



Policy: Confidentiality

Platinum Certification AQA Pty Ltd is legally obligated to maintain confidentiality and privacy of all personal and commercial information and records under the *Privacy Act 1988* and the Australian Privacy Principles (APPs) contained in that Act.

PCAQA will follow the APPs in all matters relating to the collection, secure storage, use and disclosure of all information and records; whether personal or commercial-in-confidence as gathered by authorised personnel for the purposes of conducting certification and audit business.

All personal or commercial information received by, or available to, PCAQA and its' staff, while conducting audit activities, other certification activities, or conducting business with an organisation for any other reason; will be regarded as strictly confidential and shall be managed according to the APPs and not be divulged to any third party. This includes any information obtained about the client from sources other than the client, such as from a complainant or regulators.

When PCAQA is required by law or authorised by contractual arrangements (such as an accreditation or regulatory body), PCAQA will release the required confidential information as advised. The client or any individual concerned will, unless prohibited by law, be notified of the request and the type of information provided.

Where an organisation is reasonably assessed to be operating contrary to legal or regulatory requirements or has operating practices that pose, or potentially pose, a danger to their participants, the community, PCAQA staff member/s or the environment; PCAQA reserves the right to immediately report any incident to the relevant authority verbally and in writing. Such reporting will be undertaken within established timeframes by the notifying staff member, immediately upon verbal authorisation being granted by the CEO/Director. Written notification of this authorisation will be provided thereafter.

All records required for the purpose of conducting business and for certification purposes will be retained in a secure manner on password protected server and accessible to PCAQA authorised staff only. Specifically, to Contractors – when conducting their contracted audit activities with an organisation, will have authorised, time-limited access to any information and records that are relevant to that contracted activity.

Records of all activities relating to audit or other related activities kept by Platinum Certification AQA will only be made available to organisations or persons who can demonstrate in writing a legitimate (and legal) right to view those records.

All staff will be required to agree to this Policy and sign PCAQA's Confidentiality Agreement.



As an Approved Quality Auditor (AQA), PCAQA (and our staff) are given access to documents and information that are considered to be highly confidential. We also work closely with many clients that are in direct competition with each other. For these reasons it is important to our business that we maintain a strictly high level of confidentiality for all of our clients. This Policy describes how confidentiality is maintained and must be adhered to by all Platinum Certification AQA Pty Ltd staff.

General

Whilst the majority of our client's information remains confidential, there is some information that is made publicly available relating to the certification. This information includes the name and address of the organisation, and the standard to which it is certified. Clients are advised of this through the Terms and Conditions of their Service Agreement.

Where additional client information is requested by third party organisations, such as government procurement departments, the client will be advised, and no information will be released without the written consent of the client (unless legally required to be released).

Office Level

All client information that is collected including client documents, audit reports, complaints from external and regulatory bodies, and audit notes are stored on computers that are password protected.

Where, by law, client information is required to be released (typically by subpoena) the client will be notified, prior to the information being released by Platinum Certification AQA Pty Ltd, unless restricted by said subpoena.

Auditors

The nature of an audit presents a large risk for maintaining confidentiality. Our auditors hold client files on their laptops whilst performing their duties. All laptops must be password protected and when left unattended must be secured by locking down access.

There is also the additional potential risk that client information could be inadvertently released during conversation. Conscious consideration should be given when discussing information being aware of others in the immediate vicinity of the discussion.

Auditors are also encouraged to minimise the use of hard copy notes/records except on sites that do not facilitate the use of soft copy documentation (i.e. via laptop); noting hard copy records are less secure. Auditors are also discouraged from taking hard copy client documents off site.

Impartiality Committee

PCAQA's Impartiality Committee members may need to review information relating to the client in order to perform their function. As some of the committee members come from outside the certification body, members are also required to sign a Confidentiality Agreement.



Acknowledgement of Confidentiality compliance

All staff are required to read, understand, and acknowledge this Policy by signing the Confidentiality Agreement. It is a condition of service with PCAQA that staff adhere to this Policy at all times.