BIRRIBEE HOUSING

Records, Information Privacy and Confidentiality Policy

Birribee Housing

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Contents

1.About this Document

1.1 What is the purpose and objective of this policy and procedure?

The purpose of this policy is to set out how Birribee Housing collects, manages, stores and retains its records and information. It outlines the responsibilities and procedures that apply to all staff and Board members, ensuring that records are created and maintained in a consistent and accountable manner. The policy also ensures compliance with all legislative, contractual and funding requirements that govern the types of records Birribee Housing must hold, how long they must be kept, and how they must be managed throughout their lifecycle.

This policy sets out how Birribee Housing collects, uses, stores, discloses and protects personal, health and sensitive information, and establishes clear requirements for the protection, permitted use and secure release of confidential information held by the organisation.
It also establishes the principles for the management of client records, including the circumstances under which client information is collected, stored, updated, shared, accessed and disposed of.

Birribee Housing complies with the Privacy Act 1988 (Cth), Privacy and Personal Information Protection Act 1998 (NSW), Health Records and Information Privacy Act 2002 (NSW), and applies the Australian Privacy Principles, Information Protection Principles and Health Privacy Principles.

This policy also governs the management of personal information relating to employees, contractors, volunteers and other staff members.

The objectives are to ensure:

- Information management systems and processes are maintained as part of the quality management system for Birribee Housing;
- Collection and retention of information is undertaken only when it is relevant and necessary to the provision of a service or the fulfilment of a contract (including employment and funding agreements);
- Information, documents and records are up-to-date, accurate, legible, retrievable, and secure, whether stored in hard copy or electronically, in accordance with privacy legislation;
- Records are stored, transferred or disposed meeting the required length of time, as per contractual agreement or legislative requirements;
- With consent or as required under the law, relevant information is shared relating to the safety, welfare and wellbeing of clients with other organisations responsible for their care, in line with relevant legislation;
- Guidance is provided for people about whom Birribee Housing collects personal information about how their personal information is managed and how to request access to their information;
- Continuous improvement in the way Birribee Housing develops, maintains and monitors information collection, storage and retention processes to uphold client and staff rights, including their right to privacy and confidentiality;
- Birribee Housing is compliant with records and retention requirements applicable to Specialist Homelessness Services and funding requirements;
- Notification to affected clients and staff members, the Office of the Australian Information Commissioner (OAIC), the NSW Information and Privacy Commission and the NSW Department of Communities and Justice of any information security breaches (including data breaches that are likely

to result in serious harm), in accordance with the Australian Privacy Principles and other regulatory requirements;

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- Confidential information—whether relating to clients, staff, Board members, organisational operations or commercial matters—is protected, handled appropriately and only disclosed where lawful and necessary.

1.2 Who must comply with this policy and procedure?

This policy and procedure applies to all staff and Board members.

The Chief Executive Officer is responsible for administration, revision, interpretation and application of this policy. Birribee staff are responsible for implementing the policy. The policy shall be reviewed regularly.

1.3 Terms and definitions

These definitions apply to your interpretation of the terms used in this document.

Term	Meaning
The Executive	The Chief Executive Officer and senior managers making up the leadership team.
Manager	The Executive; directors, supervisors and line managers of staff.
Staff	Any person working for Birribee Housing. This includes: • permanent, temporary and casual employees, including managers and the Executive • members of committees, working groups and advisory bodies • agency staff, consultants and contractors • volunteers • work experience students • intern placements.
Record	Any information created, received or maintained by Birribee Housing as evidence of business activities. This includes documents, emails, case notes, photos, spreadsheets, audio recordings, and system-generated data.
Personal Information	Information or an opinion about an identified individual or an individual who is reasonably identifiable, whether the information is true or not.
Sensitive Information	A type of personal information that includes health information, cultural identity, racial or ethnic origin, criminal history, sexual orientation, political opinions, or membership of professional or trade associations.
Confidential Information	Any information that is not publicly available and is provided or obtained in confidence, including client details, tenancy information, internal documents or organisational data.

1.4 Related Documents

Notifiable Data Breach Policy and Procedures

Cyber Security Policy and Procedures

Complaints and Appeals Policy

Code of Conduct

1.5 Quality Assurance

	How Birribee Housing determines that records are managed and disposed of correctly
☑	Staff and Board members receive training in this policy and procedure
☑	Corporate Services report regularly to the Chief Executive Officer on the implementation of this policy and procedure
☑	Regular audits are conducted to ensure compliance with this policy and procedure

2. Records, Information Privacy and Confidentiality Policy

Birribee Housing aims to provide quality services that are culturally sensitive and culturally appropriate for Aboriginal peoples in NSW. Birribee Housing is committed to collecting, storing,using and disposing of personal, health and sensitive information relating to clients, carers, staff, volunteers, donors and all the organisation's other stakeholders in ways that protect privacy and ensure confidentiality. Birribee Housing conforms to the Privacy Act 1988 (Cth), the Australian Privacy Principles, the Privacy and Personal Information Protection Act 1998 (NSW), and the Health Records and Information Privacy Act 2002 (NSW), which govern the collection, use, disclosure, security and storage of personal, sensitive and health information.

The policy also establishes clear responsibilities for the protection, permitted disclosure and secure handling of confidential information relating to individuals and the organisation's business activities.

To ensure all Birribee Housing records are filed and managed systematically, Birribee Housing commits to:

- Clearly identifying materials related to the governance and administration of Birribee Housing and maintaining these records for the required periods of time, including all financial, taxation and other statutory records.
- Clearly identifying material of ongoing relevance to Birribee Housing's activities or of potential historical significance and archived accordingly
- Storing, reviewing, archiving and disposing of material related to clients according to this Records, Information Privacy and Confidentiality Policy;
- Regularly review, remove and dispose of material that is no longer required;
- Ensuring disposal methods protect the privacy of individuals and the confidentiality of Birribee Housing's business.
- Ensuring client records are accurate, current, complete and maintained in accordance with legislated privacy requirements and organisational procedures.
- Ensuring personal, health and sensitive information is collected only where necessary, stored securely, used appropriately and disclosed only where lawful and permitted.
- Ensuring confidential information—whether relating to clients, staff, Board matters, commercial activities or internal operations—is protected from unauthorised access, use or disclosure.

2.1 Principles of Information and Record Management

Quality data and record keeping will assist the organisation and all key stakeholders to assess the outcomes of service provision and ensure that future service provision meets identified community need. As such, data and client records are, in many ways one of the organisation's most valuable assets, and as a result, data quality is one of the highest priorities.

This policyis designed to provide guidance in the collection of data and the maintenance of client and organisational records for the purpose of ensuring quality service delivery and facilitating evaluation of the service effectiveness. It is also designed to ensure records management procedures across the organisation meet all contractual and legislative requirements.

It also establishes the standards for the creation, capture, classification, storage, security, access, use, disclosure, retention and disposal of all records, including client records, personal information, health information, sensitive information and confidential information.

Birribee Housing's records consist of the following sets of material:

Type	Location	Managed by	Access restricted to
Financial	Head office/Financial Management Systems/ Secure SharePoint restricted site	Corporate Services and Chief Executive Officer	Executive and staff directly involved in financial management, payments and transactions
Personnel	Head office/HR Management System/ Secure SharePoint restricted site	Corporate Services and Chief Executive Officer	Executive and Corporate Services
Confidential HR documents (performance, grievances, investigations, supervision notes)	Head office/HR Management System/ Secure SharePoint restricted site	Corporate Services Lead	Chief Executive Officer, Corporate Services, relevant Manager
Work Health & Safety records (incident reports, risk assessments, emergency testing, training)	Head office / WHS System / Secure SharePoint restricted site	Corporate Services Lead	Executive, Corporate Services, Managers
Information security and data breach records	Head office / Secure SharePoint restricted site	Corporate Services Lead	Chief Executive Officer, Corporate Services
Membership	Head Office/Company Register/ Secure SharePoint restricted site	Company Secretary, Chief Executive Officer	Executive, Company Secretary
Governance documents (e.g. company register, statutory documents etc)	Head office/Company Register/ Secure SharePoint restricted site	Company Secretary, Chief Executive Officer, Corporate Services Lead	Company Secretary, Executive
Complaints, feedback, incident and reportable conduct records	Head office / Complaints Register / Secure SharePoint restricted site	Corporate Services Lead	Executive, Corporate Services, relevant Service Leads
Contractual and other administrative documents (e.g insurance policies)	Head office / Secure SharePoint restricted site	Corporate Services	Executive and staff directly involved in contractual and other administrative matters
Funded project files (e.g. funding submission, agreement, budget, correspondence, reports and acquittals)	Head office/ Secure SharePoint restricted site	Chief Executive Officer/Strategic Development Manager	Executive and staff responsible for the management and administration of funded projects

Type	Location	Managed by	Access restricted to
Tenancy files (e.g. correspondence, invoices, inspections, arrears and tribunal information, rent and subsidy information, lease agreement, complaints and issues including maintenance requests, referral letters, emergency contacts, support agreements, bond information	Head office and regional offices/Housing Management System/ Secure SharePoint restricted site	Tenancy Lead	Executive, Housing officers and staff responsible for tenancy management
Property files (e.g. property acquisition information, correspondence, description of property, condition of property including details of inspections and reports, market rent increases, maintenance reports and actions, out-of-hours emergency management contacts, special conditions, insurances and warranties)	Head office and regional offices/Housing Management System / Secure SharePoint restricted site	Tenancy Lead, Assets Lead	Executive, Housing officers and staff responsible for property management
Asset management (e.g. maintenance contractors and contracts, asset registers, key registers)	Head office/Housing Management System/ Secure SharePoint restricted site	Assets Lead	Executive, Housing officers and asset management staff
SHS client case management files (case notes, assessments, safety plans)	Head Office/CIMS/ Secure SharePoint restricted site	SHS Lead	Executive, SHS Team
Marketing, promotional, newsletters and community engagement records	Head Office/ Secure SharePoint restricted site	Community Engagement Lead	Executive, Community Engagement Team
Housing developments and partnerships (e.g. lending and legal agreements, correspondence, plans, development approvals)	Head office/Business Management System/ Secure SharePoint restricted site	Chief Executive Officer	Executive and project staff

Type	Location	Managed by	Access restricted to
Client records	Head office and regional offices/Housing Management System/ Secure SharePoint restricted site	Chief Executive Officer	Executive team, Tenancy Team, SHS Team

2.2 Management of Client Records

Birribee Housing ensures that the information it collects, uses or discloses is accurate, current and complete at the time that it is collected. Staff who work with a client will update client information as soon as possible after contact or attempted contact. To ensure that clients' records are accurate, current and complete, audits of client files will be undertaken regularly.

Only authorised staff may access client records. Access must be limited to those who require the information to perform their duties. Client records must only be stored in approved systems and secure physical locations, and must not be retained on personal devices, email inboxes or unapproved storage locations.

Where a client requests to make an entry in their case file regarding Birribee Housing service provision, the Case or Tenancy Worker assists the client with documenting the entry.

If clients wish to correct errors in their information, then corrections will be made when it is reasonable to do so. However, it may not be possible to correct information that has been de-identified or published. In such cases, clients will be informed in writing of the reason why the information cannot be corrected or changed. Clients may request access to their records by contacting their Tenancy Officer or Homelessness Case Worker. Access will be arranged once authorised by the Chief Executive Officer or delegate, and will be provided within a reasonable timeframe.

Birribee Housing may receive personal information about a client or other individual that has not been requested. Where unsolicited personal information is received, staff must only retain and use the information if it could have been collected in accordance with Birribee Housing's privacy and information management requirements. If the information is not required and could not have been lawfully collected, it must be securely destroyed or de-identified as soon as practicable, provided it is lawful and reasonable to do so.

Wherever lawful and practicable, clients may interact with Birribee Housing anonymously or by using a pseudonym. This may not be possible for services that require verification of identity or where Birribee Housing is legally required to collect certain information.

Where there is a situation of a client accessing Birribee Housing services on more than one occasion, the case files established for the client on each occasion must be linked or appended to the current case file for easy access to all the relevant information about the client.

All staff of Birribee Housing are required to use CIMS, Zavanti and relevant secure SharePoint folders to document significant events in the client's life.

All staff are inducted to the program specific drive on SharePoint, and where relevant, the record management system such as CIMS and Zavanti during their role specific induction.

If an electronic record is lost, altered or damaged through a data breach, the relevant staff member will treat the incident as a Notifiable Data Breach as required under law.

The Service Lead/Team Leader will ensure that where there are multiple files maintained for or relating to an individual client, the records archiving clearly note this to provide a link between all the files.

2.3 Creation and Capture of Records

When collecting personal information, staff must inform the individual of the purpose of the collection, how the information will be used and stored, and who it may be disclosed to. Individuals must also be advised whether the collection is required by law, what may happen if the information is not provided, and how they may request access to or correction of their information. Birribee Housing does not disclose personal information to overseas recipients unless required by law.

Birribee Housing requires that full and accurate records are created and captured for all business activities. Staff must create official records of decisions, actions and communications, including file notes, meeting minutes, and records of phone calls or significant interactions.

All incoming electronic documents must be stored in the appropriate SharePoint folder or within the organisation's record management systems (such as CIMS and Zavanti). Incoming paper documents must be date-stamped, scanned, appropriately named, and filed in the correct electronic location.

All outgoing correspondence, including letters and faxes, must be dated, scanned and saved to the relevant folder to ensure a complete record of Birribee Housing's activities.

A consistent classification and document-numbering approach must be used to support traceability, version control and document tracking across the organisation.

2.4 Document Storage

Birribee Housing's preferred method of storing documents and data is electronically, using SharePoint, CIMS, Zavanti and other approved systems. Documents and data are stored securely in the cloud, with access controlled through document-level permissions.

Physical documents should be disposed of in the locked commercial shredding bin. Timeframes for the storage of documents are set out below:

Record type	Timeframe for storage
Financial records such as receipts, invoices, expenses, tax records, bank statements, asset registers, grant payments and acquittals, and funding contracts and agreements	Seven years
Legal records such as business registration documents, leases, contracts with suppliers, and insurance documents	Seven years

Employee records such as pay, leave and attendance records, work performance and history, workplace injuries, contact details and employee financial records eg tax file numbers and superannuation details	Seven years
Policies and procedures	Seven years
Work Health and Safety records such as workplace inspections, evacuation and testing records, staff training, incident reporting and investigations, Workers Compensation policies	Incident reporting and investigations – five years from the date of incident Evacuation and testing records – most recent Workplace inspections – most recent Workers Compensation policies – five years after expiry
Other business documents such customer complaints, disputes, governance documents eg Constitution, meeting minutes, strategic and operational plans, annual reports, media releases, Memoranda of Understanding, reports and promotional materials	Seven years
Information obtained when a client was over the age of 18 years	Seven years from the date of last service provision
Information obtained when a client was under the age of 18 years	Ten years from the date of last service provision or until the client has attained the age of 25 years

2.5 Managing Correspondence

All correspondence received or generated by Birribee Housing forms part of the organisation's official records and must be managed in line with this policy. Correspondence includes letters, emails, file notes, reports, notices, messages and any other record of communication, regardless of the format in which it is received.

Incoming correspondence must be reviewed promptly and filed in the appropriate location within Birribee Housing's record management system. Hard-copy correspondence must be scanned, date-stamped and named correctly before being saved to the relevant electronic folder. Electronic correspondence must be saved directly into the correct folder to ensure a complete and accessible record of all activities.

Staff are responsible for managing the correspondence they generate or receive as part of their duties. Any correspondence that relates to governance, legal, contractual, financial or administrative matters requiring long-term retention must be filed in the appropriate central location and not stored solely in personal email accounts or local drives.

Temporary or informal correspondence that does not contain operational, client, financial or sensitive information may be deleted once no longer required. All correspondence must be managed in accordance with Birribee Housing's privacy obligations, information security requirements and approved records management processes.

2.6 Organisational Records

Information and records related to the governance, management and operation of Birribee Housing should provide a reliable and accurate account of the organisation's decisions and actions.

Organisational records include records containing personal information about staff, volunteers, donors and other stakeholders and members. They also include records pertaining to the organisation's governance, management and operations. These include but are not limited to:

- personnel files
- stakeholder, member and donor databases
- budgets and financial records
- records related to meeting legal requirements (e.g. taxation records, work health and safety records, workers compensation records, insurance records and information provided to NSW Fair Trading)
- contracts
- memoranda of understanding and service agreements
- governance and management correspondence (e.g. correspondence with funding bodies)
- organisational registers (e.g. a complaints register)
- plans and policies
- management and staff reports
- operations records (e.g., minutes of meetings and administrative records, like those regarding the building and assets)
- results of client, community and stakeholder surveys and consultations

Access to the records above should be limited to staff who are authorised to access that information.

2.7 Removal of Documents

Any document removed from a file must be approved by the Service Lead and recorded. This includes client, Birribee Housing authorised carer and staff files.

A record of removal must be placed in the file (physically or electronically) noting the document removed, the date and the person authorising the removal. Documents must not be stored in personal email inboxes, personal devices or unapproved locations.

Reasons a document may be removed from a file may include, but are not limited to:

- A client requesting the document
- A Court or Tribunal requesting original documentation for legal purposes
- A client requesting case notes, case plans or copies of related documents that have been completed and placed on their file.

2.8 Exchanging Information and Permitted Disclosures

Birribee Housing exchanges information only in accordance with this Records, Information Privacy and Confidentiality Policy and relevant privacy legislation. Information must be used and disclosed in a manner that protects the privacy, dignity and safety of clients, staff and stakeholders.

Permitted disclosures

Confidential or personal information may be disclosed where it is:

- Authorised by the client through informed consent

- Required to protect the safety, welfare or wellbeing of a client or another person
- Required or permitted under law, including under child protection, tenancy, privacy or information-sharing legislation
- Required by a court order, warrant, subpoena or regulatory direction
- Necessary to report improper conduct, misconduct, breaches of law or risks to safety to an appropriate authority
- Provided in a de-identified form to auditors, funding bodies or external reviewers as part of compliance or quality assurance
- Necessary as part of formal complaints, investigations or review processes

Any disclosure must be proportionate and limited to the minimum information necessary to achieve the lawful purpose.

Information sharing with partner agencies

Where Birribee Housing works with other services or agencies to support a client, information may be exchanged with the client's consent, or without consent where a lawful exception applies, such as a serious threat to life, health or safety.

Prohibited disclosures

Personal or sensitive information must not be:

- used for direct marketing
- disclosed to external organisations for marketing purposes
- shared with unauthorised persons
- transferred to unapproved systems, devices or storage locations

Overseas disclosures

Birribee Housing does not disclose personal information to overseas recipients. In the rare circumstances where disclosure is required by law, Birribee Housing will take reasonable steps to ensure that the overseas recipient will not breach Australian privacy requirements.

2.9 Lost or Missing Records

Birribee Housing is committed to ensuring that all records can be reliably located, accessed and accounted for. Any instance where a record cannot be found, has been misplaced, or is discovered to be incomplete must be reported and addressed promptly.

If a staff member becomes aware that a physical or electronic record is missing, incorrectly filed, or appears to have been altered or damaged, they must notify their Service Lead or the Corporate Services Lead as soon as possible. Staff must not attempt to recreate, alter or repair the record themselves.

An internal review will be undertaken to determine the circumstances of the loss, confirm whether the record can be recovered, and identify any contributing factors. Appropriate remedial actions will be implemented to prevent recurrence, including changes to processes, filing practices or system permissions where required.

Where the missing record contains personal or sensitive information, the matter will be assessed to determine whether it meets the threshold for a Notifiable Data Breach under the Privacy Act 1988. If required, affected individuals and relevant regulatory bodies will be notified in accordance with legislative requirements.

This process ensures that all record-keeping issues are managed transparently, promptly and in line with Birribee Housing's obligations for privacy, accountability and good governance.

2.10 Monitoring and Maintenance of Records

Birribee Housing will ensure that records remain complete, accessible and protected for as long as they are required. All records, whether physical or electronic, must be maintained in a condition that preserves their integrity and accuracy over time.

The Corporate Services Lead is responsible for overseeing regular reviews of record-keeping practices, including confirming that records are stored appropriately, remain readable, and can be located when required. This includes periodic checks of any physical files to ensure they are stored securely and in conditions that minimise deterioration.

Electronic records must be monitored to ensure they remain accessible as systems or technologies change. Where required, data must be migrated, refreshed or converted to updated formats to prevent loss or corruption.

Where physical files or documents are moved between locations, the movement must be recorded to ensure accountability and traceability.

Ongoing monitoring supports compliance with legislative requirements, contractual obligations and internal quality standards, and ensures that records remain reliable sources of organisational information.

2.11 Quality Assurance and Compliance

Birribee Housing conducts regular internal audits of its records to ensure compliance with legislative requirements, funding obligations and organisational policies.

The relevant Service Lead and/or delegates is to undertake an internal audit of the records of Birribee Housing on a regular basis to ensure they meet legislative requirements and are maintained in accordance with the principles established by Birribee Housing.

Each Service Lead is responsible for ensuring internal audits are conducted of different samples of case files at least every three months and reported to the Chief Executive Officer (CEO) to monitor performance and identify any potential areas for continuous improvement.

The Service Lead for each operational area is responsible for coordinating internal audits with relevant staff on a quarterly basis. This may be done through a random sample of files with the outcome of these audits to be provided to the Leadership Team and recommendations made regarding identified gaps, or development or training requirements.

Audit findings, including identified gaps, corrective actions and training requirements, must be reported to the Chief Executive Officer and the Leadership Team. Follow-up reviews must be conducted to confirm that corrective actions have been implemented.

Other external audits may be arranged by the Board in accordance with the requirements of Corporations Act and the requirement of the Board to maintain good Corporate Governance, as outlined in the Birribee Housing Board Charter and Governance Policies.

2.12 Retention of Records

Records held by Birribee Housing regarding clients are held for a period of seven (7) years after service provision has ceased, in accordance with legislative and contractual requirements. In the event that the record/s relate to a child or young person and their period in out-of-home-care then they should be sent to the Secretary of the Department of Communities and Justice (DCJ).

Electronic records must be delivered in PDF format or any other format specified by DCJ. If Birribee Housing ceases operations or no longer continues to be funded by DCJ, Birribee Housing must liaise with DCJ to ensure the client records are maintained in keeping with legislation. Records sent to DCJ will become the management responsibility of DCJ.

All financial records must be held by Birribee Housing for a period of no less than seven years, after which time they should be destroyed. Storage and retention of records relating to personnel, worker's compensation and reportable conduct allegations, investigations and/or findings of misconduct must be held by Birribee Housing for a period of no less than seven years, after which time they should be destroyed.

Records relating to serious incidents or matters that may have future legal, safety or governance implications should not be destroyed until it has been confirmed that no further action, claim or investigation is anticipated.

2.13 File Archiving

The Corporate Services Lead is responsible for maintaining archiving arrangements, managing costs and coordinating the archiving of hard copy case files, including requests for:

- The provision of archive-quality storage boxes
- Maintenance of information in SharePoint
- The collection of records to be archived
- Retrieval of any cartons or files.

The Corporate Services Lead, or their delegate, will capture the following information for all archived records:

- Birribee Housing
- Name and surname of client (where applicable)
- Year of records
- Program area
- Content description (e.g. financial reports; incident reports; staff diaries)

Any request for archived documents must be approved by the CEO and documented by the Corporate Services Lead.

Archived records must be stored in secure, access-controlled facilities to protect confidentiality and prevent unauthorised access, damage or deterioration.

2.14 Disposal of Records

Birribee Housing ensures that the disposal of records is carried out in a secure, compliant and accountable manner. Records may only be destroyed once they have reached the end of their required retention period and have been reviewed to confirm they no longer hold legal, operational, financial, historical or administrative value.

All documents containing personal, confidential or sensitive information must be securely destroyed using approved destruction methods, such as the locked commercial shredding bin or a secure destruction service. This requirement applies to, but is not limited to:

- Board and management papers
- financial and taxation information
- personnel, employment and recruitment records
- grievance, investigation and performance documentation
- client records and case-related documentation
- tenancy, property and asset management records
- any document containing identifiable or sensitive information
- Records in electronic form, including emails, must be disposed of using approved digital deletion methods that ensure permanent removal and prevent recovery.

General administrative documents that do not contain personal or sensitive information may be disposed of through standard recycling once they are no longer required.

All disposal activities must comply with relevant privacy legislation, funding and contractual obligations, and Birribee Housing's retention and archiving requirements.

3. Privacy Complaints

Individuals may make a complaint if they believe their personal information has been collected, used or managed in a way that breaches privacy or confidentiality requirements. Privacy complaints must be submitted in writing to Birribee Housing and will be acknowledged promptly and investigated in a timely manner, generally within 30 days of receipt.

The Corporate Services Lead is responsible for coordinating the investigation of privacy complaints and ensuring appropriate corrective actions are taken. If a person is dissatisfied with Birribee Housing's response, they may escalate the matter to the Office of the Australian Information Commissioner or to another relevant oversight body.

Nothing in this procedure prevents an individual from making a complaint through Birribee Housing's Complaints Management Policy or from accessing external review or regulatory mechanisms.

3.1 Privacy Contact Information

Enquiries about privacy, requests for access or correction, or concerns about how personal information is managed may be directed to:

Corporate Services Lead
Birribee Housing
Email: *office@birribee.org.au*
Phone: +61 2 7252 9516

Individuals may also contact the Office of the Australian Information Commissioner for independent advice or to lodge a complaint if they are not satisfied with Birribee Housing's response.

4. Roles and Accountability

Role	Responsibilities
Board	• Recognises information exchanged in the development and monitoring of strategic directions. • Adheres with legislative and policy obligations for records and information management.
CEO	• Ensures staff are aware of their obligations, implementing strong governance frameworks and systems, providing adequate resources, monitoring the program's effectiveness, and maintaining the security and integrity of records to meet legal requirements and protect the organisation's interests. • Implements and maintains appropriate systems and frameworks for managing records throughout their lifecycle. • Actively monitors records and information management performance, addresses any issues, and complies with monitoring and reporting requests from regulatory bodies. • Ensures that records are protected from unauthorised access, alteration, loss, or destruction and that confidentiality and privacy are maintained. • Fosters a culture of accountability for records and information management. • Approves requests for archived documents. • Raises risks to the organisation for records and information management to the Board and coordinates mitigation measures. • Adheres with legislative and policy obligations for records and information management. • Ensures the organisation remains compliant with retention, disposal and data breach notification requirements
Corporate Services Lead	• Ensures system requirements are adequate to maintain current and archived records. • Where information is stored in electronic form, ensures that access to the electronic data is defined and security is maintained. • Maintains archiving arrangements, manages costs and coordinates the archiving of hard copy case files. • Raises risks to the organisation for records and information management to the CEO and coordinates mitigation measures.

Role	Responsibilities
	• Adheres with legislative and policy obligations for records and information management. • Maintains the retention and disposal schedule and ensures disposal activities are documented • Coordinates audits relating to archiving, security and access controls
Service Leads	• Ensures that information contained in the document management system is comprehensive, accurate, uses non-judgmental language and the maintenance and access to the system complies with all relevant Federal and State legislation and funding requirements. • Ensures that all staff are trained or receive training in records management and the principles regarding the management of records and information. • Conducts regular audits on records and information for compliance and quality purposes. • Raises risks to the organisation for records and information management to the Corporate Services Lead and coordinates mitigation measures. • Adheres with legislative and policy obligations for records and information management.
Staff Members	• Ensures all documentation is written in plain English and easy to understand language. • Ensures that all records accurately reflect the situation and events they describe. • Refrain from using judgemental, subjective or value-laden statements. • Adheres with legislative and policy obligations for records and information management. • Stores and handles records only in approved systems and locations, and reports any loss, damage or suspected breach immediately • When employment or engagement ends, all confidential information in a staff member's possession must be returned or securely destroyed, including printed material, electronic files, emails and any device-stored data.

5. Legislative Requirements

Privacy Act 1988 (Cth)

Privacy and Personal Information Protection Act 1998 (NSW)

Health Records and Information Privacy Act 2002 (NSW)

Australian Privacy Principles (APPs)

Information Protection Principles (IPPs)

Health Privacy Principles (HPPs)

6. Document Information

Drafted by	Corporate Services
Approved by	Chief Executive Officer
Date approved	05/12/2025
Replaces existing policies, procedures and/or factsheets	Records Management Policy and Procedures 2019 Client Records Policy and Procedures 2019 Confidentiality Policy and Procedures 2019 Privacy Policy and Procedures 2019
Next Review	December 2027

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