

PoI_122	<h2 style="margin: 0;">Information Management of Participant Records</h2>
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Life Choice is committed to collecting, keeping and disposing of participant records in ways that protect privacy and ensure confidentiality is maintained. This policy will operate in conjunction with the organisation’s Privacy Policy. Life Choice conforms to the *Federal Privacy Act (1988)* and *the Australian Privacy Principles* which govern the collection, use and storage of personal information.

Life Choice will:

- collect and keep information about participants only when it is relevant and necessary to the provision of the service
- ensure data about each participant is up to date, accurate and secure, whether stored in hard copy or electronically, in accordance with privacy legislation
- take account of any relevant cultural or religious sensitivities of people using services in the way information about them is collected, stored and used
- store participants record for the required length of time
- transfer or dispose of participants records correctly
- give participants an option to remain anonymous or use a pseudonym unless an exemption under the Privacy Act applies
- provide information to participants about how their personal information is managed

When the organisation collects, keeps and uses identifiable data about a participant, the following procedures will be implemented to guarantee the privacy of the participant, ensure that records are appropriate, accurate and secure.

Record of policy development		
Version	Date approved	Date for review
2020/2	September 2022	September 2024

Responsibilities and delegations	
This policy applies to	All staff
Policy approval	Quality & Risk Committee

Policy context – this policy relates to:	
Standards	NDIS Practice Standards and Quality Indicators 2018
Legislation	Federal Privacy Act Australian Privacy Principles
References	Disability Discrimination Action 1992 NDIS Practice Standards and Quality Indicators 2018
Organisation policies	Privacy Policy Consent Policy and Procedure

Forms, record keeping, other documents	Assessment form Complaints register Copy of signed Service Agreement Enquiry form Privacy statement Participant intake form Participant Support Plan
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Procedures

Collecting identifiable data

At the [specify point within service provision process] the [staff position/other personnel] will request the following information from the client:

- [list information to be collected]

Collecting identifiable data

The organisation collects and records the following information about individual participants relevant to the management of services or support needs: (including but not limited to)

- Participant's personal details
- Enquiry form
- Referral information
- Assessments
- Support plans and goals
- Copy of signed agreement
- Privacy statement
- Participant's reviews and reports
- Details regarding service responses, including complaint information

This information is collected for the purpose of:

- service monitoring, evaluation and reporting (de-identified information only is used for this purpose)
- meeting the reporting requirements of NDIS Commission, NDIA
- monitoring and management of service to individuals (case files)
- meeting the legal requirements of Life Choice

Life Choice will review the scope of information collected regularly to ensure that only relevant information is being recorded.

When information is being sought from participants, the staff member seeking the information will request the person's consent to provide the information and inform them of:

- the reason for requesting the information
- how the information will be recorded and stored
- what other information will be recorded during the provision of service
- how their privacy will be protected

- their rights to view or access information about them

The staff member will ask the participant if they have any concerns or specific requests about the way their personal information will be recorded or managed.

If identifiable information about a participant will be shared with another agency, the staff member will obtain the participant's consent for this and record the date of the verbal consent or obtain the client's signature on a consent form.

Communication/file notes for participants

- Communication/file notes for participants must include the following components:
 - Date the entry is made
 - Time when the entry is being made
 - Time when the event occurred
 - Nature of the event in a factual, accurate, complete and timely manner
 - Signature of the person making the entry
 - Surname of the person making the entry (printed in brackets)
 - Person's position of employment.
- Staff must ensure that all relevant information about the participant is entered into the person's file notes in a factual, accurate, complete and timely manner.
- The file notes for each participant should be written when a significant event occurs or to record the type of support provided while working with a participant. The definition of a significant event will vary, from person to person and should be determined in consultation with the supervisor and should relate to the support required by the person-centred plan.
- It's required that staff make an entry in the file notes on each workday, even when the person's day has gone according to plan and without the occurrence of unusual or extraordinary events.
- All entries made into file notes should be placed on the next available line. Under no circumstances should blank spaces be left on the file notes sheet.
- All file note entries made by staff, on behalf of another staff member, e.g. dictating over the phone, must be signed by the person dictating the notes on their next shift. It is the responsibility of that person to check the entry for accuracy and, if required, note any corrections that need to be made on the next line available.
- Whenever required, the participants should be made aware of what has been recorded in their progress/file notes.

Storage and use of identifiable data

- All current hard copy files for participants must be kept in a secure area, such as a lockable filing cabinet at the service, ensuring only authorised personnel can gain access to a participant's personal information. Authorised personnel include Life Choice's staff members who are employed to provide support to the participants. If files can't be stored at the service, then alternative arrangements will need to be made by the participant and the CEO to ensure confidentiality and security.
- If stored at the service, current files of participants can only be taken from the service by relevant staff from Life Choice to provide the participant's information or access to another service, such as a doctor.

- All electronic files must be password protected to ensure confidentiality and security.
- All data is stored in the shared drive of the server.
- All computer data (including emails) is backed up every night to a remote server.
- Periodic testing of backed-up data is undertaken to check the reliability of the system.

Faxing of information about participants should only be considered in exceptional circumstances. For example, when time constraints prohibit the use of standard security services and only when the receiver of the fax can guarantee the security of the information.

Staff must not undertake any of the following actions without the express approval of the CEO:

- Photocopying any confidential document, form or record
- Copying any confidential or financial computer data to any other computer, USB or storage system such as Google Docs
- Conveying any confidential data to any unauthorised staff member or to any other person/s.

Participants/guardians are provided access to their records on request.

- The CEO should approve and control the way participants access their files to ensure the security of other non-related information is maintained.
- All participant's files are the property of Life Choice and, although a participant and their guardian can access the file, it cannot be taken by a participant or guardian; or be transferred to any service external to Life Choice without permission of the CEO.

When access is requested by anyone other than staff employed by Life Choice

- it will only be granted when the CEO is satisfied the policies and procedures of Life Choice have been followed and access to the file is in the best interest of the participant.
- Such access will only be granted when the appropriate person has given consent.
- Copies of files that are legitimately released for any reason shall be recorded on an appropriate letter, which shall be signed as a receipt by the service recipient or their legal guardian.
- Any students on placement at Life Choice may only access files with the consent of the participant or their guardian.
- Students will be required to provide a written undertaking that they will always maintain confidentiality and only use non-identifying information. This agreement is to specify what information is to be used for and advise that any written compositions containing information are to be provided to the CEO for approval, before dissemination.

File management

All staff are responsible for managing the filing of participant records, maintaining the register of participant records and managing the archiving and disposal of client records in accordance with their job description.

A register of participant records will be kept. The register will cover all hardcopy and electronic files, day books, diaries, staff notes etc. and all computer data systems where information about clients is stored. For each type of record, the register will document:

- the type of information recorded
- where the records or data are stored

- who is responsible for entering and maintaining the record
- what security measures are in place
- when and how the information is updated
- how this particular set of records are disposed of (frequency or time period and method)

Record disposal

All records, after their active period, must be kept in archive files for an additional time. Regulatory, statutory, legislative requirements determine the retention period, or alternatively defined by Life Choice as best practice (refer to 'Attachment 1: Disposal and archiving of documents').

Archived records must be identified and stored in a way that allows for easy access and retrieval when required. Archived records, in hard copy, must be stored in an environment which minimises deterioration and damage, i.e. not exposed to direct sunlight, moisture, extremes of temperature, pests, dust and fire hazards.

Attachment 1: Disposal and archiving of documents

Function/Activity	Description	Retention/Disposal Action	Custody
Aboriginal & Torres Strait Islander	Documents relating to Aboriginal health Normal operational documents	Lifetime 7 years after the person's last contact with the service	Office
Business Information	Name Address Telephone number Compliance notices Financial records	7 years	Office
Internal Audits	Audit schedule Audit questions Audit reports	2 years	Office
Participant Records	Name Address Telephone number Emergency contact details Application or other documents Complaints about non-delivery of services Incident Records	7 years	Office

	Complaint Records BSP Records		
Contracts / Leases	Properties etc.	• 7 years	Office
Corrective Action	Corrective Action Requests	• 2 years	Office
Financial	Audits Budgets Receipts Cheques Petty Cash Documents and other financial records	• 7 years	Office
Management Review	Minutes of Meetings Monthly Reports	• 2 years	Held on PCs according to type of meeting

End of document
