



**POLICY TMP 016
CLIENT PRIVACY POLICY**

Version	Date Reviewed	Updated By:
1.0	10 th June 2018	Megan Ward GM Operations
2.0	1 st September, 2019	Megan Ward GM Operations
3.0	1st April, 2022	Megan Ward GM Operations

AUTHORISING AUTHORITY

Board of Directors / Chief Executive Officer

PURPOSE / BACKGROUND

The policy articulates how Community Housing Canberra (CHC/HG) and HomeGround Real Estate Canberra (HG) will obtain, manage and store applicants and tenants personal information. As part of a coordinated service delivery, CHC/HG may be required to collect information from applicants and tenants and report to a range of stakeholders.

CHC/HG promotes and respects the human rights and fundamental freedoms of all persons with a disability and provides a service to tenants in line with the principles of the NSW Disability Inclusion Act 2014, Disability ACT and the United Nations Convention on the Rights of Persons with Disabilities (CRPD). CHC/HG supports the objectives of the NDIS Quality and Safeguards Commission and promotes the NDIS principles of choice and control.

CHC/HG aims to:

- CHC/HG develops and maintain documentation that demonstrates a clear commitment to the rights of applicants / tenants; to respectful, fair and non-discriminatory treatment.
- CHC/HG specifies what information is released (internally/externally) and to whom; how consent is gained and recorded
- CHC/HG ensures applicants / tenant file storage is secure

RESPONSIBILITY

All CHC/HG employees

POLICY DETAIL

The purpose of this policy is to clearly articulate how CHC/HG manages personal information of applicants and tenants. Clients have the right to know who their information will be provided to and what it will be used for. The information you provide may also be disclosed where authorised or required by ACT or Commonwealth Law.

CHC/HG informs applicants/tenants from the initial application process through to ongoing tenancy management of their rights – including privacy and confidentiality. CHC/HG staff are informed via the quality system and staff engagement methods (such as staff meetings) and provides private spaces for interviews/meetings as appropriate.

Information Storage

CHC/HG is committed to protecting personal information and we take reasonable steps to ensure personal information is protected from misuse, interference, loss, and unauthorised access, modification or disclosure.

Security measures

- Physical, electronic, and procedural safeguards in line with industry standards, for examples passwords, locks and restricted access processes.
- Secure server with cyber software including closed networks
- Limited access to personal information (e.g. only relevant employees who require an individual's personal information to carry out his / her normal line of duties are allowed access)
- Management of access privileges, and regular review of the privileges from CHC/HG's Compliance team
- Destroying or de-identifying personal information pursuant to the law and record retention policies

Third party disclosure

CHC/HG will only disclose your personal information to a third party under the following circumstances:

- If the disclosure is directly related to the purpose for which the information was collected for example NRAS reporting
- If the person to whom the information relates was informed and provided a signature when the information was collected
- If it is reasonably believed that the disclosure is necessary to prevent or lessen a serious and imminent threat to any person's health, safety or life. For examples welfare checks with the Police
- Where the person to whom the information relates to has provided informed consent
- If a permitted general situation exists in relation to the use or disclosure of the information
- If lawfully authorised or required to do so under the Privacy Act by legislation, or a Privacy Code of Practice, or CHC/HG's Housing's Privacy/Consent approved forms, and if available, supported by a Service Agreement or similar document.

If you are concerned that we have not met our obligations under this policy, you may raise a complaint internally through our complaints process as outlined in our complaint and appeal policy.