

Privacy Policy & Collection Notice

1. Purpose & Scope

The purpose of this Policy is to outline Unison Housing Limited and Unison Property Corporation (Unison)'s obligations in how we manage personal and sensitive information.

This policy applies to all Unison staff, including employees, contractors and volunteers.

Unison reserves the right to make changes to this Policy at any time. If changes are made, an updated copy will be posted on our website.

2. Policy Statement

2.1 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)*, the *Privacy & Data Protection Act 2014*, the *Health Records Act 2001 (Victoria)* and the *Fair Work Act 2009*.

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 and sensitive information.

2.2 Type of information collected

- The type of information that we collect, and hold depends on the nature of the person's involvement with Unison. Information is collected to deliver services, manage commercial leases 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, gender, residential address and housing status, suburb, postcode, date of birth, marital status, phone number, email address, bank account details, income, including Centrelink payments, next of kin and dependent adults and children details, language spoken at home, employment information and images (including photo identification on licenses, WWCC, passports, etc.). In addition, for commercial leases, we may collect driver's license or passport number, bank account or credit card details, Tax File Number (TFN) and signatures.
- We may also collect sensitive information including a police check or working with children check (for staff), any criminal record affecting you or your dependent adults or children, or racial or ethnic origin. Some disability or health-related information may also be held relating to actual or potential supports or in relation to housing requirements.
- If a person chooses not to provide information requested, it may not be possible for us to provide a service. For instance, it is not possible for Unison to provide someone with housing or accommodation if they want to remain anonymous or use a pseudonym. Concerns with possible privacy or safety issues should be raised with Unison staff.

2.3 Third parties

- Where reasonable and practicable to do so, we only collect personal information directly. However, in some circumstances we may be provided with information by third parties. In such cases we 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. This is information that is provided to us without being requested. In circumstances where we receive unsolicited personal information, we 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.

2.4 How do we collect personal information?

- Personal information is collected by staff when a person walks into one of our offices with an enquiry for a service to be delivered, online via our website, follows or contacts us on social media, attends a face-to-face meeting, via email and phone, by making a payment, by completing a form and through referrals from other organisations. It is also collected when a renter/client starts receiving services from Unison.
- When we collect personal information we explain, where appropriate and where possible, why we are collecting the information and how we plan to use it.
- We may collect personal information from individuals such as visitors, contractors, and suppliers.
- We collect CCTV surveillance footage on some of our sites, and signage notifies residents of this. This is collected for the primary purpose of keeping the premises and residents safe and secure.
- We generally obtain consent from the owner of personal information to collect their personal information. Consent is usually be provided in writing however sometimes it may be provided orally or may be implied through a person's conduct.

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

2.5 Use or disclosure of personal Information

2.5.1 In relation to the collection and disclosure of sensitive information, Unison is bound by the *APPs*, which provide for the disclosure of information permitted or required by law.

2.5.2 Personal Information may be collected, held, used or disclosed in several 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 are given an opt-out in such communications.
- to share with third parties where consent has been provided.

- For requests made by government entities, and other organisations such as insurers for the purposes of insurance claims and State Trustees, with renter/client consent or if required under law or a court or tribunal order.
- for any other purpose where required or authorised by an Australian law.
- for any other purpose authorised or required by a court or tribunal.

2.5.3 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, cleaning and gardening services and services to owners via the management of owners' corporations.

2.5.4 We may use or disclose personal information for example:

- for assessment of eligibility and application.
- To those partners/suppliers delivering a service on behalf of Unison, in particular for Unison Property Corporation services or for capital works.
- 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 customer, or other individuals.
- for maintenance of properties.
- for billing customers and collecting payment.
- for payment of suppliers and reimbursement of employees for business-related expenses.
- for referring people to other agencies, where they provide consent.
- for research purposes, however all information is de-identified before it is shared.
- for reporting purposes to satisfy our regulatory or contractual requirements; and
- for complying with the law.

Specifically for renters/clients, use includes:

- to assist renters and clients to access housing and other support services
- to provide any required maintenance or improvements to renters' homes
- to maintain and administer our tenancy and other housing services records
- to maintain data on government agency platforms, including the Specialist Homelessness Information Platform (SHIP) (the client management system for IAP and PRAP), the Victorian Housing Register (VHR), the Housing Integrated Information Program (HiiP) and Centrelink
- to comply with our legal obligations
- to advise renters and clients of any changes to our housing services
- to share information about events and other matters which may be of interest to renters and clients
- to evaluate and improve our housing and other support services.

2.5.5 Automated decision-making

Unison does not currently employ a computer system, including Artificial Intelligence (AI), to use personal information to make decisions or do a thing that is substantially and directly related to making a decision, that could reasonably be expected to significantly affect the rights or interests of the individual. If this becomes the case, Unison will revise this policy to reflect the kinds of personal information used in the operation of the computer program, and the kinds of decisions that are made. This takes effect on December 10, 2026.

2.5.6 Cross-border transmission of personal information

Unison does not allow any personal information it collects or generates to be sent outside of Australia.

2.5.7 Information Sharing Schemes

Unison has procedures in place for sharing confidential information with other information sharing entities under the Family Violence Information Sharing Scheme and the Child Information Sharing Scheme.

Unison ensures that relevant managers are trained in the use of the Family Violence Information Sharing Scheme, the Child Information Sharing Scheme and the Family Violence Multi Agency Risk Assessment and Management Framework (MARAM).

2.5.8 In relation to the personal information of prospective staff members and contractors, we collect the personal information for purposes, which include, 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.

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

2.6 **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” in emails received or can contact Unison by email on info@unison.org.au.

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

2.7 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 is 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.

Unison has procedures guiding the archiving, destruction and storage of personal information.

When personal information is no longer needed for the purpose for which it was obtained, or required to be kept by laws and regulations, we take reasonable steps to destroy or permanently de-identify it. However, most personal information is stored in customer files which are kept by us for a minimum of seven years after leaving our services. Refer to the *Document Retention & Destruction Procedure*.

2.8 Maintaining the quality of personal information

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

2.9 Access to personal information

2.9.1 If an individual wishes to access or correct their personal information held by us they can do so by making a request in writing to the service they have accessed (e.g. letter or email to the Place Manager or IAP/PRAP Worker or HR Business Partner for staff or by contacting info@unison.org.au).

2.9.2 We may refuse access to personal information in several 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.
- denying access is required or authorised by an Australian law or court order.

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

2.9.4 To protect personal information, we require identification before releasing the requested information.

2.10 Use of AI

The use of Chat GPT or other AI agents is not permitted and the use such AI agents is in breach of Unison policy. A breach of policy could result in disciplinary action.

Copilot is the only AI agent authorised to be used under Unison policy as it is part of the Microsoft suite of applications. Please refer to the *ICT Use Policy*.

2.11 Information privacy breaches

If a privacy breach occurs, the Senior Manager, Compliance Risk & Quality is notified and is responsible for coordinating Unison's response to the breach including:

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

2.12 Training and guidance

Unison provides training and guidance for all members of staff, including employees, contractors and volunteers, on the proper protection, use and disclosure of confidential information, including personal information about renters and clients.

2.13 Complaints

If you wish to complain about our collection, storage, use or disclosure of personal information, you should in the first instance make the complaint to the Unison Privacy Officer in writing or through the Unison complaints portal on our website.

Our Privacy Officer investigates the complaint and decides if we should take any action to address it. The Privacy Officer will inform you in writing about the investigations made and the proposed actions we propose to take, if any.

You may at any time also make a complaint to the Office of the Victorian Information Commissioner (OVIC). Procedures for making a complaint are set out in the Office for the Victorian Information Commissioner's website: [Privacy Complaints – Office of the Victorian Information Commissioner](#)

2.14 Contact details

For all enquiries in relation to this policy, please contact:

The Privacy Officer
 117 Berkeley Street, Melbourne, VIC 3000
info@unison.org.au
 03 9349 0250

A copy of this policy is available on the Unison website or as a pdf document on request.

3. Definitions

APP: Australian Privacy Principles

Confidential Information: Any information belonging to Unison in law or equity whether written, in electronic form, or oral, including without limitation:

- information, ideas, concepts, know-how, data, results, techniques and other material proprietary to Unison
- all intellectual property rights
- information designated as confidential by Unison
- information relating to Unison's financial accounts, services, and strategic and operating plans
- any information, including personal information, relating to renters, clients, staff members, contractors and volunteers
- information relating to discussions or negotiations between Unison and any third party
- information given to Unison by any third party in confidence.

but excluding any information which is publicly known and generally available in the public domain.

Health information: Information or an opinion about: (Privacy Act s6(1), Health Records Act s3(1))

- the physical, mental or psychological health (at any time) of an individual
- the disability (at any time) of an individual
- an individual's expressed wishes about the future provision of health services to them
- a health service provided, or to be provided, to an individual
- other personal information collected to provide, or in providing, a health service
- other personal information about an individual collected in connection with the donation, or intended donation, by the individual of his or her body parts, organs or body substances
- genetic information about an individual in a form that is, or could be, predictive of the health of the individual or a genetic relative of the individual.

IPP: Information Privacy Principles

Definitions below are as per the *Privacy Act 1988*.

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.
- We consider that photographic and digital images are Sensitive Information.

4. Related Information

4.1 External documents and links

- [Fair Work Act 2009 \(Cth\)](#)
- [Health Records Act 2001 \(Vic\)](#)
- [Privacy Act 1988 \(Cth\)](#)
- [Privacy and Data Protection Act 2014 \(Vic\)](#)