

1. Purpose

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

It explains the principles and framework supporting how HCA collects and manages Personal Information. Further detail is set out in our Privacy Collection Statements and related documents.

2. Application

This Policy applies to all HCA officers, staff, contractors, consultants and volunteers who handle Personal Information on behalf of HCA entities.

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment, in accordance with HCA disciplinary procedures.

3. Collection of Personal Information

3.1. How we collect

Personal Information will be collected directly from an individual whenever reasonable and practicable. Personal Information may be collected in a number of ways, including:

- when the individual correspond with us (for example by letter, email, SMS, online chat)
- via telephone (including call recordings, which are held indefinitely)
- in person, if we meet with the individual;
- from third parties such as Centrelink, service providers including health service providers and partner or support agencies, who refer the individual to us for assistance with their consent;
- on hard copy forms that the individual completes;
- through the use of CCTV cameras in common areas; and
- at events and forums.

In addition to collection through referring third parties, sometimes information about an individual may be collected or received by HCA from another person or body. These can include:

- Neighbours
- Law enforcement bodies
- Maintenance providers
- Family members
- Friends

- Guardians or Administrators
- Banks
- Utility providers
- Courts and tribunals
- Contracted service providers
- Funded agencies e.g. the National Disability Insurance Agency
- Centrelink
- Health providers and support services
- Previous employers
- Educational institutions
- Professional bodies
- Insurers, including Workers Compensation agencies
- Superannuation organisations.

HCA may not specifically seek this information from the above people or bodies and will only retain information if it is reasonable, relevant and likely to be true.

3.2. Types of information we collect

HCA collects and holds Personal Information including, but not limited to:

- Full name
- Date of Birth
- Address
- Phone numbers
- Email addresses
- Digital images
- Sensitive Information in relation to housing needs of residents including mental health, disability, racial or ethnic origin, or criminal history
- Sensitive Information in relation to the employment needs of staff including mental health, disability, racial or ethnic origin, or criminal history.

HCA collects information directly from the individual wherever reasonable and practicable. Information may be collected via various methods such as:

- Online or hard copy forms such as housing application forms and employment related forms
- In person
- Correspondence such as emails, phone calls (including SMS and voicemail).

3.3. How we use Personal Information

Personal Information may be used to:

- Verify identity for housing applications, employment applications, complaints or requests to correct or delete Personal Information we hold
- Manage a tenancy
- Arrange or connect an individual with services (with the individual's consent)
- Process a job application
- Manage an employment relationship
- Process a donation
- Conduct an investigation
- Assess or manage a complaint
- Defend a legal claim
- Run events
- Comply with our legal obligations
- Facilitate assistance and notifications in the event of an emergency.

HCA does not currently use computer programs to make decisions that may significantly affect the rights or interests of individuals.

4. Disclosure

We do not normally disclose Personal Information to people or organisations without the individual's consent. We will only do so if we are required or authorised by law. Circumstances where we may disclose Personal Information may include to:

- People contracted by us to undertake tasks relevant to the provision of housing or accommodation services
- Third party service providers who assist us with the delivery of services or who provide services to, or partner with us to, enable us to deliver services
- Other service providers, including:
 - IT providers, e.g. so we can manage our systems
 - accounting services providers, e.g. so we can manage our accounts
 - communications and research agencies, e.g. so that we can complete surveys
 - freight and courier services
 - printers and distributors of magazines and brochures e.g. so we can inform individuals about our services
 - external business advisors (such as auditors and lawyers), e.g. so that we can comply with the law
- People who have legal powers to act for individuals, such as powers of attorney, in accordance with those rights
- Our tradespeople to carry out maintenance

- Banks or utilities providers (e.g. gas, electricity, water, phone)
- Funding agencies
- Employers (past, current or prospective)
- Nominated referees
- National tenancy databases
- Government agencies, including bond authorities.

We may also disclose Personal Information to other people or organisations (see examples below) under specific circumstances, where lawful and necessary:

- Residential tenancy tribunals and other tribunals and courts
- Law enforcement bodies
- An ombudsman
- In the event of an emergency: police, medical or hospital personnel, civil emergency services, the individual's legal representative or nominated emergency contact person, or other person assessed as necessary to respond to the emergency.

There may be circumstances where we will seek the individual's specific consent before the collection or disclosure of their Personal Information. For example, in respect of some Sensitive or Health Information or if we would like to use the individual's Personal Information for promotional activities.

Some Personal Information we hold electronically may be stored overseas using cloud computing or other electronic storage services. Where we store Personal Information overseas, we take all reasonable steps to ensure the recipient adheres to the Australian Privacy Principles or a comparable or higher level of privacy protection to that provided under the Australian Privacy Principles.

5. Rights and choices

Individuals have rights and choices about their Personal Information. An individual can request that we:

- provide access to the Personal Information we hold about them
- correct their Personal Information
- change any or all consents provided to us about the use or disclosure of their Personal Information.

6. How to make a complaint

Questions or concerns about this Policy, the Privacy Collection Statement, or the way in which Personal Information has or will be handled, should be directed to our Privacy Officer via phone, email or post. Contact details below.

Privacy Officer Contact Details	
Phone	1300 312 447
Email	privacy@hcau.org.au
Post	Privacy Officer Housing Choices Australia Limited 350 Queen Street Melbourne 3000

We will deal with complaints according to the Office of the Australian Information Commissioner's [Checklist for Handling Privacy Complaints](#). We will keep the complainant informed during the process, and we will notify the outcome within 30 days.

If, after contacting us, we are unable to resolve a concern, a complaint may be lodged with the Office of the Australian Information Commissioner via their [OAIC Web Form](#) or by sending a written [Privacy Complaint Form](#) via fax or mail.

7. Privacy Collection Statements

HCA's Privacy Collection Statements set out the detail related to specific circumstances in which we collect Personal Information.

8. Policy non-conformance

Any actual or suspected non-conformance with this policy should be immediately notified to the Privacy Officer.

HCA staff are responsible for reporting any incidents relating to unauthorised use, disclosure or loss of Personal Information to the Privacy Officer, including if the disclosure was inadvertent. The Privacy Officer is responsible for maintaining a register of these incidents.

9. Implementation

This policy is implemented through our:

- Employee Collection Statement
- Resident Collection Statement
- Contact Us Collection Statement
- Privacy Data Breach Response Procedure
- Privacy Breach: reporting portal
- Collection of Personal Information Procedure
- Complaint Advocacy Consent Form
- Code of Conduct
- Privacy Impact Assessment Procedure
- Privacy Impact Assessment Template
- Record Management Policy

10. References

This policy is created with reference to the following legislation and other external documents:

Commonwealth

- *Privacy Act 1988*
- *Privacy and Other Legislation Amendment Act 2024*
- *Archives Act 1983*
- *National Disability Insurance Scheme Act 2013*
- *My Health Records Act 2012*
- *Privacy Amendment (Notifiable Data Breaches) Act 2017*
- *Telecommunications (Interception and Access) Act 1979*

Victoria

- *Health Records Act 2001*
- *Privacy & Data Protection Act 2014*
- *Charter of Human Rights and Responsibilities Act 2006*
- *Surveillance Devices Act 1999*
- *Family Violence Protection Act 2008*
- *Child Wellbeing and Safety (Information Sharing) Regulations 2018* (HCA is a prescribed Information Sharing Entity)
- *Family Violence Protection (Information Sharing and Risk Management) Regulations 2018* (HCA is a prescribed Information Sharing Entity)
- *Workplace Injury Rehabilitation and Compensation Act 2013 (Victoria)*
- *Housing Act 1983*

New South Wales

- *Health Records & Information Privacy Act 2002 (NSW)*
- *Surveillance Devices Act 2007*
- *Workplace Surveillance Act 2005*
- *Disability Inclusion Act 2014*
- *Children and Young Persons (Care and Protection) Act 1998*
- *Workplace Injury Management and Workers Compensation Act 1998 (NSW)*

Tasmania

- *Information Privacy Act 2000*
- *Listening Devices Act 1991 (TAS)*
- *Archives Act 1983*
- NCHS Section 3: Tenant Rights and Participation 3.05: Confidentiality and Privacy
- *Children, Young Persons and Their Families Act 1997*
- *Workers Rehabilitation and Compensation Act 1988 (Tasmania)*
- *South Australia*
- *Information Privacy Principles Instruction (SA) via SAHT contract*
- *Surveillance Devices Act 2016*
- *Information Sharing Guidelines (SA)*

- *Children and Young People (Safety) Act 2017*
- *Return to Work Act 2014 (SA)*

Western Australia

- *Privacy and Responsible Information Sharing Act 2024*
- *Surveillance Devices Act 1998*
- *Workers Compensation and Injury Management Act 2023 (WA)*
- *Children and Community Services Act 2004*

11. Definitions

Term	Definition
Personal Information	Personal Information is information that could identify a person. The information can be recorded or not, an opinion, true or not. It could be information such as a name, date of birth, address, email address, education, employment history, photograph or voice recording. Personal Information includes Sensitive and Health Information.
Sensitive Information	Sensitive Information includes Health Information. Sensitive Information attracts greater protections because inappropriate handling could lead to discrimination, mistreatment, humiliation, embarrassment or undermine an individual's dignity. Sensitive Information includes racial or ethnic origin, political opinions, certain types of beliefs, memberships, practices or orientation, criminal records, health, genetic or biometric information.
Health Information	Health Information includes information about the health, genetics or a disability (at any time) of an individual. It includes a person's expressed wishes about health services and what health services are or will be provided to them. It also includes information collected in connection with providing a health service like appointment or billing details, dental records or test results.

12. Document details

Title	Privacy Policy
Version	v13.0
Approver	Board of Directors
Owner	Director Risk & Compliance
Approval date	25.03.2026
Review period	2 years



English:

If you need an interpreter, please call TIS National on 131 450 and ask them to call **Housing Choices Australia** on **1300 312 447**. Our business hours are **9am to 5pm, Monday to Friday**.

You can also visit the TIS National website for translated information about the service TIS National provides. Visit: www.tisnational.gov.au

Arabic:

إذا كنت بحاجة إلى مترجم، يرجى الاتصال بـ TIS الوطنية على الرقم 131 450 وأطلب منهم الاتصال بـ **Housing Choices Australia** على هاتف رقم **1300 312 447**. ساعات العمل الخاصة بنا **9am to 5pm, Monday to Friday**.

يمكنك أيضا زيارة موقع TIS الوطنية للحصول على معلومات حول الخدمات التي تقدمها TIS الوطنية. قم بزيارة: www.tisnational.gov.au

Farsi (alt Persian):

اگر به مترجم نیاز دارید، لطفاً با شماره تلفن تیس نشنال 131 450 تماس بگیرید و از آنها بخواهید با **Housing Choices Australia** به شماره **1300 312 447** تماس بگیرند. ساعت کاری ما **9am to 5pm, Monday to Friday** است.

www.tisnational.gov.au شما همچنین می توانید به وب سایت تیس نشنال برای اطلاعات در مورد خدماتی که تیس نشنال فراهم می کند مراجعه کنید. به

Vietnamese:

Nếu quý vị cần thông dịch viên, xin hãy gọi cho Dịch vụ Thông Phiên dịch Quốc gia (TIS Quốc gia) theo số 131 450 và yêu cầu họ gọi cho **Housing Choices Australia** theo số **1300 312 447**. Giờ làm việc của chúng tôi là **9am to 5pm, Monday to Friday**. Quý vị cũng có thể vào thăm trang mạng của TIS Quốc gia để có thông tin về các dịch vụ mà TIS Quốc gia cung cấp. Hãy vào thăm www.tisnational.gov.au

Somali:

Haddii aad u baahan tahay turjumaan, fadlan ka wac TIS National taleefanka 131 450 waxaad ka codsataa inay kuu wacaan **Housing Choices Australia** iyo **1300 312 447**. Saacadaha Shaqadu waa **9am to 5pm, Monday to Friday**. Waxaad kaloo booqan kartaa website-ka TIS National ee macluumaadka turjuman oo ku saabsan adeegga TIS National ay bixiso. Ka eeg: www.tisnational.gov.au

Simplified Chinese:

如果您需要口译员，请拨打TIS National 的电话131 450，请他们打电话给**Housing Choices Australia**，电话号码：**1300 312 447**。我们的营业时间是**9am to 5pm, Monday to Friday**。

你也可以访问TIS National 的网站，了解TIS National提供的服务。网址：www.tisnational.gov.au

Traditional Chinese:

若你需要口譯員，請撥打TIS National電話131 450並請他們轉接 **Housing Choices Australia** 的電話 **1300 312 447**。我們的工作時間是**9am to 5pm, Monday to Friday**。

你也可以瀏覽TIS National 網站瞭解TIS National 的服務資訊，網址：www.tisnational.gov.au

Spanish:

Si necesita un intérprete, por favor llame a TIS National en el 131 450 y pida que lo comuniquen con **Housing Choices Australia** en el **1300 312 447**. Nuestro horario de oficina es **9am to 5pm, Monday to Friday**. También puede visitar el sitio web de TIS National para obtener información acerca de los servicios que provee TIS National. Visite www.tisnational.gov.au

Italian:

Se hai bisogno di un interprete, telefona a TIS National al numero 131 450 e chiedi di chiamare **Housing Choices Australia** al **1300 312 447**. I nostri orari d'ufficio sono **9am to 5pm, Monday to Friday**. Puoi visitare anche il sito web TIS National per informazioni tradotte sul servizio che TIS National fornisce. Visita il sito: www.tisnational.gov.au

For other languages, access to an interpreter is available by contacting Housing Choices Australia on **1300 312 447**.