

1. Who is the Community Housing Industry Association NSW?

The Community Housing Industry Association (CHIA NSW) is the peak industry body for housing associations in NSW. Housing associations (also known as community housing providers) are not-for-profit managers and developers of low cost housing. CHIA NSW has grown to be a representative voice for housing associations, a provider of a wide range of good practice resources and a facilitator of tenant engagement.

2. Why does CHIA NSW conduct tenant satisfaction surveys?

Tenant satisfaction surveys are part of our collective efforts to improve tenancy services. It is a National Regulatory System for Community Housing (NRSCH) requirement that community housing providers must conduct surveys every two years. Tenant satisfaction surveys ensure that the community housing sector is well governed and meets the housing needs of tenants.

The surveys give tenants a voice and provide direct feedback to community housing providers. **Tenants are under no obligation to respond to surveys and may skip any or all questions if they choose.** However, the feedback that tenants provide is very important as they are used to improve community housing provider performance.

CHIA NSW collects responses from tenants to prepare Tenant Satisfaction Survey Reports for community housing providers. The reports present the findings of combined tenant feedback such as satisfaction rates with maintenance services.

CHIA NSW is well placed to conduct tenant surveys because we are independent of any individual housing provider and because we are committed to tenant participation and to the improvement of the sector as a whole.

3. Policy

The NSW Federation of Housing Associations will assure the privacy and confidentiality of all tenants who complete satisfaction surveys on behalf of our members.

4. Purpose

The purpose of this Privacy and Confidentiality Policy (tenant satisfaction surveys) details how we protect your privacy and how we comply with the requirements of the *Privacy and Personal Information Protection Act 1998* and the 13 Australian Privacy Principles issued by Office of the Australian Information Commissioner.

This policy provides information on the following areas:

- Who do we collect personal information from?
- What types of personal information do we collect from community housing providers?
- How do we collect your personal and sensitive information?
- Why does CHIA NSW collect, hold and use personal information?
- How do we hold your personal information?
- Why does CHIA NSW disclose personal information?
- Disclosure of your personal information to overseas recipients
- How we ensure the quality of your personal information
- How to gain access to your personal information we hold
- Privacy complaints

5. Procedure

5.1: Who do we collect personal information from?

In the course of distributing tenant surveys, CHIA NSW, including our related entities such as our community housing members, will collect personal and sensitive information about tenants from our members.

5.2: What types of personal information do we collect from community housing providers?

In the course of developing tenant satisfaction reports, community housing providers supply personal information to us including names, addresses and other contact details.

Sometimes we may be provided with personal information without having sought it through our normal means of collection. We refer to this as 'unsolicited information'. Examples of unsolicited information can include letters included in the return envelope written by tenants. Where unsolicited information is provided we will only hold, use and or disclose that information if we could otherwise do so had we collected it by normal means. If that unsolicited information could not have been collected by normal means, then we will destroy, permanently delete or de-identify the information as appropriate.

5.3: How do we collect your personal and sensitive information?

CHIA NSW receives personal and sensitive information from community housing providers and directly from tenants through surveys.

The community housing provider gives CHIA NSW a list of names, addresses, and mobile phone numbers as well as information about which geographical region the property lies in and which housing program it belongs to. At times, other information is also provided – for example, whether or not a property received a planned maintenance upgrade in the preceding period so that an analysis of tenants' views of the planned maintenance program can be included in the report. The contact and other information are usually provided to CHIA NSW as an Excel spreadsheet.

Tenants also provide personal and sensitive information directly to CHIA NSW by completing the surveys. By completing and returning tenant surveys to CHIA NSW, the individual consents to the collection of their personal information. Tenants are under no obligation to respond to tenant surveys and may skip any or all questions if they wish. CHIA NSW will never provide any information about how individual tenants responded to questions – analysis is provided on an aggregated basis across all tenants of a community housing provider, or broken down by region or program.

Contact details about CHIA NSW are provided on the survey's Cover Letter. The Cover Letter also directs tenants to the location of CHIA NSW's Privacy Policy on its website.

5.4: Why does CHIA NSW collect, hold and use personal information?

We only use personal information that is reasonably necessary for one or more of our functions or activities (the primary purpose) or for a related secondary purpose that would be reasonably expected by you, or to which you have consented. Surveying and benchmarking services make up some of CHIA NSW's primary uses of tenants' personal information. This may include (but is not limited to) sending out postal or online surveys, sending SMS reminders to tenants to complete satisfaction surveys, analysing responses by region or housing program or running a voluntary prize draw. Tenants have the option of opting out of receiving these reminders.

5.5: How do we hold your personal information?

We store personal information in a variety of formats including on databases, in hard copy files and on personal devices, including laptop computers.

The security of your personal information is of paramount importance to us and we take all reasonable steps to protect the personal information we hold about you from misuse, loss, unauthorised access, modification or disclosure.

These steps include:

- Restricting access to information on our databases on a need to know basis with different levels of security being allocated to staff based on their roles and responsibilities relating to the tenant survey service and security profile.
- Ensuring all staff are aware that they are not to reveal or share personal passwords.
- Ensuring where sensitive information is stored in hard copy files that these files are stored in lockable filing cabinets in lockable rooms. Access to these records is restricted to staff on a need to know basis.
- Implementing physical security measures at our premises to prevent break-ins.
- Undertaking due diligence with respect to third party service providers who may have access to personal information, including cloud service providers, to ensure as far as practicable that they are compliant with the Australian Privacy Principles or a similar privacy regime.

Personal information we hold that is no longer needed, or required to be retained by any other laws, is destroyed in secure manner, deleted or de-identified as appropriate after 6 months of project completion.

Our website may contain links to other websites. We do not share your personal information with these websites and we are not responsible for their privacy practices. Please check their privacy policies.

5.6: Why does CHIA NSW disclose personal information?

We only use personal information for the purposes for which it was given to us (namely to conduct a tenant satisfaction survey), or for purposes which are directly related to one or more of our functions or activities. We may disclose your personal information to government agencies, mail houses and other recipients **only** if one or more of the following apply:

- you have consented;
- you would reasonably expect us to use or disclose your personal information in this way;
- we are authorised or required to do so by law;
- disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety;
- where another permitted general situation applies;
- disclosure is reasonably necessary for a law enforcement related activity.

CHIA NSW will not sell or pass on personal tenant information to third parties not related to the primary activity of running tenant satisfaction surveys.

CHIA NSW may aggregate personal information supplied to us for marketing purposes such as demonstrating the capacity of the community housing sector. In the event we disclose tenants' aggregated personal information, tenants will not be personally identifiable. Tenants will not receive marketing material from CHIA NSW.

5.7: Disclosure of your personal information to overseas recipients

CHIA NSW may disclose the data collected in tenant satisfaction surveys to overseas organisations that assist us in analysing the results. Tenants are de-identified when this information is disclosed. Our research partners are located in the United Kingdom and they assist with analysing the results of the feedback provided to us.

CHIA NSW will take reasonable steps to ensure that the overseas organisation does not breach the Australian Privacy Principles (other than Australian Privacy Principle 1).

We will take all reasonable steps not to disclose an individual's personal information to overseas recipients unless:

- We have the individual's consent (which may be implied)
- We form the opinion that the disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety or
- We are taking appropriate action in relation to suspected unlawful activity or serious misconduct

5.8: How we ensure the quality of your personal information

We take all reasonable steps to ensure the personal information we hold, use and disclose is accurate, complete and up-to-date. These steps include ensuring that the personal information is accurate, complete and up-to-date at the time of collection and when using or disclosing the personal information.

CHIA NSW has a Policy Officer who is responsible for overall accountability for privacy within CHIA NSW. This accountability includes ensuring that the personal and sensitive information CHIA NSW holds is respected and protected at all times.

5.9: How to gain access to your personal information we hold

You may request access to the personal information we hold about you by contacting us. We will grant access to your information if it is reasonable and practicable to do so and within a reasonable period. If we do not agree to provide you with access to your personal information as requested you will be notified accordingly. Where appropriate we will provide you with the reason/s for our decision and the mechanisms available to complain about the refusal.

You may also request CHIA NSW to change your personal information. CHIA NSW will take steps to correct your information in reasonable circumstances and within a reasonable period. If your information has been disclosed to third parties, we will notify them where appropriate unless it is impracticable or unlawful to do so. If we do not agree to correct your personal information, you will be notified accordingly. Where appropriate we will provide you with the reason/s for our decision and the mechanisms available to complain about the refusal.

5.10: Privacy Complaints

If you wish to make a complaint about a breach by us of the Australian Privacy Principles, you may do so by providing your written complaint by email, letter or by personal delivery to any one of our contact details as noted below. You may also make a complaint verbally. If practical, you can contact us anonymously (i.e. without identifying yourself) or by using a pseudonym. However, if you choose not to identify yourself, we may not be able to give you the information or provide the assistance you might otherwise receive if it is not practical to do so.

We will respond to your complaint within a reasonable time and we may seek further information from you in order to provide a full and complete response. Your complaint may also be taken to the Office of the Australian Information Commissioner. You can contact us about this Privacy Policy or about your personal information by:

- Emailing privacy@communityhousing.org.au
- Calling (02) 9690 2447
- Writing to us at: Suite 5, 619 Elizabeth St, Redfern NSW

This Privacy Policy is subject to change at any time. Please check our Privacy Policy on our website www.communityhousing.org.au regularly for any changes.