

419 Privacy Policy

1. Customer Statement

At Link Wentworth our customers and communities are at the centre of what we do. We are committed to:

- treating our customers with compassion and respect
- communicating clearly so that our customers can make informed decisions
- providing fair service by following the right process
- working openly with customers to find shared solutions; and
- following all relevant laws and regulations.

2. Purpose

This policy details how we protect your privacy and comply with the requirements of the *Privacy Act 1998* (Cth), including the Australian Privacy Principles (APP), and the *Health Records and Information Privacy Act 2002* (NSW). The policy explains:

- the kinds of information we may collect and hold about an individual and how we hold that information
- how we collect and holds personal information
- the purposes for which we collect, hold, use and disclose personal information
- how an individual may access their personal information we hold and seek correction of such information
- how an individual may complain about a breach of privacy, and how we deal with such a complaint; and
- whether Link Wentworth is likely to disclose personal information to overseas recipients.

3. Scope

This policy applies to Link Wentworth employees, contractors, volunteers, board members, consultants and any other person who collects and administers personal information on our behalf, and all activities concerned with our collection, retention and use of personal information.

4. Policy

We collect and administer a range of personal information as part of our routine community housing and property management services. We are committed to protecting the privacy of personal information we collect and holds.

We collect only the personal information reasonably necessary for our business functions and activities.

4.1 Types of personal information collected

Tenants/Applicants

We collect information necessary for providing accommodation and support services and assessing an individual's suitability to receive accommodation and support services. This includes personal information such as an individual's name, address, telephone number, Centrelink reference number, bank account

details, income, ethnicity, date of birth, gender, disability status, health history, family history, lifestyle factors and any other information which is necessary to enable an individual to participate in social or affordable housing.

Job applicants

We collect information necessary to assess and engage applicants. This includes collecting personal information such as an individual's name, address, telephone number, professional experience, qualifications, references and past employers, and any other information which is necessary to assess suitability for employment.

Directors and committee members

We collect information in relation to individuals becoming or being directors or committee members and to enable us to manage our governance obligations. This includes collecting personal information such as an individual's name, address, telephone number, professional experience, qualifications and past appointments, and any other information which is necessary for us to collect to properly discharge our governance obligations.

Landlords

We collect information from landlords for the purposes of managing properties used to provide accommodation services. This includes collecting personal information such as name, address, telephone number, email address, bank account details and any other information which may be required to manage tenancies.

Carers/Guardians/Attorneys/Relatives

We collect information about our tenants' carers, guardians, attorneys, and next-of-kin for the purposes of contacting those individuals as needed to appropriately support our tenants. This includes collecting personal information such as name, address, telephone number and email address.

Donors

We collect information for the purposes of fundraising and managing donations. This includes collecting personal information such as name, address, telephone number, email address and credit card details.

4.2 Collection of personal information

We collect only the personal and sensitive information necessary for us to carry out our business activities.

Where possible, we collect personal information directly from individuals. However, we may also collect information from multiple sources, including directly from an individual via government agencies, police records, landlords (past and present), recruiters, employers (past and present), support partners and external referees.

4.3 CCTV

We use camera surveillance systems (commonly referred to as CCTV) in certain properties we manage to maintain the safety and security of our tenants and staff. Those CCTV systems also collect and store personal information. We comply with all privacy legislation in respect of any such information.

4.4 Use of personal information for direct marketing

We use personal information only for the purpose for which it was collected (primary purpose), unless:

- there is another purpose (secondary purpose) and that purpose is related to the primary purpose, and an individual would reasonably expect, or we have informed the individual, that their information will be used for that secondary purpose
- an individual has given their consent to have their personal information used for a secondary purpose

- we are required or authorised by law to use personal information for a secondary purpose (including for research and quality improvements within Link Wentworth).

For example, we may use an individual's personal information to:

- provide accommodation services and support services to the individual, or assess an individual's suitability to receive these services
- notify individuals of services we reasonably consider may be suitable to an individual's needs
- for the purposes of managing and maintaining properties
- invite individuals to events we facilitate or organise, where we reasonably consider those events relevant to the services we provides
- appropriately manage our business, such as reporting to any third parties with which we have contractual obligations, assessing insurance requirements, conducting audits and maintaining our registration as a community housing provider
- assess an individual's suitability to work for or with us
- assist in running our accommodation business, including quality assurance programs, billing, improving services, implementing appropriate security measures, conducting research and training personnel
- communicate with third parties, including Centrelink and the Department of Communities and Justice.

4.5 Disclosing personal information

We disclose an individual's personal information only for the primary purpose for which it was collected, or for a related secondary purpose. This includes when disclosure is necessary to provide services to an individual, assist us to run our organisation, for security reasons or to lessen threats to the life, health and safety of an individual.

We may provide your personal information to:

- government agencies, such as Centrelink and Department of Communities and Justice, if you are receiving our services under arrangements with those agencies
- government departments responsible for social services, health, aged care and/or disability where we have a legal or contractual obligation to do so
- third parties contracted to provide services to us, such as entities contracted to assist in our business operations, accommodation services, registration processes, quality assurance programs or survey processes
- anyone authorised by you to receive your personal information (consent may be express or implied); and
- anyone to whom we are required by law to disclose an individual's personal information.

4.6 Use of personal information for direct marketing

From time to time, we send information and invitations regarding our services or the services of third-party providers where we consider such services may be reasonably suitable to an individual's needs. Individuals can opt out of receiving such information and invitation at any time by contacting our Privacy Officer on the details set out below.

4.7 Disclosure of information to overseas recipients

We do not disclose personal information to any overseas recipients. However, if a request is received, we contact the individual about whom the request concerned, outline the request and seek their approval to provide the personal information. Approval from an individual to such disclosure must be provided in writing.

4.8 Quality of personal information

We take reasonable steps to make sure that the personal information collected, used or disclosed is accurate, complete and up to date.

4.9 Accessing and amending personal information

Each individual has a right to access their personal information we hold about them. If an individual makes a request to access their personal information, we ask for verification of identity and request that the information sought be specified.

An individual can also request an amendment to any of their personal information if they consider that it contains inaccurate information.

Link Wentworth can be contacted about any privacy issues as follows:

Privacy Officer
privacy@linkwentworth.org.au
Telephone: 13 14 21

While we aim to meet all requests to access and amendment personal information, we may be unable to do this if it adversely affects an individual's health and safety.

4.10 Security of personal information

We take reasonable steps to protect any personal information collected from unauthorised access, misuse, loss, theft, modification and/or unauthorised disclosure. Reasonable steps include:

- verifying the identity of any individual wishing to access their personal information
- implementing computer system safeguards, including password protection and rules of user access
- monitoring computer information systems to test and evaluate data security in line with the appropriate industry standards
- providing lockable physical security for paper records
- ensuring information is transferred securely
- archiving information in a secure and accessible manner
- storing material for a legal period and then disposing of it securely
- ensuring there is reasonable physical security in our offices.

4.11 Openness

Our Privacy Policy is available publicly on our website (www.linkwentworth.org.au) and can also be requested by contacting Link Wentworth on 13 14 21

4.12 Anonymity

Where possible and practicable, an individual has the option to deal with us on an anonymous basis or by using a pseudonym. However, if the personal information provided to us is incomplete or inaccurate, or any personal information is withheld, we may not be able to provide the services or support sought or deal with an individual effectively.

Link Wentworth employees are required to perform their duties in accordance with this Policy and related procedures.

This Policy is subject to change at our discretion. A breach of any Link Wentworth policy may result in action being taken, which may include disciplinary action.

5. Responsibility

Employees are responsible for performing their duties in accordance with this policy and related procedures.

Senior managers are responsible for proactively overseeing compliance with this policy and addressing any non-compliance by their direct reports in a timely manner.

Executive leaders are responsible for ensuring the policy addresses its purpose, can be implemented, and is kept current and approved by the ultimate approving body in accordance with the required review cycle.

6. Legislative or other applicable framework

- *Privacy Act 1988 (Cth)*
- *Health Records and Information Privacy Act 2002 (NSW)*

Complaints and appeals

A person who is not happy with a decision we make or who believes that we have not followed this policy can complain or appeal using the complaints and appeals policies that are available on the Link Wentworth website www.linkwentworth.org.au or by phoning Link Wentworth on 13 14 21.

We adhere to all notifiable data breach requirements in accordance with the *Privacy Act 1988*.

7. Privacy and Confidentiality

If you are in doubt about releasing any information covered under this Policy, seek guidance from a member of the Executive Leadership Team or Head of Legal.

Approval, Policy Owner and Review Frequency

Policy type:	Board Level
Executive Leadership Team owner:	Chief Financial Officer
Business owner:	Manager, Risk and Compliance
Ultimate Approval body:	Audit, Risk and Improvement Committee
Review Frequency:	Every two years or more frequently if circumstances warrant

Approved by – Board of Directors (Next Review ARIC)