IDENTIFIED DATA ACCESS GUIDELINES

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Author: Data and Evaluation Working Group

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The By-Name List holds key information on people sleeping rough in the Adelaide inner city. It is used for tracking movement of individuals sleeping rough and to hold some triage information. It is not a case management tool or a research tool. As such, there are limitations to what data can be sourced from the By-Name List. The current format of the By-Name List data also means that extracting information can be a somewhat complex process that may take some time to complete depending on the nature of the request.

Neami National (SA) are the Data Custodian for the By-Name List on behalf of the Adelaide Zero Project.

REQUESTING IDENTIFIABLE DATA
Identifiable data may include any combination of the below:
- Names, including first names, last names, aliases
- Date of birth
- Data provided on an individual, rather than for a summary or cohort, for example a list of status changes and By-Name List history, which could be used to identify an individual intentionally or otherwise
- Data that identifies a very small number of people, for example analysis of remote visitors from a specific community.

By-Name List person identifiers are not considered identifiable data. Where possible, Centrelink Reference Numbers or H2H identifiers should be used for data matching instead of identifiable data.

Reasons for requesting identifiable data may include:
- Data matching processes to support finding appropriate housing, healthcare and community services according to the individual's circumstances and the consent processes under which By-Name list data is collected
- Assessing eligibility for services.

To request identifiable data, complete the [Adelaide Zero Project Data Request Form](#)

To request deidentified data, please read the [Adelaide Zero Project Data usage and request guidelines](#), and complete the [Adelaide Zero Project Data Request Form](#)

APPROVING A DATA REQUEST

The Adelaide Zero Project Data and Evaluation Working Group, including representatives from the Data Custodian, will grant approval if:

- the request fits within the current consent provided by people on the By-Name List, and offers benefit to the people and systems who are represented by the data
- the requestor is from an Adelaide Zero Project partner organisation, unless the information is being shared because the Adelaide Zero Project believes there is a serious or imminent risk to an individuals' safety or the safety of another person, or where required by law
- the data will not compromise the Adelaide Zero Project if released
- the use, interpretation and presentation of the data is consistent with the vision and activities of the Adelaide Zero Project
- requested data is extractable within a reasonable timeframe
- ethical matters have been considered by the requestor and Adelaide Zero Project, i.e. the data use is consistent with the consents obtained
- the requestor agrees to meet any conditions placed on the data release as part of the identified data request process.

Priority will be determined by the Data Custodian and/or the nominated person(s) from the Adelaide Zero Project Data and Evaluation Working Group. Requests may be deemed high priority if they are associated with any of the below:

- Adelaide Zero Project Steering Group
- Minister for Human Services
- City of Adelaide Lord Mayor
- Individuals or organisations demonstrating an urgent or pressing need for data
- in support of an emergency response, for example pandemic, natural disaster, civil unrest.

The Data and Evaluation Working Group usually meets during the first week of each month. During each meeting, members will assess requests that are submitted before the end of each month, and are determined to have either:

- low priority
- high priority, but the data is not required before the meeting date.

Where a request is determined to have high priority and the data is required before the next Data and Evaluation Working Group meeting, the relevant Data and Evaluation Working Group member must seek endorsement from the Data Custodian and the Chair or Co-Chairs of the following groups, if appropriate, before providing the data:

- Project Steering Group
- Inner-City Community of Practice Working Group
- Data and Evaluation Working Group.

Where it is not possible to get the endorsement of the Steering and Working Group Chairs, the Data Custodian has the authority to provide the requested data in line with this guideline. The Data Custodia must inform the Steering and Working Group Chairs as soon as possible.

Where a data request is declined, the requesting party will be provided with the reason(s) for the declined request and the declined request logged internally.

PROVIDING DATA

Members of the Data and Evaluation Working Group will provide the data to the person requesting it. Data will not include any analysis or commentary, with the exception of some data caveats/explanations where applicable.

The Member extracting the data request will:
- extract only the necessary information from the Advance to Zero database
- use Excel to compile the necessary information
- encrypt the Excel file with a password
- send the Excel file and password separately, for example in two different emails.

The email with the Excel file should include the paragraph below, along with any other conditions of the release:

The data attached is sensitive and confidential and has been provided for [insert reasons for data request] in line with the Adelaide Zero Project consent. This dataset cannot be used beyond the aforementioned purpose or distributed beyond the people included in this email without permission.

Where appropriate, also add the following information: *Any copies of the data must be deleted or destroyed within XX days/weeks/months of this email.*

ACCESS TO LIVE DATA THROUGH THE ADVANCE TO ZERO DATABASE

Some members of Adelaide Zero Project partner organisations have access to the live Advance to Zero database and By-Name List data. Partner organisations with such access can, without further approval, use and report on data specific to the service they work within, for example Street to Home can report on demographics of Street to Home clients.

If a member has access to the By-Name List and another system, for example H2H, they can match data if all the below apply:
- the member's organisation is listed as the Lead Agency of the individual
- the matching is covered by the consents provided by the individual
- any other requirements from the other system are also met.

All partner organisations using live By-Name List data through the Advance to Zero platform must be sensitive in their use of such data, ensuring consistency with the Adelaide Zero Project's objectives, interpretation, presentation of data and its ethical use.