

Information Management Policy and Procedure



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1.0 Purpose

- To ensure Beloved Care Services Pty Ltd operates effective communication processes and information management systems
- To maintain information systems and practices in accordance with legislative, regulatory compliance and organisational standards

2.0 SCOPE

It is the policy of Beloved Care that all Participants, Staff, Volunteers and Contractors of Beloved Care Services will have records established upon entry to the service and maintained whilst active at Beloved Care.

3.0 POLICY

- Beloved Care Services will maintain effective information management systems that keep appropriate controls of privacy and confidentiality for stakeholders
- Beloved Care Services Policies and Procedures are kept as read-only documents in The Policies and Procedures folder on the shared drive.
- Beloved Care Services is responsible for maintaining the currency of this information with assistance from the Director and other staff as required
- The involvement of all staff is encouraged to ensure Beloved Care Services Policies and Procedures reflect 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 in the sub-folder; entitled "Forms"
- All staff can access the Policies and Procedures at Beloved Care Services Office in paper-based or electronic format.
- Policies and procedures are reviewed every three years at a minimum, or as required.
- All superseded policies and procedures are removed from Beloved Care Services.
- Policy and Procedure folder and electronically archived by the Director or their delegate.

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4.0 PROCEDURES

4.1 Beloved Care Services Information Management System

4.1.1 Participant Documentation Procedure

- Confidentiality of participant's records is maintained.
- All Beloved Care Service'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:
 - o Participant's personal details.
 - o Referral information.
 - o Assessments.
 - o Support plans and goals.
 - o Participant's reviews.
 - o Details regarding service responses.
- Original participant documentation will be stored in the participant's central file.
- Information relating to participant's ongoing situation, including changes to their situation (i.e. increased confusion, deteriorating health, increased risks, etc.) is to be documented in the participant's notes.
- All Beloved Care Service's staff 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's 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 was collected.

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- Participants should be advised that data which has been collected but which does not identify any participant may be used by the organisation for the purposes of a service promotion, planning and 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.

4.1.2 Entering Beloved Care Services Pty Ltd

- Create a Participant file to act as the central repository of all Participant's service information and interactions. This will only contain material relevant to the management of services or support needs, including but not limited to:
 - o Enquiry form
 - o Copy of signed agreement
 - o Assessments
 - o Support Plan
 - o Participant Intake form
 - o Communication notes
 - o Privacy statement, and
 - o Complaint information
- Assign a unique identifier for each participant for documentation and record-keeping Purposes
- Collect initial information using Beloved Care Service’s Participant Intake form.
- Collect only personal information necessary to assess and manage the participant’s support needs.
- Beloved Care Service’s Assessment Report to document the Participant's assessment information.
- Beloved Care Services Director will work with the Participant, their advocates(s) and any other family or service providers/individuals to develop and document a Participant Support Plan. This will be recorded using Beloved Care Service’s Support Plan.

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4.1.3 Ongoing Documentation Procedures

- Maintain participant information in the electronic "Participant Management System" in accordance with system practices.
- Document participant's information and service activities only on Beloved Care Services approved forms or tools.
- Ensure other service agencies and health professionals involved with the care or support of Beloved Care Services Participant provide adequate documentation of their activities and the participant's wellbeing or condition.
- Clearly document:
 - o The outcomes of all ongoing participant's assessments and reassessment.
 - o Changes or redevelopment of Participant's Support Plans, including revised goals or preferences.
 - o Any critical incidents or significant changes in the participant's health or well-being.
 - o Conversations (in person or via telephone) with the participant, family members, their representative or advocate.
 - o Conversations regarding the participant, with any other providers, agencies, health/ medical professionals, family members or other individuals with interest in the participant.
 - o Activities associated with the participant's admission and exit, including referrals.

4.1.4 Setting up and Maintaining Files for Participants

- Once the personal file for the participants has been established, staff must maintain that file to ensure that all information is accurate, up-to-date and complete.
- Staff must document in the person's file, significant issues and events that arise during their work with the participants as those events and problems occur.
- As information in the personal file becomes non-current (that is, information that no longer has any bearing on the services being provided to the participant), staff will establish an archival file, and progressively cull such non-current information into that file for storage in a secure place.
- The Director must regularly audit the files of participants to ensure that:
 - o The file is up to date.
 - o All forms are being used appropriately.
 - o Non-current information is being culled and stored in the archival file.
 - o The progress/file notes are factual, accurate, complete and in chronological order.
- When a participant leaves the service, his/her personal file and archival file are to be stored in a secure place such as a locked area, or password-protected folder on a computer; all under the control of Beloved Care Services.

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4.1.5 Participant's file formats in hard copy

The files of Participants will be established and maintained in the following format:

- The file will consist of a standard manilla folder or another similar folder or held in a secure electronic format with password access.
- The forms must be based on the current formats which have been approved by Beloved Care Services
- Archival files may be in the form of lever-arch folders or archive boxes and multiple in number; as required.
- If files are held in an electronic format, the forms/domains and formats must similarly be approved.
- For ease of access materials in the archival file should be listed chronologically with each page numbered in order and in groups of similar forms.

4.1.6 Security of Files and Participant information

- All current hard copy files for participants must be kept in a secure area, such as a lockable filing cabinet at the service to ensure that only authorised personnel can gain access to personal information of a participant.
- Authorised personnel include Beloved Care Services staff members who are employed to provide support to the participants. If it is not possible for files to be stored at the service, then alternative arrangements should be made by the participant and the Director 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 Beloved Care Services when it is clearly 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:
 - o They are being moved to a more secure archival storage unit.
 - o Permission has been sought from the Director to do so.
- Staff must not undertake any of the following actions without the express approval of the Director:
 - o Photocopy any confidential document, form or record.
 - o Copy any confidential or financial computer data to any other computer, USB or storage system such as google docs.
 - o Convey any confidential data to any unauthorised staff member or to any other person(s).

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4.1.7 Transporting Hard Copy Files of Participants

If for any reason the files of participants need to be transported from one location to another, such as from their usual site to a doctor, the files must be carried in a locked document container, such as a briefcase or attaché case. Beloved Care Services will provide such locked cases wherever required

4.1.8 Communication / file notes for Participants

- Communication/file notes for Participants must include the following components:
 - o The date of each entry is made.
 - o The time when the entry is being made.
 - o The time when the event occurred.
 - o The nature of the event in a factual, accurate, complete and timely manner.
 - o The signature of the person making the entry.
 - o The surname of the person making the entry (printed in brackets).
 - o The 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. The definition of a significant event will vary from person to person and should be determined in consultation with the Director and should relate to the support required by the person-centred plan.
- It is 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.

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4.1.9 Access to Participant's Files

- Participants and/or their guardians must have access to their own records on request - the Director should approve and control the way participants access their files to ensure that the security of other non-related information is maintained.
- Access to the participant's files is the direct responsibility of the Director. When access is requested by anyone other than staff employed by Beloved Care Services it will only be granted when the Director is satisfied with that the policies and procedures of Beloved Care Services has been followed, and access to the file is in the best interest of the participant. Such access will only be granted when consent has been given by the appropriate person.
- All the participant's files are the property of Beloved Care Services and, although participants and their guardians can access the file, it cannot be taken by the participants or their guardian or be transferred to any service external to Beloved Care Services without permission of the Director.
- 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.
- The proper procedure for releasing information about participants to persons or services that are external to Beloved Care Services is to proceed as per the "Consent Policy and Procedure."
- Any students on placement at Beloved Care Services 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. The contract is to specify what information is to be used for and that any written compositions containing the information will be given to the Director for approval

4.2 Staff Records

Staff files are kept in a filing cabinet in the Director's office and are available only to the Director. The filing cabinet is locked when the office is unattended

4.3 Minutes of Meetings

Minutes of meetings are maintained on the shared drive.

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4.4 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 in the filing cabinets in Director's office. The cabinets are locked out of hours or when the office is unattended for a lengthy period of time.

4.5 Electronic Information Management

4.5.1 Data Storage

- All data is stored in the shared drive of the server.
- Only the Director can add new data folders to the shared drive of the server.

4.5.2 Backup

- 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 this system.

4.5.3 External Programs

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

4.5.4 Log-in Credentials

- Assigned by the Director or their delegate.

4.5.5 Email

- Staff may send and receive minimal personal emails.
- All emails are filed in the appropriate folders set up by the Director
- Pornographic, sex-related or other junk email received is to be deleted immediately. Under no circumstances are staff allowed to respond to junk emails.

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4.5.6 Internet

- Internet access is restricted to work-related purposes.
- Internet access reports are maintained on the server and are regularly reviewed by the Director
- Under no circumstances are staff allowed to access pornographic or sex-related sites.

4.5.7 Getting Help and Reporting Problems

- Our organisation maintains an ongoing IT support agreement.
- If staff experience problems with a program or computer or any other piece of equipment, they can, in the first instance, contact the Director
- If necessary, the Director will arrange for the IT Consultant(s) to help.

4.5.8 Social Media

We are aware that social media (social networking sites; Facebook, Twitter or similar, video and photosharing sites, blogs, forums, discussion boards and websites) promotes 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's 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 the Director if in doubt as to the appropriateness of sharing any information related to their work on social media sites

4.6 Monitoring Information Management Processes and Systems

Information management processes and systems are regularly audited as part of our audit program. Staff, Participants and other stakeholders are encouraged to provide ongoing feedback on issues and areas where improvements can be made.

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4.7 Archival and Storage

All records after their active time must be kept in archive files for an additional period. This retention period is determined by regulatory, statutory, legislative requirements and /or defined by Beloved Care Services as best practice. (Please See “Disposal and Archiving of Documents” (Attachment 1) for a guide to retention periods.)

Records in the archive 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, fire hazards, etc

4.8 Destruction of Records

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

5.0 REFERENCES

- Disability Discrimination Action 1992 (Commonwealth)
- Privacy Act (1988)
- Work Health and Safety Act 2011
- NDIS Practice Standards and Quality Indicators 2018

6.0 RELATED DOCUMENTS

- All electronic and hard copy Beloved Care Services documentation
- Support Plan
- Communication notes
- Privacy statement
- Complaint information

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7.0 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 Complaint Records BSP Records	7 years	Office
Contracts / Leases	Properties etc.	• 7 years	Office

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Corrective Action Financial	Corrective Action Requests Audits Budgets Receipts Cheques Petty Cash Documents and other financial records	• 2 years • 7 years	Office Office
Management Review	Minutes of Meetings Monthly Reports	• 2 years	Held on PCs according to type of meeting

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