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| Client Self Service – Online Services |
| * Identity verification * Digital mail * Access to housing services * Making an online payment * View personal information * Update personal information   PRIVACY IMPACT ASSESSMENT |
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# Revision history

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| --- | --- | --- | --- |
| Version | Amended section | Effective | Details |
| V1.0 | Identity Verification and Digital Mail – Housing Application and Bond application | 26 September 2019 | Development of the PIA for Identity verification and digital mail |
| V1.1 | Digital Mail | 7 December 2019 | Implementation of some public housing Tenancy letters delivered to the myGov inbox |
| V1.2 | Access to Housing Online Services | 7 March 2020 | Implementation of access to clients seeing a summary of information about their Housing Services. |
| V1.3 | Client Self Service - Online Services | 7 June 2020 | Implementation of the ability for housing client to make payments online |
| V1.4 | Client Self Service – Online Services | March 2021 | Implementation of the ability for housing clients to view their personal and contact information, update their personal and contact information and view some information about other household members |
| V1.5 | Client Self Service – Online Services  Update to movable unit verification questions  Update to introduction  Update to signature section | Jan 2022 | Implementation of ability for housing clients to view their own supports and income information. This means amendments have been made to Appendix B and D to reflect new information for housing applications and current tenancy services  Update to questions  Updated information regarding delivery service methods  Updated signatories |
| V1.5 |  | 18 June 2022 | Implementation of functionality for an active primary applicant and/or renter to request a removal of a household member, update housing application preferences, update income of household, respond to housing document requests sent from the Department |
| V1.5 |  | 6 July 2022 | Reviewed by the DFFH Public Law and Privacy legal team | |

# Introduction

## Description of program

### Purpose of Digital Mail

* The Department of Families, Fairness and Housing (the department) on behalf of the Director of Housing provides a range of housing services. It manages approximately 62,000 public housing tenancies, processes approximately 42,000 housing applications and 14,000 bond applications per year to access the private rental market and housing associations.
* In delivering these services, over a million items of correspondence are sent by the department to clients and renters regarding their housing services.
* A majority of these letters are sent via a bulk mail contractor, email and more recently digital mail (to the client’s myGov inbox).
* Currently there are four methods of sending correspondence to new and existing clients seeking housing assistance.
  + Bulk mail – letters are generated via the Housing Integrated Information Program (HiiP) IT system to a bulk mail house, where letters are printed and despatched.
  + Email – letters are generated by HiiP and automatically emailed to client’s personal email address where clients have selected this method.
  + Local print – a small number of letters and forms are generated from HiiP by the department’s local housing offices and are manually enveloped and despatched via Australia Post or provided directly to the client.
  + Digital mail - the aim of creating an electronic mail option for clients was to increase the choice that they have in terms of the channels that they can choose to access communications from the department regarding their housing assistance.
  + A key driver of this electronic mail option was the capacity it provides for timely communication with housing clients, in particular those clients who may lack a fixed address or have security concerns about their mail.
  + By registering for electronic mail, clients may also access information about the status of their housing services.

### Scope of the assessment

This Privacy Impact Assessment (PIA) covers the use of electronic communications by people who elect to receive their mail from the department, and access certain information, regarding their housing assistance via the myGov platform.

It includes both the process for registering to receive this mail and information electronically and the privacy and related safeguards governing these arrangements.

Further, it identifies the interrelationship with the department’s housing Information Communication Technology (ICT) system HiiP and the security safeguards within that system from which the electronic mail will be generated or the housing services information is stored.

For clarity, this PIA does not cover general issues relating to the integration of the Victorian Housing Register Application into the myGov platform or the interface between HiiP and the HiiP integration layer.

### Context – why myGov?

The Director of Housing of this department is a current Member Service utilising the myGov platform by hosting the Victorian Housing Register Application (VHRA) and RentAssist Bond Online forms. These current service offerings pave the way for the next stream of self-service capability, allowing clients to access their letters using the myGov inbox feature and their housing services information provided by the myGov platform.

The myGov inbox is an online communication solution to centralise online customer communications for member services to myGov. It has been designed to provide customers with a central online communication channel that allows them to manage communications from their services in an easy to use, integrated and secure environment.

### How digital mail and access to housing services work

* Client creates a myGov account or logs into their existing myGov account
* Client then links to HousingVic Online Services (HVOS) in myGov.
* Clients can then choose to Register for online services and go through the identity verification process.
* Once the client is matched against the HiiP system, they can opt-in to receive letters from the Director of Housing and housing services information digitally via the myGov platform.
* When a letter is triggered from the HiiP system and the client has successfully matched and opted into digital mail, they will receive their letters through their myGov inbox.
* Users of the myGov inbox are notified by email or SMS when they receive a message in their myGov inbox.

### Identity verification – HousingVic Online Services:

Identity verification is the precursor to developing online digital self-service capability that interfaces with information within HiiP. In effect a digital identity solution automates the capacity of a client coming through myGov to link their HousingVic Online Services portal directly to HiiP to enable access to digital products such as Digital mail.

The identity verification process requires the client to undertake the following:

* Go through a registration process to verify who they are either online or at a department office.
* To verify online, a client must answer a defined set of primary and secondary questions to link to their existing client record in the department’s core housing system HiiP. The primary questions include: First name, Family name, Date of birth, Country of birth and as an option their Centrelink or Department of Veterans Affairs reference number to enable a greater chance of an initial match.
* For clients who have a security password stored in HiiP, these clients will be asked to enter the password as an additional security layer.
* If responses to the primary questions (and where applicable the security password) successfully match the client record in HiiP, the client then responds to secondary questions related to their most recent housing service.
* The information entered is checked via an integration layer interfaced with HiiP that stores limited information (only information required to achieve identification and verification of a client record) about all HiiP clients seeking housing assistance or who have a housing service. The information contained in HiiP is already covered by the existing privacy and security arrangements that govern HiiP.
* If both primary and secondary information match, the client is sent a verification code to their preferred mode: email or via mobile sms. This code is then entered by the client in the HousingVic online services screen to successfully achieve identity verification flow.
* If a client is unable to be verified online or choose to go to a department office to verify themselves, they will be required to provide documentation at the department office that meets the 100-point identity check.
* The client is then provided firstly, with their unique HiiP client id from the HiiP system, and subsequently a verification code is sent to them via their preferred mode, that is email or sms to their mobile phone.
* Both the unique client id and the verification code are then entered by the client in the HousingVic online services screen to successfully achieve identity verification flow.

### Enabling Digital Mail and Electronic Access to Housing Services:

* Clients who have established who they are and have met the identity verification criteria are then able to opt-in online to receive letters, via the Commonwealth’s myGov inbox, and housing services information from the Director of Housing electronically, noting that the client at any time can opt out of this service.

# Information elements

There are four linked locations in which information is held to support electronic mail;

**myGov** - myGov (independently of department) stores sufficient information to authenticate the user (a unique myGov user id, password, and contact mechanism for two-factor authentication). Depending on the user’s preference and other activities, myGov may store limited additional user information. For example, if the user has connected their myGov account with the ATO, myGov may store core user information including name and date of birth.

**HousingVic Online Services**- HousingVic Online Services accesses the department client information stored in HiiP.

**HiiP integration layer -** Data synchronisation mechanism between HiiP and HiiP integration layer which enables the storing of client information in the integration layer close to real time

**HiiP –** HiiP is the housing IT system that stores all client information relevant to housing assistance clients are seeking from the Director of Housing at the Department of Health and Human Services.

## At a more detailed level

**myGov** – This Commonwealth online service provides access to and hosts a range of Government and related services to Citizens including Centrelink, Medicare, Australian Taxation Office and HousingVic Online Services.

myGov is operated by Services Australia and has its own governance, security and privacy arrangements - <https://my.gov.au/mygov/content/html/security.html>. The department client information, information related to client services and the digital mail attachments are not stored in or transferred to myGov, or platforms hosted and supported by Services Australia.

When a citizen links to HousingVic Online Services, myGov records this in its database in order to create that link.

When a client opts in for Housing Digital Mail, HiiP triggers delivery of a digital mail message to the client accessible via myGov’s Inbox service. myGov stores the message content of digital mail however does not store attachment content.

When any information on HousingVic Online Services is updated, other than enabling or disabling digital mail, this information is not passed to myGov.

#### HousingVic Online Services

* HousingVic Online Services is the host application that enables clients seeking housing assistance to link this application from within myGov’s portal, in order to self-serve to access online services for housing assistance.
* HousingVic Online Services presents primary questionnaire to the client for the purpose of identifying client’s record in HiiP and verify the identity of a client through a secondary questionnaire (more detailed service specific questions) to enable opt in and opt out capabilities for digital mail.

#### Integration layer - HiiP

* The integration layer is where limited information about all the clients and their housing service is stored, once it is retrieved from the source system HiiP.
* The information is securely stored within the azure cloud solution and provides near real time synchronisation of information between HiiP and rendering this information on HousingVic online services portal.
* The integration layer is not directly accessible other than through its backend integration between HiiP and myGov'
* The Data synchronisation enables the transmission of information requests in order to;
  + link to HousingVic Online Services
  + passing of the myGov credentials to HiiP
  + access to client letters from HiiP

#### HiiP system

HiiP is the core housing IT system used by department to deliver housing services. The system has three primary registers: client, external party and property register, and related functionality to manage the delivery of bond loans, housing applications and tenancies.

The system is secured within multiple firewalls and access to information is governed by user provisioning based on functional role. The system is not directly accessible by clients.

All department client information, information related to client services and the digital mail attachments are stored in HiiP (subject to the data synchronisation and storage in the HiiP integration layer discussed above).

### Personal information

HousingVic Online Services captures primary information about the client’s personal details, names, date of birth, country of birth.

As part of fully verifying online, information is gathered from the client about their most recent housing service with the department. (Refer to Appendix A - outlining secondary questions for the client to enter as part of the secondary verification phase).

Where a client seeks access to online services via HousingVic online services, the information about this linkage is recorded in HiiP action history for that client, which flags that recording both online access and digital mail for that client record within HiiP. Similarly, a deactivation is recorded against the client in HiiP.

Clients, depending on their role in the household can view selected information in HiiP including summary information about their housing services such as: bond, tenancy and previously vacated tenancies, rental statements, account summary and payment transactions, in addition their Victorian Housing Register or movable unit application.

**Client access to their housing services information** – renters and applicants can also view certain information relating to their housing services that is contained in HiiP. Such information are detailed in Appendix B but, in sum, contains the following:

* Account summary, which includes property address, reference number, rent amount payable, weekly rent agreement, weekly maintenance agreement, total amount payable weekly, the contact in the Housing office, the office contact phone number and email address, rental and maintenance balance, ancillary charges for example for parking bays and bulk energy.
* Victorian Housing Register housing application:
  + Primary applicant only can view information related to the application including: reference number, application type and received date, status of application, the primary applicant’s name and name/s of household members.
  + Household members listed on an application can view limited information including reference number, application type, date arrived on application, primary applicants name and the household member/s name/s. – Refer to Appendix B
  + For completeness, information relating to the “application type” refers only to whether the application is a Register of Interest or Priority and does not include information about relevant sub-types such as whether the application is under the “Supported Housing – mental health” category discussed below.
* Victorian Housing Register Movable Unit application, host/applicant including reference number, application received date, host name, household member/s name/s, suburb where the host property is located.

Digital Mail – Information in digital mail, as for all existing paper-based mail and email, is dependent on the nature of the communication with the information drawn from the HiiP system and tailored to the client’s circumstance. Typically, the information being provided back to the client is information that they have provided to the department in the first instance, for the primary purpose of accessing assistance.

The key elements of letters include;

* Common information – includes client’s personal details: title, full name, service id, date of the letter, letter header, signature block, contact details for the department and any support information where the client has given consent for copies of letters to be sent to the support worker.
* Tailored information – dependent on the service and the type of information being communicated such as:
  + For bond – an approval letter, bond voucher, a request for further information. Each of these is likely to contain information about the property, the household, rent charge, bond amount and the real estate/landlord details – each being used for a primary purpose directly related to the bond loan.
  + For housing application – an approval letter, a request for further information, an offer of housing letter, a request for information as a result of a regular review, information, letters related to repayment of an existing debt. Each of these letters is likely to contain information about the household, the locational preferences, the current application type, debt amount, any disability or locational specific requirements – again each being used for a primary purpose directly related to their housing application.
  + For Movable Units – a request for further documentation, approval letter and a property locational proposal. Each of these letters is likely to include potential locational details for the movable unit, any special accommodation requirements, household information – again each being used for a primary purpose directly related to their movable unit application.
  + For Tenancy – a letter regarding their weekly payment for their property, any debt, payment arrangements such as direct debit and other tenancy related matters such as maintenance or programme work on their property.
  + Appeals and complaints – a letter acknowledging an appeal, requests for further information, outcome of the appeal.

**Online payments by renters –** Renters can elect to make online rental and debt payments; these payments will be recorded in HiiP against their relevant account and appear on their account summary statement.

* Online payments by Bond Loan recipients - Bond Loan recipients, whose tenancy has ceased, and where there is an outstanding amount owing to the Director of Housing, can make these payments online. Again, these payments will be recorded in HiiP against their account.
* Online payments by residents in tenancies – where a renter consents for residents to make online payments on a tenancy account in which they are a current household member, residents can make online payments to that tenancies rental account. Residents’ payments will be recorded in HiiP against the tenancy. Residents can only view payments that they have made against the tenancy.
* In each case, when the payment is processed, the client will receive an acknowledgement of the payment and can request a receipt to be emailed to them. When processed, the updated account amount and the transaction will be visible online in the transaction screen.
* As renters are legally responsible under the RTA for meeting the obligations for their lease, renters can view all payments made against their tenancy including payments made by a Resident. Residents will be advised in writing that payments made by them against the tenancy will be visible to renter(s)
* The information provided to Westpac is the de-identified unique client id and the housing service reference no. The client enters their specific card details which Westpac receives as part of the payment process (the department never has a record of these details).

**Viewing your own personal information** - all registered clients can view their own personal, contact and Centrelink Confirmation eServices information. For example, a client can view their own:

* first name, family name, date of birth, country of birth and residency
* postal and residential address, daytime, after hours and mobile phone numbers
* email address
* Centrelink Confirmation eServices consent

**Updating your own personal information** – all registered clients can update their own personal and contact information. For example, a client can update their own:

* language preferences and interpreter needs
* mobile, after hours or daytime contact numbers
* email address
* postal and/or residential address
* Centrelink Confirmation eServices consent

**Viewing other household member’s information** –clients who are primary applicants for a social housing application and/or are renters in a current public housing tenancy, will be able to view information about the household members currently listed on the housing application and/or currently living with them. For example, a primary applicant or a renter can view:

* a current household member’s first name, family name, date of birth, and their role on the application and/or tenancy.
* When the housing application is lodged, the primary applicant is required to confirm that he/she has consent (implied from dependants or express from non-dependants) to make the application and make any subsequent updates. When the tenancy is created the information from the application (name and date of birth of household members) is copied from the application into the tenancy.
* It is important for the primary applicant to have access to this information to ensure that there is no error in the information held by the department. In particular, age of the household members affects eligibility for bedrooms and whether income is or is not counted for the purposes of calculating rental charge.

**Viewing your own support and income information** - all registered clients can view their own personal support and income information if it is current. For example, a client can view their own:

* Current income source (eg wages/Centrelink)
* Current CRN/DVA number (if applicable)
* Current Centrelink Confirmation eServices Yes/No
* Current support agency/individual information and whether or not a client has consented for this support to be contacted by the Department

**Requesting updates to household –** all registered clients who are either primary applicants on an **active** housing application and/or who are **current** renters in a public housing tenancy, will be able to make updates to their household. These updates include

* + request to remove a current household member(s) (including entering a left date, and forwarding address (if known)
  + upload of their own and their household members supporting documents
  + request to update current housing preferences for their Victorian Housing application
  + request to update the Department on any income changes for their household and
  + respond to requests made by the department for document

These updates will flow through to the Department’s core housing database (HiiP) and, in most circumstances, will be assessed by a housing officer.

See Appendix E and F for details.

**Multi-renter householders** – for those households with more than one renter the following conditions apply:

* All renters can request an update to their household
* For transparency that an update is being prepared by one renter on behalf of the household, all renters can view all documents and the data being entered in HousingVic Online Services for each request. After the update is submitted, each renter can only view the information specific to themselves.
* upon submission only the renter who prepared the update can view their own information and the information they have supplied for any residents/dependants. They cannot view any documents uploaded for another renter in the household
* All documents uploaded are recorded in the department’s HiiP system and at some point, if there was a dispute within a household about changes one renter had made, these documents and information about who provided the information can be accessed by the department.

**Uploading documents** – as part of request for updates to a current housing application and/or tenancy, a HVOS registered client will be able to upload documents in support of their request. These documents can be the following file types (.pdf, .jpg, .doc, .docx, .tif, .tiff, png, .txt) and up to 25mb in size. *Whilst the update is being prepared, all renters in the household can view and edit documents, and save and delete documents. Once the update has been reassessed and finalised, then all uploaded documents will be removed from HousingVic Online Services and cannot be viewed retrospectively.*

**Notifications** – when the Department sends a client a letter requesting further information, a notification will appear in the client’s HVOS homepage. A client can select to view the details of this notification and to upload any documents requested. These notifications are removed from HVOS when either:

* a request has been assessed and finalised or
* part or all of the request is cancelled or
* if the logged in user is removed from a service or
* a service is terminated

### Health information

Health information is gathered and stored in HiiP where it directly impacts a client, their household and access to service including their property and locational needs.

Where a client for example has a mental health issue, this is not relevant unless they are applying for access to housing on the basis that they meet the criteria of Supported Housing – mental health category of the Victorian Housing Register.

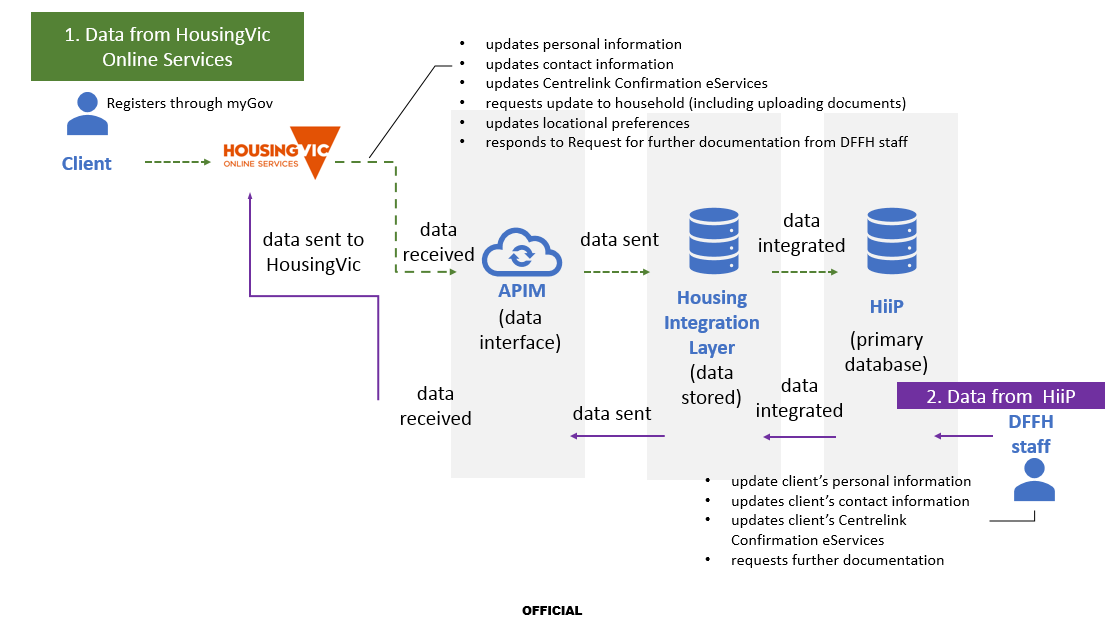
### Sensitive information

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| --- | --- |
| Type of sensitive information | Details |
| Racial or ethnic origin | Not directly collected, but potentially implied by name and country of birth – in part for verification of identity and in part to ensure eligibility for assistance. |
| Political opinions | Not collected |
| Membership of a political association | Not collected |
| Religious beliefs or affiliations | Not collected |
| Philosophical beliefs | Not collected |
| Membership of a professional or trade association | Not collected |
| Membership of a trade union | Not collected |
| Sexual preferences or practices | Not directly collected, for example by a person nominating a same-sex spouse. |
| Criminal record | Not directly collected, however where a person is incarcerated this information will be recorded in HiiP when they are applying on the basis of homeless with support, in order to establish their eligibility for housing assistance and category under the Victorian Housing Register. |

# Privacy analysis

#### Information flow – identity verification, digital mail, access to my housing services information and making an online payment

#### Information flow – updating personal, contact and Centrelink Confirmation eServices information



## Privacy principles

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| --- | --- | --- | --- | --- |
| Questions – what is the risk? | Further information | Yes | No | Detailed response |
| 1. Collection: Is all the information collected necessary for the program? | IPP 1 Privacy team | Yes |  | Information collected through HousingVic online services is required to match a client against their HiiP record in order to establish their identity and thereby access online services (including digital mail and housing services information).  This request and enabling access is also recorded in new fields in HiiP, which is necessary for the department to deliver the online services. |
| 2. Notice: Have all reasonable steps been taken to inform the individual that their information is being collected and why, by whom, how they can access, to whom it will be disclosed? | IPP 1  <https://www.dhhs.vic.gov.au/publications/privacy-policy>  Privacy team | Yes |  | Personal information may be collected and disclosed by household members, but this is only to be done with the express consent for non-dependents/implied consent from dependents. Further reasons for collecting the information are set out in the accompanying information provided when completing their personal information online or at the time of entering their client id, where the client has undergone a 100-point identity verification check.  An acknowledgement is attached to this PIA. –refer to Appendix C – Collecting information.  Residents will be advised in writing that payments made by them against the tenancy will be visible to renter(s).  The collection of information for payments processing was added to the offer letter that is sent to clients at the time of a property offer. |
| 3. Direct collection: Is all information being collected directly from the individual? | IPP 1  Privacy team | Yes |  | Personal information may be collected and disclosed by household members, but this is only to be done with the express consent for non-dependents/implied consent from dependents. |
| 4. Use and disclosure: Will the information only be used or disclosed for the primary purpose identified? | IPP 2 and HPP 2  Privacy team | Yes |  | The information collected through HousingVic online services and HiiP will only be used for the primary purpose of the collection, as detailed above.  Personal information that is contained in the content of the digital mail, and housing information that is made accessible via the myGov platform, will continue to be used for the primary purpose of providing housing assistance to the client (that is, the mere change in method of communication or mode of delivery to the client will not alter the department’s use of the information).  In particular, the disclosure of personal information about other people is limited only to the names of current household members that are listed in the tenancy or on the VHR application, and enjoy “active” status (i.e. have not vacated the residency or have been removed from the application). As such disclosure is relevant to providing housing assistance to the client, it will be for the same primary purpose as discussed above. |
| 5. Information sharing: Will the information be shared with other agencies for service delivery, data matching or analytics? | IPP 2 and HPP 2  Privacy team | Yes |  | Digital mail content is only shared with myGov to enable the delivery of the digital mail via the myGov inbox. Whilst mail is retrieved through the myGov inbox, the letter attachment is stored on DFFH infrastructure (not the myGov platform).  Financial transaction: payments made online via HVOS are processed through a third-party vendor (Westpac) using standard online payment function and protection. No details are recorded within HVOS of the debit card that has been used by the client. The information provided to Westpac is the de-identified unique client id and the housing service reference no. The client enters their specific card details which Westpac receives as part of the payment process (the department never has a record of these details).  No housing services information will be stored or transferred to myGov, or any platforms hosted and supported by Services Australia. |
| 6. Data quality: Are reasonable steps being taken to ensure that the information collected, used or disclosed will be accurate, complete and up to date? | IPP 3 and HPP 3  Privacy team | Yes |  | Given the contemporaneous collection, use and disclosure of the information in the information handling cycle of this program (for example, personal information is collected to verify the identity of the client and register the client for online services, or otherwise pertains to direct communications between the client and the department), it is reasonable in these circumstances to not take any further steps to ensure the quality of personal information.  The inclusion of the ability of registered clients to update their own personal and contact information is likely to improve the quality of the information in the system. |
| 7. Data security: Are reasonable steps being taken to protect the information collected from misuse, loss, and unauthorised access, modification or disclosure? | IPP 4 and HPP 4  Projects MUST engage the BTIM information security team to arrange an assessment | Yes |  | Business Technology Information Management (BTIM) in developing the identity verification and digital mail gateway are required to ensure appropriate security assessments and safeguards as a key deliverable for both HiiP and the HousingVic Online Services cloud solution.  Electronic documents submitted by client through HVOS which are automatically uploaded into HiiP are governed by the same security assessment and safeguards as occurs with the identification verification and digital mail gateway, as detailed in the paragraph above.  Digital mail content stored on the myGov platform is protected by myGov’s governance, security and privacy arrangements (<https://my.gov.au/mygov/content/html/security.html>)  To the extent that it may be said that digital mail content stored on the myGov platform is “held” by the department jointly with Services Australia, the department can take reasonable steps to protect information by entering into, and monitoring compliance with, an agreement with Services Australia as to security measures to be applied to data held in the myGov platform. In this respect, the agreement between the department and Services Australia contains obligations on the Services Australia to implement appropriate information security measures.  The hosting of Client Self Service - Online Service reside in Australia. Both Azure Australia and MyGov services are accredited with ASD IRAP certification and security assessed through BTIM Cyber Security team with low risk.  Penetrating testing was completed for Client Self Service hosted on department Azure Platform and no high risk or concerns were noted.  Department Azure platform is being monitored through Azure Security Centre and Azure Sentinel Security event monitoring and response process. The security regulatory compliance of Azure configuration is assessed against CIS and ISM controls rating.  Internal department access is configured using RBAC and authentication service is provided through department Azure AD supported by conditional access policy with MFA and IP Geo-blocking. |
| 8. Destruction: Will reasonable steps be taken to destroy or de-identify the information if it is no longer needed? (note this does not apply to a health service provider) | IPP 4  *Public Records Act 1973*  Records management team | Yes |  | Where required and subject to public record retention obligations, destruction of data from HiiP is managed through an automated script.  Where a client selects to move mail from their inbox mail to a “trash” box, a myGov member service (in this case HousingVic Online Services) sets an expiry date for these “trash” items which will disappear after the expiry date.  For audit purposes, myGov inbox messages can still be accessed by Member services. |
| 9. Identifiers: Will this program assign a unique identifier or use a unique identifier of another organisation? | IPP 7 and HPP 7  Privacy team | Yes |  | myGov already assigns a unique number to individual myGov accounts. This number is never communicated to HousingVic Online Services by myGov.  Additionally, when a myGov user asks myGov to link their account to an agency (e.g. HousingVic Online Services), myGov already assigns a different unique number for that myGov user in the context of that agency. That is; a single myGov user linked to multiple agencies will have a separate unique identifier for each of those agencies.  It is this agency-specific client identifier which myGov supplies to HousingVic Online Services.  This mechanism is already in use to support existing DFFH integrations with myGov.  It is this agency-specific client identifier which HousingVic Online Services associates with a pre-existing HiiP Client unique identifier as part of the identity verification process. |
| 10. Anonymity: Can individuals remain anonymous for the purpose of the program? | IPP 8 and HPP 8  Privacy team |  | No | Given that the client’s personal information is needed to verify their identity, tailor online services to their preferences and to provide access to their digital mail and housing services information, it is not possible for the client to remain anonymous for this program. This in turn protects privacy of the collective users of the online services. |
| 11. Transborder data flows: Will the program transfer the information to an organisation or person outside of Victoria? | IPP 9 and HPP 9  Projects MUST engage the BTIM information security team to arrange an assessment | Yes |  | Services Australia, the Commonwealth government body responsible for myGov, is an organisation outside of Victoria, and digital mail message text and client letter content (although not attachments or housing services information) are transferred to it. The Department of Fairness, Families and Housing is bound by the federal Australian Privacy Principles which, for these purposes, are substantially similar to the Victorian Information Privacy Principles.  The hosting of Client Self Service - Online Service reside in Australia. Both Azure Australia and MyGov services are accredited with ASD IRAP certification and security assessed through BTIM Cyber Security team with low risk.  Westpac, the online payments portal vendor, is similarly bound by national legislation governing both privacy and online banking security. |
| 12. Sensitive information: Will this program collect sensitive information? | IPP 10[[1]](#footnote-2)  Privacy team | Yes |  | Online identity verification does not directly require sensitive information but information relating to ‘racial or ethnic origin’ may be inferred from the name and Country of Birth information provided for the purpose of matching to the HiiP record.   * + However, this should not be a “collection” for IPP purposes because HousingVic online services will not record that information. Consequently, no consent is needed from the client in these circumstances.   + Clients are only required to update their information for the purpose of enabling the department to contact the client about their housing service and/or assess the clients ongoing eligibility for their housing service. |
| 13. Re-identification: Will the program involve de-identified information that may be re-identified through the linking of data or other information? | Privacy team |  | No | No de-identified data is used in this program. |
| 14. Access and correction: Are there any restrictions that would prevent individuals from accessing or correcting their information? | Freedom of Information team  Privacy policy |  | No | The option of receiving digital mail and housing services information via the myGov platform provides the opportunity for clients to gain greater control over how they access their information. |

# Privacy risk mitigation

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Risk | Mitigation strategy | Likelihood | Impact | Risk rating |
| Unauthorised persons (i.e. other than the client) are linked to HousingVic online services and the client’s record in HiiP. | Clients need to answer online, a series of questions which are detailed enough to eliminate third parties. The answers are matched against the client record in HiiP.  Where a client is not able to be verified by HiiP, the client must attend a department office with 100 points of identity which is checked and verified for HiiP access. | Low | High | Medium |
| Protecting digital mail and housing services information from loss / unauthorised access | Access to the client’s HousingVic Online Services via the myGov platform is controlled by two-factor authentication. For information stored on HiiP, it is protected by security in the system, user provisioned controlled access and by auditing of access. Any message content of digital mail stored on myGov is protected by myGov’s governance, security and privacy arrangements. | Low | High | Medium |
| Protecting online payments from loss / unauthorised access | Access to the client’s myGov inbox is controlled by two-factor authentication. For information stored on HiiP, it is protected by security in the system, user provisioned controlled access and by auditing of access.  Online payment functions are via a national banking third-party, Westpac, whose protection of information is governed nationally. | Low | High | Medium |
| PCI DSS compliance | Even though the department does not store card details (they are stored in the Westpac DB), it must still comply with the Payment Card Industry Data Security Standard (**PCI DSS**) as it accepts payment cards. The obligations are significantly lower as the department is not storing card details, but some obligations remain.  As a first step to compliance, the department should considering conducting a self-assessment questionnaire (available on the PCI Security Standards Council's website). However, the Manager of Department Cyber Security has advised that the questionnaire is not required as Department Cyber Security has been engaged to undertake security assessment and penetration testing. | Medium | Medium | Medium |
| Privacy collection notice should address payment processing | The department should ensure that the privacy collection notice provided to residents and renters (eg when they commence using the department's housing services) addresses the handling of personal information associated with online payment processing.  The collection of information is being added to the offer letter that is sent to clients at the time of a property offer.  If the offer letter is being treated as the privacy collection notice (for compliance with IPP 1), the department should ensure the letter addresses the matters listed in row 2 on page 18 above (for both residents and renters). | Low | Low | Low |
| Client information is inappropriately shared through a reporting solution | Analysis of access and usage of online services should always be de-identified. | Low | Low | Low |
| Disclosure of personal information about persons on housing application or living in house, to the primary applicant | Obtain confirmation from primary applicant that he/she has consent (implied for dependents or express from non-dependents) to supply their personal information in the application.  In gaining consent, primary applicants or renters need to ensure household members are aware that their information will be used by the department to determine eligibility for housing assistance and maybe accessible by Community Housing organisations, where they have been selected as a housing option. | High | Low | Medium |

# Summary of assessment

HousingVic Online Services, provides a secure electronic platform for clients of the Director of Housing to access letters about their bond and housing application and tenancies, check the status of their services (including what the services are) and make payments online to the Director.

The myGov inbox is an online communication solution to centralise online customer communications for member services to myGov. It has been designed to provide customers with a central online communication channel that allows them to manage communications from their services in an easy to use, integrated and secure environment.

More specifically, the myGov inbox provides links to documents originating from a customer’s selected services (only applies to the services which have agreed to use this functionality such as HousingVic online services). It allows customers to receive, view, print and save these documents. It also has the ability to notify a customer, via SMS or email depending on their nominated preference, when a new message arrives in the inbox. Anyone that has registered for myGov has access to an inbox.

The privacy impact assessment demonstrates that privacy and security has been appropriately addressed at each point of information storage and transformation, and that there are no privacy risks to the current arrangements that do not have a risk mitigation strategy in place. Consequently, the digital mail option and online payment’s solution is reasonably secure and have the client in control of their information. However, in respect of the online payment solution, steps should be taken to ensure residents and renters are adequately informed about the handling of their personal information for online payment processing.

|  |  |  |
| --- | --- | --- |
| Alicia Houlihan  A/Director Business Improvement  Community Service Operations Division | Abhendra Singh  Cyber Security  Business Technology and Information Management | Joanna Green  Senior Adviser  Legal Services Branch |
| Signature: Signed by Tony Newman | Signature:  Signed by Abhendra Singh | Signature: Signed by Joanna Green |

# Appendix A

## Secondary Verification Questions

### No Service:

The request for email and mobile number to be entered where a client exists in the HiiP system but has not had a previous service with the department.

|  |  |
| --- | --- |
| Question text |  |
| Email address\* | Mandatory |
| Mobile number\* | Mandatory |

The client will be requested to respond to the question text for the most recent service which can be related to any of the following services. In most cases responses will be required for one service, however where clients have more than one active service at the same time, they will need to enter responses for all of them. For example; a current bond application and housing application.

### Bond Service:

|  |  |
| --- | --- |
| Question text | Mandatory or not mandatory |
| Reference no.\* | Mandatory |
| What year did you move into this property?\* | Mandatory |
| Suburb of the rental property\* | Mandatory |
| Total household members (including yourself)\* | Mandatory |

### Housing Application Service:

|  |  |
| --- | --- |
| Question text | Mandatory or not mandatory |
| Reference no.\* | Mandatory |
| Are you the main applicant?\* | Mandatory |
| Total household members (including yourself)\* | Mandatory |
| What year did you submit the application?\* | Mandatory |

### Tenancy Service

|  |  |  |
| --- | --- | --- |
| Question text | Mandatory or not mandatory | Additional information |
| Reference no.\* | Mandatory |  |
| Your role in the tenancy\* | Mandatory |  |
| Year tenancy commenced\* | Mandatory | Note – this question is displayed online when the tenancy status = Current. This information is passed from HiiP |
| Year tenancy ended or when you left the tenancy\* | Mandatory | Note – this question is only displayed when tenancy status = terminated |
| Suburb the property is located\* | Mandatory |  |
| Total household members (including yourself)\* | Mandatory |  |

### Movable Unit Application Service:

|  |  |
| --- | --- |
| Question text | Mandatory or not mandatory |
| Reference no.\* | Mandatory |
| Year the tenancy commenced? \* | Mandatory |
| Suburb the property is located\* | Mandatory |

# Appendix B

## HousingVic Online Services – Renter view of My Housing

The following table outlines housing service information renters will view:

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
|  | Service address | Service reference number | Tenancy start date | Date renter left | View renter’s name | View others household member name(s) | View read only information: - local housing office name - rent/arrears status  - last visited date |
| 1. Current renter | Yes | Yes | Yes | n/a | Yes | Yes | Yes |
| 2. Renter has left but tenancy remains current | Yes | Yes | Yes | Yes | No | No | No |
| 3. Whole household has terminated | Yes | Yes | Yes | Yes | No | No | No |

## HousingVic Online Services – Renter view – My Account: account summary and view transactions

The following table outlines account information renters will view:

|  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| My Account | | | | | | | |  | |  |
|  | Service address | Service reference number | Total weekly payment | Last payment | Account balance | Rental and Maintenance Account balance breakdown | View Transactions | | View direct debit | |
| 1. Current renter | Yes | Yes | Yes | Yes | Yes | Yes | Yes | | Yes | |
| 2. Renter has left but tenancy remains current | Yes | Yes | No | No | No | No | Yes (for their period of the tenancy only) | | No | |
| 3. Whole household has terminated | Yes | Yes | No | Yes | Yes (vacated balance) | Yes (vacated breakdown) | Yes | | Yes | |

## 

## HousingVic Online Services – Primary applicant on Victorian Housing Register (VHR) application

The following table outlines housing service information a primary applicant listed on a Victorian Housing Register application will view

|  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Victorian Housing Register reference number | Application type (Priority or Register of Interest), category and transfer reason (if applicable) | Application received date | Application effective date | Application status | Primary applicant arrived on application date | Primary applicant removed from application date | Primary applicant name | Other household member name(s) | Housing preferences, options and Special Accommodation requests (read only) |
| 1. Current primary applicant on VHR application with active status (eg. approved) | Yes | Yes | Yes | Yes | Yes | n/a | n/a | Yes | Yes | Yes |
| 2. Current primary applicant on VHR application with inactive status (eg. not approved) | Yes | Yes | Yes | No | Yes | n/a | n/a | Yes | No | Yes |
| 3. Primary applicant who has been removed from application where application is either active or inactive | Yes | No to view priority category and transfer reason (if applicable) | No | Yes | Yes | Yes | Yes | No | No | No |

## HousingVic Online Services – Resident view of a Tenancy

The following table outlines housing service information residents will view:

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| My Housing | | | | | | | | My Account |
|  | Service address | Service reference number | Tenancy start date | Date Resident left | View renter’s name | View others household member name(s) |  | |
| 1. Current resident | Yes | Yes | Yes | n/a | No | No | No view of any account information | |
| 2. Resident has left but tenancy remains current | Yes | Yes | Yes | Yes | No | No | No view of any account information | |
| 3. Whole household has terminated | Yes | Yes | Yes | Yes | No | No | No view of any account information | |

## HousingVic Online Services – household member listed on Victorian Housing Register application

The following table outlines housing service information a household member listed on a Victorian Housing Register application will view:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | VHR reference number | Application type (Priority or Register of Interest) | Household arrived on application date | Household member removed from application date | Primary applicant name | Other household member name(s) |
| 1. current household member on VHR application with active status (eg. status = approved) | Yes | Yes | Yes | n/a | Yes | Yes |
| 2. current household member on VHR application with inactive status (eg. status = removed) | Yes | Yes | Yes | n/a | No | No |
| 3. household member who has been removed from application where application status is either active or inactive | Yes | Yes | Yes | Yes | No | No |

# Appendix C

## Collecting information - Acknowledgement

### Physical or over the phone verification:

Your privacy is important.

In order to complete your registration, enter the client identification number and the verification code provided to you.

The information you enter will be used only for the purpose of making sure we verify you correctly in our Housing IT system (HiiP).

Our Housing IT system is a secure system.

To know more about your privacy visit housing.vic.gov.au

### Online verification

Your privacy is important.

In order to complete your registration online, you will need to answer questions about yourself, and the housing services you have with the department.

The information you enter will be used only for the purpose of making sure we verify you correctly in our Housing IT system (HiiP).

Our Housing HiiP IT system is a secure system.

To know more about your privacy, visit our housing.vic.gov.au website.

# Appendix D

## Viewing my own information under My information tile

The following table outlines what information a client can view and update:

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
|  | View My information tile | View My personal details : date of birth  Gender  Country of birth  Residency | View and update My personal details :  Spoken language  Written language  Interpreter required  Aboriginal or Torres Strait Islander descent | View and update My contact details :  Residential address  Postal address  Mobile phone number  Daytime phone number  After hours phone number  Email address | View and update Centrelink Confirmation eServices consent | View Income | My Supports |
| 1. client with bond, movable unit or housing application ONLY (ie excluding current public housing tenancy) and Centrelink Confirmation eServices = NO | Yes | Yes | Yes | Yes | Yes | Yes (only current income and not income that has expired) | Yes (only if supports are current and not expired) |
| 2. client with bond, movable unit or housing application ONLY (ie excluding current public housing tenancy) and Centrelink Confirmation eServices = YES | Yes | Yes | Yes | Yes | No | Yes (only current income and not income that has expired) | Yes (only if supports are current and not expired) |
| 3. current renter or resident in a current public housing tenancy and Centrelink Confirmation eServices = NO | Yes | Yes | Yes | Yes (excluding residential address) | Yes | Yes (only current income and not income that has expired) | Yes (only if supports are current and not expired) |
| 4. current renter or resident in a current public housing tenancy and Centrelink Confirmation eServices = YES | Yes | Yes | Yes | Yes (excluding residential address) | No | Yes | Yes (only if supports are current and not expired) |
| 5. client with terminated service | Yes | Yes | Yes | Yes | Yes | No | Yes (only if supports are current and not expired) |

## Viewing information of other household

The following table outlines what information a client can see of other household member’s details depending on their role and currency of service:

|  |  |  |  |
| --- | --- | --- | --- |
|  | Current or past service | View other household member’s names | View other household member’s details:  First name  Family name  Role  Date of birth |
| 1. renter in a public housing tenancy | Current | Yes | Yes |
| 2. resident in a public housing tenancy | Current | Yes | No |
| 3. dependant in a public housing tenancy | Current | No | No |
| 4. primary applicant with a housing application | Current | Yes | Yes |
| 5. household member with a housing application | Current | Yes | No |
| 6. property host with a movable unit application | Current | Yes | Yes |
| 7. primary applicant with a movable unit application | Current | Yes | Yes |
| 8. bond applicant | Current or past | No | No |
| 9. renter has left a public housing tenancy | Past | No | No |
| 10. resident has left a public housing tenancy | Past | No | No |
| 11. dependant has left a public housing tenancy | Past | No | No |
| 12. primary applicant has been removed from a housing application | Past | No | No |
| 13. household member has been removed from a housing application | Past | No | No |
| 14. property host has been removed from a movable unit application | Past | No | No |
| 15. primary applicant has been removed from a movable unit application | Past | No | No |

# Appendix E

## Requesting updates to my housing application household

The following table outlines which application status will allow a primary applicant to update what part of their household information

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Type of application | Application status | Special Accommodation Requirements approved Yes/No? | Can I update my locational preferences? | Can I remove a household member? | Can I update my household’s income? |
| Register of Interest | Assessed, Reassess, Reassessed, Escalated, Awaiting action | No | Yes | Yes | Yes |
| Register of Interest | New, Approved, Awaiting client action | No | Yes | Yes | Yes |
| Register of Interest | New, Assessed, Approved, Reassess, Reassessed, Escalated, Awaiting action, Awaiting client action | Approved | Yes | Yes | Yes |
| Register of Interest | New, Assessed, Approved, Reassess, Reassessed, Escalated, Awaiting action, Awaiting client action | Pending | Yes | Yes | Yes |
| Priority | New | Any | Yes | Yes | Yes |
| Priority | Approved | Any | Yes | Yes | Yes |
| Priority | Assessed, Reassess, Reassessed, Escalated, Awaiting Action, Awaiting Client Action | Any | Yes | Yes | Yes |
| ROI or priority | Not approved | Any | Yes | Yes | Yes |
| ROI or priority | Removed less than 2 years | Any | Yes | Yes | Yes |
| ROI or priority | Removed greater than 2 years | Any | No | No | No |
| ROI or priority | Sign up in progress, Ineligible, Tenancy Created, Department Housed, Community Housed, Rejected | Any | No | No | No |
| ROI or priority | Offered, Accepted | Any | No | No | Yes |

# Appendix F

## Requesting updates for my tenancy

The following table outlines who can request what information for a tenancy service

|  |  |  |  |
| --- | --- | --- | --- |
| Role | Can I remove a household member? | Can I update my household’s income | Can I see and respond to request for documents |
| Dependant | No | No | No |
| Resident | No | No | No |
| Renter\* | Yes | Yes | Yes |
| Renter who has left the tenancy but the tenancy is still active | No | No | No |
| Renter for terminated tenancy | No | No | No |
| \*where there are more than 1 renter | Yes | Yes | Yes |

## Requesting updates for my Victorian Housing Register application

The following table outlines who can request what information for an application service

|  |  |  |  |
| --- | --- | --- | --- |
| Role | Can I remove a household member? | Can I update my household’s income | Can I see and respond to request for documents |
| Dependant | No | No | No |
| Household member | No | No | No |
| Primary applicant | Yes | Yes | Yes |
| Primary applicant who has been removed from an application | No | No | No |

|  |
| --- |
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1. Note that sensitive information only relates to “personal information” not “health information”. [↑](#footnote-ref-2)