

PRACTICE STANDARDS

Statement of Policy

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1. Business Ethics & Conflict of Interests

Whilst an employee of Eastcoast Housing you will be a representative of our reputation. It is vital that the conduct of each employee is at all times to the highest standard. This includes a commitment to satisfy the standards of honesty and fair trade at all times. All employees should adhere to the fundamental ethical practices and principals of this company as outlined in our mission statement and other related documentation.

Employees have the responsibility to work in the best interests of the Company and avoid situations and actions that may be, or create the appearance of being, in conflict with the company's overall objectives and principles. The following are examples of activities that have the potential to cause conflict and should be avoided:

Holding a substantial financial interest in any company with whom we have business or professional relationship (e.g. competitors, suppliers and customers).

The acceptance by an employee from any party or supplier of services, either directly or indirectly, of cash payments (other than reimbursements for reasonable out of pocket expenses), services, loans (except from banks or other financial institutions) or discounts (except those offered to all employees of the company).

Accepting gifts from any business party involved with Eastcoast Housing.

Problems arising through these situations can usually be avoided by conducting any business transactions in an ethical and honest manner. The following guidelines may assist in determining what is considered proper:

Payment for an appropriate lunch or meal in connection with a business meeting, for as long as they are kept on a reciprocal basis and maintain relevance to the business at hand.

Advertising novelties, provided that they do not appreciate in value and are widely distributed to others under essentially the same business relationship with the donating party (example give-aways like pens, coasters, watches).

Company products made available under customer or PR programs (such as product samples).

Relationships with commercial clients where reciprocal gifts or dealings are exchanged without inference of unethical conduct. In certain countries local custom dictates exchange of gifts as a matter of courtesy (Asia is an example).

If you are in a situation, which you believe that you may have a conflict of interest, it is appropriate to discuss the matter with your immediate supervisor, or alternatively, the HR Department.

See also Reportable Conduct Scheme

2. Community/Consumer Participation

Community participation needs to be actively developed to increase accountability, to meet the needs of the community, and to increase Eastcoast Housing's capacity to effectively address local housing issues.

One method of addressing community participation is the management of the agency by a locally elected, autonomous Board of Directors.

To encourage interest in the Board of Management, regular articles concerning Board functions should be prepared and presented at renter and member functions and through Newsletters.

The Agency should actively inform the community about its services and activities through publicity via Facebook, our website and through information sessions directly with local groups.

Community participation in our agency is also promoted through staff and Board member involvement in other local community groups.

Periodically, Eastcoast Housing will seek the views of the community on the provision of service through questionnaires and evaluation of specific areas of our Service.

3. Client Self Determination

The worker will provide clients with the accurate information regarding the extent and nature of services available to them and will not knowingly withhold such information.

The worker will inform clients of their rights and the implication of services available to them.

In circumstances where the worker must act on behalf of clients, the worker will safeguard the rights and interest of clients.

It must be remembered that clients have the right to make decisions about their own lives without undue interference. As workers in this housing service we can only present clients with the available options. It is then up to the client concerned to make an informed choice based on the information to him/her.

4. Customer Service

Procedures should be in place to handle all areas of customer service, accompanied by regular training programs. All staff at Eastcoast Housing are required to contribute towards the positive service and commitment to our clients/renters. It is our goal to maintain and fulfil our customers' requirements and meet all expectations, while at the same time, sustaining budget constraints.

It is our philosophy to nurture an ongoing relationship with our clients ensuring both parties prosper, develop and grow.

We cannot fulfil this goal without the ongoing support of the agency's most valuable resource, our employees. It is only through teamwork and collective strength, that we can stimulate the kind of quality product and superior service that results in long term customer satisfaction.

Regardless of whether your involvement with customer service is direct or supportive, each member of the team has an impact on the client's impression of our agency.

Any and every contact a client has with our agency – written or verbal – leaves an impression. We at Eastcoast Housing have a prime directive to ensure that each and every moment of contact is a positive one, thus upholding the company's high standard of quality and service. It is the role of each employee, regardless of position, to make each moment of customer service outstanding.

Every customer will have their own expectations of the service they deserve. It is only by constantly exceeding these expectations that we can maintain the highest service possible.

5. Ethical Standards of Practice

Ethics provide guidelines for behaviour within relationships between service users and staff, between staff and each other and between management and staff.

Because workers rely heavily on the maintenance of healthy relationships with their clients and within management, to work effectively, they may be frequently placed in situations where they are required to resolve dilemmas occurring in these relationships. These dilemmas may range from conflicts between a workers 'duty to warn' and consideration of client confidentiality, to the implementation of continuous management policy. In order to resolve

these dilemmas workers must use their judgement with or without service policy and if in doubt must seek guidance from the Managing Director.

The primary aim of having ethical standards is to safe guard workers and to protect clients from harm.

The following ethical standards are expected to be maintained by members of this service and form the basis for the codes of conduct.

6. Clients/workers relationships and worker values

6.1. Social Justice Principles and Worker Practice

It is not acceptable to judge one client's problems as more serious or more worthy of assistance than others are.

Every worker has his or her own values and experiences and opinions. Whilst they may approve or disapprove of a client's actions, decisions or motives, every client is entitled to the same level of assistance regardless of this. This assistance may be provided in various forms ie. Person to person or via telephone and/or video calls.

Workers have a professional obligation not to make value judgements that affect their work with clients.

Members of this service will not discriminate against any person or group on the basis of race, gender, sexual orientation, age, religion, national origin, marital status, political beliefs, mental or physical disability, or any other personal characteristic, condition or status. As such, housing operated by this service will be open to all groups regardless of age, gender, race etc.

It is the workers duty to ensure that all persons have access to the resources and services available through the housing program and the community in general.

The worker will act to expand choice and opportunity for all persons using the service with special regard for disadvantaged or oppressed groups and persons.

When acting for others, the worker will consider the implications for the competing interest of others.

The worker will promote policies, practices and procedures that encourage respect for the diversity and cultures which constitute Australian society.

6.2. Professional Conduct and Worker Practices and Principles

Eastcoast Housing workers will not exploit their relationships with clients for personal advantage or gain. Off duty relationships of any kind (personal, financial, business) have the potential to undermine the objectivity of the worker and the trust of the service user, and can therefore be potentially damaging to the client.

Eastcoast Housing recognises that the private conduct of employees is a personal matter, but requires staff to ensure that their personal lives do not compromise or diminish their professional work.

Staff must clearly differentiate between their own needs and those of the clients. This is a difficult thing, which takes a lot of honesty. Both the Managing Director and other staff should give each other feedback as appropriate when they observe any worker who appears to be acting on their own needs rather than those of the client. Case management is important here. What are the long term outcomes desired/identified for the service users or renter? Workers can regularly check whether things they are doing are leading towards or away from this.

Boundaries. Eastcoast Housing staff will, at all times, maintain clear boundaries between their professional working relationships with renters and service users and their personal lives. Staff will do their best at all times for renter and service users within the job, but will not step outside the job and do clients personal favours. They will therefore always avoid making renters and service users dependent on them, grateful to them or obligated to them.

6.3. Renter and Service User Self Determination

The worker must value the independence of the client. We are attempting to assist them to resource themselves and overcome their own problems, not to increase dependency on any other agency or on us. This principle must guide the work and practice of all Eastcoast Housing staff. Renters have the right to self-determination, and workers will provide them with accurate information and advise them of their rights, and when acting on their behalf, will safeguard their rights and interest. After renters have been advised of their rights and been presented with available options, the renter may choose to exercise their own choice without interference from the worker.

6.4. Worker Safety

Workers will not take any actions, which endanger either themselves or other workers. Worker safety will be seen as a key priority guiding worker practice. Workers have the right to feel safe at all times. Eastcoast has provide body cams to workers who must attend properties where there is deemed an element of risk to themselves. Renters must be informed that they wear them for their personal safety.

7. Freedom of Information

The Freedom of Information Act places certain legal obligations on Eastcoast Housing to provide information about the agencies operations. It is important that all staff is aware of the Act and promptly refer any request to the Managing Director.

Some information is exempted and it is therefore essential that all staff is familiar with it prior to responding to any Freedom of Information requests. The legislation details of the legislation is available online at <http://www.ag.gov.au/foi>

All requests under the Act must be made in writing. However, a person making a request is not required to state any reasons for making the request.

When a person requests information from their records, the worker who has assisted the client maybe appointed the Responsible Officer, and determines whether access or not access to the record is allowable, with due regard to the guidelines in the Act.

A formal reply to a request is required within 45 days of receiving the request, or the Responsible Officer may be called before the Administrative Appeals Tribunal.

8. Gifts and Food

Staff shall not accept or seek payment from renters and service users under any circumstances. Staff shall not accept or seek gifts from renters, except where these are of an extremely nominal nature, and/or refusal would be offensive or culturally inappropriate. Such situations may include sharing food during a home visit, or cultural festival or occasion.

9. Working with Contractors

In the course of our business workers will be engaging with various contractors and tradesmen. At no time will the worker use this working relationship to their own personal advantage.

It is recognised that we live in a relatively small community and Eastcoast Housing endeavours to enlist the work and services of the best tradesmen in the community. Therefore, if on a personal level, any employee engages the services of one of Eastcoast Housing's contractors/tradesmen fair market cost will be paid by the employee for any work undertaken. No favours will be sought, and no beer trade will occur. It is up to the Eastcoast Housing Worker to ensure this standard is maintained. Any work undertaken by any Eastcoast Housing contractors for employees in their domestic life must be disclosed to the Managing Director.

10. Intellectual Property and Non-disclosure Conditions

In times where ideas, concepts and suggestions can be transformed into major campaigns and project streams - especially in a human service company like Eastcoast Housing, we encourage employee input and suggestions. At the same time, the preservation of confidential business and professional information and trade secrets is vital to protect the interests and growth of Eastcoast Housing.

Such confidential information includes, but is not limited to the following:

- Computer processes and data
- Computer programs and codes
- Customer or property lists, details and preferences
- Financial information on company and clients
- Marketing strategies and data
- New housing product research and research and development strategies
- Technological Data and Processes

All employees may be required to sign a non-disclosure statement as a condition of employment. Even where this statement is not specifically and separately prepared and signed, the condition remains enforceable for all staff members. It also forms part of their conditions of employment and the business ethics at Eastcoast Housing.

Employees who disclose trade secrets or confidential business or professional information will be subject to disciplinary action, up to and including termination of employment. In addition, where any 'reasonable doubt' exists, contacts with the police and other relevant organisation's

may be made to lodge claims for damages incurred, even if the employee themselves does not actually benefit from the disclosed information.

11. Media – Public Relations

11.1. *Public statements.*

Eastcoast Housing has a considerable degree of influence in the community. This is because we can speak from the first – hand experience of our members and our Board as members of the local community and as providers of services to the homeless, and from the knowledge and experience of our staff, gained in their training and in working with clients.

It is important that the service with one voice, and that public statements reflect the policy of the Board.

From time to time, individual members of the Board and/ or staff will develop strong views about issues on which they would want the Service to take a stand. This policy sets out procedures through which this can be achieved.

The policy is not designed to place restrictions on statements by committee members or staff as private individuals, but does restrict individuals from involving in any way the authority of Eastcoast Housing without endorsement of the Board.

11.2. *Explicit Policy*

When the Board has on record an explicit policy on an issue, the Managing Director, another member or staff or member of the Board may draft a statement / letter for signature by the Managing Director on behalf of the Board.

A copy will be brought to attention of the next Board meeting.

11.3. *No Explicit Policy*

If the Board has no policy, or only a general policy on an issue, a statement /letter will be drafted for consideration at the next Board meeting.

Board members or staff members may seek a recommendation from the Managing Director in support of such a statement. Board or staff members may take a short presentation to the meeting of the Board in support of their proposed statement.

When endorsed by the Board, a statement/ letter will be issued over the Managing Directors signature unless the Board feels that its importance warrants signature by the chairperson of the Board.

11.4. No Explicit Policy and a Deadline

This situation is generally to be avoided, as policy made in haste (and publicity announced) will be repented at leisure. It is a situation with the potential for recriminations and disharmony.

On no account will individual Board members other than the chairperson, or staff other than the Managing Director to make public statements or send letters to the press or public officials on behalf of the Service.

The Managing Director will do so, only with the concurrence of a majority of the current Board members and/or the chairperson of the Board.

11.5. Statements by Staff

Eastcoast Housing staff may wish to align themselves with public statements made by a variety of professional or trade union organisations to which they belong, or to speak or write in their capacity as professional housing workers. Unless they have endorsement of the Eastcoast Housing Board to use the services name, staff may identify themselves only in terms of their title or professional status e.g. Community development worker, social worker etc.

Professional or other papers submitted for publication should be sent to the Board prior to publication for endorsement if the author wishes to be identified as a member of Eastcoast Housing staff.

11.6. Social Media

It is recognised that most people have social media accounts such as Facebook, Twitter etc. Under no circumstances will it be tolerated that an employee or Director of Eastcoast Housing post comments within the framework of social media about any business of Eastcoast Housing or its employees.

Public comments can be misinterpreted and taken out of context by those viewing the comments or pictures. It is recognised that comments through these forums are PUBLIC and cannot be taken back. See also 11. 2022 Social Media Policy.

11.7. Breach of Faith

Failure to observe these procedures will be dealt with under the Eastcoast Housing disciplinary procedures or the relevant award. To do so risks termination of employment and if a director, removal from the Board.

11.8. Press Releases

The Managing Director is the only employee of the service empowered with the responsibility of making policy statements on behalf of this service.

Staff should be mindful of litigation aspects of making comments on policy issues, clients situations etc.

The Managing Director requires all staff to submit media articles for approval prior to submission, to ensure that media articles are of non-legal matter and are in accord with the service's policies.

11.9. Request for comment by Media

All requests for comment on an issue or service provided by Eastcoast Housing are directed to the Managing Director and/or the chairperson where a matter of policy or service opinion is to be addressed. Comments regarding the relevant details of a particular program or activity may be given directly by the relevant team leader but recorded on the media response sheet. Wherever possible, media outlets should be given information in the form of a written press release.

12. Privacy and Confidentiality

Eastcoast Housing has developed an information sheet **“Renter Information – Privacy policy”** This is to be given at sign up to all new renters.

Eastcoast Housing considers all individual's right to privacy is of the utmost importance. Therefore, all staff are expected to familiarise themselves with the current legislation regards privacy and client confidentiality and to keep abreast of any changes as they occur. An employee's standard of work and conduct must conform to maintaining the standards of privacy and confidentiality that is an industry standard and contained in current legislation.

No employees may take Eastcoast Housing data home and/or load this material on personal computers without express and prior permission of the Managing Director.

In accordance with the priority Eastcoast Housing places on privacy, all staff, volunteers and Board members will be required to sign a Confidentiality Agreement specifying the standards of performance and conduct by which they are employed and therefore expected to comply with regards to the protection of colleagues, Board members, renters, clients or other community or company members.

During 2002 two parliamentary Acts came into effect which relate to protecting personal information that services and agencies collect. The Health Records Act applies to any health information any service may collect about a person, and the Information Privacy Act deals with all personal information collected about you by services, agencies and departments.

All staff, volunteers and Directors are subject to and must operate in accordance with the Federal Information Privacy Act 2000 when collecting, using, disclosing and storing any personal information we have about our members, applicants, renters and staff.

“Personal information” is any information which potentially identifies an individual; such as name, address, date of birth, contact and financial details etc. Eastcoast Housing collects this sort of personal information in our application forms, residential renter agreement forms, employment forms and our rebate application/review forms.

We may only disclose a person’s private information to a third party if they have signed a “Renter Privacy Statement” or a “Release of Information” form which agrees to this. The worker will respect the confidentiality of information obtained in the course of his/her work. The worker will not share confidences revealed by renters and service users without their consent.

The worker needs to inform clients fully about the limits of confidentiality in any given situation, the purpose for which information is obtained and how it may be used. Workers cannot assure clients that what they are told will be kept secret. Confidentiality rests with the agency as a whole. *That is, if a client says please don’t tell anyone what I am about to tell you – stop them - let them know you may need to disclose to others if it is a duty of care issue and you cannot keep secrets from your supervisor (also see Principle 11).*

The worker will afford clients access to records concerning them providing due care is taken to protect the confidence of others contained in those records (see Freedom of Information).

All staff, volunteers and Directors must agree to Eastcoast Housing's Privacy and Confidentiality principles and policies. In doing so they must sign an "Agreement of Confidentiality". There are criminal sanctions for a breach of this undertaking – offences under the Crimes Act 1914 (Commonwealth).

Prior to signing the "Agreement of Confidentiality" all staff, volunteers and directors must read and become familiar with all 11 (eleven) Information Privacy Principles.

Information Privacy Principles

Information Privacy Principles are the practical core of the Information Privacy Act. With limited exemptions, all Victorian government agencies, statutory bodies and local councils must comply with the Information Privacy Principles.

Principle 1 - Manner and purpose of collection of personal information

1. Personal information shall not be collected by a collector for inclusion in a record or in a generally available publication unless:
 - (a) The information is collected for a purpose that is a lawful purpose directly related to a function or activity of the collector; and
 - (b) The collection of the information is necessary for or directly related to that purpose.
2. Personal information shall not be collected by a collector by unlawful or unfair means.

Principle 2 - Solicitation of personal information from individual concerned

Where:

- (a) A collector collects personal information for inclusion in a record or in a generally available publication; and
 - (b) The information is solicited by the collector from the individual concerned;
- the collector shall take such steps (if any) as are, in the circumstances, reasonable to ensure that, before the information is collected or, if that is not practicable, as soon as practicable after the information is collected, the individual concerned is generally aware of:
- (c) The purpose for which the information is being collected;
 - (d) If the collection of the information is authorised or required by or under law - the fact that the collection of the information is so authorised or required; and
 - (e) Any person to whom, or anybody or agency to which, it is the collector's usual practice to disclose personal information of the kind so collected, and (if known by the collector) any person to whom, or anybody or agency to which, it is the usual practice of that first mentioned person, body or agency to pass on that information.

Principle 3 - Solicitation of personal information generally

Where:

- (a) A collector collects personal information for inclusion in a record or in a generally available publication; and
- (b) The information is solicited by the collector:
The collector shall take such steps (if any) as are, in the circumstances, reasonable to ensure that, having regard to the purpose for which the information is collected:
- (c) The information collected is relevant to that purpose and is up to date and complete; and
- (d) The collection of the information does not intrude to an unreasonable extent upon the personal affairs of the individual concerned.

Principle 4 - Storage and security of personal information

A record-keeper who has possession or control of a record that contains personal information shall ensure:

- (a) That the record is protected, by such security safeguards as it is reasonable in the circumstances to take, against loss, against unauthorised access, use, modification or disclosure, and against other misuse; and
- (b) That if it is necessary for the record to be given to a person in connection with the provision of a service to the record-keeper, everything reasonably within the power of the record-keeper is done to prevent unauthorised use or disclosure of information contained in the record.

Principle 5 - Information relating to records kept by record-keeper

1. A record-keeper who has possession or control of records that contain personal information shall, subject to clause 2 of this Principle, take such steps as are, in the circumstances, reasonable to enable any person to ascertain:

- (a) Whether the record-keeper has possession or control of any records that contain personal information; and
- (b) If the record-keeper has possession or control of a record that contains such information:
 - (i) The nature of that information;
 - (ii) The main purposes for which that information is used; and
 - (iii) The steps that the person should take if the person wishes to obtain access to the record.

2. A record-keeper is not required under clause 1 of this Principle to give a person information if the record-keeper is required or authorised to refuse to give that information to the person under the applicable provisions of any law of the Commonwealth that provides for access by persons to documents.

3. A record-keeper shall maintain a record setting out:

- (a) The nature of the records of personal information kept by or on behalf of the record-keeper;
- (b) The purpose for which each type of record is kept;
- (c) The classes of individuals about whom records are kept;
- (d) The period for which each type of record is kept;
- (e) The persons who are entitled to have access to personal information contained in the records and the conditions under which they are entitled to have that access; and
- (f) The steps that should be taken by persons wishing to obtain access to that information.

4. A record-keeper shall:

- (a) Make the record maintained under clause 3 of this Principle available for inspection by members of the public; and
- (b) Give the Commissioner, in the month of June in each year, a copy of the record so maintained.

Principle 6 - Access to records containing personal information

Where a record-keeper has possession or control of a record that contains personal information, the individual concerned shall be entitled to have access to that record, except to the extent that the record-keeper is required or authorised to refuse to provide the individual with access to that record under the applicable provisions of any law of the Commonwealth that provides for access by persons to documents.

Principle 7 - Alteration of records containing personal information

1. A record-keeper who has possession or control of a record that contains personal information shall take such steps (if any), by way of making appropriate corrections, deletions and additions as are, in the circumstances, reasonable to ensure that the record:

- (a) is accurate; and

(b) is, having regard to the purpose for which the information was collected or is to be used and to any purpose that is directly related to that purpose, relevant, up to date, complete and not misleading.

2. The obligation imposed on a record-keeper by clause 1 is subject to any applicable limitation in a law of the Commonwealth that provides a right to require the correction or amendment of documents.

3. Where:

(a) The record-keeper of a record containing personal information is not willing to amend that record, by making a correction, deletion or addition, in accordance with a request by the individual concerned; and

(b) No decision or recommendation to the effect that the record should be amended wholly or partly in accordance with that request has been made under the applicable provisions of a law of the Commonwealth;

The record-keeper shall, if so requested by the individual concerned, take such steps (if any) as are reasonable in the circumstances to attach to the record any statement provided by that individual of the correction, deletion or addition sought.

Principle 8 - Record-keeper to check accuracy of personal information before use

A record-keeper who has possession or control of a record that contains personal information shall not use that information without taking such steps (if any) as are, in the circumstances, reasonable to ensure that, having regard to the purpose for which the information is proposed to be used, the information is accurate, up to date and complete.

Principle 9 - Personal information to be used only for relevant purposes

A record-keeper who has possession or control of a record that contains personal information shall not use the information except for a purpose to which the information is relevant.

Principle 10 - Limits on use of personal information

1. A record-keeper who has possession or control of a record that contains personal information that was obtained for a particular purpose shall not use the information for any other purpose unless:

(a) The individual concerned has consented to use of the information for that other purpose;

(b) The record-keeper believes on reasonable grounds that use of the information for that other purpose is necessary to prevent or lessen a serious and imminent threat to the life or health of the individual concerned or another person;

- (c) Use of the information for that other purpose is required or authorised by or under law;
 - (d) Use of the information for that other purpose is reasonably necessary for enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of the public revenue; or
 - (e) The purpose for which the information is used is directly related to the purpose for which the information was obtained.
2. Where personal information is used for enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of the public revenue, the record-keeper shall include in the record containing that information a note of that use.

Principle 11 - Limits on disclosure of personal information

1. A record-keeper who has possession or control of a record that contains personal information shall not disclose the information to a person, body or agency (other than the individual concerned) unless:
- (a) The individual concerned is reasonably likely to have been aware, or made aware under Principle 2, that information of that kind is usually passed to that person, body or agency;
 - (b) The individual concerned has consented to the disclosure;
 - (c) The record-keeper believes on reasonable grounds that the disclosure is necessary to prevent or lessen a serious and imminent threat to the life or health of the individual concerned or of another person;
 - (d) The disclosure is required or authorised by or under law; or
 - (e) The disclosure is reasonably necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of the public revenue.
2. Where personal information is disclosed for the purposes of enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the purpose of the protection of the public revenue, the record-keeper shall include in the record containing that information a note of the disclosure.
3. A person, body or agency to whom personal information is disclosed under clause 1 of this Principle shall not use or disclose the information for a purpose other than the purpose for which the information was given to the person, body or agency.

For further information please contact

Privacy Commissioner
GPO Box 5218
Sydney NSW 2001
Privacy Hotline: 1300 363 992
Telephone: (02) 9284 9800
Fax: (02) 9284 9666
Email: privacy@privacy.gov.au

Please also read Reportable Conduct Scheme and Protected Disclosure

13. Sponsorship and Advertising

The Eastcoast Housing encourages the opportunity of using appropriate advertising and/or sponsorship of service activities. The benefits of both financial input and increased public profile are acknowledged.

13.1. Criteria of assessment

In recognising these opportunities the service is considered that conflicts of interest do not occur. Therefore the following principles will occur.

13.2. Approval process

All offers of sponsorship/advertising shall be submitted through the Managing Director to the Board for approval.

13.3. Evaluation of policy

It is recognised that the issue of sponsorship/advertising may become complex at times and therefore the application of this policy will have to be monitored and modified from time to time.

NB: Advertising/sponsorship from sources which is contrary to the service's philosophy will not be accepted.

14. Electronic Media

It is so easy to take photos and recordings of people and events using electronic devices today. Eastcoast Housing employees will not take photos or movies of anyone using an electronic device without that person's knowledge. Agreement does not extend to the storage and use of the images for any purpose, malicious or otherwise.