

## 2.06 Client Records Policy

<b>Policy area</b>	Service Provision
<b>Last revised</b>	June 2018
<b>Scheduled review date</b>	June 2020
<b>Compliance</b>	Privacy Act 1988 (Cth); Australian Privacy Principles (APP); Personal Information Protection Act 2004 (Tas); Right To Information Act 2010 (Tas); Archives Act 1983 (Cth)
<b>Related Documents</b>	Client Rights and Service Charter; Client Agreement; Staff Confidentiality Agreement

### Purpose

This policy provides a framework for Engender Equality in dealing with the management of client records.

### Policy

Engender Equality is committed to collecting, keeping and disposing of client records in ways that protect privacy and maintain confidentiality. This policy will operate in conjunction with 4.05 Privacy and Confidentiality Policy.

The efficient and confidential collection and storage of client-related data and information is a quality management principle that supports:

- quality service delivery through the effective and responsible management of client records;
- continual improvement approaches to service delivery through review of trends and feedback (including information analysis on such key program development areas as unmet demand; access, equity and diversity; client satisfaction and areas of improvement); and
- compliance with legislative and contractual responsibilities.

Specifically, Engender Equality will:

- Collect and keep information about clients only when it is relevant and necessary to the provision of the service;
- Collect, store and report all data required by service delivery contracts within the boundaries of client confidentiality and privacy legislative responsibilities;
- Ensure data about each client 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;
- Keep records only for the required length of time, and transfer or dispose of client records correctly;
- Inform clients about data collection and management processes and purposes;
- Consider potential safety issues for the client and their children and make accommodations where reasonably possible;
- Give clients an option to remain anonymous or use a pseudonym unless an exemption under the privacy act applies;
- Ensure that all data collection proposals are non-intrusive; and
- Collect and analyse appropriate client data to inform service improvements, staff professional development, and performance management.

## Procedures

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

### Client data collection

Engender Equality collects client data for the purposes of service monitoring, evaluation and reporting. De-identified information only is used for these purposes. Engender Equality also collects client data to monitor and manage services to individuals. The CEO will review the scope of information collected annually to ensure that only relevant information is being recorded.

Engender Equality collects and records the following information about individual clients:

- Demographic data;
- Contact information;
- Case notes; and
- Other information that is essential to delivering services and/or protecting client's safety.

### Management of client records

Information collected about individual clients is stored securely on the Engender Equality electronic database and in hard copy form in locked filing cabinets, both of which can only be accessed by authorised staff who have signed the Engender Equality Staff Confidentiality Agreement.

Engender Equality counsellors are responsible for managing the filing of client records, maintaining the database of client records and managing the archiving and disposal of client records.

In recording personal information about clients, workers will ensure that they adhere to professional codes of practice in order to ensure objectivity and prevent inappropriate or irrelevant comments.

Paper based client records are kept until the client has reached the age of 25 years or for a minimum of seven years from the time of last contact - whichever is the longer.

### Client rights

Clients may request access to their files and personal information, and may request to change information that is inaccurate. Engender Equality will facilitate access in the manner requested by the client if it is reasonable and practicable to do so. Clients will not be given access to information about other people, even if they were party to the sessions the client attended. Where access to information is denied the client will be given a reason for this decision. A request for access by a client must be considered and responded to within two weeks.

Individuals who are refused access to their own records or information files may appeal by contacting the CEO, who will review the decision in the context of this policy.

### Informed consent

When information is sought from clients, Engender Equality staff 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; and
- Their rights to view or access information about them.

This information is included in the Client Rights and Service Charter and Client Agreement. A copy of the signed Client Agreement must be stored in each client's records.

Clients must give additional consent for identifiable information about them to be shared with another agency, except under circumstances where Engender Equality is legally required to disclose information or disclosure is needed to prevent serious and imminent threat to life, health or safety. In such cases, the client will remain informed and involved in the process as much as reasonably possible.

### **Additional safety concerns**

Engender Equality counsellors should explore any client concerns or specific requests about the way their personal information will be recorded or managed. Where there are specific concerns for the client's safety, accommodations may be made to increase the anonymity or security of that client's records, such as with the use of a pseudonym, or hard copy only records. Counsellors should notify the CEO in such circumstances.

## **Authorisation**

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<b>Authorised by</b>	Alina Thomas CEO		
<b>Signature</b>	<i>Alina Thomas</i>	<b>Date</b>	August 2018

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