

# PRIVACY POLICY

## *Protecting personal information*

### 1. Why we need this policy

Launch Housing (**Launch, we, us or our**) is required to comply with Australian and Victorian Privacy Law, including the Australian Privacy Principles (**APPs**) and Health Privacy Principles (**HPPs**).

Launch Housing is committed to protecting the privacy of all its:

- Clients and renters;
- supporters and donors;
- employees and volunteers;
- contractors and consultants;
- representatives and agents; and
- trainees and work experience and tertiary students.

This policy outlines Launch Housing's commitment to these laws and to informing clients, renters, supporters, staff and others about privacy and confidentiality. Personal information collected by Launch Housing will only be used for the purpose(s) intended. Personal information is also sensitive and health information.

Launch Housing is a Child Safe Organisation and prioritises the safety of children.

### 2. Who this policy applies to

This policy applies to all Launch Housing staff. This includes employees, officers, board members, volunteers, students, staff auspiced out of Launch Housing, agency staff, and third-party contractors.

### 3. Policy overview

This policy outlines:

- i. Why Launch Housing collects personal information;
- ii. Launch Housing's obligations;
- iii. The types of personal information collected and stored by Launch Housing;
- iv. How personal information is collected and stored by Launch Housing;
- v. How Launch Housing uses and discloses personal information;
- vi. How you can request access to your personal information, or request a correction; and
- vii. How you can lodge a complaint and how Launch Housing will handle your complaint.

### 4. What this policy includes

#### 4.1 Why Launch Housing collects personal information

Launch Housing primarily collects personal information about our clients and supporters for the purposes of conducting our usual activities and operations, including securing donations or support, conducting research, developing and delivering homelessness and housing services to, and advocating for, individuals and families, with our mission being to end homelessness.

We also collect personal information regarding job applicants, employees, and contractors for the purposes of evaluating their suitability for roles at Launch Housing and to satisfy our obligations under the law.

#### 4.2 Launch Housing's obligations

Under the APPs, we must only use and disclose personal information for the primary purpose(s) for which we collected the information, any secondary purpose that is related to the primary purpose for which you would reasonably expect us to use the collected information and as otherwise permitted or authorised by law.

We take reasonable steps to get informed consent and make individuals aware of the purpose(s) for which the information we collect may be used by notifying individuals about all relevant matters at or before the time of collecting the information (including by reference to this Privacy Policy).

#### 4.3 The types of personal information collected and stored by Launch

The types of personal information that we collect will depend on the circumstances.

For example, we may collect:

- your name, date of birth, place of birth, age;
- contact details such as your address, your telephone number, and your email address;
- copies of your identification documents, such as your driver's licence;
- information about your residency status;
- photographs;
- information about your interests, family, and other relationships; and
- information about your requirements for the services we provide and existing conditions affecting those services.

We have specified the types of personal information that we collect in certain circumstances below.

The personal information we collect will be limited to information necessary to record and manage our interactions with you.

From time to time, we may also collect sensitive information (such as information regarding your gender, sexual orientation, or ethnic origin) and/or health information (such as information regarding your disability or mental health condition) about you when we have your consent or when we are required or authorised by law to collect such information.

At all times, it is your choice how much information you would like to provide. However, if you do not provide any or all of the information requested, Launch Housing may be unable to provide assistance or services to you or otherwise deal adequately with any requests you have.

#### 4.3.1 *Through recruitment*

If you apply for a role with us, with your consent we may also collect information about your qualifications, experience, character, and screening check results (including references, background, directorship, financial probity, identity, eligibility to work, vocational suitability and such sensitive information as your criminal record and Working with Children Check status).

If you then take on a role with us, we may also collect additional information about your current or former employment or engagement including information about your training, disciplining, resignation, termination, terms and conditions, staff benefits, health information (to make reasonable workplace adjustments where required) emergency contact details, performance, conduct, use of our IT and communications resources, payroll matters, union or professional/trade association membership, recreational drug/alcohol tests, leave and taxation, banking and superannuation details. We are required and/or authorised to collect your personal information under various laws including the Fair Work Act, Superannuation Guarantee (Administration) Act, and Income Tax Assessment Act.

#### 4.3.2 *When a financial donation is made*

When a financial donation is made, we may collect credit card and/or bank account details and contact information (name, address, email address, and telephone numbers). We collect this data to process donations and provide receipts. Please clearly indicate to us if you prefer your donation to be anonymous.

We also use the information to keep our supporters informed about our work.

#### 4.3.3 *In the provision of service delivery*

We may collect personal information directly from you or in some cases from third-parties including your representatives and carers, other not-for-profit organisations, government agencies, information service providers, or public sources. If we collect sensitive information about you, such as information about health, religion, ethnic origin, or criminal record, we will do so only where you consent, provide the information to us voluntarily, or where we are otherwise authorised by law.

### 4.4 **How personal information is collected and stored by Launch Housing**

We may collect information about you in a number of circumstances, including when you:

- complete a form (either physical or online);
- apply to receive our assistance or services;
- interact with us directly;
- provide feedback or request information from us;

- apply for and/or accept a job or volunteer role;
- make a donation;
- join a mailing or contact list.

We may also collect information when we:

- process transactions and administer your accounts;
- address your queries and resolve any complaints;
- send information updates;
- review our quality improvement processes;
- comply with any contractual obligations owed to funding agencies.

We may also receive personal information about you through publicly available sources of information.

With your consent, we may take written records of conversations and communications between you and our staff. We also take written records of details of our interactions with you, including any contact we have with you in person, by email, online or on the telephone. We may also collect interactions we have with you in an emergency situation through our duress alarm system that can record audio and visual information.

Our staff may also record personal information collected from you in the course of preparing notes, recommendations, and decisions.

Where we collect personal information about you, we will take reasonable steps to provide you with certain details about that collection (such as the purpose for which we are collecting the information and the type of third parties to which it is usually disclosed).

From time to time, personal information may be volunteered to us without us requesting or taking steps to collect that information. Additionally, we may receive unsolicited personal information when we ask an individual to provide us with certain information and the individual provides us with additional information. In these situations, in accordance with our statutory obligations, we will determine whether we could have lawfully collected the information had we taken steps to collect that information and, if not, take steps to destroy or de-identify that information (unless we are required or authorised by law to retain the information).

#### 4.4.1 *Job applicants and contractors*

We always try to collect information about job applicants directly from them. We also collect information about job applicants:

- through background checks, police checks, and Working with Children Checks; and
- from referees and employment agencies

Launch Housing relies on the information collected from job applicants about referees and assumes that the applicant has the consent of the referee to disclose their details to Launch Housing. Please note that we may retain personal information collected from unsuccessful applicants for the purpose of considering the applicant for other roles in the future. Information about contractors and their employees is collected directly from the contractors.

#### 4.4.2 *Storage*

We hold personal information electronically and in hard copy form, both at our own premises and with the assistance of our service providers. We take a range of steps to protect the security of personal information from misuse, interference and loss, and unauthorised access, modification and disclosure. This includes protection measures such as firewalls, access controls, user authentication, encryption, intrusion detection, site monitoring and staff training and workplace policies.

Access to personal information is only given to authorised Launch Housing staff, students, volunteers or contractors, as required for their role and task.

#### 4.4.3 Dealing with us anonymously

Under the APPs, you have the right to deal with us on an anonymous or pseudonymous basis. This means that you do not need to provide us with personal information if and when we request that information. However, if you choose to interact with us on an anonymous or pseudonymous basis, or if you do not provide us with personal information when requested, we may be unable to provide you with our services. For example, we may not be able to communicate with you, respond to your enquiries, or consider you for positions with us.

We reserve the right to verify the identity of an individual who is seeking access to personal information held by us in order to minimise the risk of releasing personal information of another individual inadvertently, as well as to verify the identity of the individual in the event the individual complains to us about the handling of their personal information.

#### 4.4.4 Government identifiers

Unless permitted by law (for example, use of an identifier to verify an individual's identity or uses or disclosures required or authorised by or under an Australian law), we will not:

- use a government related identifier of an individual (such as a Tax File Number) as our own identifier of individuals; and
- otherwise use or disclose such a government related identifier.

### 4.5 How Launch Housing uses and discloses personal information

We may use and/or disclose personal information we collect about an individual to:

- provide support and assistance to our clients and renters;
- assess prospective client referrals and intakes;
- process donations and receipts;
- identify individuals;
- maintain and update our records;
- continuously evaluate, develop and improve our programs and services via continuous improvement activities;
- assess the effectiveness of our services and programs through quality assurance and risk management activities;
- plan for future programs and services;
- conduct research;
- manage and train our staff;
- comply with our legal obligations (including the Family Violence Information Sharing Scheme and Child Information Sharing Scheme legislated under the *Family Violence Protection Act 2008*);
- respond to lawful information requests from police, government agencies, courts or lawyers;
- protect our lawful interests;
- respond to your queries or concerns;
- if you have applied for a job, assess your suitability to perform duties.

We will not use and/or disclose personal information collected from you for an unrelated purpose unless we first obtain your written consent or a statutory exception applies (such as it is impracticable to obtain your consent and we believe that collecting, using or disclosing the information is necessary to lessen a serious threat to the life, health or safety of any individual). For example, we will not use personal information you provide as a client to approach you for marketing purposes without your consent.

Personal information is unlikely to be disclosed outside Australia. If we seek to disclose personal information to third parties located overseas, we will comply with our legal obligations relating to cross border disclosures of personal information.

#### 4.5.1 *Third party disclosures*

We may disclose personal information we collect from individuals to third parties but only as required to fulfil one or more of the purposes for which the information was collected, any secondary purpose related to the primary purpose of collection, or otherwise as required or authorised by law.

We take reasonable steps to ensure that any third party to which we disclose personal information collected from or about an individual takes steps to protect the personal information and to destroy or deidentify the information when the information is no longer required.

We may exchange your personal information with your representatives, our agents or contractors, related organisations and our third party service providers who perform tasks on our behalf, for example data processing and storage services, payment processing, banking, marketing, professional services (including legal, accounting, auditing and business consulting), research, tele-services, payroll, staff benefits, training, website or technology services, and mailing services that send our letters.

If you are a client, we may disclose personal information to government agencies, for example, to inform decisions about funding, or to third parties involved in your care. This may include disclosure of information to other Information Sharing Entities to assess and manage family violence risk under the Family Violence Information Sharing Scheme (FVISS) or Child Information Sharing Scheme (CISS) legislated by the Family Violence Protection Act 2008 as part of the Multi-Agency Risk Assessment and Management Framework (MARAM).

If you have applied for a position with us, we may exchange your personal information with your referees, police, Centrelink, recruitment consultants, academic institutions, screening check providers, health service providers, professional and trade associations, previous employers, and law enforcement agencies.

We may also disclose personal information (including sensitive information) about you when required by law or court order or where we are required to do so as a result of any obligations we owe under any contract. We may disclose personal information about an individual to a third party if we consider it reasonably necessary to do so to identify, contact, or bring legal action against a third party in order to defend an action brought against us or to enforce our legal rights.

Additionally, we may disclose personal information about an individual to our professional advisers, insurers, and auditors for the purpose of their provision or performance of their duties owed under contract to us.

#### **4.6 How you can request access to your personal information, or request a correction**

We will, at your request, provide you with access to information which we hold about you in accordance with the APPs or HPPs. We will generally provide you with access to your personal information, subject to some exceptions permitted by law, for example if giving you access would have an unreasonable impact on the privacy of other individuals. We will also generally provide access in the manner that you have requested (for example, by providing photocopies), provided it is reasonable and practicable for us to do so.

If you wish to request access to information we hold about you, please contact us (see details below). We may require you to verify your identity before processing any access or correction requests, to make sure that the personal information we hold is properly protected.

You can also request us to update or correct the information we hold about you and let us know your preferences for how we communicate with you by contacting us.

When we receive a request to access and/or correct the personal information we hold about an individual, we will comply with our statutory obligations and we will respond to such a request within a reasonable period of time (within 30 days).

We will take such steps (if any) as are reasonable in the circumstances to correct information to ensure that, having regard to the purpose for which it is held, the information is accurate, up-to-date, complete, relevant, and not misleading.

If we have disclosed your personal information to a third party and you request us to notify that third party of a correction made by us, we will take reasonable steps to do so unless it is impracticable or unlawful.

Where we decide not to make a requested correction to your personal information and you disagree, you may ask us to make a note of your requested correction.

If we deny any request for access or correction, we will provide you with our reasons. If you disagree with our decision, you can lodge a complaint (see below).

Where we grant a request to access, we may charge you a fee to cover our reasonable costs for accessing and providing the information to you, as permitted by law.

**4.7 How you can lodge a complaint and how Launch Housing will handle your complaint**

You have the right to complain if you believe we have breached this policy or your rights under the APPs and HPPs. If you have any queries or concerns about the way we handle your personal information, please let us know and we will endeavour to promptly resolve your enquiry or concern.

We may be required to verify the identity of the person making the complaint and may request additional details from you regarding your concerns. We may also need to engage or consult with other parties to investigate and deal with your complaint.

We will keep records of your request and any resolution in accordance with our legal obligations.

**Contact**

Privacy Officer name: Harriet Simpson

Privacy Officer email: harriet.simpson@launchhousing.org.au

If you do not wish to send your comments using email you can send them in writing to the following postal address:

Privacy Officer  
 Launch Housing  
 Level 7, 54 Wellington Street  
 COLLINGWOOD VIC 3066

**4.8 What happens if we fail to comply with this policy**

Launch Housing can only collect, use, store and give out personal information in accordance with the *Public Records Act 1973, Health Records Act 2001, Privacy Act 1988 and Privacy and Data Protection Act 2014* (as applicable).

Breaches of confidentiality and unauthorised access and disclosure of personal information will be treated by Launch Housing as a serious misconduct issue.

**5. Who is responsible for this policy**

Who is responsible	Key activities
Chief Executive Officer (CEO) & Executive	<ul style="list-style-type: none"> <li>Implementation of this policy and monitor staff adherence to the policy</li> </ul>
Privacy Officer	<ul style="list-style-type: none"> <li>Ensure the policy is updated and compliant</li> <li>Receive any queries or complaints about or under the policy</li> <li>Oversee privacy compliance at Launch Housing</li> </ul>
Group Manager, Housing Services	<ul style="list-style-type: none"> <li>Ensure the processes involved with tenant data, including collection, storage and destruction, are compliant with this policy and law</li> </ul>
Manager, HomeGround Real Estate	<ul style="list-style-type: none"> <li>Ensure the processes involved with HomeGround Real Estate data, including collection, storage and destruction, are compliant with this policy and law</li> </ul>
Head of Philanthropy and Fundraising	<ul style="list-style-type: none"> <li>Ensure the processes involved with donor data, including collection, storage and destruction, are compliant with this policy and law</li> </ul>
Portfolio Analytics and Reporting Lead	<ul style="list-style-type: none"> <li>Ensure the processes involved with client data, including collection, storage and destruction, are compliant with this policy and law</li> </ul>
People Experience Manager	<ul style="list-style-type: none"> <li>Ensure the processes involved with employee data, including collection, storage and destruction, are compliant with this policy and law</li> </ul>
Cloud and Infrastructure Engineer	<ul style="list-style-type: none"> <li>Ensure that the IT systems for electronic document storage and destructions, and website data collection, are compliant with this policy and law</li> </ul>
All Staff	<ul style="list-style-type: none"> <li>Notify clients and renters of their rights and responsibilities with respect to privacy</li> <li>Inform line manager or direct supervisor of any issues relating to privacy</li> <li>Ensure all complaints are addressed quickly and honestly</li> </ul>

# APPENDIX: INTERPRETATION AND ADMINISTRATION

## 6. Definitions

Term	Definition
Personal information	<p>Any information or an opinion about an individual who is identified or reasonably identifiable, regardless of whether the information is true or not or recorded in material form or not.</p> <p>Examples include your name, address, date of birth and email address and CCTV footage recorded at a Launch site or service.</p>
Health information	<p>Includes any information or opinion that is also personal information about:</p> <ul style="list-style-type: none"> <li>• The physical, mental or psychological health of an individual.</li> <li>• A disability of an individual.</li> <li>• An individual's expressed wishes about the future provision of health services to the individual.</li> <li>• A health service provided, or to be provided, to an individual.</li> <li>• Other personal information collected to provide, or in providing, a health service to an individual.</li> <li>• Genetic information about an individual in a form that is, or could be, predictive of the health of the individual or a genetic relative of the individual.</li> </ul>
Informed consent	<p>Informed consent is given when a person:</p> <ul style="list-style-type: none"> <li>• Demonstrates that they understand what they are consenting to and understand the possible consequences of giving consent (clients who have long intervals between episodes of service must renew consent); and</li> <li>• provides the consent freely.</li> </ul> <p>For example, it may be determined that a person who is intoxicated or otherwise unwell is unable to provide informed consent due to their condition at that time.</p>
Sensitive information	<p>Information or an opinion that is also personal information about an individual's:</p> <ul style="list-style-type: none"> <li>• racial or ethnic origin;</li> <li>• political opinions;</li> <li>• membership of a political association;</li> <li>• religious beliefs or affiliations;</li> <li>• philosophical beliefs;</li> <li>• membership of a professional or trade association;</li> <li>• membership of a trade union;</li> <li>• sexual orientation or practices; or</li> <li>• criminal record.</li> </ul> <p>Information that is:</p> <ul style="list-style-type: none"> <li>• health information;</li> <li>• genetic information that is not otherwise health information;</li> <li>• biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or</li> <li>• biometric templates.</li> </ul> <p>Sensitive information may be associated with trauma and must be treated with mindfulness and respect.</p>

## 7. Supporting documents

Document name	Description	Type
Client Record Management Policy	Details Launch Housing's approach to how client records are managed.	Policy
Document Retention and Destruction policy	Details how Launch Housing manages and destroys documents.	Policy
Closed Circuit Television (CCTV) Policy	Details Launch Housing's approach to CCTV.	Policy
Research and Ethics Policy	Details Launch Housing's approach to ethical research.	Policy
Acceptable Use of ICT Policy	Details how Launch Housing staff should use information and communication technology.	Policy
Fundraising policy	Details Launch Housing's approach to fundraising.	Policy
Client/Renter Feedback, Complaints and Appeals Policy	Details Launch Housing's approach to feedback and complaints.	Policy

## 8. Amendments

This policy may be amended, terminated or replaced at Launch Housing's discretion. This policy will be reviewed, and updated as required, on a periodic basis.

In the event any related State or Commonwealth legislation changes, the legislation/directions will prevail to the extent of any inconsistency with this policy.

Amendments			
<b>Date last approved:</b>	07 11 2024	<b>Date of effect:</b>	07 11 2024
<b>Date last amended:</b>	07 10 2024	<b>Date of next review:</b>	07 11 2026
<b>Owner:</b>	Privacy Officer	<b>Approver:</b>	Board
<b>Audience:</b>	All		

## 9. Version Control

Version	Effective Date	Amended by	Approved By	Amendment
V1.0	20/05/2015	Chief Executive Officer	Board	
V2.0	05/05/2016	Chief Executive Officer	Board	Put into LH format
V2.1	27/02/2018	Chief Executive Officer	Board	Included reference to VHR
V3.0	30/04/2019	General Manager People, Planning, Performance & Technology	Chief Executive Officer	GM Owner and author updated in line with SLT restructure
V3.1	04/12/2019	General Manager People, Planning, Performance & Technology	General Manager Campaigns & Engagement	Individual giving specialist added, updated definitions, amended in line with fundraising and supporter care privacy statement, included supporting documents.
V4.0	07/11/2024	Privacy Officer	Board	Policy rewritten for compliance with APPs