



CEACA

Supporting Wheatbelt Communities

CEACA Limited Privacy Policy

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1.0 PURPOSE

This policy describes how CEACA manages the collection of personal information in an open and transparent way and protects the privacy of individuals regarding the personal information held.

2.0 SCOPE

This policy applies to the personal information of Directors and staff and its external contacts that is collected and held by CEACA. CEACA is bound by the Australian Privacy Principles (APP) of the *Privacy Act 1988* and is committed to protecting the personal information held in respect of any of Director, staff member and external contacts in accordance with the requirements of those Principles.

3.0 RESPONSIBILITIES

This document allocates responsibilities for CEACA:

- Directors.
- Chief Executive Officer.
- Staff (including volunteers, temporary staff, labour hire or contractors).
- Any person or company representing or contracted to undertake work for CEACA (e.g. Managing Agent).

4.0 POLICY STATEMENT

CEACA is committed to ensuring that:

- Any personal information collected is professionally managed in accordance with the *Privacy Act 1988*, the Australian Privacy Principles (APP) and all relevant state legislations.
- Staff utilise documented quality processes and procedures in their day-to-day duties to protect the privacy of Directors and Staff and external contacts.

5.0 POLICY


5.1 COLLECTION OF PERSONAL INFORMATION

CEACA will only collect and hold personal information about an individual that is necessary for business functions, activities and provision of services and advice related to that individual. The personal information collected and held will depend upon the nature of the services being provided by CEACA. The types of personal information collected and held, include but is not limited to:

- Name, gender, address, telephone number, date of birth.
- Details of personal representative, guardian, next of kin, power of attorney.
- Financial, banking and asset details.
- Current and past health information.
- Social history covering family, work and general interests.

CEACA will only collect personal information by lawful and fair means. Personal information will usually be collected directly from the individual (or their personal representative) unless CEACA receive authority from that person to obtain information from another source. CEACA will take all reasonable steps to ensure that personal information collected is secure, accurate, complete and up-to-date and that the individual is aware:

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- That their information has been collected.
- How it will be used.
- That they may access information held about them.
- Of the likely consequences of failing to provide the information.

Sensitive personal information includes information or an opinion about matters such as an individual’s health, assets and ability to live independently. CEACA will need to collect this information from individuals to assess eligibility for CEACA’s social and affordable housing options. CEACA will not collect sensitive information about an individual unless the individual has consented, or such collection is required by law. In the case of health information, specific requirements are complied with, as outlined in the *Australian Privacy Principles (APP)*.

5.2 USE AND DISCLOSURE OF PERSONAL INFORMATION

CEACA will only use or disclose available information for the purpose that:

- It was originally collected and made known to the individual.
- The individual would reasonably expect.
- Is required or permitted by any law.
- Is otherwise authorised by the individual.

The personal information collected is used to identify individuals within CEACA Information Technology (IT) systems and forms the basis for contracts entered by CEACA external contacts. Selected information is used to assess the suitability of individuals for admission to CEACA housing and provision of services as appropriate. CEACA will take all reasonable steps to ensure that personal information used or disclosed is accurate, up to date, complete and relevant, having regard to the purpose of its use and disclosure.

Where appropriate, CEACA is required to disclose personal information to government agencies. This information may be used for statistical purposes and management reporting. All organisations that CEACA may disclose personal information to are subject to strict guidelines on how they use the personal information and are bound by specific confidentiality and non-disclosure agreements.


5.3 ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

An individual may request access to their personal information held by CEACA. Individuals can request that their information is corrected if they are able to establish that the personal information held is not accurate. Individuals are only able to view and correct their own information. The privacy of others will not be compromised to facilitate this. A request to view or receive a verified copy of the personal information held by CEACA can be obtained by submitting the request, in writing to the Chief Executive Officer (refer Section 5.11). Individuals will be required to provide CEACA with appropriate identification when submitting the request. A reasonable charge may apply to gain access to information, which will be advised upon receipt of a request.

CEACA will respond to all requests within (10) ten working days, however, this is dependent on the nature of the request and the accessibility of the information. Individuals will be informed if there is a delay in providing the requested information and the reason for the delay. In limited circumstances, CEACA may not allow an individual access to their personal information or may decline requests to correct some of their personal information held. If this occurs, CEACA will provide an explanation in writing. Examples of when CEACA may decline access to personal information is if:

- Access will pose a threat to the life or health of someone.
- Access would have an unreasonable impact on another person's privacy.
- Information relates to anticipated or existing legal proceedings.
- The request is frivolous.
- Giving access would be unlawful.
- There is another legal requirement for denying access as specified in the *Australian Privacy Principles*.

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5.4 ANONYMITY AND PSEUDONYMITY

Where practical, individuals will have the option of remaining anonymous or using a pseudonym when dealing with CEACA such as when making initial enquires into CEACA operations and the services provided. However operational and legal obligations require that individuals identify themselves to CEACA once contractual discussions commence or if the lack of personal information restricts the ability for CEACA to assess their eligibility for affordable housing options. CEACA will advise if failure to provide personal information may jeopardise their application for affordable housing.

5.5 SECURITY OF PERSONAL INFORMATION

CEACA will take all reasonable steps to ensure that any personal information collected is held securely and protected from misuse, interference, loss, unauthorised access, modification, disclosure, by ensuring:

- Controls for the physical access to information.
- Passwords and other electronic protection for computer and network security.
- Secure off-site storage and disaster recovery practices which may include the use of reputable third-party IT services, such as 'cloud' based data storage and Microsoft Office 365.
- Directors and Staff respect the confidentiality of all information that is collected and held.
- Directors and Staff are trained on information handling processes.

5.6 UNSOLICITED PERSONAL INFORMATION

Unsolicited personal information is when CEACA receives personal information without taking any active steps to collect it. CEACA may retain unsolicited personal information and manage it in accordance with this policy if it can be determined that the unsolicited personal information:

- Could have been collected as per *Section 5.1*.
- Is contained in a Commonwealth record.

If the above cannot be determined, CEACA Ltd will destroy or de-identify the unsolicited personal information as soon as practicable, if it is lawful and reasonable to do so. CEACA Ltd will not pass on unsolicited personal information received without the prior consent of the sender.

5.7 DIRECT MARKETING

CEACA may use personal information collected for market research to better understand the needs of individuals with the aim to provide access to a relevant range of CEACA products and services. CEACA will only market CEACA products and services to individuals who would reasonably expect this to occur and will not use any sensitive personal information for marketing purposes without an individual's express consent. CEACA will not:


- Sell, trade, lease or rent any personally identifiable information obtained from an individual without their prior express consent.
- Undertake any marketing activities which would amount to a breach of any legislation including the *Do Not Call Register Act 2006 (Cth)* and the *Spam Act 2003*.

Individuals may choose to opt out of CEACA Ltd marketing activities at any time by contacting CEACA directly or via the unsubscribe function or other contact information provided in any marketing you receive.

5.8 ADOPTION, USE OR DISCLOSURE OF GOVERNMENT RELATED IDENTIFIERS

CEACA will not use any personal identifiers issued by a State or Commonwealth agency (e.g. Medicare number or tax file number) as a means of identification within the CEACA records systems. Where necessary, a unique code will be used to identify external contacts of CEACA.

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5.9 COMPLAINTS OF A BREACH OF PRIVACY

An individual may make a complaint if they believe that there has been a breach of privacy or if they do not agree with a decision made by CEACA regarding access to their personal information. Complaints can be made either verbally or in writing and CEACA will endeavour to resolve the complaint by following the *CEACA-PP-019 (SPV) Complaints & Dispute Resolution Policy (SPV)*.

5.10 UNRESOLVED COMPLAINTS

If an individual is not satisfied with CEACA's decision regarding a complaint, a formal written complaint can be directed to the Australian Information Commissioner at:

Office of the Australian Information Commissioner
GPO Box 5218, SYDNEY NSW 2001 Phone toll free: 1300 363 992 Email: enquiries@oaic.gov.au

5.11 CEACA DIRECTORS & STAFF BREACH OF POLICY

Directors and staff must abide by this policy and understand that breaches may result in disciplinary action, which may result in dismissal and/or legal action if required.

5.12 POLICY AMENDMENTS

CEACA will review this document and may amend this policy from time to time. In such cases, CEACA will communicate all relevant changes to Staff and external contacts as soon as practicable.

5.13 CEACA PRIVACY CONTACT

CEACA has a dedicated resource responsible to address any questions, needs or complaints from Directors and staff or external contacts relating to this Privacy Policy.

CEACA Privacy Officer (Chief Executive Officer):

Garden Office Park, C/- Regus, Level 2, Building C, 355 Scarborough Beach Rd, Osborne Park WA 6017
or PO Box 1257, Osborne Park WA 6017 Phone: (08) 9441 4815 info@ceaca.org.au

6.0 ACCOUNTABILITIES

6.1 CEACA ACCOUNTABILITIES

CEACA so far as is reasonably practicable, will endeavour to:

- Ensure Directors and Staff and contractors have access to relevant documentation and are kept up to date with regards to their obligations under the *Privacy Policy 1988*.
- Take reasonable steps to implement practices, procedures and systems that will ensure compliance with the requirements of the *Privacy Policy 1988*.
- Addressing any instances of non-compliance with the Policy.
- Implementing training and awareness raising strategies regarding the Privacy Act when required.

6.2 CEACA PRIVACY OFFICER ACCOUNTABILITIES


CEACA Privacy Officer is responsible for ensuring:

- The Privacy Policy is kept up to date in line with changes to the *Privacy Act 1988*.
- CEACA are informed of relevant policy, procedure and legislative changes.
- That all enquiries to the Privacy Officer are dealt with within the agreed timeframe.

6.3 CEACA STAFF ACCOUNTABILITIES

Staff are responsible to ensure they have read and understood this policy and adhere to it.

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7.0 LEGISLATIVE DOCUMENTS

- Privacy Act 1998
- Privacy Amendment Act 1990
- Privacy Amendment (Enhancing Privacy Protection) Act 2012
- Privacy Amendment (Office of the Privacy Commissioner Act 2000
- Privacy Amendment Act 2004

8.0 DEFINITIONS

| Term | Definition |
|---|--|
| CEACA | CEACA Limited – a Special Purpose Vehicle (“SPV”) with one Member, being Central East Accommodation & Care Alliance Inc. The SPV was created specifically to undertake the CEACA Expansion Project. |
| Clients | Customers, residents, owners and tenants of CEACA Limited. |
| Directors | The Directors duly appointed and serving on the Board of CEACA Limited. |
| External Contacts | Includes stakeholders, competitors, visitors, tenants, clients, guests, customers or partners of CEACA Limited. |
| Privacy Officer | The Chief Executive Officer of CEACA Limited. |
| Personal Information | Personal information refers to information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is either identified or reasonably identifiable. Examples include an individual's name, address, contact number and email address. |
| Sensitive information | Sensitive information refers to additional personal information that includes details about an individual’s racial or ethnic origin, political opinions, membership of political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record, or health information. |
| Staff | Permanent, part-time and temporary employees, volunteers, contractors and labour hire persons, representing CEACA Limited |
| Unsolicited Personal Information | Personal information that CEACA receives but has taken no active steps to collect. Examples include: <ul style="list-style-type: none"> • Misdirected mail received by CEACA. • Correspondence to Ministers and Government departments from members of the community. • A petition sent to CEACA that contains names and addresses. • An employment application sent to CEACA on an individual’s own initiative and not in response to an advertised vacancy. • Promotional flyer containing personal information sent to CEACA by an individual promoting the individual’s business. |

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