



# Client Information Management Policy (Version 4.0)

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## 1. Introduction

Community Housing Limited Group of Companies (CHL) complies with relevant legislation, guidelines and contractual requirements regarding data collection and reporting requirements. CHL only collects personal information about applicants, clients and tenants that is directly related to the services they are receiving, in order to meet the data and reporting requirements of relative legislation, guidelines and contractual requirements.

Note: The term 'client' includes applicants and tenants.

## 2. Aim

The Client Information Management Policy aims to:

- protect client confidentiality and privacy
- ensure that CHL adheres to all the relevant legislative and contractual requirements.
- meet all industry standards regarding applicant, client and tenant personal information.
- provide optimum service delivery.
- sustain an auditable data storage system.

### 3. Principles of CHL Information Management Policy

#### 3.1. HANDLING INFORMATION

CHL does not share confidential client information without informed consent.

Prior to an applicant, client or tenant providing their consent they must always be notified that their information may be shared with other organisations (and why). Information that is shared with other organisations without informed consent will be de-identified in order to protect the privacy of the applicant, client or tenant.

#### 3.2. CLIENT CASE/ INTERACTION NOTES

Information written in regard to contact with clients and tenants will be clear and concise with only relevant and useful information recorded. These notes will not include workers personal opinions or assumptions unless stated as such. Notes should include:

- any identified needs and risks;
- identified resources to mitigate the issues;
- explanation of services provided; and
- summary of next steps, if applicable.

#### 3.3. CLIENT FILES

Clients and tenants may receive multiple services from CHL. Storing of information regarding different services delivered requires different program files. For example, tenancy files are to only include information that is related to housing management and should allow easy cross referencing to property files.

#### 3.4. ACCESS TO INFORMATION

Client have a right to access information held about them. Clients are informed how they can access their personal information (see Client and Tenant Access to Information Procedure). Clients who are not able to communicate through written or spoken English are to be provided with access to information in their preferred language at critical points of contact in service delivery. This includes consent, their rights and critical information about their health and wellbeing.

#### 3.5. STORAGE OF PERSONAL INFORMATION

Files are stored in a lockable cabinet and archived according to the relevant guidelines before shredding. Computerised files have a password access for approved users and computers are locked and password protected when unattended. All hardcopy and electronic files are archived for seven years.

### 4. Related legislation, industry frameworks and standards, CHL policy and procedures

<b>Privacy Act 1988 (COM)</b>
<b>Information Privacy Act 2000 (VIC)</b>
<b>Privacy and Personal Information Protection Act 1998 (NSW)</b>
<b>Personal Information Protection Act 2004 (TAS)</b>
<b>GOVERNMENT INFORMATION (PUBLIC ACCESS) ACT 2009</b>
<b>Information Privacy Bill 2007 (WA)</b>
<b>Information Privacy Principle Instructions 2009 (SA)</b>
<b>Information Privacy Act 2009 (QLD)</b>

**Related legislation, industry frameworks and standards, CHL policy and procedures (cont.)**

<b>Supported Accommodation Assistance Act 1994 (COM)</b>
<b>Commonwealth State Housing Agreement 2003</b>
<b>National Community Housing Standards: Standard 1.4 - Ending Tenancies, Standard 3.1 - Tenants Rights, Standard 3.5 - Confidentiality and Privacy</b>
<b>Department of Human Services Standards: Standard 1 Empowerment, Standard 2 Access to the Homelessness Service System, Standard 3 – Wellbeing</b>
<b>National Regulatory Code</b>
<b>Victorian Regulatory Framework</b>
<b>Western Australian Community Housing Regulatory Framework – Performance Outcome 1 – Tenant and housing services, Performance Outcome 4 - Governance</b>
<b>Western Australian Residential Tenancies Act 1987</b>
<b>Freedom of Information Act 1992 (WA)</b>
<b>State Records Acts and Information Privacy Acts</b>
<b>Freedom of Information Regulations 1993 (WA) and Amendments</b>
<b>CHL Consumer Rights Policy</b>
<b>CHL Homelessness and Housing Services Work Procedures</b>

**5. Monitoring and review**

This policy should be periodically reviewed and revised. Revisions should be made as and when required. The period between reviews must not exceed two years. The date for review of this policy is on or before July 2019.

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