



# Connect Victoria Park Housing

## Privacy and Confidentiality Policy

CVP Policies	Privacy and Confidentiality	Effective date:	23/11/21
Approved By	CVP Board	Review date:	23/10/23
Warning	This process is uncontrolled after printing		

## Purpose

This policy outlines how Connect Victoria Park Inc manages the privacy rights of its tenants and Village Hub members in line with the Australian Privacy Principles (Privacy Act 1988).

## Scope

This policy covers personal information gathered by CVP Inc from its tenants and Village Hub members. It does not cover information that is not personal.

## Definitions

**Personal information** is information that identifies an individual or from which an individual's identity can be reasonably gained (regardless of the type of information or whether it is true or not).

**Sensitive information** is information or an opinion about an individual's:

- racial or ethnic origin;
- political opinions;
- membership of a political association;
- religious beliefs or links;
- philosophical beliefs;
- membership of a professional or trade association;
- membership of a trade union;
- financial circumstances;
- sexual preferences or practices; or
- criminal record.

**Unsolicited personal information** is information that CVP Inc has not asked for.

## Our commitment

CVP Inc is committed to the principles outlined in the Privacy Act 1988 and has in place procedures that ensure compliance with the legislation.

## Collecting and keeping information

CVP Inc keeps the following personal information for the purpose of providing affordable housing and social connection for older people, which may include:

- identity information such as name, date of birth, gender, postal and email addresses, home and mobile numbers;
- copies of photo ID for identification and safety;
- emergency and family contact details;

- details of any Commonwealth and state benefits being received;
- government identifiers such as Centrelink Reference Number;
- rental history;
- income and other financial information for eligibility assessments, rental, non-rental and membership payments;
- medical and disability information and any support agencies providing support;
- information about complaints including names of involved parties and details of allegations.

CVP Inc will only collect personal information that is needed to carry out its duties, where it is required by law and/or to protect the health, safety and welfare of its employees or any third party who has been asked to provide a service on CVP Inc's behalf.

CVP Inc will only collect and use an individual's sensitive information with their permission.

If bank details are requested from an individual, these will be securely stored and only used to transfer funds as necessary.

Personal information will be collected directly from an individual unless this is unreasonable or impractical. In these situations, the individual may authorise someone else to provide the information on their behalf.

CVP Inc may collect personal or sensitive information (or both) when an individual:

- fills in a form;
- contacts CVP Inc by phone;
- emails CVP Inc;
- visits CVP Inc's website; or
- speaks to a CVP Inc staff in person.

CVP Inc may also collect personal information from photographs and CCTV footage.

When CVP Inc collects personal information directly from an individual, reasonable steps will be taken to let the person know why and how the information has been collected and who it might be provided to.

CVP Inc will also provide information about how this information can be accessed, amended or how a complaint can be made.

If an individual chooses not to provide CVP Inc with personal information, CVP Inc may not be able to:

- offer or provide a tenancy or membership;
- manage a tenancy or membership appropriately (if the individual already has one);
- check an identity; or
- provide ongoing information about service delivery or changes to it.

If CVP Inc receives unsolicited personal information about an individual, and that information is needed to carry out duties or activities, the information will be managed in the same way as any other personal information. If the information isn't needed, it will be destroyed or identifying details removed.

Where possible, CVP Inc will hold interviews and meetings in spaces that provide privacy.

### **Using and sharing information**

CVP Inc will use personal information for the purpose it was intended for, or for other related purposes if it was reasonably expected the information would be used in such a way.

CVP Inc collects, holds and uses personal information:

- to provide, deliver, manage and improve services;
- to manage customers' tenancies and associated financial accounts;
- to better understand and evaluate tenants and members' needs;
- to let tenants and members know about service delivery issues or changes;
- to communicate with tenants and members;
- to ensure accurate records are maintained;
- to allow third parties to provide services such as maintenance and repairs;
- to investigate feedback and complaints; and
- where needed or allowed by law, or where it is necessary as part of an investigation, for health or safety reasons.

CVP Inc will **not** provide an individual's personal information to other people or organisations unless that person's permission has been granted or the information must be provided by law.

CVP Inc may share personal information for the main purpose it was collected for or other related purposes if it would reasonably be expected that the information would be shared in such a way.

CVP Inc may share personal information with:

- financial institutions;
- regulatory or government agencies;
- enforcement agencies.

### **Direct Marketing**

CVP Inc routinely uses personal information to provide tenants and Village Hub members with general information about our housing and community program, as well as organisations changes and other important information.

If tenants and members do not wish to receive such communications, they may at any time opt out by emailing [admin@connectvictoriapark.org](mailto:admin@connectvictoriapark.org) or directly unsubscribing from emails received.

CVP Inc will take all reasonable steps to meet the unsubscribe request within a reasonable timeframe.

### **Sharing information with organisations overseas**

CVP Inc operates only in Western Australia and does not, therefore, share customer information with overseas organisations.

CVP Inc does use an American-based software to manage tenant and members information, as well as cloud storage to store personal information. Cloud storage or IT servers may be located outside Australia.

### **Quality of the information held**

CVP Inc will take reasonable steps to ensure personal information collected, used, or shared is accurate, complete, and up to date.

If tenants or members believe the information held about them is not accurate, complete, or up to date, they can request that it be corrected and must show proof of identity before any changes are made.

Any refusal to correct personal information will be explained.

## **Keeping information secure**

CVP Inc will treat all information provided by tenants and Village Hub members as confidential and will ensure that all records are kept in a secure manner and available only to those properly authorised. This applies to electronic as well as hard copy records.

CVP Inc will take all necessary steps to ensure that the information we keep is accurate.

If tenants or members consider that any information CVP Inc have is incorrect we will amend it, where appropriate.

## **Right to access information**

CVP Inc tenants and Village Hub members have a right to request any personal information kept about them.

Request from tenants or members (or authorised tenant representatives) to access information should be referred to CVP Inc's CEO.

Any complaints regarding a breach of the Australian Privacy Principles must be made in writing to CVP Inc's CEO.

If tenants or members are still dissatisfied after receiving a reply to their complaint, they may appeal by writing to Office of the Australian Information Commissioner (OAIC), GPO Box 5218 Sydney NSW 2001 or calling the Commissioner's hotline on 1300 363 992.