workshops, certifications, and access to events
- providing and offering access to digital assets (for example, publications, training courses, how to videos and guides)
- providing access to online communities
- providing members with a subscription to AASW publications and/or other newsletters
- comply with our statutory, legislative, legal or contractual obligations.

AASW collects and may use personal information for its **Assessment of International Applicants** for the purposes of:

- processing and assessing applicants' applications or enquiries
- assessing applicants' qualifications and experience to determine their suitability and the outcome of their skills assessment application
- comply with our statutory, legislative, legal or contractual obligations.

If you do not provide us with certain personal information, AASW may be unable to perform its functions and/or provide you with the services and support you request. Please also be aware that as an education provider and an organisation that is responsible for assessing International Applicants, AASW is required to collect some personal information in accordance with its legal obligations.

#### 4. HOW WE COLLECT PERSONAL INFORMATION

The personal information we require to deliver our products and services is usually collected directly from you for specific purposes (such as application for membership or credentialling) via:

- physical, electronic or online forms
- websites (see below) and social media
- email
- telephone or facsimile
- hardcopy correspondence
- face-to-face contact (e.g. at forums, trade shows and events)
- security surveillance cameras and sign-in sheets at any location at which the AASW may from time-to-time conduct business activities.

Following standard practice, our website uses cookies to provide the functionality necessary to deliver our products and services. Our website also uses a number of third party services such as analytics and security that also utilise cookies. We do not control these third parties or their cookies and we refer you to the third party's website for details on how they use their cookies. You can reject cookies by changing the settings on your browser but doing so may limit your functionality and user experience within our site.

We also collect personal information from third parties, including from:

- migration agents acting on your behalf
- schools, universities and tertiary institutions
- people you nominate to provide references or information to support your membership, credentials or IQA assessment
- work colleagues that have written third party official Statutory Declarations or Affidavits
- your employer.

We may also seek personal information from publicly available sources, such as directories, or educational institutions, registration boards or employers, for the purpose of verifying information provided to the AASW.

We may keep unsolicited personal information (personal information we receive that we have taken no active steps to collect) if the information is reasonably necessary for one or more of our functions, services or activities.

When collecting personal information by whichever means, AASW will take reasonable steps to provide the appropriate notices and obtain relevant consents in accordance with the Australian Privacy Principles.

## 5. WHEN WE DISCLOSE YOUR PERSONAL INFORMATION

AASW at times may disclose your personal information to these entities:

**Outsourced service providers:** who assist us in the delivery of some of the services you receive, by providing functions such as mailing systems, Information technology services and event management.

**Professional Advisors:** including auditors

**Government authorities:** as required or authorised by law

**Providers of insurance products offered by the AASW**

Information disclosed to external organisations as described above occurs on a limited basis and, other than when provided as required by law, is provided with the agreement from those service providers that they will maintain security of that information and not use the personal information for any other purpose.

**Enquiries about a Member (excluding complaints):** AASW regularly receives queries from the public and regulators requesting information about individual members.

In relation to **Membership status**, AASW is able to advise that a person is a current member, as well as any contact details and area(s) of interest indicated by the Member through the 'Find a Social Worker' website function.

In relation to **participation of individual members in the AASW Continuing Professional Development (CPD) Program**, members who do not participate in the program, or participate but do not comply will be declared a 'non-participant'. The non-participant status of the Member will be communicated in response to any appropriate enquiry regarding CPD Program participation.

In relation to the **holding of credentials**, AASW may respond to enquiries by providing the current status of a member's credentials as either 'holds' or 'does not hold' a credential.

If a member ceases to hold a credential (change in status from 'does not hold' to 'hold' or vice versa) and we have previously advised third parties such as our insurer, partner organisation, agencies, Medicare or Private Health Insurers of this status, we will notify these third parties of the change in status, when required.

In response to third party requests for information other than those mentioned above, AASW may pursue any one of the following three options:

- AASW may refuse to provide the information
- AASW may elect to contact the member and advise them that information is being requested about them and seek their express consent to release it; or
- AASW may elect to obtain the contact details of the requester and provide this to the member, allowing them to contact the requester directly.

**Complaints about a Member:** These are covered in the AASW's Ethics ByLaws detailing the Complaints and Procedure. Complaints about a member are managed by the AASW Ethics Office, in consultation with the Chief Executive Officer.

AASW reserves the right to inform its Members when an enquiry or complaint has been received by the AASW referring to one of its Members unless expressly specified otherwise by law.

In addition, for AASW members:

- AASW is obligated by the Corporations Act 2001 to make available for inspection by the members of AASW the Prescribed Information in its Register of members. Prescribed Information includes the name and address of each member. In certain circumstances, members may apply to the AASW to restrict access to their personal information that is recorded in the register of members. Contact our Privacy Officer for further details
- eligible members who register to use AASW Collective Trade Marks enter the Licensing Agreement and Conditions of Use of the AASW Collective Trade Marks agreeing to their name being placed on a public register of trade mark users which will be accessible on the AASW website, accessible to the public
- members who create an AASW Advanced Search Directory listing agree to personal information being available to the public via the "Find a Social Worker" directory on the AASW website
- members who create a Locum Profile listing agree to nominated personal information being available to the public via the "Search for Locums" directory on the AASW Horizon Career Centre website
- in response to a request from an international social worker body, the AASW may disclose information held about your qualifications, activities as a social worker and other matters relevant to the request
- members who are determined through our Ethics Complaint Management Process to be ineligible for membership following a substantiated complaint of serious ethical misconduct may have their name published on the AASW website
- members who are determined through our Ethics Complaint Management Process to be ineligible for membership under the expulsion and suspension of membership clauses of the AASW Constitution may have their name published on the AASW website.

## 6. DIRECT MARKETING

Marketing AASW products and services is important for us to fulfil our role. We use a number of direct marketing strategies and channels including email, mail, SMS, social media and telephone to provide you with information relating to our products, courses, services, promotions, publications or other products or services that we reasonably think may be of interest to you.

In accordance with the Spam Act 2003, we will provide you with a way of opting out of receiving direct marketing communications, or you can opt-out by contacting our Privacy Officer.

AASW's contracted third parties may use similar marketing strategies and channels as AASW. Members have an opt-in option on AASW's website to grant consent to receive such third party communications.

AASW will never sell, trade, lease or rent any personally identifiable information to other organisations except as stated and agreed when collecting information from members or other persons.

AASW reserves the right to communicate with members about the substantive affairs of the organisation.

## 7. ACCURACY, CORRECTION AND DELETION OF PERSONAL INFORMATION

The AASW strives to keep accurate records of the personal information we collect. Accuracy depends on the information provided to the Association. Members can update their personal details in the member only area "Member Centre – Update My Details" section of the website.

Members may also contact AASW to update their details. You will be asked to verify your identity before the information is updated. The member must be the person contacting AASW as we will not provide any information or make any updates to a member's information to a member's representative.

Any non-members who wish to query the accuracy of personal information held about them may contact the Privacy Officer. You will be asked to verify your identity before the information is updated.

## 8. HOW WE SECURE AND STORE YOUR PERSONAL INFORMATION

We have implemented technology and security processes to protect the personal information that we collect, and we take all reasonable steps to protect it. Our websites have electronic security systems in place, including the use of firewalls and data encryption. We use secure third party payment gateways.

User identifiers and passwords are used to control access to our digital environment and your personal information.

Other examples of digital AASW security measures include:

- two-factor authentication is required for member and customer data access
- access is restricted to only those members of staff who require access for their role.

We maintain all personal information, including membership and 'in-house' mailing lists, subscriber details and web server logs, in controlled environments that are secured against unauthorised access.

We store your data on corporate cloud services. Our key cloud services include:

- Office 365: servers based in Australia
- Salesforce: servers based in Australia Amazon Web Services (AWS)
- Mailchimp: servers based in the United States of America
- Learning Management System: servers based in Australia Amazon Web Services (AWS)
- Event Management software: Servers based in Australia

From time to time the AASW may use other communication software systems whose servers may be based in other locations than those listed above.

We limit and monitor physical access to our offices. Any personal information stored in hardcopy is held in locked cabinets. We are actively reducing our reliance on paper files.

We store hardcopy archives with The Information Management Group (TIMG) an accredited offsite storage provider.

## 9. ACCESS TO PERSONAL INFORMATION

You have a right to access your personal information held by the AASW, subject to the exceptions listed in “Australian Privacy Principle 12 – access to personal information”. If you would like to do so, please contact the Privacy Officer. Your request must be in writing for security and administrative purposes. This includes digital format. You will be asked to verify your identity before the information is provided to you.

If requested, the AASW will provide a summary of the personal information that we hold rather than copies of any individual documents. In the event that the AASW agrees to a request for copies of individual documents, a fee for provision of documents via digital scans is payable prior to delivery. A Schedule of fees for the provision of documents via digital scans is available on our website or by contacting the Privacy Officer.

AASW acknowledges that AASW members may suspend and reactivate their AASW membership as they move through experiences and employment and AASW will retain personal information for reasonable periods to assist in this process.

Additionally, AASW acknowledges the merit in keeping metrics on the assessment of social work skills and will also retain personal information on skills assessment applicants for reasonable periods.

Outside of reasonable retention and other legal requirements, we will destroy or permanently de-identify personal information. We will also do the same on lawful requests.

## **10.OBTAINING OUR PRIVACY POLICY**

You may access and download our Privacy Policy from our website.

## **11. COMPLAINTS**

Complaints concerning the collection, disclosure or handling of your Personal Information by AASW or breaches of the Australian Privacy Principles should be addressed to our Privacy Officer.

Any complaint should be first made in writing and include the date, details of your complaint or the alleged breaches, and how you would like your complaint resolved.

The AASW Privacy Officer shall attempt to resolve the complaint within 30 business days from the date of the receipt of the complaint. This timeframe may be extended if further information is required from the complainant and/or an involved third party.

If the complaint is not resolved to your satisfaction, you can refer it to the Office of the Australian Information Commissioner.

## **12.PRIVACY OFFICER**

AASW’s Privacy Officer is your first point of contact for any matters relating to Privacy. The AASW Privacy Officer can be contacted from Monday to Friday between 9:00am and 5:00pm EST on +61 (03) 9320 1000.

Alternatively, you can write to the Privacy Officer, Australian Association of Social Workers, PO Box 2008, Royal Melbourne Hospital VIC 3050, or email: [privacy@asw.asn.au](mailto:privacy@asw.asn.au).



## SCHEDULE A – GDPR

Australian businesses covered by the Privacy Act need to comply with the GDPR if they:

- have an establishment in the EU (regardless of whether they process personal data in the EU), or
- do not have an establishment in the EU, but offer goods and services or monitor the behaviour of individuals in the EU

AASW provides International Qualification Assessment (IQA) to social workers based overseas, including the EU.

**If you are an IQA applicant based in the EU, or reside in the EU, the following applies to you in addition to the AASW Privacy Policy:**

**Data Protection Officer:** The AASW Privacy Officer is a 'Data Protection Officer' as defined in the GDPR.

**Article 17: The right to erasure (the right to be forgotten):** Under certain circumstances you have the right to request that we erase your personal information and we have the obligation to do so without undue delay. Please contact our Privacy Officer to facilitate the lawful erasure of your data.

**Article 20: The right to Data Portability:** Under certain circumstances you have the right to receive the personal information you have provided us in a structured, commonly used and machine-readable format and have the right to transmit this data to another organisation without hindrance from us. Please contact our Privacy Officer to facilitate the lawful portability of your personal information.

**Article 21: The right to object:** Under certain circumstances you have the right to object, on grounds relating to your particular situation, at any time to use of your personal information for a secondary use. The right to object to Direct marketing is covered by the Spam Act.

AASW takes reasonable steps to destroy or de-identify personal information that is no longer needed for a permitted purpose, to remove personal information from AASW activities. Please contact our Privacy Officer to facilitate your right to object over and above what is defined in the AASW Privacy Policy.

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Enquiries regarding this policy can be  
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E: [privacy@aaaw.asn.au](mailto:privacy@aaaw.asn.au)

