

Service/Area: Probity

Applicable Entity: HCAL, HCT, HCSA, HCNSW, DHL, SEHL and UCP

Approver: Board

Approval Date: 8 August 2018

Last Updated: 5 December 2018

Executive Lead: General Counsel/Company Secretary

1. Purpose

This policy outlines the HCA Group's commitment to protect the privacy of personal and sensitive information about its customers, staff, volunteers, suppliers, partners and supporters in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**), including the Australian Privacy Principles, and any other relevant state-based privacy laws.

It explains the principles and framework supporting how the HCA Group collects and manages personal information. Further detail is set out in our Privacy Statement and related policies.

2. Scope

This policy applies to our staff, volunteers, contractors and suppliers who handle personal information on behalf of the HCA Group.

The **HCA Group** means each of the following, unless the members of Housing Choices Australia Limited (**HCAL**) resolve by special resolution that an entity has been removed or released from, or has otherwise exited, the HCA Group:

- Disability Housing Limited (ACN 118 571 547) (**DHL**);
- Singleton Equity Housing Limited (ACN 007 008 853) (**SEHL**);
- Housing Choices Australia Limited (ACN 085 751 346) (**HCAL**);
- Housing Choices Tasmania Limited (ACN 147 840 202) (**HCTL**);
- Housing Choices South Australia Limited (ACN 122 807 130) (**HCSAL**);
- Housing Choices NSW Limited (ACN 619 158 299) (**HCNSWL**); and
- Urban Choices Property Limited (ACN 639 237) (**UCP**),

and any of their subsidiaries and any other entity which the members of HCAL resolve by special resolution forms part of the HCA Group from time to time, in each case including any such entity's role as trustee of a trust.

If a third party supplies personal information to the HCA Group, we agree to treat that personal information in accordance with this policy.

3. Guiding Principles

The HCA Group aims to:

RESPECT RIGHTS	to privacy by only collecting information which is reasonably necessary and by being careful regarding how we use, disclose and store personal information
TRANSPARENTLY AND SECURELY MANAGE	all personal information in a manner that is consistent with our policies
EDUCATE	our staff, volunteers, contractors and suppliers of their responsibilities in relation to personal information by investing in training and implementing practices, procedures and systems accordingly
CONTINUOUSLY IMPROVE	by regularly reviewing this policy and any associated statements or procedures to consider new laws or technology or related changes to our operations and practices

4. Privacy Statement & Collection Statement

Our [Privacy Statement](#) sets out in detail the specific matters required by the Privacy Act, including how external parties may access and correct records containing personal information.

Our [Collection Statement](#) sets out the type of personal information we may collect and how we may collect it.

5. Complaints Process

The process for making a complaint about a breach of privacy and how we deal with a complaint is set out in our [Complaints Process](#).

6. Responsibilities

All HCA Group staff will be informed of this policy and will be expected to comply.

HCA Executive and Senior Managers have responsibility for the management of compliance in their relevant functional areas and will promote, monitor and uphold a positive compliance culture. They will engage with the General Counsel for support and/or training where required.

7. Compliance and Breaches

Where there is non-conformance or breach of this policy, the Quality Assurance and Compliance Officer is to be notified, who will liaise with the relevant State Manager and/or General Counsel to manage the incident.

All HCA Group staff are responsible for reporting any incidents relating to inadvertent disclosure or loss of personal information to the General Counsel. The General Counsel is responsible for maintaining a register of these incidents for record keeping and audit purposes and will report to Board annually (or as reasonably required, if a major incident occurs).

8. Review Processes

This policy will be reviewed by the Board every 2 years.

References to Standards and Legislation

Commonwealth

Privacy Act 1988 (Cth) and the Australian Privacy Principles

My Health Records Act 2012 (Cth)

Victoria

Privacy and Data Protection Act 2014 (Vic)

Charter of Human Rights and Responsibilities Act 2006 (Vic)

Housing Act 1983 (Vic)

Health Records Act 2001 (Vic)

Surveillance Devices Act 1999 (Vic)

Tasmania

Archives Act 1983 (Tas)

Listening Devices Act 1991 (Tas)

South Australia

Information Privacy Principles Instruction (SA)

State Records Act 1997 (SA)

Surveillance Devices Act 2016 (SA)

New South Wales

Health Records and Information Privacy Act 2002 (NSW)

Surveillance Devices Act 2007 (NSW)

Application of policy

In respect of that HCA Group member, the board of any HCA Group Member may decide to opt-out of this policy at any time. This policy will only apply to a particular HCA Group Member once they have formally adopted it.

HCA Group Member	Date Policy Adopted
Housing Choices Australia Limited	8 August 2018
Housing Choices Tasmania Limited	8 August 2018
Housing Choices South Australia Limited	8 August 2018
Housing Choices NSW Limited	8 August 2018
Disability Housing Limited	8 August 2018
Singleton Equity Housing Limited	8 August 2018
Urban Choices Property Limited	8 August 2018