



# Specialist Disability Accommodation Alliance

## Privacy Policy

The Specialist Disability Accommodation (SDA) Alliance Ltd. (the SDA Alliance) is committed to protecting the privacy of personal information which the organisation collects, holds and administers. Personal information is information which directly or indirectly identifies a person.

The purpose of this document is to provide a framework and outline the procedures for the SDA Alliance in dealing with privacy considerations.

### Why do we collect information?

The SDA Alliance collects and administers a range of personal information for the purposes of information, measurement, collation, reporting, advocating and publishing. The organisation is committed to protecting the privacy of personal information it collects, uses, stores and administers.

The SDA Alliance recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – protected, correct, accessible and amendable. These privacy principles are mandated by the Privacy Act 1988 (Cth). The SDA Alliance is bound by laws which impose specific obligations when it comes to handling personal information.

### Definitions

- **Personal information:** ‘Personal information’ is information (or opinion) about an identified person (or a person who is ‘reasonably identifiable’). Personal information includes a person’s name, address, contact details, date of birth, gender, sexuality and race.
- **Sensitive information:** Racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices or criminal record.
- **Health information:** ‘Health information’ is generally afforded a higher level of protection under Privacy Laws and includes information or opinions about a person’s physical and mental health, disability (at any time), health preferences (including future provision of health services), use of health services, bodily donations (for example, blood, organs) and genetics.

The organisation has adopted the following principles contained as minimum standards in relation to handling personal information.

## Collection of data

- Collect only information which the organisation reasonably requires for its primary function(s).
- Notify stakeholders about why we collect the information and how it is administered.
- Provide stakeholders with access to their own information, and the right to seek its correction.
- Collect personal, sensitive or health information from the person themselves wherever practicable.
- If collecting personal information from a third party, advise the person whom the information concerns, from whom their personal information has been collected.
- Collect sensitive or health information only with the person's consent.
- Determine, where unsolicited information is received, whether the personal information could have been collected in the usual way, and then if it could have, it will be treated normally. (If it could not have been, it must be destroyed, and the person whose personal information has been destroyed will be notified about the receipt and destruction of their personal information).

## Use + disclosure of data

- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent.
- For other uses, the SDA Alliance will obtain consent from the affected person.
- In relation to a secondary purpose, use or disclose the personal information only where:
  - a secondary purpose is related to the primary purpose and the individual would reasonably have expected us to use it for the purposes; or
  - the person has consented; or
  - certain other legal reasons exist, or disclosure is required to prevent serious and imminent threat to life, health or safety.
- In relation to personal information which has been collected from a person, use the personal information for direct marketing, where that person would reasonably expect it to be used for this purpose, and the SDA Alliance has provided an opt out and the opt out has not been taken up.
- In relation to personal information which has been collected other than from the person themselves, only use the personal information for direct marketing if the person whose personal information has been collected has consented (and they have not taken up the opt-out).
- Ensure any person opting out of direct marketing is noted as doing so, or otherwise removed from direct marketing mailing lists.
- State in the SDA Alliance privacy policy whether the information is sent overseas and further will ensure that any overseas providers of services are as compliant with privacy as the SDA Alliance is required to be.
- Provide all individuals with access to personal information except where it is a threat to life or health, or it is authorised by law to refuse and, if a person is able to establish that the personal information is not accurate, then the SDA Alliance must take steps to correct it. The SDA Alliance may allow a person to attach a statement to their information if the SDA Alliance disagrees it is inaccurate.
- Where for a legal or other reason we are not required to provide a person with access to the information, consider whether a mutually agreed intermediary would allow sufficient access to meet the needs of both parties.
- Charge no fee for making a request for personal information, correcting the information or associating a statement regarding accuracy with the personal information.

## Storage of data

- Store personal information securely, protecting it from unauthorised access.
- Implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorised access, interference, unauthorised modification or disclosure.

- Before the SDA Alliance discloses any personal information to an overseas recipient including a provider of IT services such as servers or cloud services, establish that they are privacy compliant and have systems which provide sufficient security.
- Ensure that SDA Alliance data is up-to-date, accurate and complete.

## Destruction and de-identification of data

- Destroy personal information once it is not required to be kept for the purpose for which it was collected, including from decommissioned laptops and mobile phones.
- De-identify or anonymise information if required by the person whose information the SDA Alliance holds.
- Do not use any government related identifiers unless they are reasonably necessary for the intended use.

## Data Quality

- Take reasonable steps to ensure the information collected is accurate, complete, up-to-date, and relevant to the functions required.

## Openness

- Ensure stakeholders are aware of the SDA Alliance's Privacy Policy and its purposes.
- Make this information freely available, for example via the website.

## Access and Correction

- Ensure individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading or not up-to-date.

## Anonymity

- Allow people from whom the personal information is being collected to not identify themselves or use a pseudonym unless it is impracticable to deal with them on this basis.

## Disclosing information to other organisations

- Release information to third parties where it is requested by the person concerned.

## Authorisation

Jeremy Hope  
CEO  
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