

Privacy Policy

Version 2.0

Document ID	Privacy Policy	Classification	Public
Owner	Corporate Services Manager	Category	Governance
Endorser	Chief Executive Officer	Adopted	26/03/2026
Approver	Chief Executive Officer	Next Review Date	01/02/2029

1. Purpose

The Northern Adelaide Waste Management Authority (NAWMA) is committed to a culture that is practicable, protects an individual’s privacy and endeavors to protect the personal information it collects, stores, discloses and uses. This Privacy Policy (Policy) outlines the management of personal information that NAWMA collects.

The *Commonwealth Privacy Act 1988 (Act)* sets out privacy principles in relation to the collection, use, storage and disclosure of personal information in relation to those entities to which that legislation applies, which includes NAWMA as a Regional Subsidiary formed by its Constituent Councils – City of Salisbury, City of Playford and Town of Gawler, in accordance with the *Local Government Act 1999 (SA)*.

2. Scope

This Policy applies to all personal information provided to and held by NAWMA in the conduct of NAWMA’s operations, functions and services.

3. Policy Principles

In the application of this Policy, NAWMA will:

- Seek to only collect personal information for a lawful purpose that is directly related to or necessary for the performance of its operations, and in doing so will use lawful and fair means
- Seek to only collect sensitive information where consent has been given and as permitted by law
- Treat personal information confidentially, unless legally required or authorised to disclose the information
- Maintain secure systems for storing personal information and maintain operational policies and procedures to protect personal information from misuse and loss and from unauthorised modification or disclosure.

NAWMA will seek the individual’s consent, wherever practicable, before using or disclosing personal information for a purpose other than the one for which it was originally collected, unless disclosure is required by law.



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3.1 Collection and Use of Personal Information

All personal information collected by NAWMA will only be used for the purpose of conducting business in accordance with the *Local Government Act 1999 (SA)* (and other relevant Acts under which NAWMA is charged with any responsibility) and in the provision of NAWMA's services and operations.

All personal information will be collected for a lawful purpose directly related to a legislative function or requirement of NAWMA, where the personal information is necessary for or directly related to that purpose. NAWMA is committed to ensuring that individuals are aware of the purpose for which the personal information is being collected and aware that its collection is authorised or required by law.

NAWMA will take reasonable steps to inform individuals whose personal information it collects:

- Of the purpose for which personal information is collected, unless that purpose is obvious
- Whether the collection of personal information is authorised or required by law
- Of NAWMA's practices with respect to the use and disclosure of personal information collected.

NAWMA will take reasonable steps to ensure that the collection of personal information does not unreasonably intrude upon an individual's personal affairs and will not use personal information for purposes other than for which it was originally collected unless:

- Permission has been sought from the person providing the information
- The person might reasonably expect NAWMA to use or disclose the information for a secondary purpose of NAWMA
- It is for the purpose of training/coaching Staff
- It is for the purpose of obtaining customer satisfaction feedback
- Staff are required to collect, use or disclose the information collected by law.

3.2 Type of Information Collected

The type of personal information that is collected and held may include:

- Telephone Numbers (Mobile and Fixed)
- Name and address (including preferred postal, residential, email or social media addresses)
- Age and/or Date of Birth
- Pensioner/Concession Information
- All Images and Recordings (Audio and Visual)
- Financial details and Payment History
- Details of employment
- Insurance details.



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3.3 Collection of Sensitive Information

NAWMA will not collect sensitive information about an individual unless:

- The individual has consented
- Collection is required by law
- Collection is necessary to prevent or lessen a serious and imminent threat to the life or health of any person
- Collection is necessary for the establishment, exercise or defence of a legal or equitable claim.

If NAWMA collects sensitive information about an individual in accordance with the provisions of this Policy, it will take reasonable steps to redact the information before NAWMA discloses it.

3.4 Closed Circuit Television (CCTV)

NAWMA sites operate CCTV (Closed Circuit Television) for the safety of all people and the prevention of disorderly behaviour and the prevention and detection of crime.

CCTV forms part of several broader safety strategies which focus on reducing crimes against a person and/or property and assisting in the provision of an effective policing service and enhanced public safety.

Viewing CCTV footage captured or operated by NAWMA is restricted to the following Staff:

- Members of the Senior Management Team (SMT)
- Material Recovery Facility Manager (or nominee)
- Processing & Disposal Manager (or nominee)
- WHS & Environmental Manager
- Human Resources Coordinator.

Other Staff may be authorised by the Chief Executive Officer (CEO) (or nominee) on a case-by-case basis. Staff will only review CCTV footage if:

- They believe it is in the best interest of public safety
- Footage has been formally requested by the SA Police or SafeWork SA
- They have been notified that there is a reasonable suspicion that an alleged crime has or is being committed.

The release of NAWMA CCTV material, including access to a copy of such material, is restricted to SMT. Data is only to be released to the SA Police or SafeWork SA unless otherwise authorised by the CEO (or nominee). Other Staff may be authorised by the CEO (or nominee) on a case-by-case basis to release CCTV footage.



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3.5 Accuracy of Information Collected

In satisfying obligations for the collection and use of personal information, NAWMA assumes that:

- Any personal information provided by a person is free from errors and omissions, is not misleading or deceptive and complies with all legislative requirements
- Individuals have the necessary authority to provide the personal information submitted to NAWMA.

While NAWMA will make every effort to ensure that records of an individual's personal information are up to date and accurate, this may not always be the case.

It is the responsibility of individuals to provide NAWMA with details of any changes to their personal information as soon as reasonably practicable.

3.6 Information Obtained from Third Parties

NAWMA may obtain information concerning individuals from several sources. NAWMA will not verify the accuracy of any personal information it obtains from other sources (except for financial information).

Personal information held by NAWMA about an individual may incorporate or summarise views, guidelines or recommendations of third parties. NAWMA will endeavour to record such personal information in good faith but cannot guarantee that it will necessarily involve a considered review of the information.

3.7 Use of Email Address Information

NAWMA may use a person's email address to respond to their enquiry where they choose to contact NAWMA in an electronic form (via a website, social media or by email) where NAWMA holds this information.

3.8 Disclosure of Personal Information

Distribution to Third Parties

NAWMA will not permit the provision of personal information it holds to third parties except where:

- The person has made a written request for personal information to be provided to a third party
- The person has given consent for personal information to be available to a wider audience
- The provision of personal information is for the purpose of distributing materials on behalf of NAWMA
- The third party has been contacted by NAWMA to provide advice or services for the sole purpose of assisting NAWMA to provide services to individuals
- NAWMA is required or authorised by law to provide personal information to a third party or to the public at large (e.g. to an applicant under the *Freedom of Information Act 1991* where the information is not otherwise exempt)



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- The individual provides a response as part of a NAWMA community engagement campaign and legislation required NAWMA to disclose information, only summary information will be made public unless the legislation specifically directs otherwise. Person information will not be publicly disclosed.

Details collected through NAWMA's website will not be shared with other organisations or individuals.

3.9 Direct Marketing

Reasonable expectation to use or disclose: If NAWMA holds personal (non-sensitive) information about an individual, it will not use or disclose the information for the purpose of direct marketing except when NAWMA has collected the information from the individual and the individual would reasonably expect NAWMA to use or disclose the information for that purpose.

No reasonable expectation to use: Where the individual would not reasonably expect NAWMA to use or disclose personal (non-sensitive) information for direct marketing, the individual needs to have given consent to the use or disclosure of the information for direct marketing.

An individual may, by written request, request not to receive direct marketing communications from NAWMA, except where required by legislation to provide information.

NAWMA will only use or disclose sensitive information about an individual for direct marketing purposes if the individual has consented to the use or disclosure of the information for that purpose.

3.10 Disclaimer

NAWMA does not accept any responsibility for any loss or damage suffered by an individual because of their reliance on any personal information provided to them by NAWMA or because of NAWMA's inability to provide individuals with any requested personal information.

Before relying on any personal information that NAWMA provides, it is expected that the individual will first seek confirmation from NAWMA about the accuracy and currency of the personal information.

3.11 Maintenance and Storage of Personal Information

NAWMA will take reasonable steps to protect the personal information it holds from loss and from unauthorised access, use, modification, or disclosure and from misuse. NAWMA will maintain systems to ensure that all personal information collected is, as far as practicable, up to date, accurate and complete.

NAWMA will ensure that any person who, on behalf of NAWMA, uses or discloses personal information held by NAWMA has appropriate authorisation to do so.



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3.12 Online Payment Services

NAWMA uses software that contains a form of encryption (encoding software) to protect credit card personal information that is entered via NAWMA's Pay Online option.

3.13 Access to Personal Information

Individuals who wish to access the personal information that NAWMA holds in relation to them can do so by contacting NAWMA's Corporate Services Manager (or nominee) via admin@nawma.sa.gov.au. Requests will be managed based on the nature of the information requested and always in accordance with the *Freedom of Information Act 1991*.

The applicant must provide proof of identity to the Corporate Services Manager (or nominee) and may be required to submit a Freedom of Information Request for Access application and pay the legislated fee.

If a person can show that the personal information held by NAWMA is not accurate or complete they may apply in writing for the amendment of NAWMA's records.

3.14 Suppression of Personal Information

Personal information may be suppressed by NAWMA if such records would place that person, or any other person, at risk.

Enquiries regarding suppression of personal information must be directed to the Corporate Services Manager (or nominee) via admin@nawma.sa.gov.au.

3.15 Freedom of Information

Personal information may be released to an organisation or other individual if requested under the *Freedom of Information Act 1991*. However, in accordance with this legislation, that person may be consulted to obtain their opinion on release of the information. Should a determination be made that the information will be released against the view of the person, the impacted person has the right to request a review of the decision, prior to the information being released and on payment of the prescribed fee.

3.16 Grievances

Individuals that have any concerns regarding how NAWMA handles their personal information, or require further information, must contact the Corporate Services Manager:

Email: admin@nawma.sa.gov.au
Att: Corporate Services Manager
Phone: 8259 2100
Northern Adelaide Waste Management Authority
71-75 Woomera Avenue, Edinburgh SA 5111



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4. Applicable Legislation/Other References

4.1 Internal

Employee Code of Conduct
 Human Resources Manual

4.2 External

Australian Privacy Principles
Commonwealth Privacy Act 1988
(Cth) Freedom of Information Act
1991(SA) Local Government Act
1999 (SA) Privacy Act 1988 (Cth)

5. Definitions

For the purposes of this Policy, the following definitions apply:

Term	Definition
Access	Providing to an individual or business, information about them that is held by NAWMA. This may include allowing that individual to inspect personal information or to obtain a copy.
CCTV	Closed Circuit Television.
Collection	Gathering, acquiring or obtaining personal information from any source and by any means, including information that NAWMA has come across by accident or has not asked for.
Consent	Voluntary agreement to some act, practice or purpose.
Disclosure	The release of information to persons or organisations outside NAWMA. It does not include giving individuals information about themselves.
Direct Marketing	The use and/or disclosure of personal information to communicate directly with an individual to promote goods and services. Direct marketing in relation to this Policy does not include promotion of Council programs, projects or services or promotion of events or services where Council provides support through funding or other contributions.
Personal Information	As defined by the <i>Privacy Act 1988</i> : 'Information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not, and



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	<p>(b) whether the information or opinion is recorded in a material form or not.'</p> <p>Personal information can include written records about a person, a photograph or image of a person, or information about a person that is not written down but is in the possession or control of NAWMA. Even if the person is not named, the test is whether or not the person's identity can 'reasonably be ascertained' from the information. As long as information is being communicated to someone who can identify the person it is about, the information may meet the definition of 'personal information.'</p>
Sensitive Information	<p>As defined by the <i>Privacy Act 1988</i>:</p> <p>'(a) information or an opinion about an individual's:</p> <ul style="list-style-type: none"> (i) racial or ethnic origin; or (ii) political opinion; or (iii) membership of a political association; or (iv) religious beliefs or affiliations; or (v) philosophical beliefs; or (vi) membership of a professional or trade association; or (vii) membership of a trade union; or (viii) sexual preference or practice; or (ix) criminal record; <p>that is also personal information; or</p> <p>(b) health information about an individual; or</p> <p>(c) genetic information about an individual that is not otherwise health information: or</p> <p>(d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or</p> <p>(e) biometric templates.'</p>
Use	The handling of personal information at NAWMA including the inclusion of information in a publication.

6. Document History

Version	Date Adopted	Description of Change
V1.0	19/09/2018	Initial adoption of Privacy Policy
V2.0	26/03/2026	Complete redraft of the Policy to meet current legislative and operational requirements.

