

## PRIVACY POLICY

### Policy Statement

YourPlace Housing have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Commonwealth). The Australian privacy Principles govern the way in which we collect, use, disclose, store, secure and dispose of your personal information.

YourPlace Housing is committed to providing quality services and this policy outlines our obligations with respect to the management of your personal information.

### What Is Personal Information and Why Do We Collect It?

Personal information is information that identifies an individual. Examples of personal information we collect include names, addresses, email addresses and phone numbers.

Personal information is obtained in several ways including from the community housing customer register, housing needs assessment, Centrelink, face to face interview, by phone, by email and from third parties such as disability support providers.

We collect your personal information for the primary purpose of providing tenancy and property management services to you. When we collect personal information, we will, where appropriate and where possible, explain to clients why we are collecting the information and how we plan to use it.

YourPlace Housing may also use your personal information for a secondary purpose closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. For example, YourPlace Housing will use aggregated personal information when completing reports and surveys. Aggregated data is de-identified, to prevent any possible breach of privacy.

### Sensitive Information

Sensitive information is defined in the Privacy Act to include information or opinion about such things as:

- > Health related data, such as information relating to the diagnosis of a disability
- > Genetic data, biometric data collected to identify a person
- > Information concerning a person's criminal history
- > Data concerning a person's sexual orientation or sex life
- > Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs
- > Trade union membership

Sensitive information will only be used:

- > For the primary purpose for which it was obtained
- > For a secondary purpose that is directly related to the primary purpose
- > With your consent, or where required or authorised by law

### Third Parties

Where reasonable and practicable to do so, we will collect your personal information from you. However, there may be circumstances where we are provided with information by a third party. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by a third party.

### Disclosure of Personal Information

YourPlace Housing will often work closely with other organisations to coordinate the best support for you.

Your informed consent for the sharing of information will be sought and respected in all situations unless:

- > We are obliged by law to disclose your information regardless of consent
- > It is unreasonable or impracticable to gain consent and consent has been refused
- > Without information being shared, it is anticipated that a child, young person, or adult will be at risk of serious harm, abuse, or neglect, or pose a risk to their own or public health or safety.

YourPlace Housing will have procedures in place to ensure that all staff are familiar with the *Information Sharing Guidelines for promoting safety and wellbeing*.

### Security of Personal Information

Your personal information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification, or disclosure.

When your 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 your personal information. However, most personal information is or will be stored in client files which will be kept by us for a minimum of 7 years.

### Access to Your Personal Information

You may access the personal information we hold about you to update and/or correct it, subject to certain exceptions. If you wish to access your personal information, please contact us by phone or in writing.

### Maintaining the Quality of Your Personal Information

It is important to us that your personal information is up to date and accurate. We will take reasonable steps to make sure that your personal

information is accurate, complete, and up to date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records.

### What to Do If You Believe Your Privacy Has Been Breached

Firstly, raise your grievance or put your complaint in writing to YourPlace Housing, who will respond in accordance with the YourPlace Housing Complaints and Appeals Policy.

If you are not satisfied with the outcome, put your complaint in writing to the Office of the Australian Information Commission.

### Responsibilities

The Board and the Chief Executive Officer are responsible for ensuring that YourPlace Housing adheres to the Privacy Policy.

The Chief Executive Officer is responsible for ensuring that the organisation complies with this policy and that operational policy, procedures, forms, and safeguards exist to support staff to operate in a way which demonstrates compliance.

### Related Documents

Code of Conduct  
Records Management Policy

### Periodic Review

This policy will be reviewed annually to check it is operating effectively and whether any changes are required. The policy was approved on the 25 May 2020.