



Policy Privacy Organisational

Policy Statement

At Unity Housing Company Ltd (Unity) we are committed to delivering high quality housing services whilst respecting the privacy of our customers. Unity collects and handles a range of personal information for the purpose of providing housing services. Unity will manage personal information in an open and transparent way. This Privacy Policy will be made available in a variety of easily accessible formats.

Purpose

This policy sets out how we use and protect any personal information collected. It is designed to give you an understanding of the types of personal information we collect, and how it is used, stored, disclosed and able to be accessed.

Scope

This policy extends to all Unity staff, tenants, contractors, students, volunteers and Board members. The policy provisions apply to all our customers, including applicants and tenants, and all those who provide us with their personal information including staff, suppliers and contractors.

This privacy policy has been developed in line with the 13 Australian Privacy Principles (APP) established under the Privacy Act 1988 (Commonwealth) and the Privacy Amendment (Enhancing Privacy Protection) Act 2012. A copy of the Privacy Act 1988 is available at: www.privacy.gov.au

Definitions

Personal information broadly means information or an opinion about an identified individual, or an individual who is reasonably identifiable.

Policy

Collection of personal information

Personal information collected will depend on the nature of your relationship or interaction with Unity and its staff. We will only collect personal information where it is reasonably necessary for, or directly related to, the functions or activities of our business.

Personal information collected can include names, dates of birth, gender details, current and previous addresses, telephone or mobile phone number, email address, bank account details, occupation, driver's licence number, nationality, family circumstances, next of kin, records of communication and website usage information. We also collect information about our customers' income, assets and pension status.

Additional personal information concerning staff which is collected can include job applications, work histories, resumes, educational qualifications, training records, competency assessments, details of salary and wages, training records, performance assessments, counselling details and personnel records. Sensitive information is sometimes collected when appropriate, such as criminal record check details and relevant medical histories for employment purposes.

Medical information collected can include incident and accident reports, first aid records, workers compensation claims and documents, rehabilitation and attendance records, medical



Policy Privacy Organisational

or other health service provider records, medical histories and other assessments for insurance or employment purposes.

We collect information about our customers' health and care needs and their medical history as it relates to services we provide. We also collect information about our clients' cultural, religious, linguistic and social needs, their interests, hobbies and community activities, and any potential workplace risks involved in providing services to the customer.

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

- by phone, in application forms or other agreements, or through our website
- from a person authorised to act on behalf of another, eg power of attorney
- from third parties such as referral services
- when required for Government reporting, eg Centrelink
- via on-line forms such as maintenance requests, complaints and feedback

Unity collects personal information about our staff directly, through general background check processes, such as criminal history checks, and from other sources such as referees and employment agencies.

Personal and business details about suppliers, contractors and service providers and their staff are collected directly from our service providers.

If you are unsure about the reason for your personal information being collected, contact Unity's Privacy Officer by calling (08) 8237 8777.

Use of personal information

Unity will generally collect and use personal information for the primary purpose of:

- providing housing services
- complying with our legislative requirements including providing data to Government agencies
- providing information to support agency partners to follow up ongoing services (only with express customer consent)
- To administer employment arrangements, personnel development and management responsibilities

Unity will take reasonable steps to make you aware of:

- how you may contact Unity
- that you can access personal information collected
- why the information is collected and its likely use
- our disclosure practices
- any law requiring collection of personal information
- the main consequences of failure to provide required information

Consent to share personal information

The Privacy Act prevents Unity from providing personal information to another individual or organisation without written approval from you, including personal information provided in a referral to a support agency.



Policy Privacy Organisational

In some circumstances, Unity is legally required to provide information about our customers, for example to assist with police or Centrelink investigations, Court orders or subpoenas and can do so without your consent.

Accessing personal information

You have the right to access your personal information, subject to some exceptions allowed by law.

Requests made to access your personal information held by Unity will generally be granted, except in certain limited circumstances. Those circumstances may include where:

- it is reasonably determined that granting access would pose a serious threat to the life health, or safety of an individual or to public health or safety
- granting access would have an unreasonable impact on the privacy of other individuals
- the request is frivolous or vexatious
- the information relates to existing or anticipated legal proceedings between Unity and the individual

We may also deny access in some circumstances where we are required to do so by law or where access would be unlawful, where commercial negotiations or decision making processes may be prejudiced, where unlawful activity or serious misconduct is suspected, or where enforcement related activities may be prejudiced.

We respond to requests for access to personal information within a reasonable period (usually 30 days), and will give access to the information in the manner requested where it is reasonable and practicable. If access is refused, Unity will give you a written notice which sets out the reasons for refusal and how you can complain about the refusal.

Updating personal information

Unity takes all reasonable steps to ensure the personal information we collect, use and share is complete and correct. You are encouraged to let us know if you find an error in your personal information so that it may be updated.

Security of personal information

Information may be held in physical or electronic form on our system. We protect personal information from misuse or loss by restricting access to the information in electronic format, and by appropriate physical and communications security. Internal access controls and protocols ensure that only authorised staff can access personal information in circumstances where they are required to do so in the performance of their duties.

Collecting sensitive information

Unity may collect sensitive information such as medical information, racial origin, religious beliefs or criminal history that is reasonably necessary to deliver our housing services, or as required under our regulatory obligations. Situations where this may occur include:

- Providing translation services
- Conducting tenant satisfaction surveys
- Providing housing services
- Ensuring our staff respect the religious or cultural customs when entering properties for inspection



Policy Privacy Organisational

All sensitive information that is collected is used in accordance with this privacy policy.

Adoption, use or disclosure of government related identifiers

We will not adopt, use or disclose a government related identifier of an individual as our own identifier of the individual unless one of the following exceptions apply:

- where the adoption of the identifier is authorised by or under an Australian law or a court/tribunal order
- where the use or disclosure of the identifier is reasonably necessary for Unity to verify the identity of the individual for the purposes of Unity's activities or functions
- where the use or disclosure is reasonably necessary for an enforcement related activity being conducted by, or on behalf of an enforcement body.

Direct marketing

We will not use or disclose personal information for the purpose of direct marketing.

Cross border disclosure

Any personal information provided to us may be transferred to, stored by or disclosed to an overseas recipient in limited circumstances. For example, we may use a server hosted overseas to store data, which may include your personal information.

We will take reasonable steps, in the circumstances, before your personal information is disclosed to an overseas recipient, to ensure that the overseas recipient does not breach privacy laws in relation to your personal information.

Dealing with unsolicited information

We will take all reasonable steps to ensure that all unsolicited information is destroyed or de-identified immediately. Unsolicited information that is received verbally will not be recorded. Unsolicited information that is received in a record or written format will be destroyed or de-identified.

Anonymity

Whenever it is lawful and practicable, you will have the option of not identifying yourself by dealing with us anonymously or by using a pseudonym. Circumstances where this may apply are when reporting neighbour disputes, making a complaint or responding to a tenant survey.

Website and use of cookies

Cookies are data that a website transfers to an individual's hard drive for record-keeping purposes. Most websites use cookies, which are an industry standard; they track usage patterns and allow you to use such features as online services. The Unity website uses cookies for online services only, and does not store personal information about our visitors.

The Unity website may contain links to or from other websites. Unity is not responsible for the privacy practices of other websites. The Privacy Policy applies only to the information we collect from our website. We encourage you to read the privacy policies of other websites you link to from our website.



Policy Privacy Organisational

Note: Most browsers have the option to allow you to deny or accept the cookie feature. Please see the help menu in your browser. Be mindful that if you disable the cookie feature you may not be able to use the online services.

Complaints and disputes

If you have reason to believe that we have not complied with our privacy obligations, please refer any complaint to our Privacy Officer. We will ensure your complaint is dealt with in accordance with our complaints policy and procedures. More information about our complaints policy and procedures can be found on the Unity website, in our Complaints brochure available at any Unity site or by contacting our Privacy Officer.

Unity's Privacy Officer can be contacted by:

Email: admin@unityhousing.org.au
Phone: (08) 8237 8777
Mail: 81 Osmond Terrace, Norwood SA 5067

You may contact the Privacy Commissioner if you are dissatisfied with our response at www.oaic.gov.au.

Policy Availability

Our privacy policy is able to be accessed on our public website at www.unityhousing.org.au.

If you would like to request a copy of this policy in an alternate form, for example suitable for the vision impaired, or for individuals from a non-English speaking background, you may do so by contacting our Privacy Officer, and we will take reasonable steps to provide the policy in an appropriate form.

Associated Documentation

Privacy Act 1988 (Commonwealth)
Privacy Amendment (Enhancing Privacy Protection) Act 2012

Endorsements

Unity Housing Company Ltd

A handwritten signature in black ink, appearing to be 'M. Smith'.

Chief Executive Officer

Date : 6 August 2014

Next Review Date:

1 July 2017