

|  |
| --- |
| Housing Call Centre Privacy impact assessment  |
|  |

Contents

[Introduction 3](#_Toc47702057)

[Description of program 3](#_Toc47702058)

[Scope of the assessment 6](#_Toc47702059)

[Roles in the assessment 6](#_Toc47702060)

[Information Elements 6](#_Toc47702061)

[Personal information 6](#_Toc47702062)

[Health information 6](#_Toc47702063)

[Sensitive information 7](#_Toc47702064)

[Privacy analysis 7](#_Toc47702065)

[Information flow 7](#_Toc47702066)

[Privacy principles 8](#_Toc47702067)

[Privacy risk mitigation 14](#_Toc47702068)

[Summary of assessment 16](#_Toc47702069)

# Introduction

## Description of program

Under the Residential Tenancies Act 1997 the Department of Health and Human Services on behalf of the Director of Housing is required to maintain properties leased for residential purposes in a suitable state for its tenants.

In 2002 the department established the Housing Call Centre (**Call Centre**), locating the Call Centre in Moe in the La Trobe Valley. Consistent with the obligations under the Residential Tenancies Act the initial purpose of the Call Centre was to respond to maintenance and repairs requests to public housing properties and community housing owned or leased in by the Director of Housing.

In addition to maintenance requests raised into the Housing Call Centre from time to time local department Housing offices also raise responsive repairs requests.

**Housing Call Centre Functions**

The Call Centre has now expanded its functions to be highly responsive to the needs of public housing tenants through providing additional service delivery activities. The current services provided through the Call Centre consist of five broad groups:

* responsive maintenance (definition under Residential Tenancies Act)
* related state-wide maintenance/property activities
* centralised client services – most notably Keeping in Touch and the Victorian Housing Register and RentAssist Bond Loan
* supporting emergency management activities such as bushfire or similar events

**Communication Channels**

For Tenants to lodge maintenance and repairs requests with the Call Centre there are currently three ways:

* Call the Housing Call Centre directly
* Email the request to tenant maintenance
* Complete an [non-urgent repairs online form](https://hnb.dhs.vic.gov.au/eForms/eForms.nsf/FormsForPreview/188B9B0C64189182CA256D26007DFC50?OpenDocument) via DHHS website

The Call Centre also has an outbound engagement process which includes

* Telephone calls back to tenants seeking repairs e.g. to clarify details and arrange access, and/or to contact a Tenant by telephone where they have lodged the request by email or via the DHHS website
* Customer satisfaction survey
* Outbound telephone calls for Keeping in Touch and similar activities
* Email to applicants under the Victorian housing register and bond online applications

Requests to maintenance head contractors are dispatched online within the HiiP Repairs ICT solution.

Local housing offices use the same communication channels for raising repairs requests (about 10% of all repair jobs) with the exclusion of the online form.

**Information Gathered**

The principle information used by the Housing Call Centre in managing maintenance requests is stored in the HiiP Repairs. This data base contains the details every property in terms of physical location, number of bedrooms, and similar information necessary to manage maintenance on each property. It retains the history of all maintenance work undertaken by the department.

Information about the current tenancy in terms of the tenant who holds the tenancy agreement and contact information is stored in HiiP Repairs against the property record. This information is drawn from the HiiP customer relationship management ICT system in real time. The data from HiiP also includes whether there are any alerts on the property regarding occupational, health and safety matters which the department would have a duty of care to share with contractors undertaking work on the property.

When someone approaches the Call Centre for maintenance, they are asked to validate their identity and then provide the details of the work required and these details are captured in HiiP Repairs. Callers are able to use their unique password, or asked to answer three questions (date of birth and other factors known to the Tenant, eg when tenancy commenced).

Regardless of the methods of requesting repairs and maintenance the information captured by Call Centre staff includes whether the repair is urgent or not, about the primary applicant, and any additional tenants at that property. From this information, the Call Centre staff assess, record and raise the job request using HiiP Repairs. Access to HiiP Repairs has geographical constraints, which means that staff cannot access details of houses outside of the area that they are involved in managing.

The job is communicated electronically to the relevant head contractor which accesses a job scheduler screen in HiiP Repairs and downloads the details into their own system for managing the work. The information available to the contractor is details of the work to be done and contact details for the Tenant. If there is an occupational, health and safety matter relevant to the house, this is flagged on the information available to the contractor and they are required to speak with the local Housing Office for further information prior to attending the property. The head contractor's access to HiiP Repairs is monitored through audits.

Head contractors are bound under their contracts with the department to maintain the security of this information and only share it for the primary purpose of undertaking repairs. On this basis the information about the property location, tenant name and contact telephone number and nature of repairs required will be shared with sub-contractors when they are undertaking the work.

From time to time jobs will be varied in discussion between the head contractor and the housing Call Centre/housing office via telephone with a file note entered HiiP Repairs by the department.

At the completion of the job the head contractor invoices the department by HiiP Repairs and the payment is assessed and processed.

The information in HiiP Repairs is then fed back into the main HiiP database as the complete dataset.

**Customer Satisfaction Call Outs**

The Call Centre makes on average 1500 a month calls back to tenants to check their satisfaction with the work that has been undertaken, satisfaction with the contractor and satisfaction with the Department's handling of their request. The outcome of these calls is recorded in a separate data base held at the Housing Call Centre. Reporting occurs within the Department and is at an aggregated level with no client details provided.

However, customer satisfaction feedback is used in meetings with head contractors where significant issues are raised with the work or the specific contractor undertaking the work.

**Keeping in Touch Program**

The HCC also operates an outbound phone campaign for tenants 75 years of age and over, making 5,400 calls a month. This is an opt-in program to check on tenant’s well-being. Initial contact is made with Tenants by telephone when they turn 75 years and they are invited to participate. Any issues raised by Tenants, are passed to housing offices for follow up. These calls are not currently recorded but a free text note is made that the Tenant has been contacted.

**Call Recording**

The Housing Call Centre manages in excess of 330,000 telephone calls each year from Tenants and other third parties with who have diverse backgrounds and may be highly dependent on interpreters in order to have their maintenance requests managed effectively.

It is within this context that in order to successfully onboard new staff and maintain existing staff skills, the Housing Call Centre uses call recording as a training tool. The Tenant has the right to have the call recording deactivated. However, if at any point the staff member feels threatened by the caller the staff member can say that they will activate the call recording for the call to continue.

Additionally, with caller consent, a supervisor may join a conversation to help manage the outcome. For example, a caller may be trying to explain a problem with the plumbing in a high rise building which housing call operator has not encountered before a supervisor could join this call to help clarify the issue.

**Cyclical Safety Checks Program**

Under the Residential Tenancies Act, the Director of Housing must undertake a regular program of safety checks in properties, such as gas heaters and smoke alarms. This work is scheduled by Housing Call Centre using HiiP Repairs, via the same process as other repairs jobs. The same information about the address, property details and tenant’s details are provided as for all other job repair requests as detailed above.

## Scope of the assessment

This PIA covers the managing of maintenance request within HiiP Repairs by both the housing Call Centre and Area based Housing offices. This PIA does not consider the collection, use and disclosure of information in HiiP.

In addition, it covers the Keeping in Touch program and the scheduling of regular safety checks on properties through the Housing Call Centre.

It should be read in conjunction with PIA covering the Cloud based telephony systems, Victorian Housing Register, RentAssist Bond Loan and Housing online digital services, which are also delivered through the Housing Call Centre and local housing offices.

## Roles in the assessment

This assessment has been prepared by the Business Improvement Team within Community Services Operations Divisions with advice from Privacy and Legal Services and Information Security within Business Information Technology Management Branch.

## Information Elements

The information collected from the Tenant by Departmental staff is used to confirm the clients identify, to ensure that privacy is not breached, and for the sole purpose of delivering the service being sought by the client, for example in the case of responsive repairs activities, that the request for a job to be raised on a property is valid.

For repairs work, the information about the work required is input by Departmental staff into HiiP Repairs, and that information including the property details is then provided to the head contractor to undertake the work.

The details shared with the head contractor is the minimum data required to undertake the work on the property.

For Keeping in Touch, the information is the minimum to ensure the tenant is the correct person. Data is entered into HiiP when follow up is required.

## Personal information

The personal information shared is the address and telephone contact details for tenancy at the property where the work is to occur.

For Keeping in Touch, no information is shared unless follow up is required through a local housing office; which already has access to this formation in HiiP.

## Health information

No specific health details are captured for the Housing Call Centre.

## Sensitive information

| Type of sensitive information | Details |
| --- | --- |
| Racial or ethnic origin | Preferred language is held to provide service to client  |
| Political opinions | Nil |
| Membership of a political association | Nil |
| Religious beliefs or affiliations | Nil |
| Philosophical beliefs  | Nil |
| Membership of a professional or trade association | Nil |
| Membership of a trade union  | Nil |
| Sexual preferences or practices | Nil |
| Criminal record | Potentially if information about the cause of damage to property reveals criminal activity |

#

# Privacy analysis

## Information flow



## Privacy principles

| Questions – what is the risk? | Further information | Yes  | No  | Detailed response  |
| --- | --- | --- | --- | --- |
|  **Collection:** Is all the information collected necessary for the program?  | IPP 1 and HPP 1Privacy team |  | No | **Information collected from HiiP into HiiP Repairs:** Information about the property, prior maintenance and repairs, any occupational health and safety issues relevant to the property, information about the current tenancy. This is necessary to schedule maintenance and repairs with current tenants, and to ensure that the contractor is aware of any safety issues. **Information collected from person making maintenance request:** Identity verification answers are collected on the recorded call. Information about requested maintenance is collected. The recording of calls may mean that irrelevant information provided by the caller is collected where that information is volunteered by the caller. This information is needed to progress the request for maintenance/repair. Information is also collected where the Tenant responds to the request for feedback on satisfaction with repair/maintenance.**Information collected from Head Contractor**: Information necessary to pay invoice, or to arrange the contracted job (eg discussions about scope of repair). **Information collected in the 'Keeping in Touch' program:** The information recorded in the Keeping in Touch program is free text in HiiP Repairs. This means that the information recorded is at the discretion of staff. The information recorded may not be 'necessary' for the program. Irrelevant information may be collected in voice recordings or where Tenants email or contact the Call Centre via the website. This is minimised by directing Tenants as to the information that is needed, but irrelevant information may still be collected. |
| **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 and HPP 1[Fact sheet on developing a collection notice](https://intranet.dhhs.vic.gov.au/privacy#dhhs-privacy-policy) <https://intranet.dhhs.vic.gov.au/privacy#dhhs-privacy-policy>Privacy team |  | No | By entering into a tenancy agreement under the Residential Tenancies Act the tenant is made generally aware that the department is legally obliged to undertake maintenance and related activities such as safety inspections and that this work will be undertaken by maintenance contractors. Since early June 2020, there has been a collection notice provided - at the time of entering into a tenancy.There is currently no collection notice provided:- at the time of collecting information from a tenant about requested maintenance/repair over the telephone;- at the time of enrolling a tenant in the Keeping in Touch Program. The following information is provided on the website: If you phone the Housing Call Centre, a customer service representative will ask for:•    Your full name•    Your address•    Your telephone number•    What maintenance you wish to report.*We will then report your maintenance to our contractors for action.*The following information is stated on the website form to lodge request for maintenance:*Under the Residential Tenancies Act 1997, the Director of Housing has 14 days to carry out non-urgent repairs after receiving your request. If the non-urgent repairs are not carried out within 14 days from the date of receipt of your request, you are encouraged to contact the Housing Call Centre on 131172 and staff will follow up your request to ensure the repairs are carried out as soon as possible. Please note however, if the repairs are not carried out after the 14 days you may also contact Consumer Affairs Victoria www.consumer.vic.gov.au to ask them to investigate the need for repairs and to provide you with a written report.*The Call Centre uses the following script for the COVID response line (established on 5 July 2020): *To help resolve your concern as quickly as possible I need to ask you some questions about who you are, where you live, and what you need. I will need to share this information with agencies and service providers that have been engaged to resolve tenants’ requests. Do you consent to me sharing this information with agencies and service providers for the purpose of providing you with goods and services?*Where collection notices are provided these are not compliant with the notice requirements.  |
| **3. Direct collection:** Is all information being collected directly from the individual?  | IPP 1 and HPP 1Privacy team |  | No | The information being collected is a combination of information about the property and current tenancy used by the department to fulfil its obligations under the Residential Tenancies Act, information provided by the tenant about repairs seeking to be made to the property, and information about the repairs provided by the head contractor.  |
| **4. Use and disclosure:** Will the information only be used or disclosed for the primary purpose identified? | IPP 2 and HPP 2Privacy team | Yes |  | The information collected in regard to the repairs required to the property, property details and any safety risks at the property is only used and disclosed for the purpose of facilitating repairs at the property.Information about prior maintenance is used to identify next routine maintenance – eg fire alarm check – and to record the history of repairs at the property.Keeping in Touch information is disclosed to housing officers to action issues raised by a Tenant during a call.Recordings of telephone calls are only used for staff training purposes.The information collected in regard to tenant feedback about customer satisfaction on maintenance works is only disclosed to the contractor when it is directly relevant to contractor performance and remediation activities for unsatisfactory maintenance work. Reporting on activities only occurs within the Department and is done on an aggregate de-identified basis.  |
| **5. Information sharing:** Will the information be shared with other agencies for service delivery, data matching or analytics? | IPP 2 and HPP 2Privacy team |  | No | Beyond its use in ensuring contractors satisfactorily undertake their maintenance activities, no data is shared at a level where individual clients can be identified. All public and departmental reporting on customer satisfaction is at an aggregated non client identifying level.  |
| **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 3Privacy team |  | No  | Property and tenant related information is proactively managed by the department in fulfilling its obligations to comply with Residential Tenancies Act. However, there is a reliance on tenants maintaining their contact details when communicating with the department. From time to time telephone numbers and email addresses may therefore be out of date.  |
| **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 4Projects MUST engage the BTIM information security team to arrange an assessment | Yes  |  | Housing Repairs application hosted on Fujistu Data Centre in Melbourne. Fujistu is an approved contracted third-party service provider for DHHS Housing Applications, managed through DHHS Contracting service. The application is hosted in a secure zone behind the latest Nokia Checkpoint firewall with threat protection. Windows servers hosting Housing repairs are installed with malware protection and configured with security policies. Security events are monitored through Fujistu Security Operation Centre.Any change management for Housing Repairs application is govern and approved by DHHS Housing team and security changes are approved by DHHS Cyber Security Team.User authentications are managed through DHHS E-business Portal and Azure AD. Administrative privileges for Housing Repairs infrastructure are managed Fujistu Support team and includes: -* System patching and updates
* Cyber security monitoring
* System and data backup

 Head contractors are bound under their contracts with the Department to maintain the security of this information and only share it for the primary purpose of undertaking repairs. |
| **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 |  | Destruction of housing data forms a schedule to theDHHS Retention and Disposal Authority. |
| **9. Identifiers:** Will this program assign a unique identifier or use a unique identifier of another organisation? | IPP 7 and HPP 7Privacy team | Yes |  | Each property and each tenancy as well as each client have a unique identifier allocated through the HiiP system and leveraged via HiiP Repairs. This is both to protect privacy and ensure that the correct client and correct property are being allocated work and or having their details recorded and updated in HiiP and or HiiP Repairs.  |
| **10. Anonymity:** Can individuals remain anonymous for the purpose of the program?  | IPP 8 and HPP 8Privacy team |  | No | Individuals seeking maintenance requests on public housing properties cannot be anonymous given the legal relationship they have through the lease signed under the Residential Tenancies Act. The reasons include ensuring that the commissioning of maintenance is legally valid for the property and tenancy.  |
| **11. Transborder data flows:** Will the program transfer the information to an organisation or person outside of Victoria? | IPP 9 and HPP 9Projects MUST engage the BTIM information security team to arrange an assessment |  | No | The Director of Housing business is legislatively constrained to Victoria and there is no capacity to share any client centric information at a level that could be identifiable with any other organisation or person outside of Victoria. Housing Repairs system hosted on Fujistu Data Centre in Melbourne. Operational requirements of Housing Repairs infrastructure are managed by Fujistu Support Team under guidance of DHHS Housing Governance team. Housing Repairs Application is managed and government through DHHS Housing Development team.  |
| **12. Sensitive information:** Will this program collect sensitive information? | IPP 10[[1]](#footnote-1)Privacy team | Yes |  | Sensitive information collected (eg language and criminal activity) will be collected incidentally where the Tenant provides that information – ie by consent. |
| **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 | The information is not used or disclosed in de-identified form except in aggregate reporting within the Department. Individuals cannot be identified from the reports.  |
| 14. Access and correction: Are there any restrictions that would prevent individuals from accessing or correcting their information? | Freedom of Information teamPrivacy policy |  | No | Tenants (and household members) can access and update information within the constraints of the relationship established between the tenancy and the department under the Residential Tenancies Act. Typically given the contractual relationship is between the tenant/s and the department this would occur between those parties.  |

# Privacy risk mitigation

| **Risk** | **Mitigation strategy** | **Likelihood** | **Impact** | **Risk rating** |
| --- | --- | --- | --- | --- |
| Protecting personal information from loss / unauthorised access - | HiiP and HiiP Repairs are controlled by security in the system, user provisioned controlled access and by auditing of access by contractors and staff.Head contractor is contractually required to maintain security of information. Ensure that head contractor is contractually required to ensure that any sub-contractors also maintain security of information.  | Low | High | Low |
| Clients are not aware of how their information is handled  | Provide IPP 1.3 collection notices:- when contact is made to request maintenance (via phone, email or website)- where contact to enrol in Keeping in Touch.It is proposed to use the updated collection notices attached to this PIA.  | High | Medium | Low (if mitigation strategies used) |
| Client information is inappropriately shared through a reportingsolution | In order to access the information a staff member or third party must already be an authorised user of HiiP Repairs. For any other purposes only, de-identified information is available.  | Low | Medium | Low |
| Irrelevant information is collected from Tenants contacting Call Centre  | Prompt Tenants to provide relevant information Train staff to record in HiiP Repair only relevant information provided by the Tenant during a call  | High  | Low | Low |
| Data in HiiP Repair is not current | Staff to check contact details in Hiip Repair when speaking with Tenant, particularly where request for repair is being made  | Medium  | Medium  | Low (if mitigation is implemented) |

# Summary of assessment

*The Department of Health and Human Services Housing Call Centre and local housing offices provide a range of services to support tenants in public housing.*

*As the operator of public housing, the department holds details of the tenants and their households in its core system HiiP. When contacted by a tenant, the department confirms the tenant’s identify to protect privacy, and with any additional information provided by the client being specific to the assistance being sought.*

*A key privacy issues is making sure that persons dealing with the Call Centre understand how their information will be used. Updated collection statements have been drafted as a part of this PIA process.*

*The HiiP and HiiP Repairs systems are secured ICT systems. Information shared is for the primary purpose of delivering the service.*

*Internal and external reporting is de-identified.*

|  |  |  |
| --- | --- | --- |
| Tony NewmanAssistant Director Community Service Operations Division | Abhendra Singh, Cyber Security Manager | Phil McAloonActing Managing Principal SolicitorInformation Sharing and Privacy Team |
| Signature: signed via emailDate: 6 Aug 2020 | Signature: signed via emailDate: 6 Aug 2020 | Signature: signed via emailDate: 18 Sep 2020 |

|  |
| --- |
| To receive this publication in an accessible format email privacy@dhhs.vic.gov.auAuthorised and published by the Victorian Government, 1 Treasury Place, Melbourne.© State of Victoria, Department of Health and Human Services August 2017.Available on the [Privacy](https://intranet.dhhs.vic.gov.au/privacy) intranet page <https://intranet.dhhs.vic.gov.au/privacy> |

Attachment – Draft collection notices

**1. At the time of collecting information from a tenant about requested maintenance/repair over the telephone:**

*Your privacy is very important.*

*This call is being recorded, if you don’t want this to occur please let me know and I will stop the recording.*

*In order to log your request for repairs with our head contractor I need to confirm your identity either by you providing your password or by you answering a number of questions which relate to your tenancy with the Department of Health and Human Services. The information which you are going to give me about the repair on your property including the address as well as your contact details will be recorded in our housing ICT system HiiP and shared with the maintenance contractor in order for them to undertake the work.*

*Without this information we are not able to process your request for repairs.*

*You are able to access the information the department holds about you by approaching your local housing office or through Freedom of Information.*

**2. At the time of enrolling a tenant in the Keeping in Touch Program**

*I am ringing from the Housing Call Centre to ask you if you would like to participate in a program called Keeping Intouch where staff from our Call Centre ring Tenants on a regular basis to ensure things are going okay with your tenancy. This is a voluntary program and you are not required to participate.*

*I should let you know this telephone call is being recorded, please let me know if you are not comfortable with this and I will stop the recording.*

*Your privacy is very important so you should be aware that I have obtained your details from The Departments of Health and Human Services Housing IT system which we use to manage your tenancy on a day to day basis. If you become a participant a Keeping Intouch program, the Housing staff you deal with will make file notes in our system and with your permission share that information to arrange assistance for you such as maintenance on your property.*

*You are able to access the information the department holds about you by approaching your local housing office or through Freedom of Information.*

**3. Updated text for the website where persons can lodge request for maintenance**

*Your privacy is very important.*

*In order to log your request for repairs with our head contractor we will need to confirm your identity either by you providing your password or by you answering a number of questions which relate to your tenancy with the Department of Health and Human Services.*

*The information you provide about the repair on your property including the address as well as your contact details will be recorded in our housing ICT system HiiP and shared with the maintenance contractor for them to undertake the work. HiiP is a secure ICT system.*

*Without this information we are not able to process your request for repairs.*

*You are able to access the information the department holds about you by approaching your local housing office or through Freedom of Information.*

**4. Updated script for the COVID response line**

*Your privacy is very important.*

*This call is being recorded, if you don’t want this to occur please let me know and I will stop the recording.*

*To help resolve your concern as quickly as possible I need to ask you some questions about who you are, where you live, and what you need.*

*I will need to record these details, in our Housing ICT System and you should also be aware I will need to share this information with agencies and service providers that have been engaged to resolve tenants’ requests. With your permission we will share this information with agencies and service providers for the purpose of providing you with goods and services?*

*Without this information we are not able to process your request for assistance.*

*You are able to access the information the department holds about you by approaching your local housing office or through Freedom of Information.*

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