



## POG1703 PRIVACY POLICY

### INTRODUCTION

The Board of Women's Property Initiatives is committed to protecting the privacy of personal information which the organisation collects, holds and administers. Personal information is information which directly or indirectly identifies a person.

WPI is bound to comply with the Australian Privacy Principles (**APPs**) in the Privacy Act. The APPs regulate the manner in which personal information is handled throughout its life cycle, from collection to use and disclosure, storage, accessibility and disposal. WPI is also required to comply with the Health Privacy Principles in the *Health Records Act 2001* (Vic) (**Health Privacy Law**) when WPI collects and handles health information.

In certain circumstances (for example, where funding agreements with government agencies require it), WPI may also be required to comply with the Information Privacy Principles (**IPPs**) in the *Privacy and Data Protection Act 2014* (Vic).

In addition, WPI takes part in the Victorian Housing Register (VHR). The VHR is designed to be a single-entry point and database of all people seeking social housing. To facilitate the VHR, legislation to amend the *The Housing Act 1983* (Vic) (**Housing Act**) has been passed. *The Housing Amendment (Victorian Housing Register and Other Matters) Act 2016* (**Amending Act**) commenced on 21 December 2016.

Under the Amending Act, participating registered agencies such as WPI are not required to obtain consent from each applicant in order to:

- access the information held on the VHR; and
- collect, use and disclose it to other authorised people, for certain purposes in relation to the VHR and allocation of tenancies in social housing.

### POLICY SCOPE

All WPI staff members, volunteers, directors, tenants, donors and contractors.

### PURPOSE

The purpose of this policy is to provide a framework for WPI in dealing with privacy considerations. Therefore, ensuring that WPI collects, uses, discloses and otherwise handles personal information in compliance with the *Privacy Act 1988* (Cth) (**Privacy Act**) and other applicable privacy legislation.

### POLICY STATEMENT

WPI collects and administers a range of personal information for the purposes of:

- providing information and services;
- promoting itself and its products and services, including through direct marketing, events, competitions and social media;

- procuring products and services for itself and tenants;
- performing research and statistical analysis, including for marketing, customer satisfaction, product development and service improvement purposes relevant to WPI's activities;
- answering queries and resolve complaints;
- recruiting staff, volunteers and contractors;
- seeking funding and donations;
- assessing whether applicants meet WPI's service and/or housing criteria.

WPI may also collect, hold, use and disclose personal information for other purposes explained at the time of collection, or which are required or authorised by or under law, or for which consent has been provided.

WPI is committed to protecting the privacy of personal information it collects, holds and administers.

WPI recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – protected on one hand and made accessible to them on the other. These privacy values are reflected in and supported by our core values and philosophies and also reflected in our Privacy Policy, which is compliant with the Privacy Act 1988 (Cth).

WPI is bound by laws which impose specific obligations when it comes to handling information. The organisation has adopted the following principles contained as minimum standards in relation to handling personal information.

WPI will:

- Collect only information which the organisation requires for its primary function;
- Ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered;
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- Store personal information securely, protecting it from unauthorised access; and
- Provide stakeholders with access to their own information, and the right to seek its correction.

### **Personal information**

Personal information means information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable. Personal information includes your name, date of birth, contact details (address, phone, email etc), your residency status, evidence of your household income and assets, information about your housing needs, demographic information (such as language spoken at home and country of birth), records of conversations and communication between you and our staff, personal information recorded in notes, and recommendations and decisions made by our staff.

### **Sensitive information**

Sensitive information is a subset of personal information that is generally afforded a higher level of privacy protection. Sensitive information includes health and genetic information and information about racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual preferences or practices, criminal record and some types of biometric information.

## Employee Records

WPI is generally exempt from the Privacy Act when it collects and handles employee records and this policy does not apply to that information. However, the Privacy Act still applies to personal information about job applicants, contractors and volunteers, and the Health Privacy Law still requires WPI to protect the privacy of employee health information. This policy will apply in those circumstances.

### Collection

#### Collection of personal information

WPI will not collect personal information unless the information is reasonably necessary for its functions or activities.

For example, if you:

- **apply for housing and other property related services and activities or become a tenant of WPI,** WPI may access and collect information such as your household income, current living situation, housing needs and support needs held on the VHR for certain purposes related to your allocation of social housing. WPI may also collect additional information from you as relevant to your housing requirements;
- **contact WPI with a request or enquiry related to WPI's services,** WPI may collect your name, address, contact details and the details of your enquiry;
- **register for a subscription to a WPI publication,** WPI may collect your name, organisation and contact details and details about the information you access in our publications;
- **make a donation to WPI,** WPI may collect your name, organisation, contact details, the amount and frequency of your donation and payment details;
- **attend a WPI event,** WPI may collect your name, organisation, contact details, payment details (if applicable) and any dietary and accessibility requirements;
- **participate in WPI's surveys,** WPI may collect your name, organisation contact details and your survey responses;
- **make a complaint,** WPI may collect your name, contact details, the details of your complaint, information collected in any investigation of the matter and details of the resolution of the complaint;
- **apply for a role at WPI,** WPI may collect the information you include in your application, including your cover letter, resume, contact details and referee reports.

#### Collection of sensitive information

WPI will not collect sensitive information about you unless the information is reasonably necessary for one or more of its functions or activities and either:

- the individual has consented; or
- WPI is required or authorised by or under law (including applicable privacy legislation) to do so.

For example, WPI may collect information about any physical disability you (or your family members) may have where relevant in assessing your housing needs.

### **Methods of collection**

WPI will collect personal information by lawful and fair means as required by the Privacy Act. Where it is reasonable and practicable WPI will collect personal information directly from you.

WPI collects personal information in a number of ways, including:

- in person;
- over the telephone;
- through written correspondence (such as letters, faxes and emails);
- on hard and soft copy forms; and
- from third parties, including support agencies, health services providers or an individual's authorised representative;
- from the VHR
- through WPI's website when an individual makes a donation;
- at WPI events;
- from Centrelink

### **Indirect Collection**

WPI tries to only collect your personal information directly from you. However, there are some situations where we collect your personal information from other sources, for example:

- if you have applied for social housing with WPI, the Housing Act give us the power to access your personal information held on the VHR and use it to determine whether you meet the eligibility criteria for social housing;
- when you are a member of a household of a tenant or an applicant, in which case we can collect personal information about you from another member of the household;
- when you authorise us to ask for and collect personal information about you from another source, such as Centrelink (to enable us to calculate your rent) or your support worker (to help us match you with suitable housing or to help you sustain your tenancy with us); or
- if we are given personal information about you as part of a complaint brought by another person.

### **Why does WPI collect personal information**

#### **Direct marketing and opting out**

WPI may use your personal information to let you know about it and its services (including promotions and events) either where consent (express or implied) has been provided or where WPI is otherwise permitted by law to do so.

Where you have consented to receiving marketing communications from WPI, that consent will remain current until you advise WPI otherwise. However, you can opt out at any time.

#### **Trans-border Data Flows**

WPI does not currently disclose personal information to third parties located overseas. If this changes at some time in the future, WPI will comply with the requirements of the Privacy Act that apply to cross border disclosures of personal information and this Privacy Policy will be amended accordingly.

#### **Data quality and security**



WPI holds personal information in a number of ways, including in hard copy documents, electronic databases, email contact lists and in paper files held in drawers and cabinets. Paper files may also be archived in boxes and stored offsite in secure facilities onsite in the office archives. WPI will take reasonable steps to:

- make sure that any personal information it collects, uses or discloses is accurate, complete, up-to-date and (in the case of use and disclosure) relevant;
- protect the personal information that WPI holds from misuse, interference and loss and from unauthorised access, modification or disclosure; and
- destroy or permanently de-identify personal information that:
  - a) is no longer needed for any purpose that is permitted by the APPs; and
  - b) WPI is not required to retain by or under an Australian law, or a court or tribunal order.

#### **Access and Correction**

You may contact WPI (details at <http://www.wpi.org.au/contact-us>) if you would like to access or correct any of the personal information that WPI holds about you. WPI may require you to verify your identity before processing the request to make sure that the personal information that it holds is properly protected.

#### **Access**

Where WPI holds personal information about you, WPI will generally provide you access to that information on request by you or your authorised representative, subject to some exceptions permitted by law. WPI will also generally provide access in the manner that is requested (eg by providing photocopies or allowing a file to be viewed), provided that it is reasonable and practicable for it to do so. WPI may charge a fee to cover its reasonable costs of locating and providing the information.

#### **Correction**

If you ask WPI to correct personal information held by it, or if WPI is satisfied that the personal information it holds is inaccurate, out of date, incomplete, irrelevant or misleading, WPI will take reasonable steps to correct that information to ensure that, having regard to the purpose of which it is held, the information is accurate, up-to-date, complete, relevant and not misleading.

If WPI corrects personal information about you, and WPI has previously disclosed that information to another agency or organisation that is subject to the Privacy Act, you may ask WPI to notify that other entity. If so, WPI will take reasonable steps to do so, unless this would be impracticable or unlawful.

In addition, if WPI refuses to correct personal information in the manner you have requested, you may ask WPI to associate with the information a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading, and WPI will take reasonable steps to do this to associate the statement in such a way that will make it apparent to users of the information.

#### **Timeframe for access and correction requests**

Except in the case of more complicated requests, WPI will endeavour to respond to access and correction requests within 30 days.



### Anonymity

The nature of the business carried on by WPI means that, generally, it is not possible for WPI to provide services to its tenants or otherwise deal with individuals in an anonymous way.

Wherever it is lawful and practicable, however, WPI will provide you with the option of not identifying yourself, or of using a pseudonym (for example, when viewing WPI's website or making general phone queries). Donations may also be made anonymously, but in this case WPI may not be able to issue a tax-deductible receipt.

### Complaints

If you have a complaint about how WPI has collected or handled your personal information, please contact WPI (details at <http://www.wpi.org.au/contact-us>).

WPI is committed to the above privacy principles and will endeavour to deal with complaints in a fair, respectful and timely manner. In most cases, WPI expects that complaints will be investigated, and a response provided within 30 days of receipt of a complaint.

## RELEVANT DOCUMENTATION

PPG1931 Privacy Procedures

## RELEVANT LEGISLATION

Privacy Act 1988 (Cth)

Australian Privacy Principles (**APPs**) in the Privacy Act

WPI may also be required to comply with the Information Privacy Principles (**IPPs**) in the *Privacy and Data Protection Act 2014* (Vic)

*The Housing Act 1983* (Vic) (**Housing Act**)

*The Housing Amendment (Victorian Housing Register and Other Matters) Act 2016* (**Amending Act**) commenced on 21 December 2016

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