

# Information Management Policy and Procedure

## Impactful Solutions

### **Purpose**

The intent of this policy and procedure is to demonstrate Impactful Solutions' commitment to the governance of Information Management. We aim to provide excellent service outcomes for all participants and a harmonious and safe workplace for our team. Impactful Solutions will ensure we provide services according to best practice and legislative requirements.

Impactful Solutions will achieve optimal service, by actively working together with participants and stakeholders, supported by a workforce that has the appropriate knowledge and skills and follows our values.

### **Scope**

This policy and procedure are applicable to all our team, participants and stakeholders.

### **Policy**

Impactful Solutions will maintain effective information management systems that keep appropriate controls of privacy and confidentiality for stakeholders.

Impactful Solutions is responsible for maintaining the currency of this information with assistance from the Director and other team members as required.

The involvement of all team members is encouraged to ensure Impactful Solutions 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, titled "Forms".

All team members can access the policies and procedures at Impactful Solutions on the share drive and in hard copy upon request to Management.

Policies and procedures are reviewed as required.

All superseded policies and procedures are electronically archived.

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### Procedure

#### Participant Documentation Procedure

- Confidentiality of participant's records is maintained.
- All Impactful Solutions team members are 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 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 Impactful Solutions team members required to document the activities relating to support of participants will be appropriately trained in documentation and record keeping.
- Participants 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 team members to document their activities regularly
- Team members 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.
- Team members 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. Team members will support such persons to access their personal information as requested.

### Entering Impactful Solutions service

- Create a participant file to act as the central repository of all participant's service information and interactions on SPLOSE.

**The file will contain material relevant to the management of services or support needs, including but not limited to:**

- Referral form.
- Copy of signed agreement.
- Assessments.
- Support Plan.
- Participant tracking form.
- Participant Intake form.
- Communication notes.
- Welcome Pack.
- Risk Assessments
- Collect only personal information necessary to assess and manage the participant's support needs.
- Impactful Solutions management will work with the participant, their advocates(s) and any other family or service providers/participants to develop and document a Plan.

### Ongoing documentation procedures

- Maintain participant information in the cloud-based electronic "OneDrive".
- Document participant's information and service activities only on Impactful Solutions approved forms or tools.
- Ensure other service agencies and health professionals involved with the care or support of Impactful Solutions participant provide adequate documentation of their activities and the participant's well-being or condition.

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### **Clearly document:**

- The outcomes of all ongoing participant's assessments and reassessment.
- Changes or redevelopment of participant's Plans, including revised goals or preferences.
- Any critical incidents or significant changes in the participant's health or well-being.
- Conversations (in person or via telephone) with the participant, family members, their representative or advocate.
- Conversations regarding the participant, with any other providers, agencies, health/ medical professionals, family members or other participants with interest in the participant.
- Activities associated with the participant's admission and exit, including referrals.

### **Setting up and maintaining files for participants**

- Once the personal file for the participants has been established, team members must maintain that file to ensure that all information is accurate, up-to-date, and complete.
- Team members 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), team members will establish an archival file, and progressively cull such non-current information into that file for storage in a secure place.

### **Files are audited to ensure that:**

- The file is up to date.
- All forms are being used appropriately.
- Non-current information is being culled and stored in the archival file.
- 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 Impactful Solutions.

### **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 form.
- The forms must be based on the current formats which have been approved by Impactful Solutions.

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- 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.

### **Security of files and participant information**

- All current hard copy files for participants must be kept in the provided lockable cabinet at the Director's home address to ensure that only authorised personnel can gain access to personal information of a participant.
- Hard copies used to transport to and in between client visits are secured in the Director laptop bag and returned to the lockable cabinet at the Director's home address upon completion of the work day.
- Authorised personnel include employed Impactful Solutions team members.

### **Team members must not undertake any of the following actions without the express approval of HR/CEO:**

- Photocopy any confidential document, form or record.
- Copy any confidential or financial computer data to any other computer, USB or storage system such as google docs.
- Convey any confidential data to any unauthorised worker or to any other person(s).

### **Communication/file notes for participants must include the following components:**

- The date of each entry is made.
- The nature of the event in a factual, accurate, complete and timely manner.
- The name of the person making the entry.
- Team members 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 relate to the support required by the person-centred plan.
- It is required that team members 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.

### **Access to participant's files**

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- Participants and/or their guardians must have access to their own records on request - the team member responsible for delivering the service 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 team member responsible for delivering the service.
- When access is requested by anyone other than team members employed or engaged by Impactful Solutions, the CEO will determine a decision for granting release. Access will only be granted when consent has been given by the appropriate person.
- All the participant's administration files are the property of Impactful Solutions and, although participants and their guardians can access the file, they cannot be taken by the participants or their guardian or be transferred to any service external to Impactful Solutions without permission of the CEO.
- Although participants and their guardians can access the file, it cannot be taken by the participant or their guardian, or be transferred to any service external to Impactful Solutions, without permission of the CEO.
- Any students on placement at Impactful Solutions 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.

**Team members files are kept in a password protected electronic file and are available only to the Director.**

### **Minutes of meeting**

- Minutes of meetings are maintained electronically and are sent via email to those concerned and available upon request.

### **Other administrative information**

- Team members 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 electronically.

### **Data storage**

- All data is stored in the shared drive of the server.

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### **Backup**

- All computer data (including emails) are backed up in the cloud.

### **External programs**

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

### **Log in credentials**

- Assigned by the Director.

### **Email**

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

### **Internet**

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

### **Getting help and reporting problems**

- Our organisation will seek professional technical support by an appropriately selected provider if/when required by the Director.

### **Social media**

- We are aware that social media (social networking sites; Facebook, Twitter or similar, video and photos haring sites, blogs, forums, discussion boards and websites) promotes communication and information sharing. Team members 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.

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

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

### 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 Impactful Solutions as best practice.
- 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.

### 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 Impactful Solutions records/documents for destruction are to be shredded first using the shredding device located at the Director’s home address and then placed in the garbage bin.

### Disposal and archiving of documents

Function/Activity	Description	Retention/Disposal	Action Custody
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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.	2 years	Office
Corrective Action	Corrective Action Requests	7 years	Office
Financial	Audits Budgets Receipts	2 years	Office
	Cheques Petty Cash  Documents and other financial records		
Management Review	Minutes of Meetings Monthly Reports	7 years	Held on PCs according to type of meeting

### Breach of this Policy

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Disciplinary action may be taken against any employee who directly approves of, or has knowledge of, violations of this policy.

### Related Legislation

Privacy Act 1988

Australian Privacy Principles (APPs)

National Disability Insurance Scheme Act 2013

National Disability Insurance Scheme (Provider Registration and Practice Standards) Rules 2018

Health Records and Information Privacy Act 2002 (NSW)

Health Records Act 2001 (Vic)

Health Records (Privacy and Access) Act 1997 (ACT)

Information Privacy Act 2009 (Qld)

Information Privacy Act 2000 (SA)

Personal Information Protection Act 2004 (Tas)

Information Act 2002 (NT)

Freedom of Information Act 1982 (Commonwealth)

Electronic Transactions Act 1999 (Commonwealth)

Archives Act 1983 (Commonwealth)

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APPROVED BY	Kylie Izquierdo		
	The signatory (lead Executive) is accountable to implement, maintain and monitor appropriate systems to achieve the objectives of this document.		
BUSINESS PORTFOLIO	Specialised Behaviour Support		
CONTACT FOR QUERIES	Director		