

19. Information Management Policy and Procedure

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Purpose

Australian Quality Care actively works towards implementing and operating effective communication processes and information management systems. We strive to maintain all information systems and practices in accordance with legislative, regulatory compliance and organisational standards.

Scope

It is the policy of Australian Quality Care that all participants, Staff, volunteers and contractors will have records established upon entry to the service and maintained while active at Australian Quality Care.

Policy

- Australian Quality Care will maintain effective information management systems that keep appropriate controls of privacy and confidentiality for stakeholders.
- Australian Quality Care's policies and procedures are stored as read-only documents in the Policies and Procedures folder on the shared drive.
- Australian Quality Care is responsible for maintaining the currency of this information with assistance from the Board and other Staff as required.
- The involvement of all Staff is encouraged to ensure Australian Quality Care's policies and procedures reflect best practice and to foster ownership and familiarity with the material.
- A copy of each form used by our organisation is maintained in the shared drive
- All Staff can access the policies and procedures at Australian Quality Care's office in a paper-based or electronic format.
- Policies and procedures are reviewed every three (3) years at a minimum, or as required.
- All superseded policies and procedures are deleted from Australian Quality Care's Policy and Procedure folder and electronically archived by the Board or a delegate.

Procedure

Australian Quality Care information management system

Participant documentation procedure

- Confidentiality of participant records is maintained.
- All Australian Quality Care's Staff and volunteers responsible for providing, directing or coordinating participant support must document their activities.
- Participant's files will provide accurate information regarding their services and support and will contain, but is not limited to:
 - Participant's personal details
 - Referral information
 - Assessments
 - Support plans and goals
 - Participant's reviews
 - Details regarding service responses.
- Original participant documentation is stored in the participant's central file.
- Information relating to a participant's ongoing situation, including changes to their situation, e.g. increased confusion, deteriorating health, increased risks, is to be documented in the participant's notes.
- All Australian Quality Care's Staff who are required to document the activities relating to support of participants will be appropriately trained in documentation and record-keeping.
- Individuals are not permitted to document on behalf of another person.
- Participant records will be audited regularly to ensure documentation is thorough, appropriate and of high quality.
- Participant records will be stored in a safe and secure location with access available to authorised persons only.
- Agreements with brokerage agencies will include a requirement for brokerage workers to document their activities regularly.
- Staff must ensure that all relevant information about the progress of, or support provided to a participant, is entered into that person's file notes in a factual, accurate, complete and timely manner.
- Staff must only use information collected from a participant for the purpose for which it has been collected.
- Participants should be advised that data which has been collected, but which does not identify any participant, may be used by the organisation for a service promotion, planning or evaluation.

- Participants, family and advocates have a right to access any of their personal information that has been collected. Staff will support such persons to access their personal information as requested.

Entering Australian Quality Care's service

Australian Quality Care will work with the participant, their advocate/s and any other family or service providers/individuals to develop and document a participant support plan; this will be documented using Australian Quality Care's Support Plan.

A participant file will be created to act as the central repository of all participant's service information and interactions.

The participant's file will only contain material relevant to the management of services or support needs.

Ongoing documentation procedures

Our ongoing documentation procedures include:

- Maintaining participant information in the electronic Participant Management System, in accordance with system practices
- Documenting participant information and service activities only on Australian Quality Care's approved forms or tools
- Ensuring other service agencies and health professionals involved with the care or support of Australian Quality Care's participant, provide adequate documentation of their activities and the participant's wellbeing or condition.

Security of files and participant information

- All current hard copy files for participants must be kept in a secure area ensuring only authorised personnel can gain access to a participant's personal information.
- Authorised personnel include Australian Quality Care'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 management to ensure confidentiality and security.
- All electronic files must be password protected 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 Australian Quality Care to provide the participant's information or access to another service, such as a doctor.
- Non-current files should not be removed from the service unless:
 - They are being moved to a more secure archival storage unit
 - Permission has been sought from the Board to do so

- 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 management:
 - 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.

Access to participants files

- Participants/guardians are provided access to their records on request. Management should approve and control the way participants access their files to ensure the security of other non-related information is maintained.
- Access to a participant's file is the direct responsibility of management. When access is requested by anyone, other than Staff employed by Australian Quality Care it will only be granted when management is satisfied the policies and procedures of Australian Quality Care 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.

Staff records

Staff files are kept in a secure location on an electronic file and are available only to senior staff as relevant.

Minutes of meetings

Minutes of meetings are maintained on the shared drive.

Other administrative information

Individual Staff are responsible for organising and maintaining the filing of general information in accordance with their job descriptions.

Administrative information including funding information, financial information and general filing are maintained on the secure electronic drive.

Electronic information management

Data storage

- All data is stored in the shared drive of the server.
- Board is the only person who can add new data folders to the shared drive of the server.

External programs

No programs, external data or utilities are installed onto any workstation without the permission of management.

Log-in credentials

Log-in credentials are assigned by senior management.

Email

- Staff should send and receive a minimal number of personal emails.
- Pornographic, sex-related or spam email received is to be deleted immediately. Under no circumstances are Staff allowed to open or respond to spam emails.

Internet access

- Internet access is restricted to work-related purposes.
- Under no circumstances are Staff allowed to access pornographic or sex-related sites.

IT Support

- Our organisation maintains an ongoing IT support.
- If Staff experience problems with a program, computer, or any other piece of IT equipment, they can, in the first instance, contact the ICT officer.
- If necessary, senior management will arrange for the IT consultant/s to assist.

Social media

- Our organisation is aware that social media, e.g. social networking sites such as Facebook, Twitter or similar; video and photo-sharing sites; blogs; forums; discussion boards; and websites promote communication and information sharing.
- Staff who work in our organisation are required to ensure the privacy and confidentiality of the organisation's information and the privacy and confidentiality of the participant and

their information. Staff must not access inappropriate information or share any information related to their work through social media sites.

- Staff are required to seek clarification from management, if in doubt as to the appropriateness of sharing any information related to their work on social media sites.

Monitoring information management processes and systems

As part of our audit program we regularly audit information management processes and systems. Staff, participants and other stakeholders are encouraged to provide ongoing feedback on issues and areas where improvements are possible.

Archival and storage

All records, after their active period, must be kept in the archive files for an additional time. Regulatory, statutory, legislative requirements determine the retention period, or alternatively defined by Australian Quality Care as a 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.

Destruction of records

- The following procedures apply for the destruction of records:
 - Junk mail and instructional post-it notes may be placed in recycling bins or other bins as required.
- All other Australian Quality Care records or documents requiring destruction are to be:
 - Shredded and then placed in recycling bins
 - Sent off-site to be securely pulped
- Deleted from the network.

Related Documents

- All electronic and hard copy Australian Quality Care documentation
- Complaints Register
- Consent Policy and Procedure
- Enquiry form
- Privacy Statement
- Participant Intake Form
- Participant Support Plan

References

- [Disability Discrimination Act 1992](#)
- [NDIS Practice Standards and Quality Indicators 2020 - Version 3](#)
- [Privacy Act \(1988\)](#)
- [Work Health and Safety Act 2011 \(QLD\)](#)

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