Administrator
National Health
Funding Pool

National Health
Funding Body

Data Governance Policy

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Preface

The Data Governance Policy details the information collected, the purpose for the collection, its use, storage, disclosure, and disposal, by the Administrator of the National Health Funding Pool and the National Health Funding Body (NHFB).

The security of all data provided by jurisdictions is of particular importance.

All data requested is either not identified, or de-identified, that is, the data does not contain identifiers as defined by the Privacy Act 1988. We use de-identified information for the purposes of carrying out our work under the NHR Act, NHR Agreement and Addendum. While de-identification does not remove the chances of spontaneous recognition by people in a specific setting, the risk is actively managed through controls and data access safeguards as per OAIC guidance.

Additionally, the NHFB has systems and processes in place for the collection and storage of data in line with the Commonwealth's Protective Security Policy Framework.

The NHFB has embedded the five safes framework into our approach in making decisions about sharing and releasing data and any disclosure of data must be in accordance with provisions under the NHR Act.

This document will be updated as necessary to ensure these arrangements reflect changes in the legislative environment and best practice data and information management.

Additional information on the data required by the Administrator is detailed in the Administrator's Three Year Data Plan and is available from the website at www.publichospitalfunding.gov.au

This policy applies to **all data and information held, collected, generated or managed by the NHFB** — including data received or produced in the exercise of functions under the National Health Reform Act 2011 (NHR Act) and the National Health Reform Agreement, including the Addendum to the National Health Reform Agreement 2026–31 (the Addendum), and the NHFB's own agency data holdings (including financial, human resources, procurement, ICT and corporate governance data). See *Scope of this Policy* below for further detail on how these categories are governed.



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Administrator
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Chief Executive Officer
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Scope of this Policy

This Data Governance Policy applies to **all data and information held, collected, produced or managed by the NHFB**, regardless of source or format. This includes two broad categories:

- Program data – data received or produced by the Administrator and the NHFB in performing functions under the NHR Act, the National Health Reform Agreement and the Addendum, including 'protected Administrator information' and 'protected Funding Body information' as defined in section 5 of the NHR Act. Release and disclosure of this category is governed by the NHR Act (see Information governance principles and Release of information below) and, from 1 July 2026, by the data provisions of the Addendum (see Compliance with the Addendum's data requirements below).
- Agency (corporate) data – data generated or held by the NHFB in its capacity as a non-corporate Commonwealth entity, including financial management data, human resources and personnel data, procurement data, ICT and records data, and corporate governance material. This category does not fall within the NHR Act's protected information provisions – section 5(b) of the NHR Act limits 'protected Funding Body information' to information relating to the affairs of a person other than an official of the Funding Body, which does not extend to the NHFB's own staff or internal corporate records. Agency data is instead governed by the *Public Governance, Performance and Accountability Act 2013* (PGPA Act), the *Privacy Act 1988*, the *Freedom of Information Act 1982*, the *Archives Act 1983*, the Commonwealth Procurement Rules, and NHFB's internal delegations and the Shared Services arrangement with the Department of Health and Aged Care.

Where a provision of this policy refers to 'protected Administrator information' or 'protected NHFB information', that provision applies only to program data as defined above. Provisions of general application (for example, Data Security and Storage Arrangements, Data Archiving and Disposal, and Privacy) apply to both categories unless otherwise stated.

Role of the Administrator and NHFB

The Administrator of the National Health Funding Pool (the Pool) and the National Health Funding Body (NHFB) were established through the Council of Australian Governments National Health Reform Agreement (NHR Agreement) of August 2011.

The primary functions of the NHFB are to assist the Administrator in:

- Calculating and advising the Commonwealth Treasurer of the Commonwealth's contribution to public hospital funding in each State and Territory
- Reconciling estimated and actual public hospital services, and adjusting Commonwealth payments
- Undertaking funding integrity analysis to identify public hospital services that potentially received funding through other Commonwealth programs
- Monitoring payments of Commonwealth, State and Territory public hospital funding into the Pool
- Making payments from the Pool to each Local Hospital Network (LHN)

- Reporting publicly on NHR Agreement funding, payments, and services
- Developing and providing three-year data plans to the Commonwealth, States and Territories. The Administrator is independent of Commonwealth, State and Territory governments.

The functions of the Administrator are set out in the National Health Reform Act 2011 (NHR Act) and common provisions in relevant State and Territory legislation.

From 1 July 2026, the Addendum to the National Health Reform Agreement 2026–2031 (the Addendum) extends and updates these arrangements for a further five years, including the introduction of the Service Model and Funding Reform (SMRF) stream and revised national body data obligations under Schedule I of the Addendum. The Administrator and the NHFB are treated as one national body for data plan purposes under clause I78(d) of the Addendum.

The Five Safes Framework

The NHFB uses the Five Safes framework to support management of the privacy and confidentiality of data. The *Data Availability and Transparency Bill 2020* includes reference to Data Sharing Principles based on the Five Safes framework.

The Five Safes is an approach to thinking about, assessing and managing risks associated with data sharing and release. The Five Safes has been embedded into the NHFB's Data Governance and Release Framework which outlines the structure of policies, roles, procedures and systems that will be used to support data management.

Information collected

Table 1 provides a summary of the information collected or produced by the Administrator and the NHFB. The Administrator's rolling Three-Year Data Plan provides further detail on the information required by the Administrator to undertake their functions. The information required is dependent on the provision of data by a number of stakeholders and the Administrator and the NHFB will not disclose the information unless it complies with legislation.

Table 1 Summary of information collected or produced[1]

Information	Category	Level of detail	Provided by / derived by	Purpose of data	Data steward
Public Health Funding	Financial data	State and Territory	Commonwealth Department of Health, Disability and Ageing	Calculation of Commonwealth contribution	Director, Data, Modelling and Analysis
Service estimates	Hospital activity data	Service category within LHN	States and Territories	Calculation of Commonwealth contribution	
Service agreements	Activity and financial data	LHNs	States and Territories	Calculation of Commonwealth contribution	
Highly Specialised Therapies Data	Activity and financial data	Patient level	States and Territories	Reconciliation and funding integrity	
Hospital activity data	De-identified	Patient level	States and Territories	Reconciliation and funding integrity	
Medicare PIN for hospital activity data	De-identified	Patient level	States and Territories through Services Australia	Reconciliation and funding integrity	
Medicare Benefits Schedule (MBS) claims data	De-identified	Patient level	Commonwealth Department of Health, Disability and Ageing	Reconciliation and funding integrity	
Pharmaceutical Benefits Scheme (PBS) claims data	De-identified	Patient level	Commonwealth Department of Health, Disability and Ageing	Reconciliation and funding integrity	

[1] Any data that directly identifies an individual has been removed from the data prior to the NHFB receiving it

Information	Category	Level of detail	Provided by / derived by	Purpose of data	Data steward
Matched hospital activity data with MBS claims data	De-identified	Patient level	NHFB from linking hospital service activity and MBS claims data	Reconciliation and funding	Director, Data, Modelling and Analysis
Matched hospital activity data with PBS claims data	De-identified	Patient level	NHFB from linking hospital service activity and PBS claims data	Integrity	
Hospital Casemix Protocol (HCP) data	De-identified	Patient level	Commonwealth Department of Health, Disability and Ageing	Reconciliation and funding	
Private Hospital Data Bureau (PHDB) data	De-identified	Patient level	Commonwealth Department of Health, Disability and Ageing	Integrity	
Matched hospital activity data with HCP data	De-identified	Patient level	NHFB from linking hospital service activity and HCP data	Reconciliation and funding	
Funding and payment transactions	Financial data	LHNs and third party	States and Territories and NHFB	Reporting national health reform funding payments	Chief Finance Officer
Bank account details	Financial data	LHNs and third party	States and Territories	Payment of Commonwealth and State and Territory contributions via the Pool	
Monthly report data	Financial data	Service category within LHN	States and Territories and NHFB	Publication of monthly reports	
Correspondence from stakeholders	To be assessed when provided	To be assessed when provided	Various	Various	Deputy Chief Executive Officer

Information governance principles

The Administrator and the NHFB are committed to transparency and open access to information where appropriate and complies with legislation. In determining if information can be released or disclosed, consideration will be given to the following principles.

Principle 1 – Adherence to Sections 245, 268 and 270 of NHR Act

Under Section 245, the Administrator is required to provide to the Responsible Minister any information requested by that Responsible Minister that relates to their jurisdiction.

Sections 268 and 270 set out circumstances in which information may be disclosed by the Administrator and the NHFB, relevantly including where:

- the disclosure is for the purposes of the NHR Act (or, in the case of the Administrator, a National Health Reform law); or
- the disclosure is for the purposes of the performance of the functions of the Administrator and the NHFB under the NHR Act (or, in the case of the Administrator, a National Health Reform law); or
- the disclosure is in the course of a person's employment or service in the capacity as the Administrator or as an official of the NHFB.

Principle 2 – Consistency with role

The release or disclosure of the requested information is within the terms of the Administrator's and NHFB's remits and safeguards their independence.

Principle 3 – Compliance with legislation

The NHR Act, the Addendum, and the National Health Reform laws of each State and Territory govern the role, functions, and responsibilities of the Administrator and the NHFB. Information released or disclosed must comply with legislative requirements. Legislation includes but is not limited to:

- *National Health Reform Act 2011*
- *National Health Reform Agreement*
- *Public Governance, Performance and Accountability Act 2013*
- *Privacy Act 1988*
- *Freedom of Information Act 1982*
- *Health Services Act 1997 – New South Wales*
- *Health (Commonwealth State Funding Arrangements) Act 2012 – Victoria*
- *Hospital and Health Boards Act 2011 – Queensland*

- *National Health Funding Pool Administration (South Australia) Act 2012 – South Australia*
- *National Health Funding Pool Act 2012 – Western Australia*
- *National Health Funding Administration Act 2012 – Tasmania*
- *Health (National Health Funding Pool and Administration) Act 2013 – Australian Capital Territory*
- *National Health Funding Pool and Administration (National Uniform Legislation) Act 2012 – Northern Territory*
- *Archives Act 1983*
- *Commonwealth Procurement Rules (made under section 105B of the PGPA Act)*

Principle 4 – Application to agency (corporate) data

Where a request relates to agency (corporate) data as defined in Scope of this Policy – for example, financial, human resources, procurement or ICT data – this section and the Release of information section below do not apply. Release or disclosure of agency data is instead determined in accordance with the Privacy Act 1988, the Freedom of Information Act 1982, the PGPA Act, and the NHFB's internal delegations and information/records management framework, with the relevant Data Steward as the first point of contact (see Data Roles below).

Release of information

The information received or derived by the Administrator and the NHFB is defined as 'protected Administrator information' and 'protected Funding Body information' respectively.

Section 5 of the NHR Act states the following:

a) *protected Administrator information means information that was obtained by a person in the person's capacity as the Administrator; and*

b) *protected Funding Body information means information that:*

   i. *was obtained by a person in the person's capacity as an official of the Funding Body; and*

   ii. *relates to the affairs of a person other than an official of the Funding Body.*

Release of protected Administrator information

Under section 245 of the NHR Act, the Administrator may release protected Administrator information to the responsible Minister for a jurisdiction in the following circumstances:

Table 2 Release of protected Administrator information

Who	Circumstance
Responsible Minister for a jurisdiction	Responsible Ministers of all jurisdictions
Responsible Minister for that jurisdiction	The Administrator is required to provide to the responsible Minister for a jurisdiction any information requested by that responsible Minister that relates to that jurisdiction.
Information relating to another jurisdiction	The Administrator is required to provide to the responsible Ministers of all jurisdictions a copy of advice provided by the Administrator to the Treasurer of the Commonwealth about the basis on which the Administrator has calculated the payments to be made into State Pool Accounts by the Commonwealth. The Administrator may at any time provide any information that relates to a jurisdiction to the responsible Minister for that jurisdiction. Any information relating to a jurisdiction that is provided by the Administrator to another jurisdiction may only be publicly released by that other jurisdiction in accordance with arrangements approved by the responsible Minister for the jurisdiction to which the information relates.

In addition, each of the following is an exception to the prohibition on the disclosure or use of protected Administrator information under section 268(1) of the NHR Act:

a) the disclosure or use is authorised by the NHR Act or by a National Health Reform law of a State or Territory;

- *the disclosure or use is in compliance with a law of the Commonwealth or a law of a State or Territory;*
- *the disclosure or use is for the purposes of the NHR Act or a National Health Reform law of a State or Territory;*
- *the disclosure or use is for the purposes of the performance of the functions of the Administrator under the NHR Act or a National Health Reform law of a State or Territory;*
- *the disclosure or use is in the course of the Administrator's employment or service as the Administrator;*
- *the disclosure or use is in accordance with a direction given by COAG under subsection238(3);*
- *the disclosure is to the Treasurer of the Commonwealth or a State or Territory, or to the responsible Minister for the Commonwealth or a State or Territory;*
- *the disclosure is of information that relates to the affairs of a person with consent of the person; and*
- *the disclosure is of information that has already been lawfully made available to the public.*

Release of protected NHFB information

Section 269 of the NHR Act provides that each of the following is an exception to the prohibition on the disclosure or use of protected NHFB information:

- the disclosure or use is authorised by Division 2 of Part 5.4 of the NHR Act; and
- the disclosure or use complies with a requirement under a law of the Commonwealth or a prescribed law of a State or a Territory.

Division 2 of Part 5.4 of the NHR Act authorises the disclosure or use of protected NHFB information in the circumstances outlined in Table 3 under the NHR Act.

Table 3 Disclosure of protected NHFB information

Who	Circumstance
Disclosure for the purposes of the NHR Act Section 270	An official of the Funding Body may disclose or use protected Funding Body information if: ▪ The disclosure or use is for the purposes of the NHR Act; or ▪ The disclosure or use is for the purposes of the performance of the functions of the Funding Body under the NHR Act; or ▪ The disclosure or use is in the course of the official's employment or service as an official of the Funding Body

Who	Circumstance
Disclosure to the Minister Section 271	An official of the Funding Body may disclose Protected Funding Body Information to: ▪ The Minister; or the Treasurer
Disclosure to State/Territory Health Ministers Section 272	An official of the Funding Body may disclose protected Funding Body information to a State/Territory Health Minister
Disclosure to the Secretary etc. Section 273	An official of the Funding Body may disclose protected Funding Body information to: ▪ The Secretary of the Commonwealth Department of Health and Aged Care; or The Head (however described) of the Health Department of a State or Territory
Disclosure to a Royal Commission Section 274	▪ An official of the Funding Body may disclose protected Funding Body information to a Royal Commission The Funding Body CEO may, by writing, impose conditions to be complied with in relation to protected Funding Body information disclosed under subsection (1) An instrument under subsection (2) is not a legislative instrument
Disclosure to certain agencies, bodies or persons Section 275	Scope 1. If the Administrator or the Funding Body CEO is satisfied that particular protected Funding Body information will enable or assist any of the following agencies, bodies or persons: a) The Australian Commission on Safety and Quality in Health Care; b) The Independent Health and Aged Care Pricing Authority; c) The Administrator; d) The Standing Council on Health; e) Health Chief Executives Forum[2] (HCEF) f) The Australian Institute of Health and Welfare; g) The Australian Statistician; h) A State/Territory government body that has functions relating to health care; i) An agency, body or person specified in a legislative instrument made by the Minister with the agreement of the Health Council; j) to perform or exercise any of the functions or powers of the agency, body or person. 2. the Health Council is to give its agreement for the purposes of paragraph (1)(j) by a written resolution of the Health Council passed in accordance with the procedures determined by the Health Council[3].

Who	Circumstance
	Disclosure 3. If an official of the Funding Body is authorised by the Administrator or the Funding Body CEO, in writing, for the purposes of this section, the official may disclose that protected Funding Body information to the agency, body or person concerned If protected Funding Body information is disclosed under subsection (3) to an agency, body or person, the agency, body or person must not disclose or use the information for a purpose other than the purpose for which the information was given to the agency, body or person.
Disclosure to Researchers Section 276	Scope 4. This section applies if the Administrator or the Funding Body CEO is satisfied that particular protected Funding Body information will assist an agency, body or person to conduct research Disclosure 5. If an official of the Funding Body is authorised by the Administrator or the Funding Body CEO, in writing, for the purposes of section 276, the official may disclose that protected Funding Body information to the agency, body or person concerned.
Disclosure with Consent Section 277	An official of the Funding Body may disclose protected Funding Body information that relates to the affairs of a person if: ▪ The person has consented to the disclosure; and ▪ The disclosure is in accordance with the consent.
Disclosure of Publicly Available Information Section 278	An official of the Funding Body may disclose protected Funding Body information if it is already publicly available.

The Administrator and the NHFB are committed to respond to information requests in a professional and timely manner. Requests for release or disclosure of protected Administrator information and protected NHFB Information must be in writing and requested via nhfa.administrator@nhfa.gov.au.

Compliance with the Addendum's data requirements

Schedule I of the Addendum sets out data requirements that apply to the Administrator and the NHFB (treated as one national body for this purpose) from 1 July 2026. This section summarises the key obligations; it is not a substitute for the Addendum itself.

- **Three-Year Data Plan (clauses I78–I82)** – the Administrator and the NHFB jointly develop and maintain a rolling three-year data plan, provided to the Health Ministers' Meeting (HMM). Parties have 45 calendar days from release to lodge a submission challenging the plan.
- **Data requirements principles (clause I79)** – data requirements must use existing national data collections where practical, conform with national data development principles, allow reasonable timeframes for standardised collection, support 'single provision, multiple use', and balance national benefit against the impact on providing jurisdictions.
- **Data sharing (clauses I89–I90)** – data provided to national bodies may be shared with the AIHW, the ABS, Services Australia (for de-identification), and Commonwealth and State health departments and treasuries for policy analysis and planning (de-identified data only). Recipients must not publish or provide the data to third parties without the originating jurisdiction's written approval.
- **Statement of Assurance (clauses I93–I94)** – States provide IHACPA with a Statement of Assurance from a senior health department official on the completeness and accuracy of approved data submissions; the Commonwealth (relevant Divisional Data Steward) provides an equivalent statement for Commonwealth-provided data. IHACPA provides statements of assurance to the Administrator.
- **Data oversight (clause I92)** – the Commonwealth and States are responsible for data integrity within their own systems, and must notify the Administrator of established data oversight mechanisms by 30 June 2027 and provide annual updates thereafter.
- **Data Conditional Payment (clauses A222–A229)** – the Commonwealth's monthly payment to a State may be made subject to a Data Conditional Payment where the State has not provided Required Data in time for Annual Reconciliation.

Table 4 below applies primarily to program data roles. For agency (corporate) data, the Chief Finance Officer remains Data Steward for financial data, and the Director, Data, Modelling and Analysis remains Data Custodian for ICT-managed data assets. All Data Owners, Stewards and Custodians remain responsible for ensuring agency data under their area of responsibility is used, secured and disclosed in accordance with the Privacy Act 1988, the PGPA Act, and NHFB's internal delegations, in addition to their existing responsibilities under this policy.

Data Roles

Table 4 Key data roles and accountabilities

Role	Related Data Asset	Accountabilities
Data owners: NHFB CEO / Administrator	Protected NHFB Information and NHFB Corporate data assets In conjunction with the Administrator, oversight, and management of Protected Administrator Information.	Final Approver for Protected NHFB Information Final Approver for NHFB data assets Data Governance Policy Ensures the proper use of data assets is within legal requirements and NHFB objectives.
Data Stewards: Deputy Chief Executive Officer and Directors (Director Data, Modelling and Analysis, Chief Finance Officer and Director Policy, Planning and Performance)	Various specific data sets relating to their area of responsibility such as human resourcing, calculation, payments, reporting etc	Authorise access to and release of their data assets Development of documentation, business rules, data standards and data quality rules for the use and development of their data assets with the assistance of the Subject Matter Experts (SMEs) First point of contact for all data governance issues and change control processes for their data assets Assess impact of any high-risk data governance issues and escalate to relevant Data Owners with supporting recommendations.
Data Custodians Security Advisor and ICT Services and Security provided by the Department of Health, Disability and Ageing under a Shared Services Agreement	Enterprise Data Warehouse, Records Management System (TRIM) and desktop software	Maintenance and administration of the technical security of data sets Ensure technical processes support the use and security of the data assets Technical provision of accesses as directed by the relevant data steward Maintenance of data storage for ongoing data security and integrity
Subject matter experts (SMEs)	Various specific data sets relation to their area of responsibility such as human resourcing	Use data to undertake designated roles and associated processes
All NHFB staff (including contractors)	Calculation, payments, reporting etc	Raise data-related concerns, issues and problems to the relevant Data Steward. Knowledge share with relevant Data Steward. Work within the current data governance policies and best practices.

NHFB Data Holdings

Table 5 The Administrator and NHFB's data holdings

Who	Circumstance
Estimated National Weighted Activity Unit (NWAU)	Data submitted by the States and Territories providing an estimate of the hospital activity for a financial year by Local Hospital Network (LHN) and/or the Service Category.
Commonwealth Contribution Model (CCM)	Using data provided by the States and Territories, information provided by the IHACPA and information from the Commonwealth Government, the Commonwealth Contribution Model (CCM) is used to calculate Commonwealth funding to the States and Territories.
Payment Advice	Payment calculations are advised to the States and Territories in the form of amounts, recipients, and purpose of payments
Reconciliation (Actual NWAU)	Reconciliation of estimate and actual hospital activity data provided by States and Territories to adjust for any variances and determine final payments (six-monthly and annually)
Funding integrity	De-identified patient activity data in the form of Submission A (provided by States and Territories via IHACPA) and Submission B (provided by States and Territories via Services Australia) seek to identify any Commonwealth payments made more than once for the same hospital service
Monthly reporting	The National Health Reform (NHR) payments by State, Territory and Commonwealth governments are provided to local hospital networks. Monthly Reports are provided at National level, State or Territory level, local hospital network level within each State and Territory and Service Category level.
Compliance reporting	The Commonwealth, State and Territory compliance with the data requirements specified in the Administrator's Three-Year Data Plan and reported in the Quarterly Compliance Reports
Corporate	Information relating to NHFB corporate matters including Financial, Human Resources, Procurement, Internal Audit and Assurance, Policies and Procedures, Secretariat, Annual Reports and Corporate Plan

The 'Corporate Information' row of Table 5 above covers the NHFB's agency data holdings. For clarity, this includes: financial management data (budgets, PGPA Act annual financial statements, banking and payment records); human resources and personnel data (employee records, payroll processed via the Shared Services arrangement with the Department of Health and Aged Care, work health and safety records); procurement data (records maintained in accordance with the Commonwealth Procurement Rules); ICT and records data (including the Enterprise Data Warehouse, TRIM and desktop systems); and governance and legal data (Board and Audit and Risk Committee papers, delegations, annual reports and corporate plan). These holdings are governed by the Privacy Act 1988, the PGPA Act, the Archives Act 1983 and the Commonwealth Procurement Rules, rather than by the NHR Act protected information provisions.

Data Security and Storage Arrangements

There is commitment to the security of all data, and particularly patient level data submitted by States and Territories. The Commonwealth Department of Health and Aged Care Enterprise Data Warehouse is being used as a secure facility for the submission, storage and dissemination of data to enable the Administrator's reconciliation processes including National Weighted Activity Unit calculation and determination of activity-based funding eligibility.

The Administrator and the NHFB are reliant on the assurances provided by the Department of Health and Aged Care to attest the security and storage arrangements of the data. Where appropriate, security measures and standards employed are consistent with those provided within the Protective Security Policy Framework issued by the Commonwealth Attorney-General's Department and the Australian Government Information Security Manual issued by the Australian Signals Directorate.

The NHFB's agency (corporate) data – including financial, human resources and ICT systems – is largely hosted and managed by the Department of Health and Aged Care (DoHAC) under the Shared Services Individual Agency Agreement (IAA), co-signed in November 2024. Under the IAA, each party is responsible for protecting the data under its own control and must promptly notify the other of any material security breach. Each party is also responsible for the ICT security conduct of its own employees and contractors.

More information on the Department of Health's Aged Care's Data Strategy can be found here.

Data archiving and disposal

As a data asset ages, it may become necessary to archive or dispose of it, depending on any future use requirements and its sensitivity. The NHFB is obligated by the requirement outlined in the NHR Act and the Agreement supported by broader legislation contained in the *Archives Act 1983* and the *Public Governance, Performance and Accountability Act 2013* when archiving or disposing of information collected and managed by the NHFB, in accordance with its Records Authority 2020/00197566.

This obligation applies to all NHFB data holdings, including agency (corporate) data, not only to protected Administrator or protected NHFB information collected under the NHR Act.

Privacy

Both the Administrator and the NHFB are entities for the purposes of the *Privacy Act 1988* and are required to comply with the Australian Privacy Principles (APPs) set out in that Act. The APPs apply to sensitive and personal information.

This obligation applies to all personal information handled by the NHFB, including personal information about NHFB staff and contractors held for human resources purposes, in addition to personal information encountered in the course of the NHFB's functions under the NHR Act and the Addendum.