A.3 Privacy Policy

(website content)

September 2017

Policy

On 12 March 2014, the 13 Australian Privacy Principles replaced the National Privacy Principles and Information Privacy Principles (refer Privacy Amendment (Enhancing Privacy Protection) Act 2012, compilation date: 12 March 2012). The Australian Privacy Principles (APPs) contained in the Privacy Act 1998 (CTH) and the Privacy Amendment (Enhancing Privacy Protection) Act 2012, except when qualified by any relevant Codes of Practice, will underpin all matters related to personal information in ACN. The policy applies to personal information collected and held by ACN. This policy provides a succinct overview of how ACN collects, stores, and disposes of your personal information.

Purpose

This policy outlines ACN's legal obligations and ethical expectations in relation to privacy and confidentiality.

Scope and Application

ACN holds two types of information that are covered by this policy - personal information and organisation information.

This policy applies to ACN as an organisation and to all ACN employees and Board Directors as individuals.

Understanding and Commitment

ACN recognises the need to be consistent, cautious and thorough in the way that information about interested parties who have provided ACN with information/data is recorded, stored and managed. As such, ACN is committed to protecting the privacy and confidentiality of the interested parties and Board Directors in the way information is collected, stored and used in an ethical and responsible manner.

All individuals including interested parties who have provided ACN with information/data, staff and Board Directors have legislated rights to privacy of personal information. In circumstances where the right to privacy may be overridden by other considerations (for example, child protection concerns), staff and Board Directors are to act in accordance with the relevant policy and/or legal framework.

Outcomes

ACN provides quality services in which information is collected, stored, used and disclosed in an appropriate manner that complies with both legislative requirements and ethical obligations.

All staff and Board Directors understand their privacy and confidentiality responsibilities in relation to personal information and organisational information about ACN. This understanding is demonstrated in all work practices.

ACN’s Obligations

ACN will:

a. make available to all this policy related to the collection, use, maintenance and disposal of personal information;

b. take reasonable steps to ensure that personal information that is held is relevant, not excessive, accurate, up to date, complete and that the collection does not unreasonably intrude on the personal affairs of individuals;

c. retain personal information for no longer than is necessary and will then dispose of it lawfully and securely;

d. protect personal information from loss, unauthorised access, use, modification, disclosure or other misuse;

e. ensure that all reasonable steps are taken to ensure that personal information is not used or disclosed without authorisation by external service providers;

f. not apply to any personal information an identifier code that has been assigned by any other organisation or agency; and

g. not disclose personal information in any other circumstances other than those detailed above.
Legislation

The privacy of personal information requirements is defined by legislation (Privacy Act 1988). At all times, ACN must act in accordance with its legal requirements, which underpin this policy statement.

On 12 March 2014, the 13 APPs replaced the National Privacy Principles and Information Privacy Principles. The 13 APPs in Schedule 1 of the Privacy Amendment (Enhancing Privacy Protection) Act 2012, amends the Privacy Act 1988 and include:

- APP 1 — open and transparent management of personal information
- APP 2 — anonymity and pseudonymity
- APP 3 — collection of solicited personal information
- APP 4 — dealing with unsolicited personal information
- APP 5 — notification of the collection of 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
- APP 10 — quality of personal information
- APP 11 — security of personal information
- APP 12 — access to personal information
- APP 13 — correction of personal information

ACN’s management and staff are committed to implementing practices, procedures and systems that will ensure compliance with the APP’s.

Open and Transparent Management of Personal Information (APP 1)

ACN makes this Privacy Policy statement and other material available to ACN to inform them of ACN policies on management of personal information. Upon request, staff at ACN will let interested parties who have provided personal information/data know, generally, what sort of personal information ACN holds, for what purposes, and how ACN collects, hold and disclose that information.

Information on how to access this Privacy Policy will be made available to all interested parties.

Anonymity and Pseudonymity (APP 2)

Individuals or other interested parties have the right to be dealt with anonymously or by using a pseudonym, provided that this is lawful and practicable. It may be impracticable for ACN to deal with interested parties who have provided ACN with information/data who have not identified themselves; however, in the context of doing business with ACN, senior management will need to decide whether this is likely to be practical or possible.

Collection of Solicited Personal Information (APP 3)

ACN will ensure that each interested party providing personal information is informed about and understands the purpose of collecting the information, to whom and under what circumstances their personal information may be disclosed to another party, and how they can access the information held about them. For the definitions of personal and sensitive information refer to the Definitions page of this policy.

ACN will ensure that interested parties who have provided information/data providing personal information understand the consequences, if any, of providing incomplete or inaccurate information.

Personal information collected by ACN will only be used for purposes that are directly related to the functions or activities of the organisation. These purposes include:

- enquiry about education courses/educational services,
- events, workshops, meetings attendance,
- administrative activities, including human resources management,
- sector development activities,
- professional development activities,
- complaint handling, and
- scholarships.

The type of information collected by ACN generally includes name, date of birth, address, email address, telephone number, ethnicity, demographics, next of kin, emergency contact details.

When collecting personal information, ACN must provide information to interested parties who have provided ACN with the information/data regarding:

- the purpose for collecting information,
- how the information will be used,
- to whom information may be transferred and under what circumstances,
- limits to privacy of personal information,
- how an interested party can access or amend their personal information, and
- how an interested party can make a complaint about the use of their personal information.

Other information collected and held by ACN include job applications, personnel files and information. Data collected is considered personal information and will only be used for the purpose for which it was collected, or with prior consent from the interested party will be managed in accordance with the APP’s.
Dealing with Unsolicited Personal Information (APP 4)

Unsolicited personal information is personal information received by ACN where ACN has taken no active steps to collect the information and outlines the steps that ACN must and will take, if it receives unsolicited personal information.

In some instances, ACN may have difficulty deciding whether personal information it receives falls within the terms of an ACN request and is therefore solicited personal information. Where it is unclear whether the information is solicited or unsolicited information, ACN will err on the side of caution and treat the personal information as unsolicited information.

Notification of the Collection of Personal Information (APP 5)

ACN will take all reasonable steps to ensure interested parties who have provided ACN with information/data have access to this Privacy Policy at or before the time of collection of personal information, or as soon as practicable afterwards. This applies to all personal information ‘collected’ about an individual, either directly from the individual or from a third party.

How ACN Collects, Uses and Discloses Personal and Confidential Information (APP 6)

ACN will only use personal information for the purposes for which it is collected - purposes which are directly related to one of ACN’s functions or activities.

ACN does not disclose information about an individual to any other individual, government authority, or private sector organisation unless one or more of the following applies:

a. the individual would reasonably expect, or has been told, that information of that kind is usually passed to those individuals, bodies or agencies, will state if the collection is voluntary, and the consequences for individuals if it is not, or only in part, provided

b. ACN will not disclose personal information outside ACN except where:
   - the subject of the information has consented to the disclosure, or has been notified of the likelihood of the disclosure, and where the information disclosure is related only to the primary purpose for which it was collected; or
   - ACN is required by legislation, court order or other legally enforceable instrument and the request is in an appropriate written form; or
   - disclosure is reasonably believed to be necessary to prevent or lessen a serious and imminent threat to the life or health of any person

Where these exceptions occur then ACN will:

- state what the personal information will be used for, and
- state who will receive the personal information.

ACN collects personal information about individuals directly from individuals when it is necessary for one or more of ACN’s functions or activities and only when it is necessary for or directly related to such purposes.

Other information held by ACN may be regarded as confidential, pertaining either to an individual or an organisation. The most important factor to consider when determining whether information is confidential is whether the information can be accessed by the general public.

If they are unsure whether information is sensitive or confidential to ACN or its interested parties who have provided ACN with information/data, staff members are to refer to an Executive Director or the Chief Executive Officer (CEO) before transferring or providing information to an external organisation.

Organisation information - All staff and Board members agree to adhere to ACN’s Code of Conduct when commencing employment, involvement or a placement. The Code of Conduct outlines the responsibilities to the organisation related to the use of information obtained through their employment, involvement or placement.

Key Interested Parties Information - ACN works with a variety of key interested parties including private consultants. The organisation may collect confidential or sensitive information about its key interested parties as part of a working relationship. ACN staff will not disclose information about key interested parties that is not already in the public domain without key interested party consent/agreement.

The manner in which staff members manage key interested party information will be clearly articulated in any contractual agreements that the organisation enters into with a third party.

ACN will ensure that personal information will only be used for the purpose it was collected, or that would reasonably be expected by the interested party providing the information.

If the identified information is to be used for a secondary or unrelated purpose, such as data analysis or research, ACN will obtain informed consent from the individual or other key interested party. Interested parties who have provided ACN with information/data will be given the opportunity to refuse such use or disclosure. If an interested party is physically or legally incapable of providing consent, a responsible person (as described under the Act) may do so.

ACN will only disclose personal information without consent where such disclosure is required by law, or for law enforcement, or in the interests of the key interested parties’ or the public’s health and safety.

ACN will keep records of any such use and disclosure.

Information may be disclosed to a responsible person (as described under the Act).

ACN will only use personal information for the purposes for which permission was given, or for purposes that are directly related to one of the functions or activities of the organisation.
Personal information may be provided to government agencies, other organisations or individuals if:

a. the interested party has consented,
b. it is required or authorised by law,
c. it will prevent or lessen a serious and imminent threat to somebody's life or health,
d. the disclosure is directly related to the primary purpose for collection,
e. in an emergency situation, where release of information is necessary to aid medical treatment, or
f. ACN is required by law to disclose the information (e.g. reporting of communicable diseases).

For the definitions of personal and sensitive information refer to the Definitions page of this policy.

Direct Marketing (APP 7)

ACN will only use or disclose personal information for direct marketing purposes where the individual has either consented to their personal information being used for direct marketing or has a reasonable expectation that their personal information will be used for this purpose, and conditions relating to opt-out mechanisms are met.

ACN may use or disclose personal information for the purpose of direct marketing if certain conditions are met; however, ACN will always disclose this to interested parties who have provided ACN with information/data and seek their written approval before using their personal information for marketing purposes.

Cross-border Disclosure of Personal Information (APP 8)

ACN will take steps to protect interested party privacy if information is to be sent interstate or outside Australia. Transfer of personal information overseas will only occur when the requirements of the following points have been met in full:

a. individuals have given written consent; or
b. the transfer is necessary for the fulfilment of a contract between individuals and ACN or a government department funding the service; or
c. the transfer is for personal benefit, but it is impractical to obtain consent; or
d. it is believed that the information will be protected by a privacy scheme or legal provisions comparable to those in Australia.

Under no circumstances will partial addressing of any of these points be considered sufficient to transfer personal information overseas.

Anonymity, Adoption, Use or Disclosure of Government Related Identifiers (APP 9)

Wherever it is lawful and practicable, individuals will have the option of not identifying themselves or requesting that ACN does not store any of their personal information.

As required by APP 9, ACN will not use Medicare or Veterans Affairs numbers or other identifiers assigned by a Commonwealth or State Government agency (i.e., government-assigned individual identifier number, such as a Medicare number) to identify personal information, as if it were its own identifier or interested party code.

Quality of Personal Information (APP 10)

ACN will take all reasonable steps to ensure that personal information kept, used or disclosed by ACN is accurate, complete, and as up to date as practicable.

ACN take steps to ensure that the personal information it collects is accurate, up-to-date and complete.

These steps include maintaining and updating personal information when ACN is advised by individuals that the information has changed (and at other times as necessary), and checking that information provided about an individual by another person is correct.

Security of Personal Information (APP 11)

All reasonable steps are taken to protect personal information collected from misuse or loss, such as computer password access, access restrictions to work areas, office and building security systems, and adequate computer system virus protections and fire wall, and electronic back-up of interested party personal and health records. When the personal information that ACN collects is no longer required, it will be destroyed or deleted in a secure manner.

ACN takes all necessary and reasonable steps to ensure that personal information is accurate, complete, up-to-date and secure.

ACN may store personal information in both hard copy and on computer. The storage, use and where necessary, transfer of personal information will be undertaken in a secure manner that protects interested party privacy. Hard copy information is kept under lock and key. Information stored on computer is password protected.
ACN's Data Security Policy is as follows:

a. ACN shall maintain an adequate level of security/data protection and privacy for the protection of information supplied by key interested parties.

b. ACN shall maintain a commitment to the protection of key interested party supplied information.

c. Where there are additional security and privacy requirements as part of contractual agreements, laws and regulations, the strictest requirements shall be implemented.

d. Board Directors and the senior executive management team shall set direction for, and show commitment to security. As a minimum this policy shall be applied enterprise-wide and assignment of overall responsibility for information/data security assigned to a top-level executive.

e. All ACN personnel and ACN contractors shall be provided with guidance to help them understand the meaning of security, the importance of complying with security policies and their personal responsibilities for security, such as desired security behaviour including reporting witnessed and suspected security incidents.

f. ACN shall, in a timely manner, report all security incidents to the Board and the relevant key interested party, including, but not limited to, information or systems used for processing information, including malicious attacks, abuse or misuse of assets.

g. ACN shall arrange for a security audit and gap analysis review by an externally qualified and competent auditor as required and findings shall be evaluated for possible improvement/corrective actions.

h. ACN shall have a documented security incident management process to detect and handle information/data security incidents.

i. ACN shall have an emergency response process for dealing with serious information security incidents.

j. ACN shall report security incidents, weaknesses or suspicious activities that could have a negative impact on ACN’s key interested parties, with reports emailed to the key interested party nominated representative and ACN shall cooperate fully with the key interested party in dealing with these reports in order to ensure that provisions concerning security always are complied with and that the key interested party’s reputation is not harmed as a result of such events.

k. ACN shall provide access to a knowledgeable person(s) (Security Contact), who shall act as a liaison to the key interested party regarding security and privacy questions or concerns. ACN’s Security Contact shall be available twenty-four hours a day, seven days a week by telephone and email, or by other means as agreed to by the key interested party.

l. For the purpose of forensic evaluation and when requested by the key interested party, ACN shall provide access to computer-based evidence data. Further, ACN shall permit access to hard copy information e.g. applicable documents, other printouts etc., as the required by the key interested party.

m. ACN shall be able to demonstrate compliance with the requirements and measures that have been agreed with the key interested party. Identified non-compliance shall be dealt with as agreed by key interested party.

n. ACN shall protect the information supplied by key interested parties by implementing applicable controls and take informed decisions as to if a specific control shall be implemented fully, partly, or not at all or if alternative protection measures will be implemented. Such decisions shall always include ensuring that security is not compromised and shall be explained, if so requested by the key interested party.

o. ACN shall communicate sensitive information related to services securely through e-mail with the key interested party in accordance with their written instructions.

p. Access to the information supplied by key interested parties shall be restricted to ACN personnel individually and on a need to know basis. Such access rights shall be granted and periodically revised by ACN’s Directors, or CEO in an auditable manner.

q. The information shall be protected against unauthorised access, use, retention, disposal, modification and disclosure through physical and logical controls.

r. Records shall be kept, where possible, showing which information has been accessed, modified, disclosed or disposed.

Reasonable Physical Safeguards include:

a. locking filing cabinets and unattended storage areas,

b. physically securing the areas in which the personal information is stored,

c. not storing personal information in public areas, and

d. positioning computer terminals and fax machines so that they cannot be seen or accessed by unauthorised people or members of the public.

Reasonable Technical Safeguards include:

a. using passwords to restrict computer access, and requiring regular changes to passwords,

b. establishing different access levels so that not all staff can view all information,

c. ensuring information is transferred securely (for example, not transmitting personal information via non-secure e-mail),

d. using electronic audit trails, and

e. installing virus protections and firewalls.
Reasonable Administrative Safeguards

Include not only the existence of policies and procedures for guidance but also training to ensure staff and Board Directors are competent in this area.

Access to Personal Information (APP 12)

Individuals or other interested parties may request access to personal information held by ACN and will provide contact details regarding who to contact regarding access to and correction of that personal information. Access will be provided unless there is a sound reason under the Privacy Act 1988 or other relevant law to withhold access.

If an individual is listed on one or more of ACN’s media email lists (this includes but is not limited to communities of interest, regions, e-newsletters, events notifications) an opt-out option is available at all times. Individuals have the ability to unsubscribe by using the ‘unsubscribe’ options included in ACN’s emails.

Requests for access should be made in writing. ACN needs to be satisfied that a request for personal information is made by individuals or by another person who is authorised to make a request on personal behalf. An identity document will need to be sighted to verify personal identity or, if individuals are authorising another person to access on personal medical records on personal behalf, then a letter of authority and confirmation of personal identity will be required prior to release of personal information.

Situations in which access to information may be withheld include:

a. there is a threat to the life or health of an individual,
b. access to information creates an unreasonable impact on the privacy of others,
c. the request is clearly frivolous or vexatious,
d. access to the information has been granted previously,
e. there are existing or anticipated legal dispute resolution proceedings, or
f. denial of access is required by legislation or law enforcement agencies.

ACN will use their best efforts to take less than 14 days to respond to request for access to or amendment to information.

Correction and Updating of Personal Information (APP 13)

Where necessary, individuals can also request an amendment to any personal information in personal records should they believe that it contains inaccurate information. Such requests should be made in writing. If ACN or their contractor does not agree to change personal information in accordance with an individual’s request, the individuals will be notified and ACN will permit individuals to make a statement of the requested changes and ACN will keep the request with their personal records.

There are some circumstances in which access is restricted, and in these cases reasons for denying access will be explained.

Privacy Complaints and How ACN would Deal with a Privacy Complaint

If staff are dissatisfied with the conduct of a colleague regarding privacy and confidentiality of information, the matter should be raised with the staff member’s direct Line Manager. If this is not possible or appropriate, follow the delegations indicated in the Grievance Resolution Policy. Staff members who are deemed to have breached privacy and confidentiality standards set out in this policy may be subject to disciplinary action up to and including dismissal.

If an interested party or key interested parties are dissatisfied with the conduct of an ACN staff member or Board Director, a complaint should be raised in accordance with the Compliments, Complaints and Feedback Policy. Information about making a complaint will be made available to interested parties who have provided ACN with information/data.

Individuals or other interested parties should feel free to discuss any concerns, questions or complaints about issues related to the privacy of personal information with ACN staff.

ACN is committed to improving services and welcomes any comments or complaints that interested parties who have provided information/data may wish to offer in relation to the services ACN provides. Such feedback helps ACN to identify the things that ACN does well or need to improve. ACN recognises that, handled well, a complaint provides ACN an opportunity to strengthen relationships with interested parties who have provided information/data. It provides ACN the opportunity to understand their circumstances and to explore ways to improve ACN service to them in the future. ACN will respond to personal concerns quickly and in accordance with the ACN Complaints Management Procedures and keep individuals informed of actions and progress.

Complaints or queries with respect to this Privacy Policy may be lodged electronically via the ACN website or in writing by email or by completing a Feedback Form.
How to contact us Privacy Complaints

Individuals, who feel that ACN may have breached their Privacy or ACN’s Privacy Policy, are to contact ACN in writing either by email, fax or letter addressed to:

Company Secretary
Australian College of Nursing
PO Box 219
DEAKIN WEST ACT 2600
Fax: 02 6282 3565
Email: company.secretary@acn.edu.au

For general information:

Canberra Office
1 Napier Close Deakin ACT 2600 or postal address PO Box 219,
Deakin West ACT 2600
Free call 1800 061 660 *call may incur charges,
t 02 6283 3400,
f 02 6282 3565,
e acn@acn.edu.au
Membership - Free call 1800 061 660 *call may incur charges,
e membership@acn.edu.au
Scholarships - Free call 1800 117 262 *call may incur charges,
e scholarships@acn.edu.au

Sydney Office
9 Wentworth St, Parramatta NSW 2150
Free call - 1800 265 534 *call may incur charges,
Phone 02 9745 7500
Education - Free call 1800 265 534 *call may incur charges,
e customerservices@acn.edu.au

ACN Privacy Officer
Privacy Officer
Australian College of Nursing
PO Box 219
DEAKIN WEST ACT 2600
Fax: 02 6282 3565
Email: company.secretary@acn.edu.au

Under the Privacy Act 1988 (Privacy Act) individuals can make a complaint to the Office of Australian Information Commissioner (OAIC) about the handling of personal information.


External Reference
Australian Government - Office of the Australian Information Commissioner

Related Legislation
Privacy Act 1988 (CTH)
Privacy Amendment (Enhancing Privacy Protection) Act 2012
Privacy and Personal Information Protection Act 1998 (NSW)
Privacy Amendment (Private Sector) Act 2000 (CTH)

<table>
<thead>
<tr>
<th>Ratification:</th>
<th>Board</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of issue:</td>
<td>December 2012</td>
</tr>
<tr>
<td>Date last reviewed:</td>
<td>September 2017</td>
</tr>
<tr>
<td>Date next review due:</td>
<td>December 2020</td>
</tr>
</tbody>
</table>
## Definitions

<table>
<thead>
<tr>
<th><strong>Confidentiality</strong></th>
<th>Confidentiality applies to the relationship of confidence. Confidentiality ensures that information is accessible only to those authorised to have access, and is protected throughout its lifecycle. Confidential information may be marked as such or deemed confidential by its nature; for example, it is information that is not available in the public domain.</th>
</tr>
</thead>
</table>
| **Consent**        | Consent means agreement to some act, practice or purpose. ‘Consent’ means ‘expressed consent or implied consent’. The four key elements of consent are:  
• the interested party is adequately informed before giving their consent (i.e., knowledge of the matter agreed to); or  
• the interested party gives consent voluntarily;  
• the consent is current and specific; and  
• the interested party has the capacity to understand and communicate their consent. |
| **Expressed Consent** | ‘Expressed consent’ is given explicitly, either orally or in writing. |
| **Health Information** | ‘Health information’ is all identifying “personal information” collected to provide a health service. In the APP’s ‘Health information’ comes under the definition of ‘sensitive information’. |
| **Implied Consent** | ‘Implied consent’ arises where consent may reasonably be inferred in the circumstances from the conduct of the interested party and ACN. |
| **Individual** | Individual means any person such as a key interested parties, staff member, Board Director, contractor or a member of the public. |
| **Organisational Information** | Organisational information includes publicly available, and some confidential, information about organisations. Organisational information is not covered in the Privacy Act 1988 but some organisational information may be deemed confidential. |
| **Personal Information** | In accordance with the Privacy Act 1988 personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:  
a. whether the information or opinion is true or not: and  
b. whether the information or opinion is recorded in a material form or not. |
| **Privacy Act** | Privacy provisions of the Privacy Act 1988 govern the collection, protection and disclosure of personal information provided to ACN. |
| **Public Domain** | The public domain in relation to confidentiality is “common knowledge”; that is, information that can be accessed by the general public. |
In accordance with the Privacy Act 1988, sensitive information means:

| a. | information or an opinion about an individual’s: |
|    | i. racial or ethnic origin; or |
|    | ii. political opinions; or |
|    | iii. membership of a political association; or |
|    | iv. religious beliefs or affiliations; or |
|    | v. philosophical beliefs; or |
|    | vi. membership of a professional or trade association; or |
|    | vii. membership of a trade union; or |
|    | viii. sexual orientation or practices; or |
|    | ix. criminal record; |
| b. | health information about an individual; or |
| c. | genetic information about an individual that is not otherwise health information; or |
| d. | biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or |
| e. | biometric templates. |

All personal information received by an APP entity is either solicited or unsolicited personal information. Section 6(1) defines ‘solicit’ but does not define ‘unsolicited’. Therefore, personal information received by an entity that does not fall within the definition of ‘solicited’ is ‘unsolicited’ personal information.

<table>
<thead>
<tr>
<th>POSITION</th>
<th>RESPONSIBILITIES</th>
</tr>
</thead>
</table>
| Board of Directors     | • Approve the Privacy Policy  
• Be familiar with the organisation’s legislative requirements regarding privacy and the collection, storage and use of personal information.  
• Understand the organisation’s ethical standards regarding the treatment of other confidential information relating to ACN, its interested parties who have provided ACN with information/data.  
• Comply with Privacy Policy and associated procedures. |
| Management             | • Be familiar with the legislative requirements regarding privacy and the collection, storage and use of personal information.  
• Understand the organisation’s ethical standards regarding the treatment of other confidential information relating to ACN, and its interested parties who have provided ACN with information/data.  
• Ensure systems are in place across the organisation to adequately protect the privacy of personal information and confidentiality of other sensitive information.  
• Act in accordance with organisational systems in place to protect privacy and confidentiality.  
• Comply with Privacy Policy and associated procedures. |
| **Staff** | • Be familiar with the legislative requirements regarding privacy and the collection, storage and use of personal information.  
• Understand the organisation’s ethical standards regarding the treatment of other confidential information relating to ACN, and its interested parties who have provided ACN with information/data.  
• Act in accordance with organisational systems in place to protect privacy and confidentiality.  
• Comply with Privacy Policy and associated procedures. |
| **Contracted Markers, Tutors** | • Are, by contract with ACN, required to comply with ACN’s Privacy Policy. |