

Privacy Policy

Purpose

This policy details how CatholicCare Victoria Housing Ltd (CCVH) collects, uses, and discloses your personal information and how we protect the security of the personal information we hold.

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 CCVH may share your personal information with other participating agencies.

Employees, and prospective employees should also refer to the *Employee Privacy Policy*.

Policy Statement

About this Policy

CCVH endorses fair information handling practices and uses information in compliance with its obligations under the Privacy and Data Protection Act 2014 (Vic) and the Health Records Act 2001 (Vic). As well as Housing Act 1983 (Vic) and the Privacy Act 1988 (Cwth).

Personal information will be used only for the purpose/s intended and, where the intention includes confidentiality, information will be treated as such unless otherwise required by law.

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, along with a Privacy Statement that summarises this policy in simple terms 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.

Collecting your Personal Information

CCVH collects personal information from residents, housing applicants and others, so that we can provide housing assets and related services as a non-profit social housing provider to 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 privacy.

Generally, we collect personal information about you to help us provide a service to you – for example, to match you with suitable housing, to sign you up as a renter in one of CCVH 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 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 will only collect personal information relevant to the activity we require it for.

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

Collecting Sensitive Information and Health Information

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

When you apply for housing with CCVH or you take up an offer of housing from CCVH, we ask for and collect additional personal information about you to assess the urgency of your housing need, to help us understand the category 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 for example 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 or to make the modifications to your home that you would like.

If you have applied for social housing under the Victorian Housing Register, then CCVH can access and include your personal information that has been collected by other Victorian Housing Register agencies that you have dealt with.

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

Indirect Collection

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 are 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
- when you are incidentally captured on our surveillance camera located in the public area of one of our properties.

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 that was 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.

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 matter to enable us to properly handle your enquiry, request, complaint, or application.

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 this information to maintain, secure and improve our websites and to enhance your experience when using them.

Collecting through other social media and Email

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

Collecting and using through CCTV

For safety purposes and to ensure our property is not damaged, we have installed CCTV cameras in the public-only areas of some of our properties. There are no cameras installed by CCVH inside any accommodation. The surveillance footage is not published or publicly available. We only share footage if it is required for legal reasons, for example if we need to report property damage to the police. For privacy reasons, we do not share CCTV footage with residents unless there is CCTV footage of you (and no other person), and you have a legitimate reason to view the footage.

Using and Disclosing your Personal Information

CCVH 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 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 for which we disclose personal information including the following:

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 and
- 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.

Organising your Affordable Rent

CCVH 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.

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 center, we will only disclose to them the information that is necessary for us to complete the referral or to address your support issue.

Arranging for Repairs to your Home

If repairs to your home require a tradesperson to attend, we give the tradesperson your name and phone number so they can call you to decide plans directly with you for gaining access to the property.

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.

Publishing your Image or Story

At times, we may include selected renter stories and images on our website, such as 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.

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.

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 such as a *National Rental Affordability Scheme* (NRAS) audit, 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 information is explained to you as a condition of accepting our housing or unless we otherwise obtain your consent.

Meeting our Broader Obligations

CCVH 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 act 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.

Disclosure of Personal Information Overseas.

There would normally be no situation in which CCVH 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.

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.

Storage and Security of Personal Information

At CCVH protecting your information is important to us. That's why we're dedicated to ensuring that our systems, policies, and procedures comply with government legislation, accreditation and best practice.

As part of this commitment, we've ensured that our systems and processes are certified according to the ISO 27001:2013 standard and the Australian Cyber Security Centre ISM Controls, and we work in alignment with the Victorian Protective Data Security Standards. We continually work to safeguard your information from unauthorised or accidental modification, loss, or dissemination, and that staff are aware of these systems.

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 CCVH 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 CCVH personnel who have a right of access. Files are only removed from the cabinet when staff are currently working on them.

Video footage taken by our surveillance cameras is securely stored on our system and is not copied unless it is required for a legal reason. Only authorised personnel view the footage unless it is necessary to use it for a legal reason.

We destroy personal information in a secure manner when no longer needed. We archive old tenancy files at a secure off-site location for no longer than the legal minimum of seven (7) years, when they are then destroyed.

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 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.

CCVH 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 the third party 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 CCVH to add a statement to your file acknowledging that you believe the information is incorrect and why.

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, and we will assist you.

If we receive a privacy complaint from you, we will decide what (if any) action we should take to resolve your complaint. The decision will generally be made by the relevant unit manager.

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 CCVH, Tenancy Manager 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, *Office of the Australian Information Commissioner (OAIC)*, responsible for privacy law by using:

- an online Privacy Complaint form.
- The OAIC Enquiries Line: 1300 363 992, or from outside Australia + 61 2 9284 9749,
- Email sent to enquiries@oaic.gov.au or by fax to 02 9284 9666, or in writing to GPO Box 5218 Sydney NSW 2001.
- the OAIC through the National Relay Service if you are deaf, or have a hearing or speech impairment.
- The 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.
- The Translating and Interpreting Service on 131 450 then ask for 1300 363 992 if you do not speak English, or English is your second language.

How to contact CatholicCare Victoria Housing Ltd

You can contact us by:

Email: info@cchousing.com.au
Telephone: 03 4344 4501
Mail: CatholicCare Victoria Housing Ltd
PO Box 2537
Bakery Hill Victoria 3354

Office: 4-6 Peel Street North
 Ballarat Victoria 3350.

Definitions

Word	Definition
Consent	Includes express consent (given explicitly, either orally or in writing) and implicit consent (where in the circumstances it can reasonably be inferred). It requires four key elements: <ul style="list-style-type: none"> • the individual is adequately informed before giving consent, • the individual gives consent voluntarily, • the consent is current and specific, • the individual has the capacity to understand and communicate their consent.
Health Information	Includes personal information about a person’s current or previous health or disability, or about their expressed wishes for future provision of health services to them, or about a health service provided or to be provided to them [s6(1) of Privacy Act].
Personal Information	Means information or an opinion about an identified person, or a person who is reasonably identifiable, whether the information or opinion is true or not; and whether the information or opinion is recorded in a material form or not. See Privacy & Data Protection Act 2014 (Vic) and Health Act 2001(Vic).
Sensitive Information	Includes health information (as defined), personal information about a person’s race or ethnicity, political opinions or affiliation, religious beliefs or affiliation, membership of a trade union or professional association, sexual orientation, or practices, or genetic or biometric information. See Privacy & Data Protection Act 2014 (Vic) and Health Act 2001(Vic).

Related Information

- CatholicCare Victoria Housing Ltd Employee Privacy Policy
- CatholicCare Victoria Housing Ltd Privacy Statement
- CatholicCare Victoria Housing Ltd Complaints and Appeals Policy
- Privacy Act 1988 (Cwlth)
- Housing Act 1983 (Vic)
- Health Act 2001 (Vic)
- Privacy and Data Protection Act 2014 (Vic)

Transparency and Accessibility

This policy is publicly available on our website.

Version Control

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