



Privacy Policy

1. Purpose

This policy outlines how the Housing Trust manages the personal information of customers (tenants), staff and other stakeholders (“individuals”). The Housing Trust takes privacy very seriously and handles the personal information of all individuals in compliance with all applicable Australian laws.

2. General principles

The Housing Trust is committed to protecting the privacy of individuals. The Housing Trust collects, holds and uses information for the purpose of operating as a community housing provider and to comply with legislative requirements.

The Housing Trust will only collect personal information directly relevant to providing our services. We will use personal information only for the purpose for which it is provided, and share it only with those who have a legitimate ‘need to know’.

This Policy applies to customers (tenants, prospective tenants, past tenants), volunteers, support partners, suppliers, contractors, employees, board members, and government agencies.

The term "Personal Information" in this Policy means any information from which your identity is apparent or can be reasonably ascertained.

Information which is publicly available, in any domain, is not considered private or confidential and is excluded from this Policy.

The Housing Trust is required to comply with Australian privacy laws including the *Privacy Act 1988* and the Australian Privacy Principles.

3. Principle 1: Open and transparent management of personal information

We collect, hold and use personal information from you in order for us to:

- undertake our community housing management functions
- assess tenancy applications
- allocate appropriate properties
- provide tenancy-related services
- improve the quality of the services we provide
- contact you
- in the case of job applicants, assess your eligibility for employment with us, and
- in the case of employees, manage and administer your employment with us.

If you do not provide us with certain personal information when prompted, we may be unable to contact you, provide services to you, or in the case of job applicants, consider your application for employment.

4. Principle 2: Anonymity and pseudonymity

The Housing Trust will accept information which is anonymous however we may not be able to act on it because it is anonymous

5. Principle 3: Collection of solicited personal information

The type of information we collect about you will depend on the type of relationship we have with you. We may collect the following types of personal information:

- Name
- Current address and other contact information such as phone and email
- Date of Birth
- Gender and other demographic information
- Current and or previous property ownership details
- Financial information such as wages, investment information, Centrelink information and bank account details
- Rental history
- Educational qualifications and employment history.

Information may be provided directly from you, from public sources or from other organisations by using written forms, email, phone or other technology. Examples of other organisations or third parties from which we collect your personal information include:

- Housing NSW
- Centrelink
- Police
- Social Workers
- Support Agencies
- Previous landlords
- Medical Practitioners
- NSW Trustee and Guardian
- Previous employers.

Sensitive Information

We may also collect sensitive information about you, including health, criminal record and race information where you have consented and where this information is relevant to the services we supply to you or your employment. Sensitive information is information or opinions which may include your racial or ethnic background, religious or philosophical beliefs, employment record, criminal record or health/medical information.

Tax file numbers (TFN)

Tax file numbers (TFN) are collected for staff and contractors. If you do not provide your TFN we may withhold payment without it or we may be required to process your payment differently. We do not record, collect, use or authorise TFN information unless it is permitted under taxation, personal assistance or superannuation law. We take reasonable steps to securely destroy or permanently de-identify TFN information when they are no longer required.

6. Principle 4: Dealing with unsolicited personal information

The Housing Trust may receive information which we have not asked for. If we consider we do not require this information we will destroy it or de-identify it as soon as practical.

7. Principle 5: Notification of the collection of personal information

The Housing Trust will take reasonable steps to notify you or ensure you are aware that personal information is being collected of you. This includes making this Policy available online and on request as well as notifying you on our forms and documents.

8. Principle 6: Use and disclosure of personal information

The Housing Trust may use and disclose information it collects for a range of purposes as outlined above. We will also use and disclose your personal information for a secondary purpose where you would reasonably expect us to use or disclose your personal information for that secondary purpose. For example:

- To seek feedback on and improve our services
- To better understand our customer base

- To issue payment reminders.

We may also use and disclose your personal information in other circumstances including:

- Where customers consent to the use or disclosure to the third party (e.g. support partners)
- Where required or authorised by Australian Law, or a court/tribunal order (e.g. subpoena/NCAT)
- Where we reasonably believe that the use or disclosure is necessary to prevent serious impact to an individual's life, health or safety or a serious threat to public health and safety
- Where it is reasonably necessary for the purposes of law enforcement activities or if information is requested under the NSW Police Record of Understanding for Community Housing providers.

We may disclose your information to third party service providers (e.g. information technology providers) for the purposes outlined in this Policy.

9. Principle 7: Direct marketing

The personal information of you is not provided for direct marketing purposes to an external body.

10. Principle 8: Cross border disclosure of personal information

Information is not disclosed overseas.

11. Principle 9: Adoption, use or disclosure of government related identifiers

The Housing Trust will not use an Australian Government identifier for any customer as its own. However, we will record government identifiers such as the Centrelink Reference Number (CRN) in order for us to fulfil our obligations to Centrelink.

12. Principle 10: Quality of personal information

The Housing Trust will take reasonable steps to ensure that personal information is accurate, complete and up-to-date. The Housing Trust will take reasonable steps to correct information to ensure it is up to date, complete, relevant and not misleading. These steps include maintaining and updating personal information when we are advised by you that your personal information has changed, and at other times as necessary.

13. Principle 11: Security of personal information

The Housing Trust will take reasonable steps to protect information from misuse, interference, loss and unauthorised access, modification or disclosure. Reasonable steps include holding the information in a secured password protected IT system, locked filing cabinets, physical access restrictions and securing our premises. All staff and volunteers sign confidentiality agreements and code of conduct agreements which reflect the commitment to the privacy and protection of your information. We also provide training to our staff in how to keep information safe and secure.

14. Principle 12: Access to personal information

You can access the information which is collected and recorded about you. The request must be in writing. In some cases the Housing Trust will not provide information to you such as where:

- Access will pose a serious threat to life or health of any individual
- Your identity has not been verified
- Withholding access is required by law
- The request is frivolous or vexatious
- The privacy of others may be affected
- The information is commercially sensitive
- Information relates to existing or anticipated legal proceedings.

We will provide the information to you or let you know of our decision within 21 days.

15. Principle 13: Correction of personal information

You can ask the Housing Trust to correct the information we have. If we do not think that the information needs correcting we will let you know.

To request access to and or correct information, contact the Housing Trust, 120 Smith Street, Wollongong NSW 2500 or telephone (02) 4254-1166.

16. Complaints

If you are concerned that the Housing Trust has not complied with the Privacy Policy, you can make a complaint under the Complaints Policy:

- Contact the Housing Trust at privacy@housingtrust.org.au or telephone (02) 42541166
- Send a letter to the Housing Trust Privacy Officer, 120 Smith Street, Wollongong NSW 2500

You may decide to make a formal complaint with the Office of the Australian Information Commissioner (www.oaic.gov.au) (which is the regulator responsible for privacy in Australia).