

Privacy Policy

1. Purpose

This policy details how Jubilee Housing collects, uses and discloses your personal information and how we protect the security of the personal information we hold.

2. Scope

This policy is intended to protect the privacy of anyone who visits or uses our services. Our staff, contractors, students on work placement, board members and volunteers must all follow this policy.

If you have applied for social housing under the Victorian Housing Register, this policy also summarises how Jubilee Housing may share your personal information with other participating agencies.

Jubilee Housing recognises and supports the framework and foundational principles of [Privacy By Design](#), which was adopted in 2010 as the global privacy standard. Our detailed legal obligations are set out in the [13 Australian Privacy Principles \(APPs\)](#) within the Commonwealth's *Privacy Act 1988*. We are also bound by Victoria's Information Privacy Principles, but our policy is based on the Commonwealth's APPs, as they provide greater rights and better protection.

We want our privacy practices to be open and transparent. To achieve this, our Privacy Policy is written in simple language; we publish this policy on our website; and we provide the Privacy Statement when collecting personal information face-to-face.

We will update this privacy policy when our information handling practices change. Updates will be publicised on our website.

3. Collecting Information

Jubilee Housing collects personal information from residents, housing applicants and others, so that we can provide housing services and carry out our mission.

"Personal information" means any information that can be connected to your identity, including your name and address, other personal details, and information and opinions about you. Commonwealth and Victorian laws set out how we must manage your personal information to protect your privacy.

Generally, we collect personal information about you to help us provide a service to you – for example, to put you on our housing waiting list, to match you with suitable housing, to sign you up as a renter in one of our properties, or to calculate your rent charge.

In these situations, we ask you for details about yourself and any other members of your household so that we can confirm your eligibility for our housing and provide the kind of housing that matches your household's needs. If you don't give us this information, we may not be able to provide you with suitable and affordable housing.

We also ask for and collect personal information about you when you contact us, for example to ask for information, or report a tenancy issue (such as repairs needed on your home) or lodge a complaint with

us. Without this information, we may be unable to provide you with accurate or detailed information or act on your request or complaint.

We always try to only ask for and collect the personal information we need for the particular function or activity we are carrying out.

In addition, Jubilee Housing takes part in the Victorian Housing Register. The *Housing Act 1983 (Vic)* allows us in some circumstances to share the personal information of applicants for social housing with other participating registered agencies of the Victorian Housing Register.

4. Collecting Sensitive Information and Health Information

We generally only collect *sensitive information* (such as about racial or ethnic origin) and *health information* (such as about a person's disability or mental health condition) about you when we have your consent.

When you apply for housing with us or you take up an offer of housing from us, we ask for and collect additional personal information about you to assess the urgency of your housing need, to help us understand the kinds of people that need our housing, and to provide statistical data to government departments that require us to report to them. This additional information may include sensitive information (such as about your health or disability, and your racial or ethnic origin) and other information such as your personal circumstances at the time of applying for housing or being offered housing.

You do not have to provide this additional or sensitive information to us, but if you don't tell us about your current circumstances or your health condition or disability, we may be unable to offer you housing that suits your specific needs.

Our legal obligations for health information is set out in the *Health Privacy Principles in the Health Records Act 2001 (Vic)*.

5. Indirect Information

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

- when you're a member of a household applying for or renting our housing, in which case we may 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),
- if we are given personal information about you as part of a tenancy complaint against your household,

6. Unsolicited Personal Information

If we receive your personal information without asking for it, we assess whether the information is reasonably necessary for our use and, if it is not, we destroy or de-identify the information as soon as possible. We also destroy or de-identify any sensitive information relating to you and received or collected without your consent, unless an exception under the *Privacy Act 1988* applies. Examples of exceptions include where collection of sensitive information is necessary to lessen or prevent a serious threat to someone's life, health or safety; or where the sensitive information relates to a tenant, resident or visitor at one of our properties and is necessary for us to carry out our functions as Rental Provider.

7. Anonymity

Where possible, we will allow you to interact with us anonymously or using a pseudonym.

However, for most of our functions and activities we usually need your name and contact information and enough information about the particular matter to enable us to properly handle your enquiry, request, complaint or application, or to act on your report.

8. Collecting Through Our website

If our website allows you to make comments or give feedback, when you do this, we will collect your email address and sometimes other contact details. We may use your email address to respond to your feedback. We store this personal information on servers located in Australia.

We may use a range of tools provided by third parties to collect or view website traffic information. These third-party sites have their own privacy policies. We may also use cookies and session tools to improve your experience when accessing our website.

The information collected by any of these tools may include the IP address of the device you are using and information about sites that IP address has come from, the pages accessed on our site and the next site visited. We use the information to maintain, secure and improve our websites and to enhance your experience when using them.

9. Collecting Through Email

We collect your email and, if you provide it, other contact details when you register on our waitlist. We only use this information for the purpose of sending you regular updates on our activities, and to administer the lists.

10. Using and Disclosing Your Personal Information

We use your personal information to help us provide you with appropriate and affordable housing services or relevant information about these services, or to deal effectively with your request or complaint. We also use personal information (including some sensitive information) to generate statistical data for reporting to government bodies and to plan for improvements to our services. We take care to ensure that our statistical data and reports cannot be used to identify you. 'Disclosing' personal information means giving your information to someone else or allowing someone else to have access to it. We take care to protect your personal information and we only disclose it when it's necessary and we have the right to do so.

We generally use or disclose your personal information only for the primary purpose it was collected. In some situations, we disclose your personal information for a different ("secondary") purpose. This section of the policy also sets out some common secondary purposes.

Common situations in which we disclose personal information include:

10.1 Managing your housing application

If you have a current Victorian Housing Register application for social housing or are making an application to the Victorian Housing Register, the *Housing Act 1983 (Vic)* allows us to use and disclose your (and your household's) personal information to participating agencies for certain purposes, including to:

- determine whether you are eligible for social housing,
- determine whether you are eligible for priority housing,
- determine whether to allocate a tenancy in social housing to you,
- determine your health, safety and support needs and housing requirements,
- support you to access housing that is appropriate to your needs.

This information is a summary only. For more information about how personal information in the Victorian Housing Register is collected, used and disclosed, please see advice published on the [Victorian Housing Register](#) website.

10.2 Organising your Affordable Rent

We may disclose your personal information to Centrelink so that Centrelink can provide us with the information we need to calculate your rent and so that your rent can be paid through Centrepay. We will not do this without your consent, but if you do not give us permission, we may not be able to give you a discounted rent and you may have to make less convenient arrangements to pay your rent.

Jubilee Housing complies with [Services Australia Privacy Requirements](#) in relation to Centrelink and Centrepay and organising your affordable rent. These are as follows:

A Business (and its Business Representative) must:

- a. comply with the Privacy Act 1988 (Cth) ('Privacy Act') to the extent it applies to the Business
- b. only access, collect, use and disclose a Customer's personal information obtained for Centrepay purposes with the Customer's consent
- c. take all reasonable steps to ensure that a Customer's personal information (including the Customer's CRN) in their possession or control in connection with Centrepay is protected against loss and unauthorised use, access, modification or disclosure
- d. inform the Agency, within 3 Business Days, of any eligible data breach that occurs in relation to the personal information of Customers held by the Business (to the extent the Business is subject to the Privacy Act 1988)
- e. protect Customer's personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure
- f. handle privacy complaints and inquiries and requests for access to and correction of personal information from Customers appropriately and consistently with the Privacy Act 1988 and Australian Privacy Principles, and
- g. cooperate with any demands or enquiries made by the Privacy Commissioner.

Where the Agency:

- a. receives a complaint in relation to the use, disclosure or management of personal information of a Customer, or
- b. identifies a breach or risk of a breach of section 20.1, then the Agency may:
- c. investigate the matter
- d. notify any relevant Business in writing of the nature of a relevant breach

e. issue directions to a Business that the Agency believes are necessary to avoid a breach or remediate the effects of a breach and the Business must comply with such directions, and

f. refer the matter to the Office of the Australian Information Commissioner.

10.3 Sustaining your Tenancy

If you have authorised us to discuss your tenancy or personal information with your support worker, case manager, carer, guardian, legal representative, health professional or other nominated advocate, or to make a referral on your behalf to a support agency or health centre, we will only disclose to them the information that is necessary for us to complete the referral or to address your support issue.

10.4 Arranging Repairs to Your Home

If repairs to your home require a tradesperson to attend, we give the tradesperson your name and phonenumber so they can call you to make arrangements directly with you for gaining access to the property.

10.5 Taking Legal Action

If we take legal action against you (for example, under the *Residential Tenancies Act*), we will only disclose to the Tribunal or Court the personal information (including sensitive information) that is necessary for us to apply for a hearing or to present our case.

10.6 Publishing your Image or Story

We include selected renter stories and images on our website, in our annual report, in promotional material, and in other published documents. We will ask for your written consent to use your image, story or other personal information in this way. If we are unable to obtain your consent, we will ensure that you cannot be identified from the image or information we publish.

10.7 Handling Your Appeal or Complaint

It may be necessary to disclose your personal information to a third party if we are asked to respond to or investigate an appeal or complaint you lodge. We will not make any disclosure without your consent, but if you don't consent, we may be unable to process your complaint.

10.8 Reporting to Government

In most situations we de-identify your personal information before we provide it to a government department or agency. In some limited circumstances it may be necessary to disclose your personal information to that agency to satisfy our regulatory or contractual requirements. We will not make such a disclosure unless this was explained to you as a condition of accepting our housing or unless we otherwise obtain your consent.

10.9 Meeting our Broader Obligations

We will disclose your personal information if we are required to by law (for example, by a court order). We may also disclose your personal information if this is necessary to lessen or prevent a serious threat to someone's life, health or safety or to take action on suspected unlawful activity or serious misconduct. If it is necessary for us to use or disclose your personal information for enforcement related activities, we will make a written note of this.

We may also disclose relevant information with third party service providers we use in conducting our business, subject to confidentiality provisions as we deem appropriate. These services include, but are

not limited to, external photocopying providers, survey distributors, auditors, translating and interpreting services, legal outsourcing providers, and technology services providers.

10.10 Disclosure of Personal Information Overseas.

There would normally be no situation in which we would disclose your personal information to an overseas recipient. The only likely exception is where you have provided an overseas contact for your next of kin in case of emergency.

11. Quality of Personal Information

To ensure that the personal information we collect is accurate, up-to-date, and complete, we record information in a consistent format, we promptly add updated or new personal information to existing records, and we regularly audit our data to check for inconsistencies.

We also review the quality of personal information before we use or disclose it.

12. Storage and Security of Personal Information

We take steps to protect the security of the personal information we hold. Personal information in electronic form is stored on a secure computer server within our main office and is only accessible by Jubilee Housing staff using our password-protected network. Most personal information is recorded in a customised software program that requires an additional password to access.

Renter and applicant paper files are kept in lockable filing cabinets that can only be accessed by Jubilee Housing personnel who have a right to do so. Files are only removed from the cabinet when staff are currently working on them.

We destroy personal information in a secure manner when we no longer need it. We retain the personal information of previous Jubilee Housing residents for longer than the legal minimum of seven years if there is a possibility that the person might apply for housing with us again.

13. Accessing and Correcting your Personal Information

You have the right to ask for access to personal information that we hold about you, and to ask that we correct any errors in that personal information. You can ask for access or correction by contacting us, and we will respond within 30 days. We will usually agree to your request for access and take reasonable steps to correct information we agree is incorrect.

There are some situations where we have the right to reject your request, or to give access but not in the way or to the extent that you asked for – for example, if your request is frivolous or vexatious; or giving access would seriously threaten someone else's health or safety or have an unreasonable impact on their privacy; or there is a law that requires us not to.

We will ask you to prove your identity before we give you access to your information or correct it, and we will try to make the process as simple as possible. If we refuse to give you access to, or correct, your personal information, we must notify you in writing setting out the reasons.

If we make a correction and we have disclosed the incorrect information to others, you can ask us to tell them about the correction. We must do so unless there is a valid reason not to.

If we refuse to correct your personal information, you can ask us to add to it a statement that you believe the information is incorrect and why.

14. Employee Privacy Policy

We collect personal information about our employees for the purposes of staff recruitment, performance management and professional and personal development, as well as general staff administration functions such as payroll operations.

This personal information may include an employee's name, address, contact details, date of birth, gender, qualifications, occupation, employment history, next of kin, financial information (including tax file number and banking details), performance agreements and appraisals, conduct, salary and allowances, superannuation details, leave details, references and character checks, and security checks.

Where relevant, we collect and hold some types of sensitive information relating to our employees. This may include personal information about an employee's racial or ethnic origin, membership of a political association, membership of a professional association, membership of a trade union, criminal record or health information. We collect, hold, use and disclose personal information (including sensitive information) about our employees, in a manner consistent with the APPs.

15. Contractors and Suppliers Privacy Policy

We collect personal information about contractors and suppliers we engage to provide goods and services. The information relates to individual contractors and suppliers, and the employees/ specified personnel of entities that are contracted to provide or supply us with goods and services. The purpose of the information is to enable us to select contractors and suppliers and to effectively manage its services and consultancy arrangements. This personal information may include name, address, contact details, employer, previous projects undertaken, financial background, references, payment details, security checks and performance assessments.

16. How To Make a Privacy Complaint

If you want to complain to us about the way we have handled your personal information, you should give us your privacy complaint in writing (by letter or email). If you need help lodging a complaint, you can contact us.

If we receive a privacy complaint from you, we will decide what (if any) action we should take to resolve your complaint.

We will promptly let you know that we have received your privacy complaint, and we will respond to your complaint within 30 days.

If you disagree with our response you can ask for a formal review by Jubilee Housings CoM (Committee of Management) who will then make a recommendation to the Chief Executive Officer (CEO), and the CEO will make a final decision. Alternatively, you can appeal to the Commonwealth agency responsible for privacy law:

15.1 How to contact the Office of the Australian Information Commissioner (OAIC):

- online Privacy Complaint form,
- OAIC Enquiries Line: 1300 363 992, or from outside Australia + 61 2 9284 9749,
- by email to enquiries@oaic.gov.au or by fax to 02 9284 9666,
- in writing to GPO Box 5218 Sydney NSW 2001,

- if you are deaf, or have a hearing or speech impairment, contact the OAIC through the National RelayService,
- Teletypewriter (TTY) users phone 133 677 then ask for 1300 363 992;
 - Speak and Listen users phone 1300 555 727 then ask for 1300 363992;
 - Internet relay users connect to the [National Relay Service](#) then ask for 1300 363 992;
 - if you do not speak English, or English is your second language, call the [Translating and Interpreting Service](#) on 131 450 then ask for 1300 363 992.

15.2 How to contact Jubilee Housing

You can contact us by:

- **Email:** enquiries@jubileehousing.org.au
- **Telephone:** 03 98994356
- **Mail:** 3 Ellingworth Pde, Box Hill VIC 3128

17. Related Policies

- Jubilee Housing Complaints Policy (TBA)
- Jubilee Data Breach Policy
- Jubilee Password and Practice Policy

18. Legislation and standards

This policy implements the obligations of Jubilee Housing Inc under:

- [VIC Housing Act 1983](#)
- [VIC Privacy and Data Protection Act 2014](#)
- [The Privacy Act 1988](#)
- [VIC Information Privacy Act 1982](#)
- [VIC Health Records Act 2001.](#)