



Bringing people together since 1929

Privacy

Air Force Association WA Limited (raafa) is committed and will use all reasonable efforts to protect the privacy of individuals' personal information and to comply with the obligations imposed by the Privacy Act 1988 (Cth), the Australian Privacy Principles (APPs), the Corporations Act 2001 (Cth) and Aged Care Act 2024 (Cth) and the Aged Care Quality Standards.

We will routinely collect and use personal and sensitive (including health) information required to perform core business functions during the course of the relationship with the individual.

Purpose of information collection

We collect personal and sensitive (including health) information for the purpose of:

- Membership to Air Force Association WA Limited, including determining your eligibility;
- Residency in raafa's Retirement Village, Aged Care Facility or Veteran accommodation;
- Determining your eligibility and/or provision of appropriate services and care;
- Administrative purposes to meet our State and/or Commonwealth legal and contractual obligations;
- Enabling contact and lawful liaison with your nominated person;
- Monitoring quality and effectiveness of our services provided;
- Determining your suitability of employment with us; and
- Conducting research – in the event your personal information is used for research purposes, we will seek consent from you or your nominated person and provide the opportunity to opt out at any time.

If you choose not to provide all of the information requested, we may not be able to provide the services and/or care required.

Collection of information

We will only collect personal and sensitive information by lawful and fair means and if it is necessary for one or more of our organisation's functions or activities. Where reasonable and practical, personal information will be obtained in the following ways:

- Directly from you and/or your authorised representative; and/or
- From your previous/current health care provider and/or assessment agency (i.e. Doctor, the Aged Care Assessment Team, hospital, allied health professional); and/or
- Where relevant, from Government departments/agencies.
- The collection of information will be undertaken when it is reasonably necessary for, or directly related to one or more of our functions/activities and:
- You have consented to the collection of this information; or
- The collection of the information is required, or authorised by, or under an Australian law, or court/tribunal order; or



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- As a not-for-profit organisation, the information relates only to the members of *raafa*, or to individuals who have regular contact with us.

Unsolicited personal information

In the event we receive unsolicited personal information, unless retaining the information is permitted as per the APP Guidelines, we will destroy or de-identify the information as soon as practicable, if it is lawful and reasonable to do so.

Closed Circuit TV (CCTV)

CCTV recording devices are in place at our Retirement Villages (common areas and external grounds, including carparks), Residential Care Facilities (external grounds and internal common areas) and *raafa* Clubs to ensure the safety and security of residents, visitors and staff.

CCTV will record images of all people who access the areas listed above and all footage remains the property of *raafa*.

Notification

We will as soon as practicable, prior to or after the collection of personal information from you, take all reasonable steps to ensure that you are notified of the purpose for the collection of personal information and the identity of other entities or persons to whom *raafa* usually discloses personal information to.

Security of information

We are committed to preserving the confidentiality, integrity and availability of all personal information collected.

We will take all reasonable steps to ensure the personal information we hold in paper and electronic form (including IT servers which may include cloud storage), is securely managed within the premises of *raafa*, and, where applicable, by external service providers located in Australia where possible. In all cases, we will ensure that this information is protected against unauthorised access, misuse, interference, loss, unauthorised modification and improper disclosure.

In the event of a data breach that is likely to result in serious harm, we will notify you if your personal information is involved and the Office of the Australian Information Commissioner in accordance with the Notifiable Data Breach Scheme as soon as practicable.

We will take all reasonable steps to destroy or de-identify the personal information once it is no longer required for any permitted use or disclosure as per the APPs and applicable information management policy.

Use and disclosure of information

We will primarily use personal and sensitive (including health) information for the purpose of assisting in the provision of health and other services. When required, we may disclose personal and sensitive information about you to authorised external health care professionals (e.g. nominated GP, site pharmacist) or external organisations for administrative purposes (e.g. government agencies for funding purposes).

We may disclose health information about you to a person who is responsible for you if:



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- You are incapable of giving / communicating consent;
- Disclosure is necessary to provide appropriate care or treatment; and
- Disclosure is not contrary to any wish/es previously expressed by you of which we are aware or of which we could reasonably be expected to be aware and disclosure is limited to the extent reasonable and necessary for providing care or treatment.

We will not use or disclose personal information other than the primary purpose of collection, unless:

- You have consented;
- Secondary purpose is related to the primary purpose and you would reasonably expect use or disclosure;
- Health information collected is necessary for research, relevant to public health or safety or it is impractical to obtain consent;
- Disclosure is necessary to prevent or lessen a serious imminent threat to an individual's life and/or individual's/public health or safety;
- Use or disclosure is part of our investigation or reporting to relevant persons or authorities in the event we suspect unlawful activity; or
- Use or disclosure is required or authorised by Australian law and/or court/tribunal order.

We will not disclose personal information about you to an overseas recipient (other than the person to which the information relates to) unless consent is provided, and specific requirements are met.

We may use general contact information to provide organisational service information, updates about *raafa* and new services. You may “opt-out” of receiving further similar material at any time.

Direct marketing

We will not use or disclose personal information it holds for the purpose of any third party commercial direct marketing unless:

- You would reasonably expect us to use or disclose personal information for the purpose of direct marketing; and
- We have provided you with means to “opt-out” and you have not opted out.

Government related identifiers

We will not adopt, use or disclose government related identifiers (e.g. Medicare numbers, Centrelink Reference numbers, tax file numbers, Individual Healthcare Identifiers), unless required by law.

Access and correction of information

You may request access to and/or correct your personal information held by us provided that we are able to confirm the request is made by you or your authorised representative.

Requests for access to your personal information should be addressed to the Estate/Facility Manager or applicable Operations Manager. Access to your personal information may result in administrative fees.



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We aim to ensure your personal information held is accurate, complete and up-to-date. If you believe that the information held about you is inaccurate, incomplete, out-of-date, irrelevant or misleading, we will take reasonable steps to correct the information.

In the event access/amendment/annotation to your personal information is not granted, we will provide written notice of the reason(s) for refusal within a reasonable period.

Anonymity and pseudonymity

You may remain anonymous or assume a pseudonym during some interactions with us (e.g. admission/service queries, employment queries, customer feedback) if it is lawful and practicable.

Media

All enquiries from the media must be referred to the Chief Executive Officer at our Central Support Office.

Feedback and complaints

In the event you are dissatisfied with how we have managed your personal information or consider it has not complied with the Privacy Act and the APPs, notification may be made in person, by phone, email or in writing to the Estate/Facility Manager/Operations Manager or *raafa's* Privacy Officer.

If you are not satisfied with the investigation and/or the outcome, a further complaint may be made to the:

Chief Executive Officer, Air Force Association WA Limited

18 Bowman Street, South Perth WA 6151

08 9288 8400

enquiries@raafawa.org.au

raafawa.org.au

Office of the Australian Information Commissioner

Online: oaic.gov.au/privacy/privacy-complaints

GPO Box 5288, Sydney NSW 2001

1300 363 992 (Monday to Thursday 10am to 4pm AEST/AEDT)

Fax: 02 6123 5145

oaic.gov.au

How to contact us

If you wish to contact us about any matters in relation to privacy, please do so by contacting:

Privacy Officer, Air Force Association WA Limited

18 Bowman Street, South Perth WA 6151

08 9288 8400

privacy@raafawa.org.au

raafawa.org.au

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