

# Australian Alliance to End Homelessness (AAEH) AtoZ Database Privacy Policy

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## Document Control

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| <b>Document Name:</b>       | Privacy Policy |
| <b>Document Maintainer:</b> | Carman Wilson  |
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## Version Control

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## Section 1: Introduction

The Australian Alliance to End Homelessness (AAEH) is an independent champion for ending homelessness in Australia. We support communities across Australia through the Advance to Zero movement, our Allied Networks and our Training and Advisory services to demonstrate that it is possible to make homelessness rare, brief and once-off. Australian Alliance to End Homelessness (ABN: 52 163 151 808) (AAEH, **we**, **us** or **our**), a not-for-profit company limited by guarantee.

AAEH is seeking to end homelessness (starting with rough sleeping) by implementing a real time By-Name List (BNL). The BNL is a database, and this approach is about knowing every individual and family currently experiencing homelessness in a community by name and coordinating local resources to meet their needs. The AAEH works in a number of locations in Western Australia, South Australia and Queensland and aims to expand to other regions in later phases.

We commit to maintaining the privacy and security of the information we collect at all times as required under the *Privacy Act 1988* (Cth) (**Privacy Act**) and all other applicable laws.

## Section 2: Collection of information

### 2.1 What Personal Information Do We Collect

Personal information means information or opinion about you as an identified or reasonably identifiable individual. The types of personal information we may collect include your personal details such as your name, date of birth, gender, and phone number.

Other types of personal information we may collect includes information on your housing and support needs. In terms of housing, the information we may collect includes your housing goal, current housing status and your social housing application status. In terms of support needs, the information we may collect includes primary support needs, who is supporting you and upcoming appointments.

We may also collect some information that is considered sensitive information under the Privacy Act such as information about your health and race or ethnic origin.

### 2.2 How We Collect Your Personal Information

#### Information we collect from you

We may collect personal information directly from you, or through an appointed representative or agent, either:

- in person;
- by telephone or mail; or
- when you provide your information to us online.

#### Information we collect from Partners

We may also collect personal information from Partners, with whom you may have had contact, whereby the Partners will disclose your information to AAEH, including by adding your information to the BNL. We may combine information about you that has been collected from multiple Partners into a single profile on the BNL.

For example, AAEH may receive information from:

- survey(s) that you participate in; or
- partners that you have received services from;

### 2.3 Purposes for which we collect, hold, use and disclose your personal information

We collect your personal information on the BNL in order to:

- record and monitor your housing, health and support needs; and
- progress your access to housing, health and support services.

From time to time, your de-identified information may be used to inform government, non-government agencies, research and the broader community about the needs and experiences of people experiencing homelessness and to change the system that leads people into homelessness.

### 2.4 Disclosing your personal information

#### Partners

Partners will have access to your personal information on the BNL. There is a list of all Partners which you can access in hard copy upon request. This list is kept up to date including where new Partners may be added.

You can request that AAEH not collect from, or share your information with, a specific Partner.

#### Other disclosures

We may also disclose your personal information in certain other circumstances such as:

- where required by law;
- you have consented to us doing so; and
- to service providers when reasonably required (e.g. to help us host and manage the BNL database).
- When we disclose your personal information, we take reasonable steps (including obtaining contractual commitments from Partners) to ensure that an adequate level of protection is in place in accordance with the relevant privacy laws.

We will not disclose your personal information outside of Australia, unless required by law.

### 2.5 How we keep your personal information secure

We take steps to protect your personal information from misuse, interference, and loss and unauthorised access, modification or disclosure with appropriate safeguards and security measures. The measures that we take include ensuring that:

- only authorised personnel are granted access to your information; and
- your data is stored and accessed using security best practices.

### 2.6 How to request access, correction or of deletion your personal information

If you would like to make a request about the personal information that we hold about you, you can contact us by using the contact details below.

#### Access

You are entitled to access the personal information about you held by us. Please contact us using the details in section 2.9 and we will endeavour to give you access to that information within a reasonable time.

We require proof of identity before granting access to any personal information. Individuals who have engaged with us via the use of a pseudonym are also required to establish to our satisfaction that they are the 'owner' of the pseudonym to whom the personal information relates.

If we do not provide you with access to your personal information, we will provide you with reasons for denying access.

### Correction

If you believe that the information that we hold about you is incorrect or not up-to-date, and you want to correct information we hold about you, you can contact us using the contact details in section 2.9. We will:

- amend your personal information if it is possible and reasonable for us to do so; or
- provide a written reason if the information cannot be altered.

### Deletion or Withdrawal of Consent

You may request that we delete the personal information we hold about you in our BNL database or withdraw your consent by using the contact details in section 2.9. If you request to delete your information from the BNL or withdraw your consent, we will de-identify or delete such information in accordance with our BNL Data Retention and Disposal Policy, unless we are required to retain that information by law.

Be aware that by deleting your personal information or withdrawing your consent, other Partners may not be able to get a full understanding of your needs, and you may be required to provide multiple Partners with the same information about yourself. In any event, you will still be able to access the services you currently get.

Your personal information may be held separately by our Partners. If you wish our Partners to delete your personal information, you will need to separately request them to do so.

### 2.7 Changes to our Privacy Policy

We may amend or modify our Privacy Policy by posting the amended Privacy Policy to our website. We encourage you to check our websites regularly for any updates to our Privacy Policy.

### 2.8 Complaints about our privacy practices

If you are concerned that we may have breached the Australian Privacy Principles or this privacy policy, please contact the Privacy Officer using the details at the end of this Privacy Policy.

We respond to complaints by investigating the issue, deciding on any action that are required and responding to the individual within twenty (20) business days of lodgement (or sooner if practicable).

If you are not satisfied with our response you can complain to the Office of the Australian Information Commissioner in the relevant state:

**Address:** GPO Box 5218, Sydney, NSW 2001

**Call:** 1300 363 992

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

**Website:** <https://www.oaic.gov.au/contact-us>

### 2.9 How to contact AAEH

If you have any concerns or queries regarding this privacy policy, please contact the Privacy Officer as listed below:

Carman Wilson, Privacy Officer

**Email:** [info@aaeh.org.au](mailto:info@aaeh.org.au)

