



## Privacy Policy

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### 1. Purpose

Eastern Suburbs Rental Housing Co-operative (ESRHC) is committed to protecting the privacy of personal information which the organisation collects, holds and administers. Personal information is information which directly or indirectly identifies a person.

The purpose of this document is to provide a framework for dealing with privacy considerations.

### 2. Basis for Policy

To ensure compliance with the Privacy Act 1988 (Cwlth), the Privacy and Data Protection Act 2014, the Health Records Act 2001, and to meet the expectations of the Performance Standards for Registered Housing Agencies established under Section 93 of the Housing Act 1983.

### 3. Policy

The Co-operative collects and administers a range of personal information for the purposes of:

- Assessing and accepting membership applications;
- Administering rental payments and obligations;
- Conducting property maintenance;
- Employing staff; and
- In the course of its activities, generally.

The Co-operative is committed to protecting the privacy of personal information it collects, holds and administers.

ESRHC recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – protected on one hand and made accessible to them on the other. These privacy values are reflected in and supported by our core values and philosophies.

The Co-operative is bound by Victorian Privacy Laws, the Privacy and Data Protection Act 2014, as well as other laws, which impose specific obligations when it comes to handling information. The Co-operative has adopted the Information Privacy Principles contained in the Victorian Privacy Laws as minimum standards in relation to handling personal information.

In broad terms this means that we:

- Collect only information which the organisation requires for its primary functions;
- Ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered;
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- Store personal information securely, protecting it from unauthorised access; and
- Provide stakeholders with access to their own information, and the right to seek its correction.

ESRHC will adhere to the Procedures outlined below.

## 4. Procedures

### 4.1 Collection

The Co-operative will only collect information that is necessary for the performance and primary function of the Co-operative.

- (a) ESRHC collects information from members and applicants for housing, including:  
Name, address and contact details, age and gender, family member details, employment and income details, bank account details, personal asset information, nationality or indigenous status information, disability and or other health details.
- (b) ESRHC accesses information via the internet direct from Centrelink relating to members' income (and discloses information to Centrelink relating to changes in rents assessed).
- (c) ESRHC collects information on staff for employment purposes
- (d) ESRHC collects information from contractors relating to their business registration and insurance.

### 4.2 Use and Disclosure

#### *Member information*

The Co-operative will:

- Only use or disclose information for the primary purpose for which it was collected (that is for the calculation of household rental), or a directly related secondary purpose (being for Government statistical and performance monitoring purposes).
- For any other purposes the Co-operative will obtain written consent from the affected person.
- Subject to receiving a member's consent, the Co-operative may, from time to time, distribute contact details of members to the membership, including names, addresses, telephone, and email details nominated by members.

### *Non-member information*

The Co-operative will:

- Only use or disclose non-member information for purposes connected with maintaining or servicing our membership or processing requests services.
- Not use or disclose any details of staff members other than as required in connection with their employment or as required by law.

### 4.3 Data Quality

The Co-operative will:

- Take reasonable steps to ensure the information we collect is accurate, complete, up-to-date, and relevant to the functions we perform.

### 4.4 Data Security and Retention

The Co-operative will:

- Safeguard the information we collect and store against misuse, loss, unauthorised access and modification.
- Secondly, information is kept confidential within the Co-operative on a “need to know” basis so that only those who need the information shall have access to it.
- Member’s personal information is kept in a locked filing cabinet and is only accessible by the staff. Computer records have password access for approved users.
- Non-member information is securely filed and accessible only to the Board and relevant committee members and the Office Manager.
- Only destroy records in accordance with relevant laws. Typically, all information on individuals will be destroyed five years after the cessation of their membership.

### 4.5 Awareness and Access to Policy

The Co-operative will:

- Ensure stakeholders are aware of The Co-operative’s Privacy Policy and its purposes.
- Make information about the Co-operative’s Privacy Policy and its purposes freely available to members.

### 4.6 Access and Correction

The Co-operative will:

- Ensure individuals have a right to seek access to information held about them and;
- Ensure individuals have a right to correct information held if it is inaccurate, incomplete, misleading or not up-to-date.

### 4.7 Anonymity

The Co-operative will:

- Give stakeholders the option of not identifying themselves when completing evaluation forms or opinion surveys.
- Assign a random number to members, which will normally be the only point of reference regarding the routine discussion of rental arrears and maintenance issues.

### 4.8 Making information available to other service providers

The Co-operative:

- Can only release personal information about a person with that person's expressed permission. For personal information to be released, the person concerned must sign a release form.
- Can release information to third parties where it is requested by the person concerned.

## 5. Complaints

If any person believes their privacy has been breached, or they consider access to their personal information has been denied unreasonably, they should:

1. Lodge a written complaint with the Chairperson of the Board; if still not satisfied
2. Lodge a complaint with or contact the:

Commissioner for Privacy and Data Protection  
Level 5, 121 Exhibition Street  
Melbourne Vic 3000  
Ph: 8684 1660  
[www.cpdp.vic.gov.au](http://www.cpdp.vic.gov.au)

## 6. Responsibilities

The Co-operative's membership and staff are responsible for the adoption and implementation of this policy.