

## M14 Client and Renter/Tenant Information Management

---

### 1. Purpose

YWCA National Housing and YWCA Housing (YWCA) are committed to ensuring the privacy and confidentiality of client and renter/tenant information collected and held by YWCA, in line with the Australian Privacy Principles and all relevant federal and state privacy legislation, regulations and guidelines.

### 2. Scope

This policy applies to all YWCA staff, contractors and volunteers involved in tenancy management and property maintenance (Employees). The policy applies to both residential rental agreements and rooming house agreements. Unless stated otherwise, references to “renters/tenants” include rooming house residents and references to “tenancies” include rooming house residencies.

### 3. Policy Aim

This policy aims to ensure that all client and renter/tenant information, collected, stored and managed by YWCA is handled confidentially, securely and only used for the prescribed purposes and delivery of services. YWCA will comply with all legal and contractual requirements in regard to the information it collects.

### 4. Definitions

Clients	Any person contacting or engaging with YWCA
Personal information	Any information from which an individual’s identity is apparent, or can reasonably be ascertained, regardless of the way in which it is recorded, whether the information is true or not, or whether it is an opinion
Health information	Any information or opinion about: <ul style="list-style-type: none"> <li>• The physical, mental, or psychological health of an individual.</li> <li>• A disability of an individual.</li> <li>• An individual’s expressed wishes about the future provision of health services to the individual.</li> <li>• A health service provided or to be provided to an individual that is also personal information</li> </ul>
Informed consent	Consent that is given when a person: <ul style="list-style-type: none"> <li>• Demonstrates that they understand what he or she is consenting to, as informed by subject- specific discussions held within the last six-months, and</li> <li>• Provides the consent freely.</li> <li>• Informed consent cannot be given by a person who is intoxicated or otherwise unwell.</li> </ul>

Sensitive information	Any information about a person’s experiences or circumstances that is of a private nature but is relevant to the service being provided to that person. Sensitive information may be associated with trauma and must be treated with mindfulness and respect. Disclosing information of a personal or sensitive nature can be a risk for clients and people do not have to provide information if they choose not to.
-----------------------	---

## 5. Policy Statement

YWCA is committed to ensuring such information is handled and stored confidentially and securely by only allowing access to it by authorised YWCA staff, students, volunteers or contractors, as appropriate.

YWCA ensures that all clients and tenants are provided with plain language information about this policy and their rights and responsibilities in relation to privacy. This includes details of the information collected and its use, who has access to it and their access rights, including how to raise any concerns or complaints about the handling of personal information.

YWCA takes all reasonable steps to ensure that the personal information collected is accurate, up to date and complete. Wherever possible, personal information is collected directly from the individual. Where the personal information is held by a third party, YWCA obtains permission before seeking this information from such sources.

People accessing YWCA services have the right to refuse to provide information which is not essential for service provision; however, some services have varying information requirements for service provision and the withholding of information may mean that services cannot be delivered as intended.

YWCA does not sell any personal information to any third party.

## 6. Information Collection

YWCA Housing collects information from the following individuals and groups.

- YWCA Clients and Renters/Tenants
  - YWCA collects personal information on or about people who access our services.
  - YWCA collects sensitive and health information where necessary for providing services or is a requirement of government funding, or during activities such as outreach service delivery.
  - Additional information necessary for service provision is also collected. This includes the need for YWCA to assess eligibility for entry to, or support from, specific programs or services.
  
- Employees, Volunteers and Students/Interns on Placement
  - Employees: YWCA collects the personal information of people who seek to be, are, or have been, employed with us. This includes information about recruitment and selection, employment, terms and conditions of employment, performance, discipline and resignation.
  - Volunteers: YWCA collects personal information of people who seek to be, are, or have worked with YWCA as volunteers. This may include information about recruitment and selection, work arrangements, performance, discipline and resignation.
  - Students/Interns on Placement: A minimum data set is gathered from students in order to meet the requirements of the formal agreement with the student’s educational institution, as well as YWCA’s standard employee information.
  
- Donors, Partners and other Stakeholders:

- YWCA collects personal information for the purposes of processing donations, fund raising, keeping supporters and donors informed of our work, raising awareness, thanking and acknowledging our donors and supporters, conducting research into supporter attitudes and desires, and for internal reporting purposes.

## 7. Information Use and Disclosure

YWCA takes the privacy and appropriate use of information it collects seriously and will only use information in relation to work-related practices and activities. Any breach of this is treated by YWCA as a serious misconduct issue. YWCA uses and discloses information in the following ways:

- Clients and Tenants
  - Client and tenant information is not normally disclosed to other organisations or individuals without consent. An exception to this may be where YWCA is required to do so by law, government requirements or government funding agreements.
  - YWCA may use client and tenant information for the evaluation (planning and research) of its services.
- Employees, Volunteers & Students on Placement
  - Information about employees, volunteers or students on placement is not normally disclosed to other organisations or individuals without their consent, unless YWCA is required to do so by law, government requirements or government funding agreements.
- Funding Bodies
  - Some government funded programs require de-identified information and others require identified information. Wherever possible, clients and tenants are informed of YWCA's requirement to pass on information and the nature of the information.
  - YWCA will, from time to time, provide de-identified client data to funding sources other than government to support funding submissions. Such information may also be used to report on the success of a funded project. Additionally, deidentified client data may be used to profile YWCA's work to the broader community. In principle, informed consent will be sought wherever possible to maximise client choice to participate in such activities.
- Contractors
  - In a case where personal information is supplied to, or collected by contractors who perform specific tasks directly on our behalf (for example mailing houses), contractors are required to sign privacy agreements with YWCA Housing which oblige the contractors to comply with YWCA's Privacy Policy, the Privacy Act and the National Privacy Principles.
- Donors, Partners and other Stakeholders
  - From time to time, YWCA will acknowledge and thank supporters and donors in our publications unless stakeholders request that this not happen..

## 8. Information Access and Correction

Clients and renters/tenants have a right to access all information which YWCA collects and stores, and a right to correct any errors of fact, or update details as required. All clients and renters/tenants are provided with information about how to access their information. Only in exceptional circumstances where YWCA reasonably believes denial of access to records may lessen or prevent a serious or imminent threat to an individual's welfare, or a threat to public health and safety, will access to records be denied.

Donors, partners and/or other stakeholders can view the information YWCA holds on them and have a right to correct any errors of fact in the recorded information. YWCA is committed to ensuring donors, partners and other stakeholders retain control over the communications we send to them. They may decline to receive publications or other communications from YWCA at any time.

Clients, renters/tenants, donors and supporters all have a right to make a complaint regarding the handling of their personal information if they believe it has been handled inappropriately.

## 8. Feedback and Appeal of decisions

YWCA has an effective and appropriate response in place to deal with complaints and ensures that accurate information and records of investigations are maintained. YWCA will ensure that privacy principles are followed at all times and tenant confidentiality is maintained throughout the incident management process.

YWCA welcomes anyone to query any decisions we make and/or ask questions about our work practices. If a customer wishes to provide feedback to YWCA and/or believes a decision made by us is incorrect, they can register their feedback and/or lodge an appeal using the YWCA Feedback and Appeals Policy.

Document Control Data	
Policy Framework	
Responsible Body	Chief Executive Officer
Accountable Officer	General Manager, Community Housing
Application	All employees of YWCA
Supersedes	All previous local policies
Associated documents	YWCA Housing Policies and Procedures YWCA Feedback and Appeals Policy and Procedures YWCA Privacy Policies and Procedures YWCA Customer Service Charter
Legislation, Frameworks, Standards, Codes and Agreements	Housing Assistance Act 1996 (COM) Housing Act 1983 (VIC) Housing Act 2003 (QLD) Housing Regulations 2015 (QLD) Housing Act 1982 (NT) Residential Tenancies Act 1997 (VIC) Residential tenancies & Rooming Accommodation Act 2008 (QLD) Residential Tenancies Act 1999 (NT) National Affordable Housing Agreement Victorian Charter of Human Rights and Responsibilities Act 2006 Queensland Human Rights Act 2019 National Community Housing Standards Department of Human Services Standards (VIC) Consumer Charter for Community Managed Housing and Homelessness Services (VIC) National Community Housing Regulatory Code

	Victorian Community Housing Regulatory Code State based agreements between YWCA and statutory bodies		
Approval and Amendment History			
Review period – 2 years			
Approval Date	Version	Amendments	Next Review
June 2022	1.0	Superseded Privacy Client and Tenant	June 2024