

# PRIVACY POLICY

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## 1.0 PURPOSE AND SCOPE

This policy establishes how EACH Housing Limited (EHL) collects, uses, and discloses your personal information. EHL collects personal information from renters, applicants, and others, so that EHL can provide housing and related services.

Commonwealth and Victorian laws set out how we must manage your personal information to protect your privacy. Our detailed legal obligations are set out in:

- The Australian Privacy Principles in the *Privacy Act 1988 (Cwlth)*;
- The Information Privacy Principles in the *Privacy and Data Protection Act 2014 (Vic)*; and
- Where your personal information is also health information, the Health Privacy Principles in the *Health Records Act 2001 (Vic)*.

In addition, EHL takes part in the Victorian Housing Register (VHR). The *Housing Act 1983 (Vic)* allows us, in some circumstances, to share the personal information of applicants for social housing with other VHR agencies.

We want our privacy practices to be open and transparent. To achieve this:

- Our privacy policy is written in simple language.
- We publish this policy on our website, along with a Privacy Statement that summarises this policy in simple terms.
- We provide the Privacy Statement when collecting personal information face-to-face.

We will update this privacy policy when our information handling practices change. Updates will be publicised on our website.

## 2.0 POLICY STATEMENT

Accordingly, EHL undertakes the following:

### 2.1 Collection of Personal and Sensitive Information

We ask for and collect personal information about you to help us provide a service to you – for example:

- To help you apply for social housing via the VHR.
- To sign you up as a renter in one of our properties.
- To manage your tenancy, for example, to calculate your rent; and
- When you contact us, for example, to ask for information, report a tenancy issue, or lodge a complaint with us.

We usually collect the following information about you and your household members:

- Identity (name, date of birth) and identification documents.
- Contact details (address, phone, email)
- Residency status.
- Evidence of household income and assets.
- Information about housing needs.
- Demographic information (e.g., country of birth, language spoken).
- Records of communication between you and our staff.
- Notes, recommendations, and decisions made by staff.

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### 2.2 Collecting Sensitive and Health Information

We only collect sensitive information (e.g., racial, or ethnic origin) and health information (e.g., disability or mental health) when we have your consent.

When assisting with a VHR priority housing application, we may ask for:

- Details of urgent housing need.
- Disability or mental health conditions.
- Support service involvement.
- Housing history (e.g., homelessness or risk factors).

You are not required to provide this information, but withholding it may mean:

- We cannot support the right type of housing application.
- We may not be able to offer housing suited to your needs.
- We may be limited in how we can support your tenancy.
- We may not be able to arrange property modifications you request.

### 2.3 Indirect Collection

While we aim to collect your personal information directly, sometimes we receive it from other sources, for example:

- From household members, when you are part of their tenancy or application.
- From Centrelink or your support worker (with consent).
- From others involved in a complaint or dispute involving you.

We also collect and update your information through the VHR where another agency you have dealt with has collected your personal data.

### 2.4 Anonymity

Where possible, we will allow you to interact with us anonymously or using a pseudonym. However, to deliver most of our services, we need enough information to identify you and assess your needs.

### 2.5 Using and Disclosing Personal Information

We use personal information to:

- Deliver housing and related services.
- Respond to enquiries, complaints, or maintenance requests.
- Calculate rent and manage tenancy matters.
- Coordinate support services (with consent).
- Meet regulatory, legal, and contractual obligations.
- Plan and improve our services using de-identified data.

We only disclose personal information when necessary and lawful to do so. Common scenarios include:

#### 2.5.1 Victorian Housing Register (VHR) Applications

We disclose your personal and household information to VHR agencies to:

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- Determine eligibility and priority for social housing.
- Make offers of housing.
- Assess health and support needs to match housing appropriately.

### 2.5.2 Rent Assessment and Centrepay

We may share your details with Centrelink (with consent) to:

- Access income information for rent calculations.
- Set up Centrepay as a rent payment method.

### 2.5.3 Support Services

With your permission, we may disclose information to your:

- Support worker, case manager, guardian, advocate, or health professional.
- Referred agency, to assist you to sustain your tenancy.

### 2.5.4 Repairs

For necessary repairs, we may provide your name and phone number to the attending tradesperson so they can contact you directly to arrange access.

### 2.5.5 Legal Action

If we act at VCAT or in court under tenancy law, we will only disclose relevant information necessary to present our case.

### 2.5.6 Media and Promotions

We may include renter stories or images in reports or publications, but only with your signed consent. If we cannot obtain consent, we ensure you can't be identified.

### 2.5.7 Complaints

If you lodge a complaint, and we need to disclose your details to investigate or respond, we will seek your consent first.

### 2.5.8 Government Reporting

In most cases, we de-identify your data before sharing with government bodies. If identified information is needed to meet funding or legal requirements, we will tell you or seek your consent.

### 2.5.9 Legal and Safety Obligations

We may disclose information:

- If required by law (e.g., court order).
- To prevent or respond to serious threats to life, health, or safety.
- To address suspected unlawful conduct or serious misconduct.

## 2.6 Overseas Disclosure

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We do not normally disclose information overseas. Exceptions include:

- When you nominate an overseas emergency contact.
- If you interact with us via social media (e.g., Facebook, Twitter), which may store data overseas.

### 2.7 Data Quality and Security

We maintain accurate and up-to-date information by:

- Recording in consistent formats.
- Promptly updating information when you notify us.
- Regular data checks and audits.

We protect personal data by:

- Using secure servers and password-protected systems.
- Limiting staff access based on role.
- Keeping paper files in locked cabinets.
- Securely destroying data when no longer required.

We retain some records longer than seven years where it is likely a former renter may apply for housing again.

### 2.8 Accessing and Correcting Your Personal Information

You have the right to:

- Access personal information we hold about you.
- Request a correction if the data is wrong, incomplete, or outdated.

Requests must be made in writing. We will:

- Acknowledge within five business days.
- Respond within 30 days, unless extended by law.
- Verify your identity before providing access or correction.

We may refuse access in limited cases (e.g., if it endangers someone, impacts an investigation, or is unlawful). If refused, you will receive written reasons and your appeal rights.

If we agree to correct the information, we will also update others we have shared it with if you request. If we refuse, we can add a note to your record explaining your disagreement.

### 2.9 Complaints and Concerns

If you are concerned about how your personal information has been handled or believe your privacy has been breached, you can:

- Speak to your Housing Coordinator or another EHL staff member; or
- Contact the EHL Privacy Officer directly:
  - **Email:** [privacyofficer@each.com.au](mailto:privacyofficer@each.com.au)
  - **Phone:** 1300 00 EACH (1300 00 3224)

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- **Post:** Privacy Officer, EACH Housing, 20 Melbourne Street, Ringwood VIC 3134

We treat all privacy complaints seriously. We will:

- Acknowledge your complaint within five business days.
- Investigate the issue confidentially.
- Respond to you with the outcome or progress update within 30 days.

If you are not satisfied with our response, you can contact:

### Office of the Australian Information Commissioner (OAIC)

☎ 1300 363 992

✉ enquiries@oaic.gov.au

🌐 [www.oaic.gov.au](http://www.oaic.gov.au)

📮 GPO Box 5218, Sydney NSW 2001

### Office of the Victorian Information Commissioner (OVIC)

☎ 1300 666 444

✉ enquiries@ovic.vic.gov.au

🌐 [www.ovic.vic.gov.au](http://www.ovic.vic.gov.au)

📮 PO Box 24014, Melbourne VIC 3001

## 3.0 DEFINITIONS

<b>Applicant</b>	A person who applies for social housing through EACH Housing.
<b>Consent</b>	Permission given voluntarily by an individual who is adequately informed, has the capacity to give it, and provides it freely. Consent can be written, verbal, or implied, and must be specific and current.
<b>Cookies</b>	Small data files stored on a user's device by a website to collect information about browsing behaviour and preferences.
<b>DHHS</b>	Former Victorian Department of Health and Human Services, now functions under the Department of Families, Fairness and Housing (DFFH).
<b>Health Information</b>	Information about an individual's physical, mental, or psychological health or disability, including information about health services provided to them.
<b>Personal Information</b>	Information or an opinion that identifies or could identify an individual. This can include names, addresses, birth dates, financial and contact information.
<b>Sensitive Information</b>	A subset of personal information including information about a person's racial or ethnic origin, political opinions, religious beliefs, sexual orientation, criminal record, health or biometric data.
<b>Social Housing</b>	Includes both public housing (owned and managed by the Victorian government) and community housing (owned or managed by registered housing agencies like EACH Housing).

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<b>VHR (Victorian Housing Register)</b>	The centralised application system for people seeking social housing in Victoria.
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### 4.0 DOCUMENT OWNER

The EHL Manager Operations is the subject matter expert and person responsible for this document review.

### 5.0 REFERENCES AND RELATED DOCUMENTS

- Privacy Act 1988 (Cwlth)
- Privacy and Data Protection Act 2014 (Vic)
- Health Records Act 2001 (Vic)
- Housing Act 1983 (Vic)
- Performance Standards for Registered Housing Agencies
- Privacy Statement
- Each Privacy Policy