

Privacy and Confidentiality Policy

Common Ground Queensland Ltd (Common Ground Queensland) collects and uses information for the purposes of providing supportive housing and affordable housing to eligible tenants. This includes information about tenants, applicants for housing, visitors, staff, donors and volunteers.

Common Ground Queensland acknowledges an individual's right to privacy. Common Ground Queensland will protect and uphold your rights and the rights of tenants, applicants, visitors, staff donors and volunteers and Common Ground Queensland to privacy and confidentiality in the way information is collected, stored, used and disclosed.

Common Ground Queensland collects, stores, uses and discloses personal information in accordance with the Australian Privacy Principles (APPs) contained in the [Privacy Act 1988 \(Cwlth\)](#) and the Information Privacy Principles (IPPs) contained in the [Information Privacy Act 2009 \(Qld\)](#).

Common Ground Queensland has policies and procedures in place to ensure that the collection, storage, use and disclosure of personal information is done in a safe, secure and confidential manner to ensure an individual's rights are protected.

Information

Common Ground Queensland will only collect and use information that is necessary to provide the services of supported housing and affordable housing to eligible tenants, or in accordance with the law.

Common Ground Queensland will take reasonable steps to ensure that the information which it holds is accurate, complete and up-to-date.

Common Ground Queensland will take reasonable steps to correct information about an individual where that information is not accurate, complete or up-to-date.

Common Ground Queensland will give an individual access to all personal information it stores about the individual in a timely manner, unless an exception applies under the *Privacy Act 1988* (Cwlth).

Common Ground Queensland will retain information once an individual's application has been processed until an individual ceases to be a tenant or visitor. Once the information is no longer relevant or required by Common Ground Queensland, the information will be either destroyed or de-identified.

What kinds of information does Common Ground Queensland collect?

Common Ground Queensland collects personal information of applicants, tenants, staff, donors, volunteers and visitors to both our building and our website for the purposes of providing supportive housing and affordable housing.

Personal information is defined in section 6 of the *Privacy Act 1988* (Cwlth) as "information or an opinion about an identified individual, or an individual who is reasonably identifiable whether the information or opinion is true or not and whether the information or opinion is recorded in a material form of not."

The *Privacy Act 1988* (Cwlth) applies to records of personal information. A "record" includes a photograph, video image or picture of a person. If an individual can be identified in an image then the image is "personal information" and the collection, use and disclosure of the image is governed by the *Privacy Act 1988* (Cwlth).

As part of providing a safe and secure community and supportive housing, Common Ground Queensland obtains copies of photo identification of applicants and takes photographs of its tenants

and visitors of tenants. Common Ground Queensland also uses CCTV within the common areas of its housing to ensure the safety of tenants, visitors, staff and volunteers. Sometimes, with a tenant's consent, Common Ground Queensland will use a tenant's photograph on its website or in promotional material.

Personal information includes information about the health or a disability (at any time) of an individual. This kind of information is considered to be sensitive information and is collected, used, disclosed and stored accordingly. As detailed below, Common Ground Queensland may collect personal information (and therefore, sensitive information) regarding the health or disability of an applicant or tenant to help Common Ground Queensland determine an applicant's suitability for accommodation and to provide a tenant with appropriate care and support. Common Ground Queensland will only collect this kind of information with an individual's consent.

Common Ground Queensland will collect and hold details of individuals (primarily applicants and tenants) which include, but are not limited to:

1. Full name, contact number, date of birth and email address;
2. Primary source of income;
3. Occupation;
4. Credit card details;
5. Bank account details;
6. Centrelink Customer Reference Number;
7. Rental Application Number;
8. Whether the individual identifies as being of Aboriginal and/or Torres Strait Island Origin or Australian South Sea Islander Origin;
9. Whether the individual has any disabilities; and
10. Whether the individual is a client of the Public Trustee, Mental Health Services, Adult Guardian, Probation and Parole or any other government authority.

Collection and storage of personal information

Common Ground Queensland will collect personal information of tenants, applicants, staff, volunteers, donors and visitors directly from those individuals by one of the following means:

1. By requesting information on an application form and other written forms, including via the Common Ground Queensland website;
2. By taking photocopies of photographic identification, photographs or video recordings (CCTV footage) of an individual; and
3. By an individual updating their records with Common Ground Queensland.

Common Ground Queensland will store the personal information of individuals in the following manner:

1. All relevant personal information will be entered into and held on Common Ground Queensland electronic database maintained on Common Ground Queensland's secure server. The database is only accessible by authorised Common Ground Queensland staff. The server is maintained in Brisbane.
2. Personal information provided on written forms will be kept in safe and secure storage.

Purpose of collection, holding, use and disclosure of personal information

Common Ground Queensland will only collect personal information when it is reasonably necessary for one of Common Ground Queensland's functions or activities related to the provision of supportive housing and affordable housing.

Common Ground Queensland may use personal information for marketing and fundraising purposes but only with the individual's consent or where an individual would reasonably expect Common Ground Queensland to use their information for these purposes.

Common Ground Queensland will only collect personal information that is considered sensitive information with the consent of an individual or as required or authorised by law.

All personal information which is collected, held, used and disclosed by Common Ground Queensland is for the primary purpose of providing supported housing and affordable housing.

Common Ground Queensland is committed to the principles and practices of coordination between tenancy management and the on-site Support Provider to sustain tenancies. Tenant consent to share information is a mandatory requirement before any information sharing can occur.

Common Ground Queensland will not use or disclose personal information for any other purpose unless:

1. Consent has been given by the individual; or
2. The individual would reasonably expect Common Ground Queensland to disclose the information for another purpose which is directly related/related to Common Ground Queensland's primary purpose; or
3. Common Ground Queensland is required or authorised by law and/or under the *Privacy Act 1988* (Cwth) or *Information Privacy Act 2009* (Qld).

Common Ground Queensland does not disclose personal information to overseas recipients.

Access to and correction of personal information

An individual has a right to request access to personal information (including documents containing personal information) that Common Ground Queensland holds about them.

There is no fee involved in making such a request.

If an individual would like to access personal information that Common Ground Queensland holds about them, they are required to contact Sonya Keep, Chief Executive Officer on (07) 3370 8320 or PO Box 3180, Southbank BC, QLD, 4101 to assist them with their request.

If any of the personal information that Common Ground Queensland holds is incorrect, incomplete or out of date, please advise the Administration Manager and it will be corrected accordingly.

Complaint policy

All complaints about a breach of the APPs or IPPs by Common Ground Queensland in relation to an individual's personal information should be directed to Sonya Keep, Chief Executive Officer on (07) 3370 8320 or PO Box 3180, South Brisbane BC, QLD, 4101.

A complaint must be initially lodged in writing to Common Ground Queensland. Common Ground Queensland takes any complaint regarding the privacy of personal information seriously and will work with an individual to try to resolve the complaint. Common Ground Queensland will consider and respond to a written complaint within a reasonable time (usually 30 days).

If a complaint remains unresolved, the complaint may be taken to the Office of the Australian Information Commissioner. The contact details for the Office of the Australian Information Commissioner can be found via its website located at www.oiac.gov.au and are also listed below:

Office of the Australian Information Commissioner

Telephone: 1300 363 992

Email: enquiries@oaic.gov.au

Facsimile: +61 2 9284 9666

Post:

Sydney Office
GPO Box 5218
SYDNEY NSW 2001

Canberra Office
GPO Box 2999
CANBERRA ACT 2601

Common Ground Queensland appreciates feedback regarding its *Privacy and Confidentiality Policy*. All comments or queries must be directed to Common Ground Queensland via email on admin@commongroundqld.org.au.

Amendments to this policy

Common Ground Queensland may change this *Privacy and Confidentiality Policy* from time to time. Updated versions of this policy will be posted to the Common Ground Queensland website www.commongroundqld.org.au.

The *Privacy and Confidentiality Policy* was last updated on 5th of February 2019.

Procedures and Resources that Implement

This policy will be actively implemented by adherence to the following procedures:

- Communication with Tenants Procedure
- Document Control Procedure
- Employee Induction Procedure
- Ending a Tenancy Procedure
- Fulfilling Legislative Obligations Procedure
- Incident Management and Reporting Procedure
- Privacy and Confidentiality Procedure
- Starting a Tenancy Procedure
- Tenant Compliments, Complaints and Appeals Procedure
- Tenant Transfer Procedure