PRIVACY AT THE AUSTRALIAN NUCLEAR SCIENCE AND TECHNOLOGY ORGANISATION

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Overview

This document describes how the Australian Nuclear Science and Technology Organisation (ANSTO) protects and handles personal information, including sensitive information, in accordance with its obligations under the Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles (APPs).

In particular, it explains:

• why and how we collect your personal information
• the kinds of personal information we collect
• how your personal information is used
• when and with whom we share your personal information
• how we keep your personal information secure
• how you can access and seek to correct your personal information
• how to make a complaint about ANSTO’s privacy practices.

In this document, personal information and sensitive information has the meaning given to it in the Privacy Act, which is available on the Comlaw website available at: www.comlaw.gov.au

This document is available to the public through ANSTO’s website: [www.ansto.gov.au](http://www.ansto.gov.au).

**Why do we collect personal information?**

We collect personal information to perform our functions and activities as set out in the *Australian Nuclear Science and Technology Organisation Act 1987* (Cth). These functions and activities include:

- to undertake research and development in relation to nuclear science and nuclear technology;
- produce and use radioisotopes, isotopic techniques and nuclear radiation for medicine, science, industry, commerce and agriculture;
- provide advice to government and undertake international liaison in nuclear-related matters; and
- make available (on a commercial basis where appropriate) facilities, equipment and expertise for research in nuclear science and technology.


**How do we collect personal information?**

In general, we collect your personal information directly from you when you deal with us by telephone, letter, email, face to face contact or through our website ([www.ansto.gov.au](http://www.ansto.gov.au)) where it is reasonably necessary for, or directly related to, our functions or activities.

**Personal information you give to us**

For example, we collect your personal information directly from you when you enter, or apply for access to, ANSTO. We also collect your personal information directly from you if you apply through our website for a position at ANSTO.

We will not collect sensitive personal information about you unless you consent and the information is reasonably necessary for one or more of our functions or activities. For example, if you are employed at ANSTO, we will not collect health information from you unless it is reasonable necessary for, or related to, your employment.

**Personal information we collect from other sources**

Sometimes we also obtain your personal information from third parties, such as other Australian government agencies or health related entities. For example, ANSTO collects the initials, date of birth and sex of nuclear medicine patients in Australia. This information is included as part of documentation provided to ANSTO by the health related entity. The collection of this information is required by the
Therapeutic Goods Administration, and is provided to the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) as part of the process for issuing radioactive import permits.

We will only collect personal information from other sources with your consent, or if it is impracticable or unreasonable to obtain the information directly from you.

If we do collect your personal information from another source, we will take reasonable steps to ensure that you are notified:

- that we collected your personal information from another source;
- what we will do with the information;
- of any other person or body to whom we may share or disclose the information.

We may also collect sensitive personal information in accordance with the exceptions contained in APP 3.4 of the Privacy Act. For example, if the collection is required or authorised by or under an Australian law or by a court or tribunal order.

**What kind of personal information do we collect and hold?**

The types of personal information we collect and hold will depend on the function or activity being undertaken. Examples of personal information that we collect and hold include:

- name, email address and citizenship of users of, and visitors to, the OPAL neutron beam facilities. This information is collected to assist us to organise site access and to keep ANSTO security personnel apprised of expected visitors and users
- name, position, work address, email address and contact telephone numbers of ANSTO customer contacts
- name, email address and contact telephone numbers of persons who make complaints about ANSTO and its operations name, date of birth, address, citizenship, immigration status, academic qualifications, credentials, references, photographs, professional memberships and employment histories of our staff\(^1\) and visiting scientists. Staff personal information is discussed further below.
- name, email address and telephone number for tenants at ANSTO’s Lucas Heights facility to facilitate the lease arrangements and enable security access to the site.

Examples of sensitive information we collect and hold include:

- health information, including medical, of our staff
- health information, including initials, date of birth and sex, of nuclear medicine patients

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\(^1\) References to ANSTO staff includes former, current, permanent, temporary and prospective staff.
• information contained in personnel records including information about a staff member’s physical and mental health, racial or ethnic origin, criminal convictions and, in some instances, sexual preferences or practices.

*Can you deal with us anonymously or pseudonymously?*

To provide you with access to our facilities or a service, or to deal with your employment application, we will need to collect your name, contact details and other personal information.

Where it is practicable, you may choose to remain anonymous or adopt a pseudonym when dealing with us. For example, you may choose to use a pseudonym to make an enquiry or provide feedback about ANSTO using our online forms. Alternatively, you may choose to anonymously telephone ANSTO to make an enquiry or provide feedback. However, the extent to which we may be able to respond or assist may necessarily be limited.

*How we deal with unsolicited information*

If you send us your personal information when we don’t ask for it (unsolicited personal information), we will determine whether or not the information is related to one or more of ANSTO’s functions or activities. If the information is not relevant to what we do, we may destroy or de-identify the personal information if it is lawful and reasonable to do so.

*How do we use and disclose your personal information?*

We use and disclose your personal information for the particular purpose for which it was collected. For example, personal information collected when a person applies online to visit the Bragg Institute is used to manage access to ANSTO’s OPAL neutron beam facilities and instruments. Similarly, names, addresses and the date of birth of individuals who apply to visit ANSTO’s Lucas Heights facility may be disclosed to the AFP to enable security checks before the individuals are approved to visit the facility.

Sometimes we may use and disclose your personal information for purposes that are related to the primary purpose. For example, for statistical reporting or conducting customer surveys.

We may also use your personal information for a purpose related to the purpose of collection, where you would reasonably expect that your information would be used for this other purpose. For example, if you are an ANSTO customer, or work for an ANSTO customer, we may use your email address to keep you informed of changes to services that you presently receive, or to similar or related services. We may also use or disclose your personal information for another purpose permitted by the Privacy Act and the APPs, including where:

• you provide consent;

• we are required or authorised by or under an Australian law or a court or tribunal order;
● a permitted general situation exists as defined by the Privacy Act;
● a permitted health situation exists as defined by the Privacy Act;
● we reasonably believe that the use or disclosure is reasonably necessary for regulatory or enforcement related activities conducted by, or on behalf of, a regulatory enforcement body.

We will not use your sensitive personal information for another purpose unless it is directly related to our functions and activities.

**Do we use your personal information for marketing purposes?**

Ordinarily, we do not use your personal information for marketing purposes. However, in some circumstances, we may use or disclose your personal information for the purposes of direct marketing. Where information is used for marketing purposes, collection will be in compliance with the Privacy Act and we will always provide a simple means by which you can request not to receive direct marketing.

**Do we send your personal information overseas?**

It may be necessary for us to send personal information overseas, for example revealing security clearance status to an overseas government, upon request, if ANSTO personnel are travelling for work purposes. We may also send personal information to an overseas government that relates to the staff of that government who have visited an ANSTO facility.

However, before sending personal information overseas, we will take reasonable steps to ensure that the recipient will not breach the APPs. Otherwise, we will obtain your express consent to the disclosure.

**How do we manage personal information of potential, current and former staff?**

When you apply for a position with us, or if you are a former or current staff member of ANSTO, we will need to collect and deal with your personal information.

When you submit an employment application, we collect personal information included in your application and curriculum vitae (resume) such as your contact details, employment history and immigration status. If it is relevant to the position, we may also collect sensitive information such as information about your health or details of your racial or ethnic background, with your consent.

When we process your application, we may need to collect and disclose your personal information to third parties where it is not reasonable or practicable for us to collect the information directly from you. We will seek your consent before we do so. For example, we will contact your referees to discuss your academic and employment history and suitability for the position.

If you are selected as the successful applicant, we will collect personal information from you as part of security and medical assessments with your consent. We will collect sensitive information about your health, and may also collective sensitive
information about any criminal record to assess your suitability to maintain a valid security clearance. You may also be asked to complete a security assessment with the Australian Government Security Vetting Agency (AGSVA). You will provide information directly to AGSVA and the results of the assessment will be collected by ANSTO.

As part of your employment, we will maintain a personnel record for you. Information maintained as part of this record includes:

- name, date of birth, address, citizenship, immigration status, academic qualifications, credentials, references, photographs, professional memberships and employment history;
- passport details of staff required for overseas travel;
- recruitment, contracts and conditions of employment records;
- personal security file including criminal record check and any adverse security assessments;
- payroll and administrative information of ANSTO staff such as administrative information are tax file numbers, declarations of pecuniary interests, next of kin details, workers’ compensation claims;
- records relating to attendance, overtime and leave including medical certificates;
- performance appraisals and records relating to personal development and training;
- logs detailing your access to ANSTO facilities, ANSTO computers and the sites that you have visited on the internet;
- medical and dental records including details of accidents and injuries, and compensation and rehabilitation case files;
- records of complaints and grievances and recommendations for honours and awards.

We will store your personal information securely. Your personal information will only be accessible by persons with a business need including human resources staff.

If you are a current or former staff member of ANSTO and wish to obtain your personal information, there are existing processes in place to facilitate access without the need to make a Privacy Act or FOI Act application. Please contact ANSTO Human Resources on 9717 3111 before submitting a formal request for information under the Privacy Act process or the FOI Act.

**How we keep your personal information secure**

ANSTO uses a range of physical and electronic security measures to protect personal information from misuse and loss and from unauthorised access, modification or disclosure. For example, we restrict physical access to our offices
housing personal information, utilise safes, vaults and lockable cabinets, secure
databases, permission restrictions and password protection.

Emails you send to us are screened by our email security systems and may be
viewed by authorised ANSTO information technology personnel for security or other
official purposes.

How do you access and correct your personal information?

You have a right to request access to your personal information and to request its
correction.

Upon request or pursuant to the Privacy Act, we will provide you with access to your
personal information or take reasonable steps to correct your personal information
to ensure that it is accurate, up-to-date, complete, relevant and not misleading,
subject to any applicable exceptions under the Privacy Act.

To obtain access or seek correction of your personal information, you should make
a request through one of the following means:

- sending a letter to:
  Privacy Contact Officer (Building 25)
  Australian Nuclear Science and Technology Organisation
  Locked Bag 2001
  Kirrawee DC NSW 2232

- sending an email to our Privacy Contact Officer at enquiries@ansto.gov.au

- telephoning (02) 9717 3111 and making your request to the Privacy Contact
  Officer or

- visiting ANSTO reception at our Lucas Heights campus

Your request should state that you are seeking access to or correction of personal
information in accordance with the Privacy Act, specify the information you are
seeking or correcting and provide your contact details including an email address or
mailing address.

Before providing access to or correcting your personal information, we may require
you to verify your identity. You will not be charged for lodging a request to access or
correct your personal information.

In general, we will respond to your request within 30 days of the request being
made. If access or correction is refused, we will provide you with a written notice
setting out the reasons for the refusal and information about how you can make a
complaint. If your correction application is refused, we will take reasonable steps to
associate a statement with your personal information which provides that you
believe that your personal information is inaccurate, out-of-date, incomplete,
irrelevant or misleading.
We have a separate policy that describes how we handle requests for information or amendment or annotation requests made under the Freedom of Information Act 1982 (Cth). Our Freedom of Information Policy is available at: http://www.ansto.gov.au/AboutANSTO/About/AccessstoInformation/FOI/

How do you make a complaint about our privacy practices?

If you have a concern about the way in which ANSTO handles your personal information and wish to make a complaint, contact ANSTO’s Privacy Contact Officer (contact details below).

Under the Privacy Act, the Information or Privacy Commissioners have the power to investigate complaints or acts or practices that may be a breach of privacy even if there is no complaint. If you have made a complaint to us about an ANSTO practice that you think amounts to an arbitrary or unreasonable interference with your privacy; and you do not believe that the matter has been resolved satisfactorily, you should either write to the Privacy Commissioner setting out the details of the practices which you think interfere with your privacy, or telephone the Privacy Hotline (below).

If you wish, you may make a complaint directly to the Privacy Commissioner rather than to ANSTO. In most cases, however, it is likely that the Privacy Commissioner would refer you to ANSTO, in the first instance, to see if your complaint can be resolved without requiring the involvement of the Commissioner.

Further information

To find out more about how ANSTO manages personal information, contact:

   ANSTO Privacy Contact Officer
   Tel: (02) 9717 3111
   Fax: (02) 9543 5097

For more general information on the Privacy Act and the APPs:

- Visit the website the Office of the Federal Privacy Commissioner
- Contact the Privacy Hotline 1300 363 992 (local call charge).

We will, from time to time, review and revise this Privacy Policy. We reserve the right to amend this policy at any time and any amendments will be notified by posting an updated version on our website at http://www.ansto.gov.au.