

Policy name	Communicating with Tenants and Stakeholders
Policy date	August 2020
Authorisation	General Manager, Operations
Policy owner	General Manager, Operations
Policy type	Mission Australia Housing Operational Policy
Policy setting	

1 Purpose

1.1 Overview

1.1.1 This policy sets out the principles to be followed when communicating with tenants, applicants, and stakeholders (Service Users) for services provided by Mission Australia Housing (MAH). We aim to ensure that the process:

- Is fair and transparent;
- Protects Service Users; and
- Complies with the specific legal and contractual obligations placed upon MAH by Government, funders, and other housing partners.

1.2 Coverage

1.2.1 This document is a national policy and covers both Mission Australia Housing (MAH) and Mission Australia Housing Victoria (MAHV). All references to Mission Australia Housing, MAH and Housing include both MAH and MAHV unless specifically stated otherwise. Where state based variations exist in policies and procedures, these will be identified in the document.

1.2.2 This policy applies to all Service Users receiving services provided by MAH including social, affordable, and transitional housing.

1.3 Information on procedures and other related policies

1.3.1 This policy focuses on why certain things need to be done. It is supported by procedures that provide more detail on what to do and the steps involved in communicating with tenants and stakeholders.

1.3.2 This policy is one of several interlinked policies that support MAH's delivery of housing services. To assist you, these are identified where relevant in this policy and the supporting procedures.

2 Scope

2.1 Parts of Mission Australia that this policy covers

2.1.1 This policy applies to MAH staff responsible for working with MAH clients, tenants, and properties.

2.2 Definitions

2.2.1 Key terms used in this policy are defined in the following table.

Term	Definition
Agent	Any third party who carries out functions on behalf of MAH or a tenant of MAH. Agents include but are not limited to contractors, advocates, and other tenants.
Service Users	All tenants, prospective tenants, former tenants, volunteers, and support partners that receive communications from MAH.
Spam	Irrelevant or unsolicited messages sent via email or SMS, typically to many users, for the purposes of advertising, phishing, or spreading malware.
Tenant	Under state-based residential tenancy and rooming accommodation legislation, a tenant is a person who has entered explicitly into a lease agreement.

3 Policy

3.1 Guiding principles

3.1.1 The MAH communicating with tenants and stakeholders process is fair and transparent:

- MAH will make the process as clear and straightforward as possible.
- MAH will communicate to tenants utilising plainer English principles whenever appropriate including for responses to complaints.
- MAH upholds accountability and transparency through its record-keeping practices.

3.1.2 The MAH communicating with tenants and stakeholders process is security-focused:

- MAH will ensure that they communicate with all Service Users in the best way that protects data held and prevents spamming service users.

3.1.3 The MAH tenancy establishment process complies with relevant laws and procedures:

- MAH fully complies with the jurisdictional requirements of the states and territories in which it operates.

3.2 Creating the base for successful communication

- 3.2.1 The process followed in communicating with Service Users lays the base for successful communication and for the management of any problems that might arise from the various forms of communication. It also complies with legal requirements, including the Australian Privacy Principles and the Spam Act 2003.
- 3.2.2 The current legislation regulating Spam is the Spam Act 2003. This is enforced by the Australian Communications and Media Authority (ACMA). However, it is also the responsibility of individual businesses to make sure their behaviour is complicit with the Act. The Act covers all forms of commercial electronic mail, including email, MMS, IM and SMS.

3.3 Spam

- 3.3.1 Spam is a generic term and is used to describe unsolicited commercial electronic messages that contain one or more of the following:
- Offers
 - Advertisements
 - Promotions
- 3.3.2 MAH may from time to time communicate with service users about promotional events and activities. Communication about these events and activities could be unwanted by the Service User and considered as Spam.
- 3.3.3 Most of the communication from MAH to Service Users will relate to services provide by MAH. The following types of communication are not considered as Spam as they relate to the services provided by MAH:
- General information and updates about MAH, including tenant newsletters;
 - Informing and reminding Service Users of appointments;
 - Contacting tenants regarding rent payments;
 - Contacting tenants about maintenance to the properties;
 - Contacting tenants about alleged breaches of their tenancy agreement; and
 - Vacating, allocating and letting a property.

3.4 Privacy

- 3.4.1 MAH abides by the Australian Privacy Principles, **see Mission Australia Privacy Policy.**

3.4.2 MAH will only collect personal and sensitive information that is necessary for the organisation to carry out its duties.

3.4.3 MAH will not release personal contact details to un-related organisations, nor will we use personal information for direct marketing purposes.

3.5 Letters and Notices

3.5.1 MAH will send communication to Service Users via Australia Post or similar service as the primary communication delivery method.

3.5.2 Letters must be printed onto MAH headed paper and sent using Australia Post or a similar service or through personal delivery by MAH staff.

3.5.3 All letters must be dated.

3.5.4 Letters will be drafted with consideration given to principles of plainer English drafting.

3.5.5 Communications sent by Australia Post may include:

- Letters regarding services provided by MAH, rent arrears, appointments, maintenance repairs, breaches of tenancy agreements, tenancy/property management etc.
- Tenant Newsletters
- Surveys

3.5.6 All legal notices must be sent by Australia Post or hand delivered by a member of MAH staff.

3.6 Electronic Messages

3.6.1 All electronic messages (SMS & Email) sent from MAH need to have the following in place:

- **Permission from Service Users** – Service Users must give their permission, by explicitly signing up to receive SMS or emails.
- **Identification** – SMS and emails must contain clear and accurate information stating that MAH is the organisation sending the message. A great way to ensure this for SMS is to include a Sender ID with the name MAH. All emails must be sent from a registered MAH email account and include contact details for the organisation.
- **Unsubscribe option** – all marketing or promotional messages must contain a functional 'unsubscribe' feature that allows the recipient to opt-out from receiving messages in the future.

3.7 Obtaining permission

- 3.7.1 As part of the starting tenancies process, **see Starting Tenancies Procedure**, applicants will be asked to complete a contact form, which includes their contact details and contact method preferences. During this process, applicants will also be asked for their consent to share information.
- 3.7.2 The communication preferences will be entered and stored in the IT system. Copies of the forms the applicant has signed giving their consent to share information and communication preferences should be uploaded and saved in the tenant's file.
- 3.7.3 During the annual property inspections and, on occasion, through other contact with tenants, MAH staff will check with tenants if their contact details and preferences have changed. Any changes will be recorded and updated in the IT system.

3.8 Social Media

- 3.8.1 MAH may use social media to promote events and activities. **See Mission Australia Social Media Policy.**
- 3.8.2 Where a Service User follows, likes, or engages with MAH on social media, they are inadvertently providing consent to receive notifications through this means of social media.
- 3.8.3 MAH will never share Service User personal information on Social Media, and all content will be generic.
- 3.8.4 If a Service User contacts MAH directly using social media or instant messaging services, MAH will not share any personal information and only provide general information already available on the website. If further information is requested, MAH will seek permission to contact the Service User using an alternative communication method, so that ID can be verified.

3.9 Tenant information

- 3.9.1 All tenants will be provided with information explaining how MAH will contact them and protect their privacy.
- 3.9.2 Changes to the policy and guidelines will be communicated to Service Users through tenant newsletters and letters.

3.10 Informed decision making

- 3.10.1 To assist Service Users where cultural or communication barriers are identified, or where a Service User is unable to consent on their own behalf, staff will:
 - Engage an interpreter and/or support service at no cost to the Service User; and/or
 - Engage an advocate, guardian, or family member of the Service Users choice to witness the signing of the agreement. Housing Officers will organise representation for tenants under 18 years of age where they are unable to nominate a representative for themselves.

4 Responsibilities

4.1 Housing staff including Housing Officers and Client Service Officers are responsible for:

- Collecting and updating contact details and contact preferences.
- Providing information to tenants.
- Keeping records associated with contact details and preferences in the tenancy management system and, where required, in original hardcopy tenant files.
- Recommending improvements to this policy and associated procedures.

4.2 Team Leaders/Regional Manager are responsible for:

- Incorporating this policy and associated procedures into staff induction and training.
- Ensuring staff are aware of and have access to this policy and associated procedures.
- Escalating feedback about this policy to the policy owner and/or policy writer.

4.3 The National Housing Services Manager is responsible for:

- Ensuring that MAH complies with this policy and associated procedures.
- Recommending any changes to this policy and associated procedures.