

1.0 Privacy Policy

2.0 Identification Grid

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Owner: CEO	Portfolio: Governance
Author: Deputy CEO	

3.0 Purpose

Privacy is a legal requirement and the purpose of this policy is to describe Launch Housing's commitment to protect the privacy and confidentiality of the personal and sensitive information belonging to clients, tenants, students, volunteers, staff, partners and supporters. We comply with the law when collecting, using, storing, providing access to, and disposing of, personal information.

This policy outlines the principles relating to:

- a. collecting personal information,
- b. using and disclosing information,
- c. recording and storing personal information,
- d. the rights and responsibilities of all stakeholders in terms of accessing and correcting information, and
- e. the lawful instances when Launch Housing may disclose personal and health information without consent of the person concerned.

4.0 Definitions

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"> • can demonstrate they understand what they are consenting to, as informed by subject specific discussions held previously with Launch Housing and • provides the consent freely. <p>Informed consent cannot be given by a person who is intoxicated or otherwise unwell.</p>
Personal Information <i>See also Note on Collection</i>	<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. Note: Personal Information includes CCTV footage recorded at a Launch Housing site or service.

<p>Sensitive information</p> <p><i>See also Note on Collection</i></p>	<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.
<p>Note on Collection of Personal and Sensitive Information:</p>	<p>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.</p> <p>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.</p> <p>A person should never feel pressured to disclose TGD status. They may provide this information over time as trust develops and this may need a sensitive response in their service provision.</p>

5.0 Policy Details

- 5.1 **Scope:** This policy applies to all staff, clients, tenants, contractors, volunteers and students / interns of Launch Housing. The intent of the policy applies equally to all parties however some aspects of the policy vary between these groups.
- 5.2 Launch Housing takes all reasonable steps to ensure that the personal information collected from any user or associate of Launch Housing’s services, is accurate, up to date and complete.
- 5.3 All employees, volunteers, students/interns on placement and contractors are required to sign and comply with a Launch Housing Confidentiality Agreement provided to them on engagement.
- 5.4 All information is stored within secure facilities which can only be accessed by authorized persons.
- 5.5 All documents, whether in soft or hard copy, are stored in the manner described in the Launch Housing Acceptable Use of Information and Communication Technology Policy and the Client Record Management Policy.
- 5.6 Launch Housing does not sell any personal information to any third party.
- 5.7 Complaints about the handling of personal information can be made by any group using the appropriate Launch Housing Complaints process.

5.8 Launch Housing collects and uses information from the following individuals and groups.

5.8.1 **Clients and tenants**

5.8.1.1 Launch Housing collects personal information on or about people who access our services. Personal information is collected directly from individuals whenever possible.

5.8.1.2 Where the personal information is held by a third party, Launch Housing obtains permission from the individual before seeking the information.

5.8.1.3 Launch Housing also collects sensitive and health information where it is needed to provide services or is a requirement of government funding, or during activities such as outreach service delivery.

5.8.1.4 Clients, tenants and other people accessing Launch Housing's services have the right to refuse to provide information which is not essential for service provision.

5.8.1.5 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 details of the information collected and its use, how it can be accessed, and how to give feedback or raise complaints about the handling of personal information.

5.8.1.6 Client and tenant information is used within the internal service areas of Launch Housing.

5.8.1.7 Clients and tenants are asked to give their informed consent (either verbally or in writing) to share their information with agencies external to Launch Housing unless it is an exceptional circumstance.

5.8.1.8 An exceptional circumstance is where Launch Housing is required to provide the information by law, government requirements or government funding agreements.

5.8.1.9 Clients and tenants are also asked if they want to give their informed consent to their information being shared with a relevant other such as a carer or advocate. This consent can be withdrawn at any time.

5.8.1.10 Clients and tenants have a right to apply to access all information which Launch Housing collects and stores about them, and correct any errors of fact, or update details as required, however some information may be withheld.

5.8.1.10.1 Access may be restricted where Launch Housing reasonably believes denial of access of a client or tenant to their records may lessen or prevent a serious or imminent threat to an individual's welfare, or a threat to public health and safety.

In these circumstances the relevant manager will inform the client / tenant of the decision.

5.8.1.11 Launch Housing may use client and tenant information for the internal evaluation of its services and for planning.

5.8.1.12 Research may be conducted internally using identified information. Published research will contain de-identified information unless the individual concerned has given their consent, or approval has been given by a Launch Housing Ethics Committee.

5.8.2 Employees, Volunteers and Students / Interns on Placement

5.8.2.1 Launch Housing collects personal information from 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

5.8.2.2 In addition to collecting Launch Housing's standard employee information, a minimum data set is gathered from students / interns in order to complete a formal agreement with the student's educational institution.

5.8.2.3 Launch Housing also collects and maintains records of police checks and Working with Children Checks held by employees, students / interns and volunteers.

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

5.8.2.5 Information is accessed by authorised persons in order to manage and support the working relationship between the individual and Launch Housing and to meet legislative requirements.

5.8.2.6 Employees, employees, volunteers or students / interns on placement have the right to access their information to correct errors or update details.

5.8.3 Donors, Partners and other Stakeholders

5.8.3.1 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 aims, and for internal reporting purposes.

5.8.3.2 Launch Housing asks permission to use the data they hold to acknowledge and thank supporters and donors in various Launch Housing publications.

5.8.3.3 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.

5.8.3.4

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.

5.8.4 Funding Bodies

5.8.4.1 Launch Housing will, from time to time, provide de-identified client data to funding sources other than governments 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.

5.8.5 Contractors

5.8.5.1 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 privacy agreements with Launch Housing which oblige the contractors to comply with Launch Housing’s Privacy policy, the Privacy Act and the Australian Privacy Principles.

6.0 Responsibilities

Privacy Officer	<ul style="list-style-type: none"> • Provide information and advice relating to privacy on request • Support good privacy practice across Launch Housing
Managers	<ul style="list-style-type: none"> • Address document and report issues/complaints related to privacy
All staff	<ul style="list-style-type: none"> • Notify clients of their rights and responsibilities with respect to privacy • Inform manager or direct supervisor of any issues relating to privacy • Ensure all complaints are addressed quickly and honestly • Adhere to Confidentiality Agreement

7.0 Relevant Legislation & External Documents

- Privacy Act 1988 (Federal)
- Privacy & Data Protection Act 2014 (Victoria)
- Charter of Rights and Responsibilities (Victoria)
- Health Records Act 2001 (Victoria)
- Housing Act 1983 (Victoria)
- Performance Standards for Registered Agencies
- DHHS Standards
- Australian Privacy Principles February 2013 (Amended 2014)
- Fundraising Institute of Australia’s Code of Ethics and Code of Professional Conduct

8.0 Supporting Documents and Implementation Tools:

- Launch Housing Working Together Brochure
- Launch Housing Client Tenant Complaint Policy

- Launch Housing Client Tenant Complaint Procedure
- Launch Housing Access and Equity Policy
- Launch Housing Code of Conduct Policy
- Launch Housing Confidentiality Agreement
- Launch Housing Client Tenant Records Management Policy
- Launch Housing Information Collection Statement
- Launch Housing Contractor Agreement
- Launch Housing Confidentiality Agreement
- Launch Housing Client Consent to Share Information Form
- Launch Housing Client Request to Access File Form
- Launch Housing Acceptable Use of Information and Communication Technology Policy

Version Control	Date Effective	Date last amended	Summary of Amendment
2	20160505	20/05/2015	Put into LH format
1	20/05/2015	CEO	Version 1
3	20170615		Updated with changes in Working Together brochure
3.1	11/12/2017	11/12/2017	Include reference to CCTV, Police and TGD.