

# Privacy Policy

## Commitment

Illowra is committed to providing and maintaining quality Specialist Disability Accommodation (SDA), and this policy outlines how we respect and manage privacy. The way we collect, use, disclose, store, secure and dispose of information is in line with legislation and standards.

## Scope

This policy relates to all staff, Supported Independent Living (SIL) providers and contractors with access to individual information on our behalf.

Individual information relates to information we may collect about stakeholders, including residents, family/carers, SIL providers, investors and contractors. (It does not apply to staff, in line with legislation, however privacy principles are applied to the management of staff information.)

## What is personal information and why do we collect it?

Personal information is information that identifies an individual. We collect names, addresses and phone numbers through conversation, correspondence and public sources. We collect this information to provide SDA and maintenance, and provide relevant information to stakeholders. When we collect information we will, where appropriate and where possible, explain why we are collecting the information and how we plan to use it.

## What is sensitive information and why do we collect it?

Sensitive information includes information or opinion about a person's disability, health, relationships, culture or beliefs. (Under legislation, information about a person's disability is also considered health information.) We may use for this type of information to ensure people are matched with the right house and household. We only share this:

- with consent
- where required or authorised by law.

You choose what information you provide. However, incorrect or incomplete information may affect service quality, or may make it impossible to offer a service.

## Who is an authorised person and how do we work with them?

Illowra Projects and Illowra Living will try to collect information directly from you, but may also get information from authorised people. This may be family, planners, case coordinators, or someone with guardianship or power of attorney. We will take reasonable steps to ensure you are made aware of information provided, and only provide them

information if you have agreed to this using the Sharing Information Form.

### **Disclosure of personal information**

We will only disclose information to you, or people who are authorised by you. Your information may only be disclosed where:

- it is being used to provide SDA management, maintenance, safety, finance or auditing requirements
- we have written consent
- required or authorised by law.

### **Disclosure of de-identified information**

When advertising a vacancy in shared SDA, general non-identifying information about housemates may be included.

### **Security of personal information**

Your information is stored securely and protected from unauthorised access. Information will be kept for a minimum of seven years. When your information is no longer needed, we will take reasonable steps to securely destroy it.

### **Access to your personal information**

You may access the information we hold about you. Please write to us if you wish to access your information. We will not charge a fee for your request, but may charge a fee for providing a copy. In order to protect information we will require identification.

### **Maintaining your personal information**

It is an important to us that your information is up to date. We will take reasonable steps to make sure that your information is current and complete. Please let us know if your information changes so we can update our records and ensure we can continue to provide quality services.

You may unsubscribe from our general mailing list at any time by contacting us in writing.

## Notifiable Data Breach

Organisations that suspect a data breach must undertake an assessment within 30 days. If a breach occurred, and is likely to result in serious harm to an individual affected, the individual and the Australian Information Commissioner must be notified. Notification must include:

- the identity and contact details of the organisation
- a description of the data breach
- the kinds of information concerned
- recommendations about the steps individuals should take in response to the data breach.

The notification to the Commissioner should be made using the Notifiable Data Breach form.

## Responsibilities

- Staff must work to the Privacy Policy.
- In shared living, residents must respect the privacy of others in line with their tenancy agreement, and this expectation extends to family and visitors.
- Supported Independent Living (SIL) providers must meet privacy requirements in line with the Collaboration Agreement.
- Contractors must meet privacy requirements in line with their agreement/contract/project specifications.
- Translators for people with hearing or vision impairments, or people from linguistically diverse backgrounds, must maintain privacy in line with this policy. Generally they are bound by confidentiality within their contract arrangement.
- Auditors are bound by confidentiality.
- Investors must meet privacy requirements in line with their contract.
- The Finance and Governance Manager is the designated Privacy Officer and has responsibility to ensure compliance with this policy and investigate any concerns.
- The Managing Director is responsible for acting if any breach occurs.

## Privacy Policy questions and feedback

If you would like a copy of this policy, or if you have any privacy questions or feedback, please contact us at:

[info@illowraliving.com.au](mailto:info@illowraliving.com.au)

**1300 455 697 (1300 illowra)**

For people who are deaf, hearing impaired or speech impaired:

**[National Relay Service](#)**

1300 728 187 (local call from land lines)

1800 555 677 then 1800 677 342 (TTY users)

1800 555 677 then dial 1800 677 342 (speak and listen users)

There are other organisations you can contact in relation to management of your information. These include:

**Office of the Australian Information Commissioner (OAIC)**

1300 363 992

[enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

## Legislation, Standards and Agreements

The following legislation applies to this policy and supporting documentation:

[National Disability Insurance Scheme Act 2013](#) (Commonwealth)

[Privacy Act 1988](#) – (Commonwealth)

The following Standards apply to this policy and supporting documentation:

[Australian Privacy Principles](#)

[National Standards for Disability Services \(DSS\) – 2013](#)

[NDIS Provider Toolkit and SDA requirements](#)

The following are useful privacy resources:

[Notifiable Data Breaches Scheme](#)

[Notifiable Data Breach Form](#)

[Fact Sheet - A Guide to Privacy Laws in NSW](#)

[Privacy Guide – A Guide to compliance with Victorian and Federal Privacy Laws 2014](#)

## Related internal documents

Sharing Information Form

<b>Privacy Policy</b>	<b>Policy Matrix: Governance and management</b>
<b>Version</b>	<b>Details</b>
Version 3	30 October 2018
Version 4	22 May 2019
Endorsed	Managing Director
Changes	NSW requirements