

Privacy Policy

Purpose

The purpose of this policy is to ensure that tenants/residents, contractors, board members and staff are aware of their rights and responsibilities concerning privacy and confidentiality. Alliance Housing is committed to protecting the privacy of personal information it collects, holds and administers.

Scope

This policy applies to all Alliance Housing staff, Board members, contractors, tenants/residents and other stakeholders.

Intent

This policy provides guidance to staff and other parties in the proper gathering, use, disclosure and disposal of personal information in accordance with the Australian Privacy Principles.

Policy

Alliance Housing is bound by the 13 Australian Privacy Principles.

[Australian Privacy Principles Summary](#)

1. Open and transparent management of personal information:

Alliance Housing manages personal information which identifies an individual or from which an individual's identity can be reasonably gained in an open and transparent manner.

For the purpose of providing social and affordable housing the types of information collected will depend on the information needed, which generally includes:

- Name, date of birth and general demographic information (including background and language spoken)
- Rental history
- Copies of ID for identification and safety purposes
- Income and other financial information for eligibility assessments, rental and non-rental payments
- Details of next of kin
- Contact information including forwarding and alternate addresses
- Other personal information to support application and transfer requests
- Government identifiers
- Literacy needs

Alliance Housing may collect personal or sensitive information such as:

- Racial or ethnic origin
- Criminal record
- Medical information where it is required to support their application and provision of service
- Information about complaints including names of involved parties and details of allegations
- Sensitive information will only be collected and used with the permission of the individual

Alliance Housing uses this data to manage properties and tenancies including:

- Verification of identity
- To provide, deliver, manage and improve tenancy services
- To better understand and evaluate client needs
- For reporting requirements to Government agencies and other funding bodies
- As required or permitted by law
- To communicate with tenants, residents and contractors

If an individual chooses not to provide personal information Alliance Housing may not be able to:

- Offer or provide a tenancy or residency
- Manage a tenancy or residency appropriately
- Confirm identity

2. Collection of personal information:

- Alliance Housing shall use lawful and fair means to collect personal information
- An individual's consent for the collection of personal information must be voluntary, informed, current, specific and unambiguous.
- Alliance Housing will only collect personal information that is needed to carry out its duties, where it is required by law and/or to protect the health, safety and welfare of its employees or any third party providing a service on behalf of Alliance Housing
- Personal information will be collected directly from an individual unless this is unreasonable or impractical. In these situations, the individual may authorise a third party to provide information on their behalf.
- Personal information collected for the purpose of reference checks will be authorised by the individual concerned prior to the collection

- Alliance Housing shall ensure the use and disclosure of personal information is for the primary purpose for which it is collected
- Individuals have the right to withdraw consent to collect their personal information at any time by advising Alliance Housing in writing or in person.

Alliance Housing may collect personal information when an individual:

- Fills in a form
- Makes telephone contact
- By email
- On the Alliance Housing website
- In person

3. Unsolicited information:

If Alliance Housing receives unsolicited personal information about an individual and that information assists Alliance Housing to carry out duties or activities, the information will be managed in the same way as any other personal information. If the information is not needed, it will be destroyed or identifying details removed.

4. Website:

Alliance Housing's website is hosted on Webflow, which utilises standard cookies. These cookies support functions such as remembering visitor activity during a session and detecting malicious activity (e.g., robots). No cookies are used to transmit information once a user leaves the website.

No personal information is stored other than the visitor's IP address, which is standard practice. For Webflow users, this information is not accessible unless specifically requested by authorised personnel.

5. Use and disclosure of personal information:

- Alliance Housing shall ensure the use and disclosure of personal information is for the primary purpose for which it was collected
- Alliance Housing shall ensure that the tenant/resident, contractor, Board member or staff member's consent is given when information about them is to be used or disclosed to a third party except where required or authorised by or under law
- Alliance Housing shall provide information to third parties where it is legally required to do so. The request must be received in writing.
- Where no consent to disclose has been received but disclosure is required to lessen or prevent a serious and imminent threat to an individual's life, health or safety or a serious threat to public health or public safety, Alliance Housing may release confidential information within its authorised delegations. Alliance Housing will ensure authorised staff have been provided the adequate training to assess threats as serious and imminent

- Alliance Housing will allow individuals the option of maintaining anonymity or using a pseudonym where lawful or practicable, when contacting Alliance Housing

6. Direct Marketing:

- Alliance Housing may provide customers with information of a general or service nature that may be useful or beneficial. This may be by newsletter, email, web-posting or mail
- Customers can advise Alliance Housing staff if they do not wish to receive information other than Organisational changes

7. Adoption, use or disclosure of government related identifiers:

- Alliance Housing will not adopt an identifier of an individual that has been assigned by a Commonwealth or State Government agency
- Alliance Housing may collect, use or share government related identifiers, where it is reasonably necessary to identify an individual and to be able to carry out Alliance Housing's activities or functions

8. Security of personal information:

- Alliance Housing will take reasonable steps to protect the personal information collected, in both paper and electronic form
- Alliance Housing has established and will maintain appropriate information management practices that meet its business needs and accountability requirements, including:
 - Computer system protection, including password protection, restrictions on access and implementing cyber security protections
 - Lockable filing cabinets for paper records and ensuring cabinets are locked when not in use
 - Archiving information in a secure and accessible way
 - Storing information for the legally required period and then securely disposing of the documents or removing all identifying details
- Alliance Housing will not release information to agencies or individuals known not to act in accordance with the Australian Privacy Principles or to overseas recipients
- Alliance Housing will not provide an individual's personal information to other people or organisations unless that person's permission has been granted or the information must be provided by law
- Alliance Housing takes reasonable steps to ensure the personal information it collects, uses or discloses is accurate and up to date
- Alliance Housing staff will undertake training in privacy risks, doxxing laws and breach response to understand their responsibilities and obligations.

9. Individual Rights

Individuals have the right under the amended Privacy Act to:

- Access their personal information
- Correct inaccuracies
- Request data deletion
- Object to certain data processing activities
- Lodge complaints with the OAIC

10. Access to personal information:

- Tenants/residents and staff or their representative, seeking to access the information held about them must provide a written request to Alliance Housing. Representatives must provide written consent from the tenant/resident or legal permission to act on their behalf
- Alliance Housing will provide access to the information at a prearranged time
- Third party information will be removed before access is granted
- Access may be refused on the grounds listed under the Australian Privacy Principles
- Alliance Housing will not charge the cost of providing access to personal information
- If Alliance Housing refuses access to or correction of personal information, it will provide a written refusal outlining the reasons for the refusal

11. Correction of personal Information:

- If individuals believe the information held about them is not accurate, complete or up to date, they can request that it be corrected and must show proof of identity before any changes are made
- Any refusal to correct personal information will be explained in writing

12 Right to Erasure

Individuals will be informed of their right to request deletion of their personal information when the information is no longer necessary for the purpose for which it was collected, consent has been withdrawn or if the information was unlawfully collected.

The above does not remove Alliance Housing's responsibility to archive information under legislation and this will be explained to the individual requesting deletion of their personal information.

13. Notifiable data Breaches (NDB):

- Alliance Housing will ensure that it conducts its business, including procurement and provision of services, in an ethical, honest and fair manner. It will adopt and maintain a code of conduct, governing the behaviour of Board members and employees.

- Alliance Housing will notify individuals (and the Australian Information Commissioner) if their personal information is involved in a data breach that is likely to result in serious harm.
- A data breach occurs when the following three criteria are satisfied:
- There is unauthorised access to or unauthorised disclosure of personal information, or a loss of personal information held by the organisation
- This is a likely to result in serious harm to one or more individuals; and
- The likely risk of serious harm has not been prevented, even with remedial action

A data breach may be caused by malicious action (by an external or insider party), human error, or a failure in information handling or security systems.

Examples of data breaches include:

- loss or theft of physical devices (such as laptops and storage devices) or paper records that contain personal information
- unauthorised access to personal information by an employee
- inadvertent disclosure of personal information due to ‘human error’, for example an email sent to the wrong person
- disclosure of an individual’s personal information to a scammer, as a result of inadequate identity verification procedures.
- Should Alliance Housing assess that a data breach has occurred and is likely to cause serious harm, the individual impacted will be notified and provided the following:
 - A description of the data breach;
 - The kind, or kinds, of information concerned; and
 - Recommendations about the steps they can take in response to the data breach
 - A data breach statement will also be provided to the Australian Information Commissioner.

Data Breach response process.

Actions to be taken following a data breach should include the following four key steps:

Step 1: Contain the data breach to prevent any further compromise of personal information.

Step 2: Assess the data breach by gathering the facts and evaluating the risks, including potential harm to affected individuals and, where possible, taking action to remediate any risk of harm.

Step 3: Notify individuals and the Commissioner if required. If the breach is an ‘eligible data breach’ under the NDB scheme, it may be mandatory for the entity to notify.

Step 4: Review the incident and consider what actions can be taken to prevent future breaches.

Further information:

Data breach preparation and response

In the event that a notifiable data breach incident occurs, Alliance Housing will complete an Eligible Data Breach Statement as soon as possible or within thirty (30) calendar days of the data breach.

Complaints process

If an individual wishes to make a complaint about the way Alliance Housing has collected, used, held or shared their personal information, they may contact Alliance Housing to obtain a copy of the Feedback, Complaints & Appeals Policy and Complaints Form which outlines the process for managing the complaint.

If an individual wishes to lodge a complaint with OAIC, staff will assist with any information requested.

Legislation and Compliance

Privacy Act 1988 and amendments
Australian Privacy Principles

Implementation, Review and Amendments

This policy is applicable from the date of Board Approval.

Alliance Housing will review this policy on a regular basis to ensure it remains up to date.

Document or version number	Modified By	Narrative	Date approved by Board	Status
PP-1	CEO	Original version	01.04.2022	Approved
PP-1	CEO	Amendments	01.05.2026	

An individual or body may request a copy of Alliance Housing Privacy Policy in their preferred form eg electronic or print which will be made available at no charge.