

PROBITY

PRIVACY POLICY

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Queries regarding the content of this document may be directed to:

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1. PURPOSE

Cornerstone Housing Ltd (Cornerstone) is required to comply with the Privacy Act 1988 (Cth) (Privacy Act) and the Australia Privacy Principles (APP).

The purpose of this Privacy Policy is to explain;

- The kinds of personal information that Cornerstone collects and holds;
- How Cornerstone collects and holds personal information;
- The purposes for which Cornerstone collects, holds, uses and discloses personal information;
- How an individual may access their personal information that is held by Cornerstone and seek the correction of such information;
- How an individual may complain about a breach of privacy and how Cornerstone will deal with such a complaint; and
- Whether your business is likely to disclose personal information to overseas recipients.

2. DEFINITIONS

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:
(a) whether the information or opinion is true or not; and
(b) whether the information or opinion is recorded in a material form or not.

Sensitive information is a subset of personal information relating to an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual orientation or practices, criminal record, or health information.

3. POLICY STATEMENT

3.1. Collection and Retention of Personal Information

3.1.1 Tenants/Applicants

Cornerstone collects information from individuals which is necessary to provide accommodation and support services and assess an individual's suitability to receive accommodation and support services. This includes collecting personal information such as an individual's name, address, telephone number, Centrelink reference number, bank account details, income, ethnicity, date of birth, gender, disability status, your health history, family history, lifestyle factors and any other information which is necessary to enable an individual to participate in social or affordable housing.

3.1.2 Job applicants

Cornerstone collects information from individuals which is necessary to assess and engage applicants. This includes collecting personal information such as an individual's name, address, telephone number, professional experience, qualifications, references and past employers, and any other information which is necessary to assess your suitability for employment.

3.1.3 Board Members and committee members

Cornerstone collects information from individuals for the purposes of individuals becoming or being a board or committee member, and to enable Cornerstone to appropriately manage its governance obligations. This includes collecting personal information such as an individual's name, address, telephone number, professional experience, qualifications and past appointments, and any other information which is necessary for Cornerstone to collect to properly discharge its governance obligations.

3.1.4 Landlords

Cornerstone collects information from individual landlords for the purposes of managing properties used to provide accommodation services. This includes collecting personal information such as your name, address, telephone number, email address, bank account details and any other information which may be required to manage tenancies.

3.1.5 Carers/Guardians/Attorneys/Relatives

Cornerstone collects information about our tenants' carers, guardians, attorneys, and next-of-kin for the purposes of contacting those individuals as needed to appropriately support our tenants. This includes collecting personal information such as your name, address, telephone number and email address.

3.1.6 Donors

Cornerstone collects information from individuals for the purposes of fundraising and managing donations. This includes collecting personal information such as your name, address, telephone number, email address and credit card details.

3.1.7 Contractors

Cornerstone collects information from individual contractors for the purposes of managing and maintaining properties used to provide accommodation services. This includes collecting personal information such as name, address, telephone number, email address, bank account details and any other information which may be required.

3.2. Collection of Personal Information

Cornerstone will only collect personal and sensitive information that is necessary for it to carry out its business activities.

Where possible, personal information will be collected directly from individuals. However, information may also be collected from multiple sources including directly from an individual, via a government agency, police records, landlords (past and present), recruiters, employers (past and present), support partners and external referees.

3.3. Use of Personal Information

Cornerstone only uses your personal information for the purpose for which it was collected by Cornerstone (primary purpose), unless:

- there is another purpose (secondary purpose) and that secondary purpose is related to the primary purpose, and the individual would reasonably expect, or Cornerstone has informed the individual that your information will be used for that secondary purpose; or
- you have given your consent for your personal information to be used for a secondary purpose; or
- Cornerstone is required or authorised by law to use your personal information for a secondary purpose (including for research and quality improvements within Cornerstone).

For example, Cornerstone may use an individual's personal information to:

- provide accommodation services and support services to an individual, or assess an individual's suitability to receive such accommodation and support services;
- notify individuals of services which Cornerstone reasonably considers may be suitable to an individual's needs;
- for the purposes of managing and maintaining properties;
- invite individuals to events which Cornerstone facilitates or organises, where we reasonably consider those events are relevant to the services Cornerstone provides to the individual;
- appropriately manage our business, such as reporting to any third parties to which Cornerstone has contractual obligations, assessing insurance requirements, conducting audits and maintaining our registration as a community housing provider;
- assist it in running its accommodation business, including quality assurance programs, billing, improving services, implementing appropriate security measures, conducting research and training personnel; and
- effectively communicate with third parties, including Centrelink and the Department of Family and Community Services.

3.4. Security of Personal Information

Cornerstone will take reasonable steps to protect any personal information collected to ensure protection from unauthorised access, misuse, loss, theft, modification and/or unauthorised disclosure.

Reasonable steps include:

- Verifying the identity of any individual wishing to access their personal information;
- Implementing computer system safeguards including password protection and rules of user access;
- Monitoring computer information systems to test and evaluate data security in line with the appropriate industry standards;
- Provision of lockable physical security for paper records;
- Ensuring that information is transferred securely;
- Archiving information in a secure and accessible manner;
- Storing material for a legal period and then disposing of it securely; and
- Ensuring there is reasonable physical security in Cornerstone's offices.

3.5. Disclosure to Overseas Recipients

As of the date of approval on this policy, Cornerstone does not disclose personal information to overseas recipients.

We may engage services providers based overseas to host data storage for personal information. Cornerstone will take reasonable steps, in the circumstances, to ensure that the overseas recipient does not breach Australian privacy laws in relation to the personal information.

However, the reasonable steps may not apply if Cornerstone reasonably believes that:

- The recipient is subject to laws that has the effect of protecting information in a similar way to the Australian Privacy Principles; and
- There are mechanisms that an individual can access in that overseas country to enforce their rights for any breaches or privacy of their personal information.

3.6. **Accessing and Amending Personal Information**

Individuals can request access their personal information which Cornerstone holds about them by contacting the Cornerstone by email at privacy@cornerstonehousing.com.au or by post PO Box 100 Marden SA 5070. If an individual makes a request to access their personal information, Cornerstone will ask for verification of identity and request that the information sought be specified.

An individual can also request an amendment to any of their personal information if they consider that it contains inaccurate information.

While Cornerstone aims to meet all requests to access and amendments to personal information, if there is an instance where we are unable to do this, Cornerstone will provide you with a reason.

3.7. **Complaints Handling**

If you have a complaint or any concerns about how your personal information has been handled by Cornerstone, please contact the Cornerstone by email at privacy@cornerstonehousing.com.au or by post PO Box 100 Marden SA 5070.

If we do not adequately address your concerns, you are entitled to contact the Office of the Australian Information Commissioner. Their contact details are GPO Box 5218 Sydney NSW 2001, Phone: 1300 363 992 or Email: enquiries@oaic.gov.au

3.8. **Openness**

Cornerstone's Privacy Policy is available publicly on its website (www.cornerstonehousing.com.au) and can also be obtained on request by contacting Cornerstone on 8165 5300.

3.9. **Anonymity**

Where possible and practicable, an individual will have the option to deal with Cornerstone on an anonymous basis or by using a pseudonym. However, if the personal information provided to Cornerstone is incomplete or inaccurate, or any personal information is withheld, Cornerstone may not be able to provide the services or support being sought, or deal with an individual effectively.

4. RESPONSIBILITIES

- 4.1. The Board, through the CEO or delegate, will be responsible for maintaining the Privacy Policy

- 4.2. The Board, through the CEO or delegate, will be responsible for the day to day management of personal information collection, access, correction, storage, use, and disclosure.
- 4.3. Managers, including the CEO, will be responsible to consult and communicate with relevant staff on issues relating to privacy.
- 4.4. All employees will be responsible and accountable for their role in compliance with the Australian Privacy Principles.

5. VERSION CONTROL

<i>Revision</i>	<i>Comment</i>	<i>Date</i>
1.0		31/03/2002
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