



Policy Privacy Organisational

Policy Statement

At Unity Housing Company Ltd (Unity) we are committed to respecting and protecting the privacy and rights of individuals in relation to their personal information. 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 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). A copy of the Privacy Act 1988 is available at: www.privacy.gov.au

Definitions

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

- (a) whether the information or opinion is true or not; and
- (b) whether the information or opinion is recorded in a material form or not.

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Collection of personal information

Personal information collected will depend on the nature of your relationship or interaction with Unity and our 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.

We only collect information about our customers' health and care needs and their medical history as it relates to services we provide. We may 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.

Sensitive information is a subset of personal information and is defined as:

- information or an opinion (that is also personal information) about an individual's:
 - racial or 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 orientation or practices, or
 - criminal record
- health information about an individual



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- genetic information (that is not otherwise health information)
- biometric information that is to be used for the purpose of automated biometric verification or biometric identification, or
- biometric templates (e.g. using a person's unique physical and other traits for the purposes of identification and security).

We recognise that inappropriate handling of this type of sensitive information can have adverse consequences for you or those associated with you, including discrimination, mistreatment, humiliation, embarrassment or the undermining of your dignity.

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, e.g. Power of Attorney
- from third parties such as referral services
- from the Single Housing Register (SHR)
- when required for Government reporting, e.g. Centrelink
- via online forms such as maintenance requests, complaints and feedback.

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 or Government requirements. 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.

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

Collection of staff information

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 about staff can include incident and accident reports, first aid records, workers compensation claims and documents, rehabilitation and attendance records, medical or other health service provider records, medical histories and other assessments for insurance or employment purposes.

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, tenancy and property management 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)
- administering employment arrangements, personnel development and management responsibilities.

Unity will take reasonable steps to make you aware of:

- how you may contact Unity
- your right to 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.

Disclosure of personal information

We will only disclose personal information to a third party under the following circumstances:

- If the disclosure is directly related to the purpose for which the information was collected and there is no reason to believe that the person concerned would object.
- If the person to whom the information relates was informed when the information was collected that it might be disclosed in this way.
- If it is reasonably believed that the disclosure is necessary to prevent or lessen a serious and imminent threat to any person's health, safety or life.
- Where the person to whom the information relates has provided informed consent.
- If a permitted general situation exists in relation to the use or disclosure of the information.
- If lawfully authorised or required to do so, for example to assist with police or Centrelink investigations, Court orders or subpoenas (can be provided without your consent).

We may disclose personal information through submission to a Government database, such as the Single Housing Register, which will be accessible by all Community Housing Providers and Government Housing Authorities. We will inform you of this use of your information at the time we collect the information from you and request your consent.

Accessing personal information

You have the right to access your personal information held by us, 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 form or electronic form. 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.

Information held on a Government database, such as the Single Housing Register, can only be accessed by appropriately vetted and authorised personnel for the purpose of providing housing.

Any information destroyed is disposed of in a manner that protects the privacy of information in an appropriate manner.

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 or iCloud 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/iCloud recipient, to ensure that the overseas/iCloud recipient does not breach privacy laws in relation to your personal information.



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Dealing with unsolicited information – e.g. information not asked for, given or provided voluntarily

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 (i.e. a fictitious/imaginary or fabricated name). 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.

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: privacyofficer@unityhousing.org.au

Phone: (08) 8237 8777

Mail: PO Box 32, Welland SA 5007

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), as amended
Privacy and Confidentiality Procedure

Endorsements

Unity Housing Company Ltd

Chief Executive Officer

19 September 2024

Next Review Date:

1 August 2027

Version History

Version No.	Date	Endorsement
1.0	9 July 2014	6 August 2014
2.0	24 August 2017	5 February 2018
3.0	13 February 2019	17 April 2019
4.0	12 October 2020	20 October 2020
5.0	9 August 2024	19 September 2024