

RECORDS AND INFORMATION MANAGEMENT POLICY AND PROCEDURE

Purpose and Scope

The purpose of this policy and procedure is to provide direction to staff on the creation and management of information and records. It meets relevant legislation, regulations and standards as per *Schedule 1.0 Legislative References*.

It applies to all:

- Ace Allied Health staff
- aspects of Ace Allied Health's business and
- business information created and received.

This policy and procedure covers:

- information and records in all formats, including documents, emails, voice messages, memoranda, minutes, audio-visual materials and business system data
- all applications used to create, manage and store information and records, including Ace Allied Health's client and financial management systems, emails, websites, social media, databases and business information systems, and
- information and records created for Ace Allied Health and managed in-house and off-site.

Applicable NDIS Practice Standards

- Information Management

Definitions

Information - knowledge that is communicated or received. It is the result of processing, gathering, manipulating and organising data in a way that adds to the knowledge of the receiver.

Information management – a system for creating, collecting, organising, storing, retrieving and distributing information. This information may be in any format and available from internal or external sources.

Record – information that is information in any form (including data in a computer system) and that is required to be kept as evidence of the activities or operations of a business.

Records management – a system for creating, receiving, maintaining, using and disposing of records. This includes processes for capturing and maintaining evidence of business activities and transactions.

Policy

Ace Allied Health's information and records are a corporate asset, vital for supporting its ongoing operations and for providing evidence of business decisions, activities and transactions.

Ace Allied Health's information and records management practices meet its business needs, accountability requirements and stakeholder expectations. They also support all stages of the information lifecycle:

Procedures

General

As per Ace Allied Health's *Human Resources Policy and Procedure*, all staff must undergo Induction, which includes training in privacy, confidentiality and information management. Staff knowledge and application of confidentiality, privacy and information management processes is monitored on a day-to-day basis and through annual Performance Reviews. Additional formal and on-the-job training is provided to staff where required.

All information, in paper copy, electronic or any other format, created by Ace Allied Health staff in the course of their employment, or that is accessed by staff on Ace Allied Health's equipment, is the property of Ace Allied Health.

Work-related information or storage devices (such as USB drives) must not be taken from Ace Allied Health without permission from the Directors.

Creating Records

All Ace Allied Health staff must create records of all business activities and decisions, including with respect to interacting with and supporting NDIS clients. This includes file notes of verbal conversations related to client support or business activities, particularly where those conversations provide directions that need to be followed or queries that need to be followed up and answered.

Information that should not be recorded includes information that is not related to Ace Allied Health's activities and decisions and duplicated information where an appropriate record has already been created.

Records must be created in the most appropriate format for the information being recorded. For guidance on what format should be used to create a particular record, staff should consult the Directors and Team Members.

Records created must contain all relevant detail and be accurate and objective. See the *Client Case Notes Policy and Procedure* for guidance on recording support-related case notes.

Wherever possible, records should be created in digital format. Hard copy records should only be created when absolutely necessary (such as when they are required for legal purposes).

Document Control

Documents created for Ace Allied Health must have document control applied to ensure that only current and up-to-date documents and forms are used and referenced. This includes:

- title or document reference
- issue date
- document owner or controller
- version number and
- details of the revision/changes.

All documents issued will be recorded in Ace Allied Health's *Quality Management System Register (QMS Register)* to enable efficient tracking of documents and version history. Documents must be authorised by the Directors before being distributed (and the authorising person listed as the Document Owner).

Out of date, superseded or revoked documents are to be archived or disposed of in accordance with the relevant procedures listed below.

Updating Policies and Procedures

Policies and procedures are designed to be 'living' documents that provide a central source of information and direction for all staff and other stakeholders. They make sure everyone at Ace Allied Health is following a consistent approach and should help guide staff in making decisions.

Policies and procedures need to match what is happening in the organisation. If there is a discrepancy, either staff need to be retrained to follow the correct procedures, or the procedures should be updated to reflect the true process.

Updates to policies and procedures should occur:

- when there are changes to legislation or regulations relevant to Ace Allied Health's services
- when there is a decision by the Board of Directors to change a process
- following an incident and the investigation reveals a change in process is needed
- if there is feedback or a complaint and the investigation reveals a change in process is needed
- if a new system is implemented
- within the specified timeframe for review (if this has not occurred prior) e.g., every 1- 2 years depending on the document review cycle or
- as part of continuous improvement activities and it is identified that changes are required.

To update a procedure, the Directors will:

1. *Draft*

Prepare a draft procedure. This may need to be done in consultation with other staff, clients or other stakeholders, depending on the source or nature of the change.

2. *Review Draft*

Once the draft has been prepared, the Board of Directors will review the proposed procedure and note any changes required.

3. *Consult*

Depending on the source or nature of the change, consult with other relevant staff, clients or other stakeholders and obtain their feedback about the proposed Draft.

4. *Approve*

When no further changes are required, the Board of Directors will approve the procedure. Approval of the procedure is to be documented in the Board of Directors meeting minutes.

5. *Publish*

Once the procedure has been approved, the Directors will finalise the procedure for publishing. The Directors will notify PIA Powered by PNYX (email pia@poweredbypnyx.au) so that the updates can be published to the

Comm.Care system. PIA Powered by PNYX will update Ace Allied Health's *Document Control Register* with the details of the change.

6. *Archive*

Any previous versions of the procedure must be archived/removed from access as per the *Retaining and Disposing* section of this procedure.

7. *Communicate/Train*

Depending on the nature of the change will determine what communication and/or training is required to ensure that all relevant staff and stakeholders are informed and aware of the new requirements.

Storing Records

Records must be stored securely in the most appropriate system, whether it be physical (e.g. locked filing cabinets) or electronic. For guidance on what system should be used to store a particular record, staff should consult the Directors.

Records should be created and stored methodically and logically (e.g. in relevant categories, on relevant client or staff files, in chronological order, using naming conventions, etc.).

Where information is initially received in a digital format it should be retained in that format where possible (for instance, not printed and filed in hard copy). Digital records should only be converted to a different digital format if the content and quality of the record can be maintained.

Electronic Records

Ace Allied Health's electronic records are stored securely in the following information management systems:

- QuickBooks for financial management
- Zanda Health for client record keeping
- PIA powered by PNYX for Policies and Procedures, and Microsoft Office for business-related records, including emails, and
- Ace Allied Health Intranet (sharepoint) - for all staff records, training records, and policies and procedures, forms related to service provision and training material.

Staff must use individual user names, passwords and two-factor authentication to access these systems. The systems have back up and disaster management arrangements in place that are managed by the respective system suppliers.

All Ace Allied Health computers have password protection.

Business records must not be stored in email folders, shared folders, personal drives or external storage devices such as USBs, as they are not secure.

Where an email is considered a Ace Allied Health record, it must be captured in the relevant information management system as soon as possible.

Records created when using social media applications or mobile devices may also need to be captured in the relevant information management system.

Password Management

All staff must:

- regularly reset their passwords
- use passwords of at least 8 characters that include letters, numbers, and symbols
- if credentials have been compromised, reset passwords as soon as possible
- refrain from reusing the same password across critical services such as banking and social media sites or sharing passwords for a critical service with a non-critical service and
- ensure new passwords do not follow a recognisable pattern.

Hard Copy Records

All hard copy records that contain private and confidential information about clients, staff or Ace Allied Health must be stored in a locked filing cabinet. Filing cabinet keys are stored in a lockable box and are available to authorised staff when they need to access files. Access to these keys is managed by the Directors using a *Key Register*.

Filing cabinets should be kept in secure, lockable areas with access limited to authorised staff only. The cabinets should be regularly maintained and cleaned and protected from pests, water, damp and mould. They should be stored away from direct sunlight, heat and risk of fire.

Where it is necessary to remove private and confidential records from Ace Allied Health's premises, they must be stored securely in a non-transparent container (for example, a locked brief case).

Using Records

Access to Ace Allied Health's information management systems must be approved by the Directors.

Access to Ace Allied Health's information management systems will be reviewed regularly by the Directors and may be amended, suspended or terminated if a staff member's employment situation changes.

Staff must only access records that are necessary for them to fulfil their duties. More detail on access to and disclosure of records is provided in Ace Allied Health's *Privacy and Confidentiality Policy and Procedure*.

To protect records when they are being used, staff must lock unattended computers and maintain a 'clean desk' policy.

Use of records by staff is monitored and file audits are undertaken to ensure files are complete, up-to-date, and procedures are being followed. The Directors also undertakes regular physical and digital access audits to ensure Ace Allied Health continues to store records securely. See Ace Allied Health's *Internal Review and External Audit Schedule* for the regularity of these audits.

Offsite Access to Records

The Directors must approve any requests for access to systems that are accessed offsite, such as via personal mobile devices. Security of all devices must be reviewed before approving so that it does not compromise privacy and confidentiality requirements (such as having username and password protections along with two-factor authentication), and staff must be made aware of their obligations to protect Ace Allied Health data.

Retaining and Disposing of Records

Records that are not frequently used or that are not required for current business use (inactive records) may need to be:

- archived - if they need to be retained for a certain period or
- disposed of - if they have already been kept for the required retention period.

The [Position Title] is responsible for identifying records that need to be retained or disposed as part of the file, physical and digital access audits detailed above.

Retention Periods

Records that are considered public must be retained for the periods set out in the relevant State/Territory Disposal Schedule.

VIC: Retention and Disposal Authority (Public Record Office Victoria)~

Note: Different schedules may apply to different types of services.

In most cases Ace Allied Health's records are not public, but contain personal information, which is subject to the relevant State/Territory and Australian Privacy Law.

All records relating to Ace Allied Health's NDIS operations and service delivery must be kept for a minimum of seven years from the date they were created.

The Australian Securities and Investment Commission (ASIC) requires companies to keep records for seven years from the date they were created.

The Fair Work Ombudsman (FWO) requires businesses that employ staff to keep employee records for seven years from the date they were created.

The Australian Taxation Office (ATO) requires businesses to keep records for five years from the date they were created. For example, a document used in the 2016 financial year must be kept until the end of the 2021 financial year.

Archiving Hard Copy Records

Inactive hard copy records with less than 12 months of their retention period remaining should be kept in the same way and location as active records. Inactive records with 12 months or more of their retention period remaining should be archived.

Inactive records that require archiving should be grouped with other similar records and placed in an archive box. All extraneous materials such as rubber bands, paperclips, bulldog clips, plastic sleeves and display folders should be removed. Staples do not need to be removed.

A Contents List must be completed and attached to each archive box. Archive boxes must be numbered and stored in a secure location. Ace Allied Health's archived records are stored in a locked cabinet and protected from pests, water, damp and fire.

Archiving Electronic Records

Electronic records will be archived using the archive functionality in Ace Allied Health's electronic information management systems.

Where electronic records are not held in an information management system, they must be stored on a secure internal or external storage device. The file formats and the devices records are kept on must be able to be read for as long as the record is required to be retained.

Disposing of Records

Records should be disposed of once they have been kept for the required retention period. Where a State/Territory Disposal Schedule applies (see the '*Retention Periods*' section above), Ace Allied Health will comply with the disposal requirements it sets out.

Disposing of Hard Copy Records

Once information can be destroyed, it is shredded using a secure shredder.

Disposing of Electronic Records

The "delete" function is not sufficient to destroy electronic records as the information may still be recoverable.

Electronic records must be destroyed either by physical destruction of the storage device they are held on, or by clearing or purging the records held on the device.

Freedom of Information

Ace Allied Health will provide clients, their representatives and government agencies access to its records where this is required by law, including Freedom of Information legislation.

Supporting Documents

Documents relevant to this policy and procedure include:

- Privacy and Confidentiality Policy and Procedure
- Human Resources Policy and Procedure
- Client Case Notes Policy and Procedure
- Internal Review and External Audit Schedule
- Key Register

References

~Public Record Office Victoria, Victorian Government (2024) *Retention and Disposal Authorities (RDAs): Standards authorising the disposal of public records*, accessed 28 March 2024,

Monitoring and Review

This policy and procedure will be reviewed at least every two years by the Board of Directors. Reviews will incorporate staff, client and other stakeholder feedback.

Ace Allied Health's feedback collection mechanisms, such as staff and client satisfaction surveys, will assess:

- satisfaction with Ace Allied Health records and information management and privacy and confidentiality processes
- whether stakeholders have received adequate information about privacy and confidentiality including how their records will be stored and disposed of and how they can access and change them and
- the extent to which clients and their supporters feel their privacy and confidentiality has been protected.

Ace Allied Health's *Continuous Improvement Plan* will be used to record improvements identified and monitor the progress of their implementation. Where relevant, this information will be considered as part of Ace Allied Health's service planning and delivery processes.

Document Revisions

30/07/2024 - PIA update to *Step 5. Publish* for updating policies and procedures - include contact details to notify PIA Powered by PNYX of required policy and procedural changes.