

## Information Privacy Policy

Version date: 01 November 2018  
Review date: 01 November 2020  
Policy owner: Director Corporate Services

### Purpose

To outline Unison Housing Limited (**Unison**)’s obligations in how we manage personal information

### Scope

This policy applies to all Unison staff.

This policy applies to personal information (including sensitive information) as defined in the Privacy Act (see Glossary).

### Principles

Unison is committed to the collection and use of personal information in a manner consistent with the provisions of the Privacy Act 1988 (Commonwealth) and the Health Records Act 2001 (Victoria). Unison works within the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 to govern the way in which we collect, use, disclose, store, secure and dispose of Personal Information.

### Application

#### **Type of information collected**

The type of information that we collect and hold will depend on the nature of the person’s involvement with Unison. For tenants and clients, information is collected in order to deliver services, and where required by funding bodies.

Depending on the reason for collecting the personal information, the personal information that we collect may include (but is not limited to) name, age, residential address, suburb, postcode, date of birth, phone number, email address, bank account details, next of kin details, language spoken at home, employment information and images.

We may also collect sensitive information from a person including a police check or working with children check (for employees), or racial or ethnic origin for clients/tenants.

If a person chooses not to provide information as requested, it may not be possible for us to provide a service. For instance, it will not be possible for Unison to provide someone with housing or accommodation, if they want to remain anonymous or use a pseudonym.

## Third Parties

Where reasonable and practicable to do so, we will directly collect Personal Information only. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that the individual is made aware of the information provided to us by the third party.

We sometimes receive unsolicited personal information. In circumstances where we do receive unsolicited personal information, we will usually destroy or de-identify the information as soon as practicable if it is lawful and reasonable to do so unless the unsolicited personal information is reasonably necessary for, or directly related to, our functions or activities.

## How do we collect personal information?

Personal information is collected by our teams when a person walks in to one of our offices with an enquiry, online via our website, via email and phone, and through referrals from other organisations.

When we collect personal information we will, where appropriate and where possible, explain why we are collecting the information and how we plan to use it.

We will endeavour wherever practicable to collect personal information directly from the person concerned. Information is collected in a number of ways including from when someone fills in a form, makes an enquiry online, attends a face-to-face meeting, provides email correspondence, engages with us on social media, phones us, or makes a payment.

We may collect personal information from individuals such as visitors, contractors, and suppliers.

We will generally obtain consent from the owner of personal information to collect their personal information. Consent will usually be provided in writing however sometimes it may be provided orally or may be implied through a person's conduct.

We will endeavour to only ask for personal information if it is reasonably necessary for the activities that the person is seeking to be involved in.

## Use or Disclosure of Personal Information

In relation to the collection and disclosure of sensitive information, we are bound by the APPs, which provide for the circumstances in which disclosure is permitted, or required by law.

Personal Information may be collected, held, used or disclosed in a number of circumstances, including the following general purposes:

- to identify people;
- for the purpose for which the personal information was originally collected;

- for a secondary purpose related to the primary purpose, in circumstances where the person would reasonably expect such use or disclosure;
- for a purpose for which the owner of the information has consented;
- for information for direct marketing, and people will be given an opt-out in such communications;
- to share with third parties where consent has been provided
- for any other purpose where required or authorised by an Australian law.
- for any other purpose authorised or required by a court or tribunal.

Our primary purpose of collecting personal information is to provide housing (social, affordable and market rent), services and accommodation for people who are homeless or at risk of homelessness, and services to owners via the management of owners' corporations.

We may use or disclose personal information for example:

- for assessment of eligibility and application;
- for management of the tenancy, client brokerage or any other involvement with us;
- where reasonably necessary to facilitate the immediate care and safety of a tenant, client, or other individuals
- for maintenance of properties;
- for billing tenants/clients, and collecting payment;
- for payment of suppliers and reimbursement of employees for business related expenses;
- for referring people to other agencies, where they consent;
- for research purposes, however all information will be de-identified before it is shared;
- for reporting purposes to satisfy our regulatory or contractual requirements; and
- for complying with the law.

In relation to the personal information of prospective staff members and contractors, we collect the personal information for purposes including to:

- enable us to carry out our recruitment functions;
- correspond with the applicant, employee or contractor, provide training and professional development;
- fulfil the terms of any contractual relationship;
- ensure that the applicant, employee or contractor can perform their duties.

If you have any concerns about your personal information being used by us in any of these ways, please notify us.

## Direct marketing

From time to time, and in support of our future development and growth, we may send direct marketing material to people who have consented to receiving such information.

People who do not want to receive any such information can click on “unsubscribe” on emails, or contact Unison by email on [info@unison.org.au](mailto:info@unison.org.au)

Once we receive a request to “opt out” from receiving marketing information, we will cease sending such information within a reasonable period of time.

## **Storage of Personal Information**

We take all reasonable steps to protect personal information under our control from misuse, interference and loss, and from unauthorised access, modification or disclosure. Personal Information will be stored in a manner that reasonably protects it from misuse and loss including securely storing paper records, using professional software systems, and password restricted access.

We also have policies in place in relation to archiving, destruction and storage of personal information.

When Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify it. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

## **Access to Personal Information**

If an individual wishes to access their Personal Information held by us they can do so by making this request in writing to the service they have accessed (e.g. letter or email to the Place Manager or IAP/PRAP Worker) or by contacting [info@unison.org.au](mailto:info@unison.org.au)

We may refuse access to personal information in a number of circumstances. These might include where:

- giving access to the information would pose a serious threat to the life, health or safety of a person;
- giving access would have an unreasonable impact on the privacy of a person;
- the information relates to existing or anticipated legal proceedings and would not be available under the discovery process; or
- denying access is required or authorised by an Australian law or court order.

We will seek to handle all requests for access to personal information as quickly as possible.

In order to protect personal information, we will require identification before releasing the requested information.

## **Information Privacy Breaches**

In the event that a privacy breach occurs, the Director Corporate Services (DCS) will be notified and will be responsible for coordinating Unison's response to the breach including

- Breach containment
- Breach assessment
- Notifications
- Prevention of future breaches

Refer to the [Information Privacy – Data Breach Procedure](#) for more details

## Maintaining the Quality of Personal Information

It is important to us that Personal Information is up-to-date. We will take reasonable steps to make sure that Personal Information is accurate, complete and up-to-date.

## Complaints

The Complaints Policy outlines how concerns and complaints can be raised, and how they will be managed.

If a complainant is not satisfied with Unison's investigations or response to a complaint relating to privacy, they can refer the complaint to the Office of the Australian Information Commissioner.

## Review of policy

This Policy will be reviewed every two years as delegated by the Responsible Director.

## Glossary

Definitions below are as per the *Privacy Act 1988* (the Act)

**Personal information:** information or opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual that is reasonably identifiable. Personal information can range from sensitive and confidential information to information that is publicly available.

**Sensitive information** is a type of personal information. It is defined in the Act as including:

- Personal information that is information or an opinion about an individual's racial origin, ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences, sexual orientation or practices or criminal record
- Health information about an individual

## Links and resources

Unison Information Privacy and Your Rights brochure



CCTV and Images Policy

Complaints Policy

SHS Data Collection & Reporting Procedure

Information Privacy Procedure

Privacy and Data Protection Act 2014 (Victoria)

Health Record Act 2001 (Victoria)

Privacy Act 1998 (Commonwealth) and amendments to the Act in 2012 & 2016

Housing Registrar Performance Standard; Section 6 Management 2.3