# 2.06 Client records Policy

Policy type	Service provision		
Last revised	October 2025		
Scheduled review date	October 2027		
Related documents	Therapeutic Service clinical governance guidelines		
	Therapeutic Service practitioner handbook		
	Staff confidentiality agreement		
	Client details & confidentiality and Therapeutic		
	counselling agreement		
Related policies	2.04 Client safety and security Policy		
	2.13 Request for client information Policy		
	2.24 Legal requests Policy		
	4.05 Privacy and confidentiality Policy		

### Purpose

The purpose of this policy is to describe Engender Equality's approach to the creation and maintenance of client records, including the collection and protection of personal information about clients.

# 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 ethical service delivery through the effective and responsible management of client records 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;
- Inform clients about data collection and management processes and purposes at the beginning of their service engagement;
- Ensure data about each client is up to date, accurate and secure, whether stored in hard copy or electronically;
- Keep records only for the required length of time (7 years), and transfer or dispose of client records correctly according to best practice guidelines including the State Archivist and standards provided by peak professional bodies;
- 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;
- Take account of any relevant cultural or religious sensitivities of people using services in the way information about them is collected, stored and used; and

• Collect and analyse appropriate client data to inform service improvements, staff professional development, and performance management.

# **Application**

This Policy and its associated procedures are applicable to all employees, volunteers, and students at Engender Equality.

# Responsibilities

The CEO is responsible for creating, reviewing and managing this policy and related procedures.

Practitioners and other workers are responsible for ensuring that they comply with this policy and related procedures.

### **Procedures**

Engender Equality operates in accordance with the Personal Information Protection Act (Tasmania), 2004. That Act establishes the Personal Information Protection Principles which operate in Tasmania.

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.

Engender Equality maintains the following information about individual clients:

- Demographic data:
- Contact information;
- Feedback and complaints (when clients have chosen to identify themselves)
- Case notes: and
- Other information that is essential to delivering services and/or protecting client safety.

Engender Equality will ensure that the information it collects and maintains about clients is accurate, complete and up-to-date.

#### Informed consent

When information is sought from clients, Engender Equality 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:
- How their privacy will be protected; and
- Their rights to view, access and update information about them.

This information is included in the *Client details & confidentiality and Therapeutic counselling Agreement*. A copy of the signed *Client details &* 

confidentiality and Therapeutic counselling Agreement must be stored in each client's records.

Clients must give additional consent for identifiable information about them to be used for a purpose other than that for which it was collected.

Clients must give consent for identifiable information to be disclosed to another agency or individual, except where:

- Engender Equality is legally required to disclose information (2.24 Legal requests Policy); or
- Disclosure is needed to prevent serious and imminent threat to life, health or safety (for example, to child safety services or the police, in accordance with 2.04 Client Safety & Security Policy).

In such cases, the client will remain informed and involved in the process as much as reasonably possible.

### Management of client records

Information collected about individual clients will be stored securely on the Engender Equality electronic database which can only be accessed by authorised staff who have signed the Engender Equality *Staff confidentiality agreement*.

Therapeutic practitioners are responsible for managing the filing of client records, maintaining the database of client records and managing the archiving and disposal of client records.

A regular auditing process is in place to ensure practitioners comply with this Policy.

In recording personal information about clients, practitioners or other workers will case note in line with the case noting guidelines in the *ETS Practitioner Handbook*.

Client records will be kept for a minimum of seven (7) years from the time of last contact or until the client has reached the age of 25 years, whichever is the longer.

Records of managing and documentation of allegations and incidents of child abuse can be destroyed 125 years after the date of birth of the child. (Disposal schedule for records relating to child abuse DA2520 – Office of the State Archivist).

### Disposal freeze on records about children

The Office of the State Archivist (Tas) has issued a disposal freeze on records that relate to children. This freeze is to protect records that may become relevant for National Redress Scheme applicants, or for people taking legal action for abuse suffered when they were children. For more detail, please refer to the <u>Guide</u> available from the Office of the State Archivist.

### Client rights

Clients may request access to their records and personal information. Engender Equality will facilitate access in the manner requested by the client if it is reasonable and practicable to do so – refer to 2.13 Request for client information Policy.

# Additional safety concerns

Engender Equality workers will 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. Workers should notify the CEO in such circumstances.

### Authorisation

Authorised by	Alina Thomas, Chief Executive Officer	Date	October 2025