



TMP 016

CLIENT PRIVACY POLICY

VERSION	DATE REVIEWED	CHANGE SUMMARY
1.0	10/6/2018	First version
2.0	1/9/2019	
3.0	1/4/2022	
4.0	1/4/2023	Update to recognise handling of information by service providers

1. AUTHORISING AUTHORITY

Chief Executive Officer

2. PURPOSE / BACKGROUND

The policy articulates how Community Housing Canberra (CHC/HG) and HomeGround Real Estate Canberra (HG) will obtain, manage and store applicant and tenant 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 maintains 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.

3. 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, and CHC 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 from unauthorised access, modification or disclosure.

Security measure include:

- 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); and
- 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 recorded consent 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 example, 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, or
- 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.

Privacy of housing applications

CHC does use information in housing applications for other purposes, and destroys application information when it is no longer needed for any housing assessment. If an application is successful, the application is kept with the file created for the tenancy.

CHC use of service providers

CHC may make use of service providers to handle and store private information about tenants and applicants. CHC does not allow any service provider to use that information for other purposes, and does not allow any service provider to retain that information beyond a reasonably necessary time. CHC takes responsibility for assessing the provider's capability to protect private information from unauthorised use and disclosure.

4. APPEALS AND COMPLAINTS

If you are concerned that we have not met our obligations under this policy, you may lodge an appeal or make a complaint as outlined in CHC's Appeals Policy or Complaints Policy.

5. POLICY RESPONSIBILITY AND REVIEW

The Chief Operating Officer is responsible for implementation of this Policy and for recommending updates. This Policy is reviewed at least once annually.