



COMMUNICATION & CONSULTATION

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POLICY

This policy sets out the principles to be followed when communicating with tenants, applicants, contractors and stakeholders for services provided by and for Central East Accommodation & Care Alliance Inc (CEACA). We aim to ensure that the process:

- Is fair and transparent.
- Protects tenants, applicants, contractors, and stakeholders.
- Complies with the specific legal and contractual obligations placed upon CEACA by State and Federal Government.

This policy applies to all tenants, applicants, contractors and stakeholders who receive services from CEACA including social and affordable housing, or who provide services to CEACA (eg. ongoing maintenance or projects).

The CEACA process for communicating with tenants, contractors and stakeholders is fair and transparent:

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

RESPONSIBILITY

The CEACA Executive Officer is responsible for:

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

The CEACA Operations Manager is responsible for:

- Collecting and updating contact details and contact preferences.
- Providing information to tenants.
- Keeping up to date online records (eg. *CEACA-FRM-022 Tenant Record by Shire* and *CEACA-FRM-23 Master Tenant Register*) associated with contact details and preferences and, where required, in original hardcopy tenant files.
- Recommending improvements to this policy and associated procedures

PROCEDURE

Spam

The current legislation regulating Spam is the *Spam Act 2003*. The Spam Act 2003 is a piece of Australian legislation that regulates the sending of commercial electronic messages. Its primary objective is to minimise the amount of unsolicited spam by setting out clear rules on consent, the content of messages and the provision of an easy means to opt out. 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.

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 CEACA may from time to time communicate with tenants, contractors or stakeholders about promotional events and activities. Communication about these events and activities could be unwanted by the recipient and considered as Spam. Most of the communication from CEACA to tenants will relate to services provided by CEACA. The following types of communication are not considered as Spam as they relate to the services provided by CEACA:

- General information and updates about CEACA, including tenant newsletters.
- Informing and reminding tenants, contractors or stakeholders of appointments.
- Contacting tenants regarding rent payments.
- Contacting tenants about maintenance to the properties.
- Notices of meetings.
- Contacting tenants about alleged breaches of their tenancy agreement. and
- Vacating, allocating and letting a property.
- Emergency Services or safety notices.

Privacy

- CEACA abides by the Australian Privacy Principles (refer *CEACA-PP-006 CEACA Privacy Policy*).
- CEACA will only collect personal or sensitive data that is necessary for the organisation to carry out its duties.
- CEACA will not release personal contact details to un-related organisations, nor will we use personal information for direct marketing purposes.

Letters and Notices

- CEACA will send communication to tenants, contractors or stakeholders primarily via email or text, but if necessary, will also send via Australia Post or delivered by hand.
- All letters must be printed onto CEACA headed paper and sent using Australia Post or a similar service or through personal delivery by CEACA or Managing Agency staff.
- All letters must be dated. Letters will be drafted with consideration given to principles of plainer English drafting.
- Communications sent by Australia Post may include:
 - Letters regarding services provided by CEACA, rent arrears, appointments, maintenance repairs, breaches of tenancy agreements, tenancy/property management etc.
 - Tenant Newsletters.
 - Surveys.
- Text messages will only be sent to tenants who do not have access to email and only if the item is of a general nature (eg. notice regarding maintenance works). If the notice is too lengthy for a text message and the sending by post is not an option due to time constraints, the Managing Agent will be asked to print a copy of the notice and place it in the tenant's mailbox.
- All legal notices must be sent by Australia Post or hand delivered by CEACA or their Managing Agent.

Electronic Messages

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

- **Permission from Tenants** – Tenants 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 CEACA is the organisation sending the message. Example: For SMS include a Sender ID with the name CEACA. All emails must be sent from a registered CEACA 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.

Obtaining permission

- As part of the new tenant application process, applicants will be asked by the Managing Agent for their contact method preferences. During this process, applicants will also be asked for their consent to share information.
- The communication preferences will be entered and stored in the Managing Agents files. Copies of the forms the applicant has signed giving their consent to share information and communication preferences are uploaded and saved in the tenant's file.
- During the annual property inspections and, on occasion, through other contact with tenants, the Managing Agent's staff will check with tenants if their contact details and preferences have changed. Any changes will be recorded and updated in the Managing Agent's system.

Social Media

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

Tenant information

- All tenants will be provided with information explaining how CEACA will contact them and protect their privacy.
- Changes to the policy and guidelines will be communicated to tenants, applicants or contractors through newsletters, emails or letters.

Informed decision making

To assist individuals where cultural or communication barriers are identified, or where an individual is unable to consent on their own behalf, staff will:

- Advise the tenant to approach a Community Resource Centre or shire office in their area who can assist.
- Engage an advocate, guardian, or family member of the Service Users choice to witness the signing of the agreement. The Managing Agents will organise representation for tenants under 18 years of age where they are unable to nominate a representative for themselves.

DEFINITIONS

Term	Definition
Managing Agent	Any third party who carries out functions on behalf of CEACA or a tenant of CEACA. 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 CEACA.
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.