



# ACHL Customer Information Management Policy (Version 1.0)

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## 1. Introduction

Aboriginal Community Housing Limited (ACHL) complies with relevant legislation, guidelines and contractual requirements regarding data collection and reporting requirements. ACHL only collects personal information about applicants, customers 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.

## 2. Aim

The ACHL Customer Information Management Policy aims to:

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

### 3. Principles

#### 3.1. Handling information

ACHL does not share confidential customer information without informed consent.

Prior to an applicant, customer 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, customer or tenant.

#### 3.2. Customer case/ interaction notes

Information written in regard to contact with customers 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. Customer files

Customers and tenants may receive multiple services from ACHL. 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

Customers have a right to access information held about them. Customers are informed how they can access their personal information (see ACHL Customer and Tenant Access to Information Procedure). Customers 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, ACHL policy and procedures

#### 4.1. Standards

National Community Housing Standards: Standard 1.4 - Ending Tenancies, Standard 3.1 - Tenants Rights, Standard 3.5 - Confidentiality and Privacy
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Department of Human Services Standards: Standard 1 Empowerment, Standard 2 Access to the Homelessness Service System, Standard 3 – Wellbeing
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#### 4.2. Legislation

Aboriginal Land Rights Act 1983 No. 42 (NSW)
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Housing Assistance Act 1996 (COM)
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Housing Act. 1983 (VIC)
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Related legislation, industry frameworks and standards, ACHL policy and procedures (cont.)

Housing Act 2003 (QLD)
Privacy Act 1988 (COM)
Privacy and Personal Information Protection Act 1998 (NSW)
Government Information (Public Access) Act 2009
Supported Accommodation Assistance Act 1994 (COM)
Freedom of Information Act 1992 (WA)
Freedom of Information Regulations 1993 (WA) and Amendments
Queensland Human Rights Act 2019
State Records Acts and Information Privacy Acts

#### **4.3. Residential Tenancy Acts**

Residential Tenancies Act. 1997 (VIC)
Residential Tenancies Act 2010 (NSW)
Residential Tenancies Act 1987 (WA)
Residential Tenancy Act 1997 (TAS)
Residential Tenancies Act 1995 (SA)
Residential Tenancies and Rooming Accommodation Act 2008 (QLD)

#### **4.4. Codes, frameworks and agreements**

The National Affordable Housing Agreement
Commonwealth State Housing Agreement 2003
OOH, Homelessness Assistance Program Guidelines and Conditions Funding 2006-2009 (VIC)
Consumer Charter for Community Managed Housing and Homelessness Services
Western Australian Community Housing Regulatory Framework – Performance Outcome 1 – Tenant and housing services, Performance Outcome 4 - Governance
National Regulatory Code
Victorian Regulatory Framework
The Human Rights and Responsibilities Charter Act 2006 (VIC)

#### **4.5. ACHL related policies and processes**

ACHL Housing and Homeless Service Pathways Policy
ACHL Privacy Policy
ACHL Tenancy Manual

## 5. Monitoring and review

This document should be periodically reviewed and revised. Revisions should be made as and when required. The period between reviews must not exceed three years. The date for review of this document is on or before February 2028.

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