

Farm Data Code

Summary Audit Report for People in Paddocks Platform (PIPA)



Provider: People in Paddocks Pty Ltd

Assessed against Farm Data Code version: 2.0

Published Date: 13/02/2025

Expiry Date: 13/02/2026

Audit Number: 0013

Transparency

✓ 1.1 ✓ 1.2 ✓ 1.3 ✓ 1.4 ✓ 1.5 ✓ 1.6

Fairness

✓ 2.1 ✓ 2.2

Control

✓ 3.1 ✓ 3.2 ✓ 3.3 ✓ 3.4 ✓ 3.5

Portability

✓ 4.1 ✓ 4.2 ✓ 4.3 ✓ 4.4 ✓ 4.5 ✓ 4.6

Security

✓ 5.1 ✓ 5.2 ✓ 5.3 ✓ 5.4 ✓ 5.5

Compliance

✓ 6.1 ✓ 6.2

Summary of terms

What Farm Data, or other data about the farmer or farm business is being collected, created, aggregated, used, or shared?

Farm Data: Personal HR information, metrics about worker behaviour, and safety compliance data is collected. Worker GPS locations are shared within the farmer's management portal and worker payroll information is shared with the farmer's chosen accounting software provider (i.e., myob, xero)

Other data about the Farmer or their farm/business: Personal information

Why is this being done?

Farm Data: 1. Personal data related to farm workers, including contact details and employment records is collected for workforce management, compliance, and reporting purposes. 2. Data on worker performance, safety compliance, and job-related behaviour is collected to improve safety, optimise farm operations, and provide insights for promotions, and 3. Data generated by farms, such as production data, environmental data, and transaction data is collected to assist in operational decisions and industry benchmarking.

Other data about the Farmer or their farm/business: Personal information collected for operating the platform.

Who is the Provider sharing Farm Data with?

Currently only People in Paddocks Pty Ltd has access to data. Data transfer to third parties in the Data & Privacy Policy, details the nature of intended future entities for sharing anonymised data such as industry bodies for benchmarking and researching purposes.

Is Farm Data being de-identified?

Anonymised data will be used for industry benchmarking.

How long is Farm Data stored for?

Unless immediate deletion of data is requested, data is only kept for as long as necessary, i.e. Employee timesheet information is retained for 7 years and then deleted using secure digital erasure, worker behaviour metrics are retained for 5 years (unless used in anonymised form) and then deleted from all systems, and other farm data is retained for the duration of the service provided or until deleted by the farmer.

How can farmers obtain a copy of their Farm Data?

Farmers can initiate a data portability request through their account settings in the management platform.

How can farmers get Farm Data deleted?

Farmers can request deletion of their data at any time through their account settings or by contacting People in Paddocks support

In which countries is Farm Data stored or made available?

Farmers can access our platform from anywhere in the world. All data, including back-ups, is stored in servers located in Australia.

What's in it for the farmer, and for the Provider?

Workers: recruitment opportunities & job requirement, Farmers: new source of workers and improved worker management tools, Provider: platform subscription fees. This information is published in our Data & Privacy Policy

Are there any risks or detriments that may affect farmers?

In accordance with Fair Work Australia rulings, employers have to keep time and wages records for 7 years. The records must be readily accessible for an auditor. For this reason, unless the farmer opts to retrieve their data to be used in other platforms, the platform would be required to retain the data in its true form.

Detailed compliance report against Farm Data Code

Transparency

Transparent, clear and honest collection, use and sharing of Farm Data. Providers will:

Data Code Principles



1.1



1.2



1.3



1.4



1.5



1.6

Detailed compliance report against Farm Data Code

Transparency

1.1

Provide Farmers with plain-English, easily found terms and associated policies for data collection, use, and sharing detailing:

- the identity of the contracting party/ies;
- what Farm Data and any other data about the Farmer or their farm/business, will be collected, created, aggregated, used, or shared;
- purpose/s for which Farm Data is being collected, used and shared;
- the value being created for the Farmer, and the Provider;
- how Farm Data will be managed and shared, in terms of security, access, and de-identification protocols;
- identity and/or nature of any other entities with whom it shares Farm Data;
- processes and conditions for data retention, data retrieval, and service termination; and,
- any risks or detriments that may adversely affect Farmers who share data with the Provider.

Meets the code?



Yes

Provider's comment

Yes, we have Terms and Conditions as well as a Data & Privacy Policy. Both are available through every page on our website as well as through the management portal for PIPA.

Detailed compliance report against Farm Data Code

Transparency

1.2

Obtain clear, fully informed, and express consent from the Farmer as to the terms for collection, use, and sharing of Farm Data.

Meets the code?



Yes

Provider's comment

For subscriptions, prior to submitting payment details, farmers receive a pop up message "by proceeding you agree to our platform terms and our Privacy Policy" (both hyperlinks to the documents on our website). For users visiting the website only, our Terms & Conditions and Data & Privacy Policy are accessible from every page.

Detailed compliance report against Farm Data Code

Transparency

1.3

Provide prompt notice about any material changes to the terms and associated policies for collection, use, and sharing of Farm Data.

Meets the code?



Yes

Provider's comment

We give farmers 4 weeks notice via email and in-app alerts for material changes to terms and conditions, and our data and privacy policies. Minor changes are made on a needs basis and will not change the intent or key clauses of our terms and conditions or policies. This is explained to the farmer in clause 11. Policy Review & Updates in the 'Data & Privacy Policy'.

Detailed compliance report against Farm Data Code

Transparency

1.4

Where a material change to terms and associated policies is proposed, obtain clear, fully informed, and express consent for the Farmer to accept the change and; provide an avenue for the Farmer to terminate the agreement without incurring a financial penalty and with adequate time to port or delete their Identifying Farm Data.

Meets the code?



Yes

Provider's comment

Farmers receive an email and in-app pop up inviting them to view the changes to the terms and advising them that the changes will come into effect in 4 weeks time and that by continuing to use the platform beyond this period, they are agreeing to the new terms. Our refund policy in our Terms and Conditions explains how farmers can terminate their subscription. The Data Deletion and Retention Policy in the company's 'Data & Privacy Policy' explains how much time is provided to farmers to port or delete their farm data.

Detailed compliance report against Farm Data Code

Transparency

1.5

Provide a mechanism for Farmers to enquire about the collection, use, storage, security and sharing of Farm Data.

Meets the code?



Yes

Provider's comment

The Chief Technology Officer is the main point of contact for farmers regarding Farm Data. The current CTO is Tristan Goodfellow and she can be contacted via email support@peopleinpaddocks.com.au. The CEO also has access to this email address. Contact details are offered to the farmer in both the Terms and Conditions and the Data and Privacy Policy

Detailed compliance report against Farm Data Code

Transparency

1.6

Notify Farmers of the legal jurisdiction in which Farm Data is stored or made available.

Meets the code?



Yes

Provider's comment

Farmers can access our platform from anywhere in the world. All data, including back-ups, is stored in servers located in Australia. This is published in our Terms & Conditions.

Detailed compliance report against Farm Data Code

Fairness

Fair and equitable use of Farm Data.
Providers will:

Data Code Principles



2.1



2.2

Detailed compliance report against Farm Data Code

Fairness

2.1

Ensure that Farmers get value from the use of Farm Data – including products and insights derived from it.

Meets the code?



Yes

Provider's comment

Workers: recruitment opportunities & job requirement.

Farmers: new source of workers and improved worker management tools, Provider: platform subscription fees. This information is published in our Data & Privacy Policy

Detailed compliance report against Farm Data Code

Fairness

2.2

Ensure that Farm Data is not used to the detriment of Farmers without their clear, fully informed, and express consent.

Meets the code?



Yes

Provider's comment

Our vision is Farming without Fatalities. The primary aim of our data collection is to improve a worker's productivity, engagement and safety on farms

Detailed compliance report against Farm Data Code

Farmer Control

Ability to control and access Farm Data.
Providers will:

Data Code Principles



3.1



3.2



3.3



3.4



3.5



Detailed compliance report against Farm Data Code

Farmer Control

3.1

Ensure the Farmer has control over who can access and use their Identifying Farm Data.

Meets the code?



Yes

Provider's comment

A farmer can integrate their accounting system (i.e.. MYOB, Xero) to PIPA for exporting timesheets. They can also delete this integration through their management portal.

If famers share their login details with others, and then want to stop their access, they can change their passwords within their settings in the management portal.

Detailed compliance report against Farm Data Code

Farmer Control

3.2

Take all reasonable steps to ensure any other entities permitted access to Farm Data are bound by the terms agreed between the Provider and Farmer, and do not contravene the provisions of this Code. This does not include entities nominated by the Farmer for data sharing purposes. Inform the Farmer where terms have not been fully passed on, or Code isn't complied with.

Meets the code?



Yes

Provider's comment

When sharing data to third-party service providers, People in Paddocks follows strict data-sharing agreements that comply with national laws. These agreements ensure that third parties adhere to the same standards of transparency, security, and fairness. The farmer authorises data sharing to Xero, MYOB and Google Maps. The farmer has the ability to remove these third party sharings through their management portal. Future sharing of anonymised data will be to WHS industry bodies; Safe Work Australia and National Farmers Federation, and to Farm Insurance companies & banks such as Elders and NAB with the aim to reduce farmer's risk profiles

Detailed compliance report against Farm Data Code

Farmer Control

3.3

Provide a mechanism for the Farmer to request corrections to Farm Data.

Meets the code?



Yes

Provider's comment

Clause 4. Data Control and Portability in the 'Data & Privacy Policy' explains to farmers that they have the right to access, correct, delete and port their data, and the clause offers the support email address for actioning these requests.

Detailed compliance report against Farm Data Code

Farmer Control

3.4

Ensure Identifying Farm Data and any other data provided by the Farmer to the Provider, is not deleted without the Farmer's authorisation during any agreed or legally required data retention period.

Meets the code?



Yes

Provider's comment

Farmers can request deletion of their data at any time through their account settings or by contacting People in Paddocks support as explained to farmers in the 'Data & Privacy Policy' - clause 14. Data Deletion and Retention Policies. In the case a farmer doesn't request the deletion of their data, all data is only kept for as long as necessary, i.e.. Personal HR Information is retained for 7 years and then deleted using secure digital erasure, worker behaviour metrics are retained for 5 years (unless used in anonymised form) and then deleted from all systems, and other farm data is retained for the duration of the service provided or until deleted by the farmer. Further information is available in clause 14 of the 'Data & Privacy Policy'

Detailed compliance report against Farm Data Code

Farmer Control

3.5

Take all precautions to avoid identification or re-identification of a farm or Farmer from de-identified data, without the Farmer's clear, fully informed, and express consent.

Meets the code?



Yes

Provider's comment

Before any statistics are collected, all user identifiers (specifically IDs and names) are removed so it is impossible to identify who created and contributed to the data. Statistics will only ever be measured on a larger scale; regional, State, Country.

Detailed compliance report against Farm Data Code

Portability

Ability to obtain and delete Farm Data.
During any agreed and legally required data
retention period. Providers will:

Data Code Principles



4.1



4.2



4.3



4.4



4.5



4.6

Detailed compliance report against Farm Data Code

Portability

4.1

Provide Farmers and/or their nominees with the ability to obtain all Identifying Farm Data (both raw and/or processed) in a structured and frequently used machine – or human-readable format where technically feasible.

Meets the code?



Yes

Provider's comment

Farmers can request and retrieve their data in both processed and unprocessed forms. This ensures they have the ability to switch providers, use third-party systems, or retain their data for personal records. Farmers can initiate a data portability request through their account settings in the management platform. The request will be processed within 10 business days, during which time the data will be compiled and made available for download in a standardised, machine-readable format (e.g., CSV, JSON, or XML). This information is made available to the farmer in our 'Data & Privacy Policy'

Detailed compliance report against Farm Data Code

Portability

4.2

Provide documentation to make ported data usable, e.g. Application Programming Interface (API) documentation and data model diagrams.

Meets the code?



Yes

Provider's comment

Farmers can request and retrieve their data in both processed and unprocessed forms. This ensures they have the ability to switch providers, use third-party systems, or retain their data for personal records. Farmers can initiate a data portability request through their account settings in the management platform. The request will be processed within 10 business days, during which time the data will be compiled and made available for download in a standardised, machine-readable format (e.g., CSV, JSON, or XML). This information is made available to the farmer in our 'Data & Privacy Policy'

Detailed compliance report against Farm Data Code

Portability

4.3

At the request of the Farmer, delete or dispose of any Identifying Farm Data, unless prohibited by law or unable to do so.

Meets the code?



Yes

Provider's comment

Farmers can request deletion of their data at any time through their account settings or by contacting People in Paddocks support as explained to farmers in the 'Data & Privacy Policy' - clause 14. Data Deletion and Retention Policies. In the case a farmer doesn't request the deletion of their data, all data is only kept for as long as necessary, i.e.. Personal HR Information is retained for 7 years and then deleted using secure digital erasure, worker behaviour metrics are retained for 5 years (unless used in anonymised form) and then deleted from all systems, and other farm data is retained for the duration of the service provided or until deleted by the farmer. Further information is available in clause 14 of the 'Data & Privacy Policy'

Detailed compliance report against Farm Data Code

Portability

4.4

Ensure that contingency plans exist to give Farmers the option to port and/or delete Identifying Farm Data in the event of insolvency.

Meets the code?



Yes

Provider's comment

In the case, insolvency was on the cards, we would have advance warning allowing us to email farmers with as much notice as possible. Farmers would be given instructions for deleting or porting their data. Under the 'Data & Privacy Policy' - clause 4. Data Control & Portability, farmers can request the deletion or retrieval of their data at any time by submitting a request via the app or to support@peopleinpaddocks.com.au at any time.

Detailed compliance report against Farm Data Code

Portability

4.5

Provide the Farmer fair warning in advance of changes to legal jurisdiction, change of control, or sale of the Provider entity, and adequate time for the Farmer to port and/or delete their Identifying Farm Data.

Meets the code?



Yes

Provider's comment

Yes, we will email farmers with as much notice as possible before such an event. Farmers can download their data or close their account if they choose, as specified above.

Detailed compliance report against Farm Data Code

Portability

4.6

Ensure that Farmers can port and/or delete Identifying Farm Data in the event of service termination.

Meets the code?



Yes

Provider's comment

Farmers can terminate the service by deleting their account in the platform. On cancellation of a subscription, the services will still be available until the end of the paid period as per Terms and Conditions - clause 10 Refund Policy. Unless immediate deletion of data is requested, data is only kept for as long as necessary, i.e.. Personal HR Information is retained for 7 years and then deleted using secure digital erasure, worker behaviour metrics are retained for 5 years (unless used in anonymised form) and then deleted from all systems, and other farm data is retained for the duration of the service provided or until deleted by the farmer. Further information is available in clause 14 of the 'Data & Privacy Policy'

Detailed compliance report against Farm Data Code

Security

Keeping Farm Data protected and secure.
Providers will:

Data Code Principles



5.1



5.2



5.3



5.4



5.5

Detailed compliance report against Farm Data Code

Security

5.1

Take all reasonable and prudent steps, in line with industry best practice, to ensure Farm Data and any other data provided by the Farmer to the Provider, are protected at all times from unauthorised access, damage or destruction.

NOTE: Assessed based on this provider's answers to security questions based on the Australian Cyber Security Centre guidelines for small and medium businesses

Meets the code?



Yes

Provider's comment

All data is encrypted both in transit and at rest to ensure confidentiality. Access to data is restricted to authorised personnel only, with role-based permissions. In the event of a data breach, People in Paddocks will notify affected farmers within 48 hours and provide guidance on steps to mitigate the impact. We regularly review our security protocols to ensure they meet or exceed industry standards.

Detailed compliance report against Farm Data Code

Security

5.2

Put in specific data management protocols to protect sensitive data about the Farmer or farm, such as personal/financial information.

Meets the code?



Yes

Provider's comment

Payment data is stored in a separate database - we do not store credit card details, just subscription details.

Detailed compliance report against Farm Data Code

Security

5.3

Promptly notify the Farmer of a data breach that has led to unauthorised access to, or damaged or destroyed Farm Data.

Meets the code?



Yes

Provider's comment

In the event of a data breach, People in Paddocks will take the following steps: 1. Immediate Response: The breach will be investigated within 24 hours by the Chief Technology Officer. 2. Farmer Notification: If affected farmers will be notified within 48 hours of identifying the breach. 3. Mitigation: Steps will be taken to contain and resolve the breach, with guidance provided to affected parties on how to protect your information. 4. Reporting: The incident will be documented and reported as part of People in Paddocks' annual transparency report.

Detailed compliance report against Farm Data Code

Security

5.4

Implement a backup and recovery regime that is appropriate for the scale, sensitivity and timeliness of the Farm Data.

Meets the code?



Yes

Provider's comment

Daily back ups of the database. Database recovery can be done almost instantly, can go roll back to previous day - max data loss is 1 day.

Detailed compliance report against Farm Data Code

Security

5.5

Ensure all staff and sub-contractors that work with Farm Data, and/or set terms, policies, and/or processes for Farm Data are trained to comply with the terms of this Code.

Meets the code?



Yes

Provider's comment

All employees and contractors are taken through Induction training. The induction starts with a personal one-on-one review of the Employee Policy Manual which includes "Client Data Policy" plus the company's "Data & Privacy Policy". Induction refreshers are carried out annually. Additionally, all employees involved in data handling are trained on data security and privacy best practices. Details of the types of training are listed in our 'Data & Privacy Policy' - clause 19. Training and Awareness. To ensure the effectiveness of our data management practices, regular reviews and assessments are undertaken as detailed under clause 21. Policy Effectiveness Review.

Detailed compliance report against Farm Data Code

Compliance

Compliance with privacy and disclosure obligations. Where Providers are required by law to provide information to a third party, they will:

Data Code Principles



6.1



6.2

Detailed compliance report against Farm Data Code

Compliance

6.1

Avoid disclosing any Identifying Farm Data; or,

Meets the code?



Yes

Provider's comment

We will avoid disclosing any identifying farm data. Our 'Data & Privacy Policy' - clause 6 states that any third-party data sharing will be governed by strict agreements that comply with National standards, and that we will always inform and asked for consent before data is shared with third parties, with the exceptions of legal compliance or aggregated and anonymised data for research and benchmarking. Clause 7 further states that if we are required to disclose data due to legal obligations, we will notify the farmer in a timely matter.

Detailed compliance report against Farm Data Code

Compliance

6.2

If Identifying Farm Data must be disclosed, where legally permissible the Provider must promptly notify any Farmer whose information will be (or has been – if prior warning is not possible) disclosed.

Meets the code?



Yes

Provider's comment

We will avoid disclosing any identifying farm data. Our 'Data & Privacy Policy' - clause 6 states that any third-party data sharing will be governed by strict agreements that comply with National standards, and that we will always inform and asked for consent before data is shared with third parties, with the exceptions of legal compliance or aggregated and anonymised data for research and benchmarking. Clause 7 further states that if we are required to disclose data due to legal obligations, we will notify the farmer in a timely matter.

Disclaimer

The “Farm Data Code Provider Summary Audit Report” website (Website) is operated by the National Farmers’ Federation Limited (NFF). The Website provides a listing of data and technology products (Products), supplied by different providers (Providers), assessed by NFF for compliance with the NFF Farm Data Code (Code).

What is certification?

Providers who wish for their Products to be assessed and certified for compliance against the Code apply for assessment by NFF. NFF perform a desktop review of certain documents to assess a Product’s compliance before publishing the outcome of this assessment on the Website. Where a Product complies completely with the Code it will be certified.

NFF’s intention is that the Website provides a quick reference for how Products comply with the Code and provides a summary of how Farm Data is handled by Providers.

Certification and assessment is not advice on the quality of the services provided by a Provider or the Product and the review performed by NFF does not consider or reflect these aspects in any way.

By including the Summary Audit Report or certification of a Product on the Website, NFF is not providing an endorsement of the Product, Provider or any services.

How do members of the farming industry use the Website?

NFF operates the Website to allow members of the public to review Providers’ and Products’ performance against the Code, as assessed by NFF.

While NFF has taken all reasonable measures to confirm the accuracy of its assessment, it does not warrant that any information published on the Website is accurate, complete, reliable or up to date. We request that Providers ensure the information they provide is correct when they apply for assessment and certification, however rely on Providers to comply with this request.

NFF does not make any representations or give any warranties about the information available on the Website or contained in the Summary Audit Report, or the suitability of any Provider or Product for a particular purpose. To the extent permitted by law, NFF will not be liable for any expenses, losses, damages or costs which might be incurred as a result of the information contained on the Website or in a Summary Audit Report being inaccurate or incomplete in any way and for any reason.

What if the Provider’s product was not as expected?

NFF encourages farmers to report to NFF any conduct of a Provider or a Product that does not comply with the Code. However, NFF accepts no liability for any aspect of the interaction between a Provider and user of the Website, including but not limited to fees, payments and refunds, scope of services, performance or delivery of any services or contractual disputes. NFF is not a regulator of the relationship between a Provider and any recipient of the Provider’s services.

How is personal information used in a complaint?

If you make a complaint, your personal information will be used by NFF to contact you and obtain additional information from you about the alleged breach of the Code. Your personal information will never be published by NFF or provided to a Provider.

For further information on how NFF collects, uses, discloses and stores personal information, please see our Privacy Policy at <https://nff.org.au/programs/australian-farm-data-code/australian-farm-data-code-certification-privacy-policy/>. The Privacy Policy also provides for how complaints related to privacy may be raised with and managed by NFF.