

# MLQ Privacy Protection Policy

## (Complete Policy Version)

\* This statement is the property of MLQ Pty Ltd

MLQ Pty Ltd (A.C.N. 069 806 917) provides leadership questionnaires and instruments through a national and international network of accredited members ("the accredited network"). MLQ also trains, accredits and monitors leadership consultants, trainers, coaches, managers and human resources personal ("the AN members") operating within the MLQ network.

AN members operate independently of MLQ. The AN members are not employees, agents or contractors of MLQ and, while MLQ seeks to monitor the activities of the AN members, MLQ cannot be held responsible for their actions. However if you have any problems with an accredited network member or if you wish to check on their standing as an AN member, please contact MLQ on the number provided below.

The questionnaires and instruments supplied by MLQ involve both personal and group assessments using either self- or multi-rater assessment processes. In this policy we have identified the individual being rated as the 'subject' and the individuals' rating the subject as the 'raters'.

MLQ has also developed or is developing relationships with a number of international and national partners who work extensively in the area of leadership and emotional intelligence research and development. These partners include:-

- Mindgarden Inc. (USA)
- Professor Bruce J. Avolio, University of Nebraska (USA).

MLQ is subject to the Privacy Amendment (Private Sector) Act 2000 ("the Act"). As part of complying with the Act we have prepared this privacy policy. We are committed to protecting your privacy and to informing you of how we manage your personal information to maintain its integrity and security information. As such if you have any queries on reading this policy, you are unclear on any matter or simply want more information, please contact us at the telephone number or addresses provided below.

You can find more information about privacy on the Federal Privacy Commissioner's website at [www.privacy.gov.au](http://www.privacy.gov.au).

### Our Principles

We have published these principles to advise you of how we deal with personal information. In general these principles reflect the Act however in some areas the principles surpass the requirements of the Act and, we believe, demonstrate our commitment to privacy.

1. *MLQ will only collect personal information which is necessary for the assessments you or your firm have requested*
2. *MLQ will not use your personal information for purposes other than those set out in this policy unless we have your express consent.*
3. *MLQ will not disclose personal information other than as outlined in this policy except with your express consent.*
4. *MLQ will take reasonable precautions to store your personal information securely at all times.*
5. *MLQ will destroy your personal information once it is no longer required for research purposes and we have satisfied any legal and ethical holding requirements we may have.*
6. *MLQ will always attempt to answer any questions you may have in relation to the collection, use, disclosure, storage or disposal of your personal information.*

MLQ requests that all members of our accredited network adopt and follow our privacy principles and policy. MLQ is working toward making these principles binding on all its members. In the meantime, MLQ recommends that clients make their own enquiries with the accredited member as to that member's privacy principles and policy and/or its adherence with the MLQ privacy principles and policy.

### **Collecting Personal Information**

We collect a wide variety of personal information from self-raters and it will commonly include name, address, email address, telephone numbers and organisational level.

We also collect information from the various assessment questionnaires or instruments we employ including:

- Multifactor Leadership Questionnaire (MLQ)
- Multifactor Leadership Questionnaire for Teams (MLQTeam)
- Organisational Description Questionnaire (ODQ)
- Mentor – Mentee Reports (MMR)

The information gathered using these questionnaires or instruments is classified as the personal information of both the rater and the subject so that protection is granted to both in the use of the information. Please note the exception for level above raters referred to in the section on disclosure of information.

In the event that you choose not to answer parts of the questionnaire, MLQ will not be able to complete an assessment. The entire questionnaire must be completed in order to ensure that reports generated from the questionnaires are accurate and complete.

### **Purposes of Collection**

Information collected from raters and subjects is used to assess leadership qualities of the specified leader, team, or organisation and to provide reports through the accredited network.

MLQ may in certain circumstances allow the information it collects to be used for research purposes. In every case where this is allowed MLQ will ensure that confidentiality agreements are in place between MLQ and the recipient of the information to ensure that any information used in research will only be published in de-identified form.

### **Disclosure of Information**

The following third parties may have access to a subject's personal information:-

- The identity of a subject will naturally be disclosed to a rater.
- The information will usually be provided to the accredited network facilitating the assessments and providing report assessment feedback.
- Staff and contractors (including I.T. technicians) may have access to information, however it is MLQ's practice for all staff and contractors to enter into confidentiality agreements.
- Information may from time to time be provided to research institutions and/or partners of MLQ for research purposes however as noted above information will only be transferred:-
  - where there is a confidentiality agreement between MLQ and the recipient; and
  - where that agreement provides that information will only be published or used in de-identified form.

In addition to the above, the following third parties may have access to a rater's personal information:-

- The subject will be provided with the assessment by a rater but only in a de-identified form. If the assessment is to be grouped with any less than three other Raters, prior consent will be sought to the disclosure or the assessment data will be integrated with another group.
- Assessments by level above raters are usually disclosed to subjects but only with their prior informed consent to the possible disclosure of their identity.

The policy which MLQ applies generally is that rater information will not be disclosed to any party in identified form, other than an organisation involved in processing or report generation, except with the rater's prior consent. This consent will be recorded by MLQ either via email or through documentation of a verbal consent.

The information supplied by raters and leaders is compiled into reports which may contain either de-identified information or a combination of both. These reports will generally not be supplied to management unless otherwise agreed and disclosed to the subjects prior to the assessment.

These conditions ensure the privacy of others and the validity and authenticity of the information as it is collected under conditions of anonymity.

MLQ will not otherwise disclose information unless the disclosure:

- is required by law
- is authorised by law or
- you have consented to our disclosing the information about you.

### **Personal Information Quality**

MLQ aims to ensure that your personal information is accurate, complete and up to date. To assist us in this, you need to provide true, accurate, current and complete information about yourself as requested and properly update the information to us to keep it true, accurate, current and complete.

If you believe that the information is inaccurate or incomplete, please contact us and we will use all reasonable effort to correct the information.

In the event that we do not believe the information to be incorrect, we will take reasonable steps to add a statement to the information claiming that you believe the information is not accurate, complete or up-to-date.

### **Securing Your Personal Information**

MLQ are committed to maintaining the security and confidentiality of the data you provide us and MLQ will take reasonable precautions to protect your personal information from unauthorised disclosure, use or alteration.

MLQ has the following security measures in place to protect your information:-

- Archived files and electronic records are kept in secure locked areas.
- Electronic information systems are only accessed by password protected computer stations
- Procedures are actively and routinely followed to provide firewall protection from unauthorized access (including internet hackers).
- Paper filing systems are contained in locked filing cabinets.
- Both computers and filing cabinets are located in secure locked office spaces. Access is only allowed to persons who have signed confidentiality agreements with MLQ.
- Employees and contractors are only provided with the information they need to perform the duties for which they are engaged.

### **Accessing Your Personal Information**

You have a limited right to access all personal information that we hold about you. In limited circumstances, we may refuse your request to access, in which case, we will give you a reason for that refusal.

We are not required to provide access where:-

- denying access is required or authorised by law; or
- providing access would be unlawful.

### **Changes to this Statement**

This Privacy Policy is not a static document, we may make changes to this Privacy Policy from time to time for any reason. We will publish these changes on our website at [www.mlq.com.au](http://www.mlq.com.au).

### **Contacting Us**

If you would like further information regarding this privacy statement or if you think we have breached any aspect of this Privacy Policy please contact Ray Elliott at:-

<b>Telephone</b>	+613 9819 3689
<b>Email</b>	rayelliott@mlq.com.au
<b>Post</b>	MLQ Pty Ltd PO Box 199 Hawthorn Vic 3122