

Cambridge Housing Authority Data Use Privacy Policy

Whereas the CHA collects information about its tenants and applicants for a wide variety of purposes, including: tenant selection, periodic rent determination, property management and compliance with regulatory and contractual obligations; and

Whereas the CHA is covered by the Fair Information Practices Act, M.G.L. ch.66A and regulations covered by 760 CMR 8;

Whereas: M.G.L. c.66A §1 defines Personal Data as “any information concerning an individual which, because of name, identifying number, mark or description can be readily associated with a particular individual; provided, however, that such information is not contained in a public record, as defined in clause twenty-sixth of section seven of chapter four and shall not include intelligence information, evaluative information or criminal offender record information as defined in section one hundred and sixty-seven of chapter six.”

Now therefore the CHA mandates that:

1. This Data Use Privacy Policy shall apply to the Cambridge Housing Authority (CHA), its employees, and third parties conducting business with CHA.
2. “Identifiable Data” includes any data or combination of data that can readily be identified with a particular individual. All “Personal Data” defined under ch.66A is “Identifiable Data.” Further all data contained in any Criminal Offender Record Information (CORI), medical history, and data regarding domestic violence or other violent crime shall be Identifiable Data.
3. Identifiable Data shall not be disclosed to any person within or outside of CHA other than in the performance of official duties other than as required by law.
4. CHA shall require that any third party that has access to Identifiable Data execute a ‘Holder Agreement’ as required by Massachusetts law, binding the third party to the requirements of this policy.
5. CHA will secure permission from individuals prior to sharing any Identifiable Data with a third party.
6. Non-Identifiable Information includes any data that is disassociated from unique identifiers that would permit the information to be associated with a particular individual.
7. CHA may use Non-Identifiable Information for auditing purposes, trend analysis, and research to improve CHA’s business practices – including the development, revision, and implementation of agency policies and programs. CHA may aggregate Non-Identifiable Information to generate internal and external reports.
8. CHA shall inform applicants, residents and voucher holders that the U.S. Department of Housing and Urban Development (HUD) and the Massachusetts Department of Housing and Community Development (DHCD) may have access to Identifiable Data (“Personal Data”) held by the CHA.
9. Applicants, residents and voucher holders may grant or withhold their permission when requested to provide information or release of information; however, failure to permit CHA to obtain the required information or agree to its release consistent with this Policy may result in delay, ineligibility for programs, or termination of tenancy or housing subsidy.
10. CHA shall appoint a Data Security and Privacy Officer to enforce this policy.

Rights of Data Providers

Data Providers (i.e., applicants, residents, voucher holders or other participants in CHA programs) have the following rights in regard to their Personal Data collected by CHA.

1. No Identifiable Data may be used for any purpose other than those described above without a person's consent.
2. No Identifiable Data may be disclosed to any other person other than those described above without a person's consent. If CHA receives a legal order to release the data, CHA will notify the person in question in accordance with the provisions of M.G.L. ch.66A.
3. Individuals or their authorized representative have a right to inspect and copy any data collected about them, except as provided by M.G.L. ch.66A or 760 CMR 8.
4. Individuals may ask questions and receive answers from CHA regarding processes and procedures for data collection and use.
5. Individuals may object to the collection, maintenance, dissemination, use, accuracy, completeness or type of data held by CHA. CHA shall investigate the objection and shall either correct the problem or make the objection part of the person's file. If individuals are dissatisfied, they may appeal to the Data Security and Privacy Officer. Further appeal is to the CHA Grievance or Conference Panel.