



Greenham Group Protection of Employee Personal Data Policy



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Integration with Mission and Values

STATEMENT OF INTENT

At HW Greenham our mission is, to:

- Efficiently produce the highest quality beef products.
- Strive to be leaders within our Industry.
- Provide our suppliers and customers with the best quality and service possible.
- Be a workforce that seeks excellence, and
- Continually improve on everything we do for the long term benefit of all our stakeholders.

In conducting ourselves, we have five core values that drive our behaviours, namely:

- **Integrity** – we are ethical, transparent and inclusive in all dealings with suppliers and customers.
- **Safety** – we provide a safe and healthy workplace for all staff, contractors and visitors.
- **People** – we value our employees and work together to better our industry.
- **Ideas** – we embrace innovation and are driven by an improvement culture, and
- **Community** - We are ardent supporters of local communities and organisations, particularly in rural areas.

The mission and core values are designed to guide our actions and how we interact with one another on a daily basis and are fundamental to the way we do business.

The Greenham Group Protection of Employee Personal Data Policy provides guidelines and direction regarding the collection, storing, access, sharing and security of all Employee Personal data at HW Greenham locations.

By complying with this policy and applying the mission and core values in all we do, we move towards trusted and mutually successful relationships with our employees.

HW Greenham fully expects that all employees are committed to and will uphold the standards and values contained within the Greenham Group Protection of Employee Personal Data Policy. Compliance with this policy for all employees is a requirement of employment with HW Greenham and any breach of this policy will be taken seriously, will be investigated and if found, may lead to disciplinary action up to and including termination of employment, depending upon the seriousness of such breach.

For the purposes of this Policy, HW Greenham refers to those companies associated with HW Greenham Group of Companies, as follows:

HW Greenham & Sons Pty. Ltd.
Greenham Tasmania Pty. Ltd.
Greenham Gippsland Pty. Ltd.



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Protection of Employee Personal Data Policy

HW Greenham takes the collection and handling of personal information seriously and applies a similar rigor to employee information as it does to other personal information collected throughout its business processes.

Employee records used for a purpose that is directly related to the employment relationship, do not fall under the requirements of the Australian Privacy Principles, however, HW Greenham will take every effort to ensure employee records are treated with the same importance as personal information.

This Protection of Employee Personal Data Policy is implemented to inform all employees:

- How is employee information collected?
- How is employee information is stored and secured?
- Who has access to employee information?
- Who has access to employee information?
- How employee information is shared with third parties?
- What information can be shared by way of an employment reference?
- E-mail and Internet access across HW Greenham.
- What to do if you suspect this policy has not been complied with.

How is employee information collected?

HW Greenham collects employee information in many formats. That information may be collected in hard copy, electronic copy, including video and other formats via the following internal processes, including but not limited to:

- Recruitment and Onboarding
- Training and Development
- Workers Compensation
- Performance Management
- OH&S
- Security and Surveillance

Employee information covered by this policy includes but is not limited to:

- Personal Details
- Superannuation Details
- Training and Development Details
- Photos / Videos
- Work and Employment Details
- Banking and Financial Details
- Work Related Health Details
- Disciplinary Records
- Emergency Contact Details
- Workplace Surveillance Details



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How is employee information stored and secured?

Employee information in hard copy format must be stored in structurally sound and secure receptacle(s), such as filing cabinets, desk cabinets, high volume stored shelving, etc. with the capacity to be securely locked when not in use. In all cases where employee records are securely locked a secondary access point must be determined (e.g.: spare key) and held where the primary access point exists and cannot be used.

Employee information in electronic or soft copy must be stored on secure company computer network drives with automatic system backup, with password protection access. Under no circumstances shall employee information be saved to personal drives or portable data storage devices without first a current copy saved to secure company computer network drives. The most recent version must always be stored on secure company computer network drives and once employee information used via portable data storage devices is no longer required, such employee information shall be updated to secure company computer network drives and then deleted such that access is no longer possible.

Should HW Greenham have reasonable grounds to believe an eligible data breach has occurred and that data breach is likely to cause serious harm to individual(s) whose employee information is involved in the breach, HW Greenham will comply with the requirements of the Notifiable Data Breaches Scheme in containing, identifying, assessing, taking remedial action, notifying and reviewing all aspects of any said data breach.

Who has access to employee information?

Access to employee information shall only be granted on a position requirement basis within the employee's own organisation department and hierarchical establishment of HW Greenham. Access shall be denied below supervisor level, unless prior approval is granted by the supervisor's manager otherwise referred to the location most Senior Manager or Group Human Resources Manager for decision.

For the purposes of data administration, Payroll Officers / Managers shall be responsible for all access and security requirements to payroll and associated records, both hard copy and soft copy under their effective control.

Personnel Officers and HR Managers shall be responsible for all access and security requirements for employee records under their effective control.

Under no circumstances shall employee records be left under the control and security of employees outside Payroll, Human Resources, Finance and/or Plant Management departments.

Employees can make a formal written request to review their own employee information, clearly outlining what information is requested for review and for what purpose. Vague, general and unsupported requests shall not be approved. Employee information stored by HW Greenham, of a factual nature found to be inaccurate, out of date or incomplete can be requested, in writing, to be corrected once replacement information has been verified as correct.

How is employee information shared with third parties?

HW Greenham may be required, at law, to share employee information with official Government agencies (e.g.: Fair Work Inspector(s), Australian Tax Office officials, WorkSafe Inspectors etc.). In all circumstances and before any employee information is shared, HW Greenham employees must establish relevant bona fides of those requesting employee information and confirm they have the power to make such requests.

All access to employee information requested by a permit holder (e.g.: a union official) will be treated in strict compliance with the relevant legislation providing access to such employee information (e.g.: Fair Work Act 2009, relevant Modern Award, local Enterprise Bargaining Agreement, etc.).

All access to employee information requested by an official from an accredited industry audit program (e.g.: AUS-MEAT Limited, etc.) will be completed in strict compliance with the audit program requirements providing access to such employee information. (e.g.: SEDEX/Smeta, SWA McDonalds, etc.)

Whenever doubt exists as to the provision of employee information to a third party, HW Greenham must receive written approval from the employee in question to release any relevant employee information. The relevant employee information shall be provided to the employee in question, in the first instance, to allow them to release the employee information them self.

Under no circumstances can medical or health related information be provided without receiving written consent from the employee in question.

Where the release of employee information is of a commercial in confidence nature and such release may harm HW Greenham's position in the market or harm the HW Greenham's name or brand names, approval to release any information must be provided by a Board or Executive Team Member prior to the release of any employee information.

What information can be shared by way of an employment reference?

HW Greenham does not provide verbal or written employee references and no employee may provide a written or verbal employment reference in representing HW Greenham in any way or format. For the purposes of providing information to prospective employers, HW Greenham can supply a Statement of Service which indicates an employee's tenure, the roles in which they had been employed and any qualifications achieved whilst an employee of HW Greenham. No statement(s) regarding any further information can be provided.

Employees can provide personal references in such instances, clearly stating the information provided is a personal reference and is not attributed to HW Greenham in any way or form. Extreme care should be taken when providing personal references as referees may be liable for any comments made.



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E-mail and Internet access

HW Greenham recognises the growth of electronic equipment and systems in this day and age as tools of trade to legally and effectively carry out the requirements of employees' roles. Access may be granted to employees to use desk top computers, lap top and notebook computers, hand held computers, including but not limited to mobile phones, iPads, tablets, etc. fax machines, data readers, data scanners, etc. Employees who are custodians of such equipment must ensure the security of such equipment whilst under their control.

HW Greenham provides access to a range of IT systems to assist all employees perform their duties as effectively as possible, including but not limited to e-mail and Internet access. This policy is not intended to preclude reasonable personal use of IT systems however such personal use must not interfere or take precedence over work practices.

HW Greenham provides many different tools of trade for employees to carry out their role legally and effectively.

Employees must ensure the security of their own user account and not share their user account with others when accessing the Company's IT systems. Similarly, employees must not use another employee's user account for unethical purposes, including but not limited to the sending of e-mail from another employee's user account or impersonating another individual user or accessing the Internet from their account.

Employees must not send, access, store, copy, and/or knowingly receive any material on the Internet or by e-mail which is or may be prohibited by law in Australia or in the country to which you send or receive material. This includes but is not limited to:

- Pornographic, obscene or objectionable material, in whatever form, such as text, image or multimedia.
- Material portraying violence, nudity, or inappropriate content, including but not limited to material which is sexist, racist, exploits people or animals, or contains cruelty in any form;
- Abusive, defamatory or offensive material;
- Gambling and betting websites;
- Online "chat rooms";
- False or misleading material;
- Material which is intended to annoy, harass or intimidate another person;
- Material which may infringe copyright, including software applications, copyrighted texts, etc., accessed or copied without proper authorisation.

If you receive an e-mail and you believe the e-mail has been sent to you in error, you must notify the sender. Do not forward the e-mail or disclose the contents of the e-mail to anyone else.

HW Greenham has the right to access all information stored on HW Greenham IT facilities, systems, software and hardware. The use of personal e-mail and Internet is subject to monitoring and logging by IT service providers for security and network management reasons. Reports may be made available to Senior Managers to assist in identifying performance impacts with staff. Users who abuse the personal use of e-mail and Internet access may have limitations placed on the use of such facilities or may have access rights revoked. In cases where the breach of this policy is serious and willful, disciplinary action will ensue, up to and including the termination of employment.



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What to do if you think this policy has not been complied with?

Should an employee suspect this policy has not been complied with, they should, in the first instance, contact the Group Human Resources Manager to discuss the suspected breach in more detail. Should a suspected breach require further investigation it will be required that the employee put their specific concerns regarding such breach of policy in writing to the Group Human Resources Manager such that the matter can be fully investigated and corrective action taken if required.

An employee may initiate a grievance in accordance with the Grievance Policy (HSEMS – 36.2 Grievance Policy) should actions taken as a result of a breach of this policy not meet that employee’s expectations.



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General Information

Approved by	HW Greenham Board
Responsible Policy owner	Group Human Resources Manager
Contact area	Human Resources
Commencement date	1 st February 2019
Date approved	25 th January 2019
Review	Every three years unless required earlier

Related Company policies:

- HW Greenham Code of Conduct
- HW Greenham Privacy Policy
- HW Greenham IT Policy (to be developed)
- HWG HSEMS – 36.2 Grievance Procedure

Related Legislation and Regulation:

- Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth)
- Australian Privacy Act 1988 (Cth)
- Australian Privacy Provisions
- Data and Privacy Protection Act 2014 (Vic)
- Personal Information Protection Act 2004 (Tas)
- <https://www.oaic.gov.au/privacy-law/privacy-act/notifiable-data-breaches-scheme>



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Background:

In introducing the Privacy Act 1988 (Cth), the Australian Government set out organisations' responsibilities and compliance matters regarding the collection and handling of personal information through minimum standards known as the Australian Privacy Principles (APP). Greenham Group Companies are required to comply with the APPs by virtue of annual turnover.

Personal information is described as information that identifies a person and may take the form of information, photos, digital files, bank account details, etc. – basically any information where the person is reasonably identifiable.

Commonwealth Privacy Laws do not apply when dealing with employee records, providing the information is used for something that is directly related to the employment relationship between the Employer and the Employee.

It is sound business practice to apply a similar standard to employee personal information collected to ensure there is no doubt over the use of such information.

In introducing the Notifiable Data Breaches Scheme (NDBS) to the Privacy Act 1988 in February 2018 the Australian Government set out an organisations' responsibilities and compliance matters regarding data breaches that cause serious harm to an individual(s).

HW Greenham has introduced a Privacy Policy which is available on their website at:
https://www.greenham.com.au/privacy_policy.html



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