

Legal

CLC.PO.07 Privacy Policy

Purpose

This privacy policy explains how Settlement Services International Limited and its subsidiary entities (**SSI Group**) collect, hold, use and disclose personal information, including sensitive information. SSI Group complies with the Privacy Act 1988 (Cth) (**Privacy Act**), including the Australian Privacy Principles (**APPs**), and takes its privacy obligations seriously.

Scope

This privacy policy applies to all SSI Group Board directors, staff, volunteers, contractors and subcontractors who are engaged by SSI Group to assist in its activities and deal with personal information.

This privacy policy does not apply to personal information that we hold for employees apart from tax file numbers.

Policy

1. What is Personal information

- 1.1 **Personal** Information means information or an opinion that relates to an identified individual, or an individual who is reasonably identifiable, whether true or untrue.
- 1.2 **Sensitive** Information is a subset of personal information including information such as racial or ethnic origin, religious beliefs, criminal record, genetic and biometric information or health information.

2. Collection of personal information

Why do we collect personal information

- 2.1 SSI Group collects personal information that is reasonably necessary for, or directly related to, one or more of our functions or activities. Examples of this include (but are not limited to):
 - 2.1.1 determining if our programs and services are suitable for individuals;
 - 2.1.2 operating our programs and services;

2.1.3 connecting with and sending communications to members and supporters;
and

2.1.4 assessing, placing and engaging staff and volunteers.

What kind of personal information do we collect

2.2 Personal information that may be collected by SSI Group includes:

2.2.1 for everyone: name, address, telephone number, email address, age, date of birth, profession, occupation and job title;

2.2.2 for clients: personal circumstances and history, visa status, health information, employment and education history, details about family members, needs assessment (including accommodation requirements) and assessment of suitability of accommodation;

2.2.3 for contractors, volunteers and prospective staff members: qualifications, employment history, background checks (i.e. Police and Working with Children Checks), banking details, identity documents, photographs, job applications and declared conflicts of interest;

2.2.4 for donors: bank details and the amount/frequency of the donation; and

2.2.5 for event participants: organisation, bank details, dietary, accessibility requirements.

How we collect personal information

2.3 SSI Group collects personal information directly from:

2.3.1 clients and prospective clients when they make contact about our programs and services, and during ongoing case management;

2.3.2 prospective staff and volunteers when they apply for positions within SSI Group;

2.3.3 individuals who attend SSI Group events and training workshops; and

2.4 SSI Group will only collect personal information by lawful and fair means.

Collection of personal information through the SSI Group website

2.5 When an individual accesses SSI Group's website, we may record certain information so that SSI Group can improve its services. Examples include:

2.5.1 Cookies: small data files placed on a computer to help remember information about an individual's visit and preferences. An individual can configure the web browsing software to reject cookies, however this may limit the functionality of the SSI Group website.

- 2.5.2 Google Analytics: if an individual would like to opt-out of the Google Display Network and/or Google Analytics they can use ad settings or install the Google Analytics Opt-out Browser Add-on to disable tracking.
- 2.6 SSI Group's website may contain links to third party websites not owned or controlled by SSI Group. SSI Group is not responsible for those websites.

3. Use and disclosure of personal information

Purposes of use and disclosure

- 3.1 SSI Group may use or disclose personal information to:
 - 3.1.1 provide any of our programs or services such as settlement support, community engagement, education, employment services and case management case management;
 - 3.1.2 fulfil obligations under funding agreements and comply with reporting requirements set by government agencies and partners;
 - 3.1.3 conduct research, data analysis and quality assurance activities aimed at improving and developing SSI Group's services and initiatives;
 - 3.1.4 maintain records of participation, consent, and service delivery in accordance with legal and regulatory requirements; and
 - 3.1.5 carry out any other purposes required or permitted by law, or as otherwise explained at the time of collection.

Direct marketing purposes (including fundraising)

- 3.2 SSI Group will seek an individual's consent to use their personal information for direct marketing, unless the individual would reasonably expect SSI Group to use or disclose their personal information (excluding sensitive information) for direct marketing purposes; and
- 3.3 SSI Group will ensure that individuals can, at any time, easily opt out of receiving marketing materials.

Automated decision making (ADM)

- 3.4 SSI Group may use computer programs to make or assist with decisions that might affect an individual's rights or interests. These decisions may include:
 - 3.4.1 assessing an individual's eligibility for programs or services using automated evaluation of information provided by the individual or referring agencies;
 - 3.4.2 matching individuals to appropriate support services, case workers or partner organisations based on criteria such as location, needs and service availability;

- 3.4.3 scanning, classifying, and processing documents (for example, invoices or applications) to support timely and accurate service delivery;
- 3.4.4 scheduling appointments, allocating resources, or managing waitlists for high-demand services through automated systems;
- 3.4.5 analysing data to improve service delivery, identify trends or fulfil reporting obligations to funding bodies or regulators.
- 3.5 SSI Group will use and disclose the kinds of personal information described in this privacy policy:
 - 3.5.1 in the operation of these computer programs;
 - 3.5.2 in its day-to-day operations, including to adapt, predict, recommend and personalise processes using artificial intelligence ('AI') technologies; and
 - 3.5.3 to share it with service providers that SSI Group engages to be provided with and conduct AI, as well as other persons involved in SSI Group's use of this kind of technology including developers or owners of AI technologies.

Direct marketing purposes (including fundraising)

- 3.6 SSI Group may disclose personal information to third party service providers, such as web hosting providers, insurers, archiving service providers and professional advisors (i.e. auditors, lawyers and business consultants), to run its business.
- 3.7 SSI Group will ensure any third party service provider that personal information is disclosed to, will be bound under contract to adhere to the Privacy Act, when handling personal information provided by SSI Group.

Disclosures to overseas recipients (including cloud storage)

- 3.8 SSI Group:
 - 3.8.1 seeks to ensure that personal information stored in the cloud is held on cloud servers that are located within Australia wherever possible;
 - 3.8.2 will store any personal information collected for any government funded contract in accordance with the relevant contract requirements, including storing all personal information within Australia when required; and
 - 3.8.3 will otherwise resort to storing personal information in cloud servers located outside Australia, however SSI Group will not do so without seeking specific consent from the relevant individual and taking reasonable steps to ensure that personal information is held, stored and dealt with consistently with the APPs.

4. How SSI Group holds and stores personal information (data security)

- 4.1 SSI Group takes all reasonable steps to protect the personal information it holds from misuse, interference, loss and from unauthorised access, modification or disclosure, including:
 - 4.1.1 storing physical records in locked cabinets within secure premises or on the office floor, or archiving the physical records of personal information with secure and reputable archive service providers;
 - 4.1.2 holding electronic records of personal information on secure networks and cloud-based servers; and
 - 4.1.3 undertaking organisational measures, such as training, education seminars and e-learning for staff.
- 4.2 SSI Group will take reasonable steps to destroy or permanently de-identify personal information if it is no longer required to be held by SSI Group, unless:
 - 4.2.1 it is part of a Commonwealth record;
 - 4.2.2 it is a health record (which is required to be retained until the subject of the health record is 25 years old, if the subject is under the age of 18 at the time the health record is collected, and for a period of 7 years if the subject of the health record is over the age of 18); or
 - 4.2.3 required to be retained by an Australian law or court/tribunal order.

5. Access to and correction of personal information

Access

- 5.1 Individuals can request access to personal information held by SSI Group by contacting SSI Group's Privacy Officer (contact details in 7.1 below).
- 5.2 SSI Group will provide access to personal information within a reasonable period of time after the request is made, unless it has a good reason not to which may be because (but is not limited to) the following reasons:
 - 5.2.1 SSI Group reasonably believes that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety;
 - 5.2.2 giving access would have an unreasonable impact on the privacy of other individuals;
 - 5.2.3 the request for access is frivolous or vexatious;
 - 5.2.4 the information relates to existing or anticipated legal proceedings;

- 5.2.5 denying access is required or authorised by an Australian law or a court/tribunal order;
- 5.2.6 giving access would be likely to prejudice law enforcement activities; or
- 5.2.7 giving access would reveal commercially sensitive information.
- 5.3 SSI Group may charge a fee to cover costs in providing an individual with access to their personal information.
- 5.4 If SSI Group refuses to provide an individual with access to some or all of their personal information, SSI Group will give the individual a written notice setting out the reasons for the refusal (unless it is unreasonable to do so) and how they can complain about the refusal.

Correction

- 5.5 An individual can request that SSI Group correct personal information held by SSI Group and SSI Group will take reasonable steps to correct the personal information to ensure it is accurate, up-to-date, complete, relevant for the purpose for which it is held and not misleading.
- 5.6 SSI Group will correct personal information within a reasonable period of time and free of charge.
- 5.7 If SSI Group decides not to correct the personal information, SSI Group will:
 - 5.7.1 give the individual a written notice setting out the reasons for the refusal (unless it is unreasonable to do so) and how they can complain about the refusal; and
 - 5.7.2 if the individual requests, include a statement about the requested correction that is visible to anyone using the information.

6. Government related identifiers

- 6.1 SSI Group will not adopt a government related identifier of an individual as its own identifier of the individual unless required or authorised by Australian law.
- 6.2 SSI Group will not use or disclose a government related identifier of an individual unless:
 - 6.2.1 it is reasonably necessary for SSI Group to verify the identity of the individual for SSI Group's activities and/or functions;
 - 6.2.2 it is reasonably necessary for SSI Group to fulfil its obligations to an Australian Government agency or authority;
 - 6.2.3 it is required or authorised by an Australian law or court/tribunal order; or

6.2.4 SSI Group believes the use or disclosure is reasonably necessary for a law enforcement activity.

7. Contact and complaints

7.1 SSI Group's Privacy Officer contact details are:

Privacy Officer
Settlement Services International Limited
Level 2, 158 Liverpool Road
Ashfield NSW 2131
Tel: (02) 8799-6700
Email: privacy@ssi.org.au

7.2 SSI Group will treat all requests or complaints confidentially and will respond within a reasonable time after receipt of a request or complaint.

7.3 Where a complaint is received, SSI Group will:

7.3.1 attempt to confirm the complainant's understanding of the conduct relevant to the complaint and expected outcome;

7.3.2 inform the complainant whether an investigation will be conducted, and if so, the name, title and contact details of the investigating officer and the estimated completion date for the investigation process;

7.3.3 after enquiries have been completed, contact the complainant, usually in writing, to advise the outcome and invite a response;

7.3.4 assess any response received and advise the complainant if it has impacted SSI Group's views; and

7.3.5 aim to ensure that complaints are resolved in a timely and appropriate manner.

7.4 The Office of the Australian Information Commissioner may be contacted for further information about privacy complaints at:

Website: www.oaic.gov.au
Mail: GPO Box 5218 Sydney NSW 2001
Email: enquiries@oaic.gov.au

Related documents

Related Policies/Procedures

Document code	Document title
CPAC.PO.01	Code of Conduct Policy
CPAC.PR.16	Clean Desk Procedure
CIT.PO.01	Information Technology & Systems Policy
CIS.PL.01	Information Security Incident Response Plan

Related References

Description
<i>Privacy Act 1988</i> (Cth), including the Australian Privacy Principles
<i>Health Records and Information Privacy Act 2002</i> (NSW)
<i>Health Records Act 2001</i> (VIC)
<i>National Disability Insurance Scheme Act 2013</i> (Cth)

Version History

Version	Created	Author	Description
1	25 November 2014	Project Manager, Policies and Procedures	New procedure approved for implementation
2	22 October 2014	Legal Officer	Procedure information migrated to a policy document. External law firm provided guidance.
2.1	12 August 2016	Project Manager, Policies and Procedures	Minor updates. References to “you” changed to staff
2.2	20 September 2016	Legal Counsel	Minor updates to contact information
3	6 September 2017	Project Manager, Policies and Procedures	Coding changed from CRC to CLC. Contact information updated.
3.1	9 January 2019	Legal Counsel	Contact information updated
4	1 August 2020	Legal Counsel	Major review and updates throughout
4.1	30 June 2022	Legal Counsel	QMS review with minor updates
5	22 September 2025	Privacy Officer	QMS review and updated to reflect recent privacy amendments, clarify scope and simplify language.