



## CLIENT RECORDS

<b>Policy Number:</b>		<b>Version:</b>	2
<b>Drafted by:</b>	Strategic Finance Executive	<b>Board approval on:</b>	November 2022
<b>Responsible Person:</b>	Strategic Finance Executive	<b>Scheduled Review Date:</b>	November 2023

### INTRODUCTION

Big Yellow Umbrella is committed to collecting, keeping, and disposing of client records in ways that protect privacy and ensure confidentiality is maintained. This policy will operate in conjunction with the organisation's Privacy Policy. Big Yellow Umbrella confirms to the Federal Privacy Act (1988) and the National Privacy Principles which govern the collection, use and storage of personal information.

### PURPOSE

The purpose of this document is to provide a framework for Big Yellow Umbrella's staff and volunteers in dealing with client records.

Big Yellow Umbrella collects and administers a range of personal information for the purposes of:

- better understanding client needs
- knowing who to contact in the event of an emergency
- being able to work closely with other agencies to determine the best approach to assist a client
- statutory reporting
- facilitating funding submissions
- funding contracts and procurement processes
- collecting donations
- managing staff, students, and volunteers

Big Yellow Umbrella is committed to protecting the privacy of personal information it collects, holds, and administers.

Big Yellow Umbrella recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – protected on one hand and made accessible to them on the other. These privacy values are reflected in and supported by Big Yellow Umbrella's core values and philosophies and also reflected in this Privacy Policy, which is compliant with the Privacy Act 1988 (Cth).

Big Yellow Umbrella is bound by laws which impose specific obligations when it comes to handling information. Big Yellow Umbrella has adopted the following principles contained as minimum standards in relation to handling personal information.

Big Yellow Umbrella will:

- collect only information which it requires for its primary function
- ensure that stakeholders are informed as to why the information is collected and how Big Yellow Umbrella administers the information gathered
- use and disclose personal information only for its primary functions or a directly related purpose, or for another purpose with the person's consent
- store personal information securely, protecting it from unauthorised access
- provide stakeholders with access to their own information, and the right to seek its correction

## **POLICIES**

Specifically, Big Yellow Umbrella will:

- Collect and keep information about clients only when it is relevant and necessary to the provision of the service.
- 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.
- Store clients' records for the required length of time.
- Transfer or dispose of client records correctly.

When the organization collects, keeps, and uses identifiable data about a client, the following procedures will be implemented to guarantee the privacy of the client, ensure that records are appropriate, accurate and secure and protecting the privacy of personal information which it collects, holds, and administers. Personal information is information which directly or indirectly identifies a person.

## **ROLES AND RESPONSIBILITIES**

The Board, Chief Operations Manager and the Strategic Finance Executive are responsible for the implementation and monitoring of all aspects of this Policy and Procedures.

All staff, students and volunteers are responsible for ensuring they fully comply with this Policy and Procedure by always observing privacy procedures.

The Chief Operations Manager and the Strategic Finance Executive are responsible for monitoring changes in Privacy legislation, and for advising on the need to review or revise this policy as and when the need arises.

## **PROCEDURES**

The following procedures apply to the collection and administration of personal information:

### **Collection of identifiable data**

Big Yellow Umbrella will collect and record the following information about individual clients:

- Full name of client
- Full address
- Gender
- Main language spoken at home
- Migration visa category
- Year of first arrival into Australia
- Are they at risk of becoming homeless
- Household composition
- Employment status
- Highest level of education/qualification
- Are they living with an impairment, condition, or disability and if so the type of impairment, condition, or disability.
- Do they have an NDIS package or are they in the process of getting one.
- How did the client hear about our program / services.
- Emergency contact details of someone that the client gives consent to share their information with.

## Use and Disclosure

Big Yellow Umbrella will collect this information for the purpose of:

- Service monitoring, evaluation, and reporting (de-identified information only is used for this purpose)
- Meeting the reporting requirements of funders and key stakeholders
- Monitoring and management of service to individuals (case files)
- Meeting legal requirements
- Management will review the scope of information collected on an annual basis to ensure that only relevant information is being recorded.
- At the intake/registration for Big Yellow Umbrella events, activities and programs, BYU workers will request the following information from the client:

When information is being sought from clients, the staff member seeking the information 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
- Their rights to view or access information about them.

## Storage and use of identifiable data

Information collected about individual clients is stored in the following ways:

- Electronic program folders, which require passwords to access
- Entries into hard copies are stored in locked filing cabinets

The Manager and senior program workers are authorized to access file or information storage areas.

Casuals, volunteers and/or students may have access to databases or information storage areas on the authorization of the senior program work supervising the casual, volunteer and/or student.

Clients may request access to their files by speaking directly to the Manager or Senior program workers. Access by a client to their file requires the authorization of the Manager and will be arranged by the relevant senior program worker once approved. A request for access by a client must be considered and dealt with within a week.

## Maintaining and verifying client records

Senior program workers are responsible for reviewing and updating client records on a three-monthly basis.

A file will be created for each client/or client family by a community worker and used to record:

In recording personal information about clients, all workers will ensure that

- File notes are factual and objective
- Written using appropriate comments
- And are verified by clients

## File Management

Community workers are responsible for managing the filing of client records, maintaining the register of client records and managing the archiving and disposal of client records.

A register of client records will be kept by community workers. The register will include all hardcopy and electronic files, day books, registers, diaries, sign in sheets, staff notes etc. and all computer data systems where information about clients is stored. For each type of record, the register will document:

- The type of information recorded
- Where the records or data are stored
- Who is responsible for entering and maintaining the record

- What security measures are in place
- When and how the information is updated
- How this particular set of records are disposed of (frequency or time period and method).

## Record Disposal

Client records are kept for seven (7) years from the last point of service provision. The exception is any file relating to a client less than 18 years of age. In these instances, the file should be held for seven (7) years from the data at which the client turns 18 years of age.

Records of clients who have left the service are archived after three (3) years.

Records of clients who have left the service are disposed of by shredding after the prescribed period of time. The exception is where the client has been referred to another agency and continues to receive service from this organization. In this instance, the client file can be copied for the other agency, and the original Big Yellow Umbrella file shredded.

RELATED DOCUMENTS
Access and Equity Policy
Children (working with) Policy
Code of Conduct Policy
Complaints Management Policy
Confidentiality and Declaration Policy
Customer Service Policy
Data Security Policy
Disclosure of Information Policy
Fraud Management Policy
Governance Policy
Privacy Policy
Risk Management Policy
Staff Induction Policy
Standards of Practice Guidelines Policy

## AUTHORISATION

The Board of Big Yellow Umbrella have reviewed and approved this policy

Signature of Board Secretary: \_\_\_\_\_

Date of approval by the Board: \_\_\_\_\_

On behalf of the Big Yellow Umbrella

