

1.0 Privacy Policy

2.0 Identification Grid

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Owner: GM People, People, Planning , Performance & Technology	Portfolio: People, Planning , Performance & Technology
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3.0 Purpose

The purpose of this policy is to make clear that the protection of privacy, as defined in the Privacy Act 1988 (Commonwealth), Privacy and Data Protection Act 2014 (Vic), the Health Privacy Principles in the Health Records Act 2001 (Vic) and the Australian Privacy Principles, is a legal requirement and is relevant to all Launch Housing's dealings.

Launch Housing is committed to complying with these laws and to informing clients, supporters and relevant others about privacy and confidentiality in the way described in the Privacy Principles. This includes providing information relating to:

- Collecting personal information,
- Using and disclosing information,
- Recording and storing personal information,
- The rights and responsibilities of all stakeholders in terms of accessing and correcting information.
- The lawful instances when Launch Housing may disclose personal and health information without consent of the person concerned.

4.0 Definitions

Personal Information	<ul style="list-style-type: none"> • Any information from which an individual's identity is apparent, or can reasonably be ascertained, regardless of the way in which it is recorded, whether the information is true or not, or whether it is an opinion. <p>Note: Personal Information includes CCTV footage recorded at a Launch Housing site or service.</p>
Supporter Information	<p>Any kinds of personal information collected by Launch Housing:</p> <ul style="list-style-type: none"> • the names, contact information (eg first name, surname, mailing address, phone number and email address), date of birth, gender and financial information (eg bank account or credit card details) of our donors • details of donors' donation history, emails, letters and other interactions with Launch Housing • A donor's employer details in regards to workplace giving • the names and email addresses of persons who subscribe to our emails

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Health Information	<p>Any information or opinion about:</p> <ul style="list-style-type: none">• The physical, mental or psychological health of an individual.• A disability of an individual.• An individual's expressed wishes about the future provision of health services to the individual.• A health service provided, or to be provided, to an individual, that is also personal information.
Informed consent	<p>Informed consent is given when a person:</p> <ul style="list-style-type: none">• Demonstrates that they understand what they are consenting to, as informed by subject specific discussions held within the last six months, and,• provides the consent freely.• Informed consent cannot be given by a person who is intoxicated or otherwise unwell.
Sensitive information	<ul style="list-style-type: none">• Sensitive information is any information about a person's experiences or circumstances that is of a private nature but is relevant to the service being provided to that person. Sensitive information may be associated with trauma and must be treated with mindfulness and respect.
Note on Collection of Personal and Sensitive Information	<ul style="list-style-type: none">• Disclosing information of a personal or sensitive nature can be a risk for clients and people do not have to provide information if they choose not to.• An area that may be relevant in this way is gender identity. A person who identifies as trans or gender diverse (TGD) may be hesitant to disclose TGD status due to experiences of discrimination, compromised safety or transphobia.• A person should never feel pressured to disclose TGD status. They may provide this information if and when they feel ready to do so.
VHR	<ul style="list-style-type: none">• The Victorian Housing Register, the state-wide common application for people seeking community and public housing.

5.0 Policy Details

5.1 Scope:

- 5.1.1 This policy applies to all persons and all situations where personal and / or health information is sought by Launch Housing.
- 5.1.2 In addition, Launch Housing takes part in the Victorian Housing Register (VHR). The Housing Act 1983 (Vic) allows us in some circumstances to share the personal information of applicant for social housing with other VHR agencies.
- 5.1.3 This policy also summarises how Launch Housing shares personal information with other VHR agencies.
- 5.1.4 This policy applies to all supporters where personal and financial information is held and distributed by Launch Housing for fundraising purposes.

5.2 Policy Principles

5.2.1 Launch Housing is committed to ensuring such information is handled and stored confidentially and securely by only allowing access to it by authorised Launch Housing staff, students, volunteers or contractors, as appropriate.

5.2.2 Launch Housing ensures that all clients and tenants are provided with plain language information about this policy and their rights and responsibilities in relation to privacy. This includes

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details of the information collected and its use, who has access to it and their access rights, including how to raise any concerns or complaints about the handling of personal information.

5.2.3 Launch Housing takes all reasonable steps to ensure that the personal information collected is accurate, up to date, and complete.

5.2.4 Wherever possible, personal information is collected directly from the individual. Where the personal information is held by a third party, Launch Housing obtains permission before seeking this information from such sources.

5.2.5 People accessing Launch Housing's services have the right to refuse to provide information which is not essential for service provision, however some services, such as the Victorian Housing Register, have varying information requirements for service provision.

5.2.6 Launch Housing does not sell any personal information to any third party.

5.3 Launch Housing collects information from the following individuals and groups

5.3.1 Clients and tenants

- i. Launch Housing collects personal information on or about people who access our services. Personal information is collected directly from individuals whenever possible.
- ii. Launch Housing collects sensitive and health information when necessary for providing services or is a requirement of government funding, or during activities such as outreach service delivery.
- iii. Additional information necessary for service provision is also collected. This includes the need for Launch Housing to assess eligibility for entry to, or support from, specific programs or services.
- iv. Launch Housing collects information specifically for applicants who are seeking priority access to the VHR.

5.3.2 Employees, Volunteers and Students/Interns on Placement

- i. **Employees**
Launch Housing collects the personal information of people who seek to be, are, or have been employed with us. This includes information about recruitment and selection, employment, terms and conditions of employment, performance, discipline and resignation.
- ii. **Volunteers**
Launch Housing collects the personal information of people who seek to be, are, or have worked with Launch Housing as volunteers. This may include information about recruitment and selection, work arrangements, performance, discipline and resignation.
- iii. **Students/Interns on Placement**
A minimum data set is gathered from students in order to meet the requirements of the formal agreement with the student's educational institution, as well as Launch Housing's standard employee information.
- iv. **Donors, Partners and other Stakeholders**
Launch Housing collects personal information for the purposes of processing donations, fund raising, keeping supporters and donors informed of our work, raising awareness, thanking and acknowledging our donors and supporters, conducting research into supporter attitudes and desires, and for internal reporting purposes.

5.4 Launch Housing uses and discloses information in the following ways

5.4.1 Clients and Tenants

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- i. Client and tenant information is not normally disclosed to other organisations or individuals without consent. An exception to this may be where Launch Housing is required to do so by law, government requirements or government funding agreements.
- ii. Launch Housing may use client and tenant information for the evaluation (planning and research) of its services.

5.i.2 Employees, Volunteers & Students/Interns on Placement

Information about employees, volunteers or students/interns on placement is not normally disclosed to other organisations or individuals without their consent, unless we are required to do so by law, government requirements or government funding agreements.

5.i.3 Funding Bodies

- i. Some government funded programs require de-identified information and others require identified information. Whenever possible, clients and tenants are informed of Launch Housing's requirement to pass on information and the nature of the information.
- ii. Launch Housing will, from time to time, provide de-identified client data to funding sources other than government to support funding submissions. Such information may also be used to report on the success of a funded project. Additionally, de-identified client data may be used to profile Launch Housing's work to the broader community. In principle, informed consent will be sought wherever possible to maximise client choice to participate in such activities.

5.4.4 Contractors

- i. In a case where personal information is supplied to, or collected by contractors who perform specific tasks directly on our behalf (for example mailing houses), contractors are required to sign a privacy agreement with Launch Housing which obliges the contractor to comply with Launch Housing's Privacy Policy, the Privacy Act and the Australian Privacy Principles.

5.4.5 Donors, Partners and other Stakeholders

- i. From time to time, Launch Housing will acknowledge and thank supporters and donors in our publications unless donors request that this not happen.

5.5 Accessing and Correcting Information

- i. Clients and tenants have a right to apply to access all information which Launch Housing collects and stores about them, and a right to correct any errors of fact, or update details as required.
- ii. All clients and tenants are provided with information about how to access their information. Only in exceptional circumstances where Launch Housing reasonably believes denial of access to records may lessen or prevent a serious or imminent threat to an individual's welfare, or a threat to public health and safety, will access to records be denied.
- iii. Donors, partners and/or other stakeholders can view the information Launch Housing holds on them, and have the right to correct any errors of fact in the recorded information.
- iv. Launch Housing is committed to ensuring donors, partners and other stakeholders retain control over the communications we send to them. They may decline to receive publications or other communications from Launch Housing at any time.
- v. Clients, tenants, donors and supporters all have a right to make a complaint regarding the handling of their personal information should they wish to do so.
- vi. Information provided to Launch Housing for social housing applications under the VJR is stored on the VHR's database, which is controlled by DHHS. Other VHR agencies can update the information at the applicant's request.

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5.6 Use of Launch Housing Information by Employees

- i. Employee access to and use of confidential information is limited to work-related activities. Access, use of, or disclosure for any other purposes is prohibited without proper authorization, unless required by law. The internal systems of Launch Housing must not be used to access information for personal benefit or interest, or that of any employee's family, friends, colleagues, or of any public figure.
- ii. Breaches of confidentiality, access and disclosure of information will be treated as a serious misconduct issue.
Launch Housing considers the following to be examples of confidential information:
 - a. Lists of clients and contact details
 - b. Supporter information, contact details, donation history and financial information
 - c. Any financial or costing information
 - d. Research data or papers not publicly released.
 - e. Information about new program and/or service development.
 - f. Employee remuneration.
 - g. Details of tenders.
 - h. Marketing /communication plans.
 - i. Intellectual property or other processes unique to the employer.
 - j. Terms of business.

5.7 Lodging Complaints

- i. All complaints regarding mishandling of personal information should be provided in writing (by letter or email).
- ii. Launch Housing will decide what (if any) action will be taken to resolve privacy complaints. All privacy complaints will be responded to within 30 days.

6.0 Responsibilities

General Managers, Group Managers and Program Managers	<ul style="list-style-type: none">• Implementation of this policy and monitor staff adherence to the policy.• Ensure the policy is updated as per the regular policy review cycle or if there are changes to the compliance environment.
All staff	<ul style="list-style-type: none">• Notify clients of their rights and responsibilities with respect to privacy• Inform line manager or direct supervisor of any issues relating to privacy• Ensure all complaints are addressed quickly and honestly

7.0 Relevant Legislation & External Documents

- Privacy Act 1988 (Commonwealth)
- Privacy & Data Protection Act 2014 (Vic)
- Charter of Human Rights and Responsibilities Act 2006 (Vic)
- Health Records Act 2001 (Vic)

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- Housing Act 1983 (Vic) and the Housing Amendment Act 2016 (Vic)
- Housing Registrar, Performance Standards for Registered Housing Agencies
- DHHS Victorian Housing Register Policies and Operational Guidelines
- Australian Privacy Principles February 2013 (Amended 2014)
- Fundraising Institute of Australia's Code of Ethics and Code of Professional Conduct
- ACN (Australian Charities and Not-for-profits Commission)
- Office of the Australian Information Commissioner

8.0 Supporting Documents and Implementation Tools:

- Launch Housing Working Together Brochure
- Launch Housing Client / Tenant Complaints and Appeals Policy
- Launch Housing Client / Tenant Complaints and Appeals Procedure
- Launch Housing Access and Equity Policy
- Launch Housing Code of Conduct Policy
- Launch Housing Supporter and Donor Data Policy

Version Control	Date Effective	Date last amended	Summary of Amendment
1.0	20/05/2015		Version 1 Approved CEO/Board
2.0	05/05/2016	05/05/2016	Put into LH format
2.1	27/02/2018	27/02/2018	Included reference to VHR
3.0	30/04/2019	30/04/2019	GM Owner and Author updated in-line with SLT re-structure. Amended in-line with VHR Compliance
4.0	04/12/2019	04/12/2019	Individual Giving Specialist Amended in-line with Fundraising and Supporter Care Privacy Policy Included supporting documents Supporter Care Privacy Policy