



Information Management Policy and Procedures

"I have a right to have my information safely and securely stored" - client voice

Introduction

Play Grow Flourish is committed to ensuring that the service undertakes secure and effective information management systems that respects rights to client's right to privacy.

This policy is in line with NDIS Quality and Safeguards Quality Indicators 2018.

Scope

All clients, staff and contractors of Play Grow Flourish will have records established upon entry to the service and maintained whilst either a client or employee of the service.

Principles

In line with Play Grow Flourish's Code of Conduct, they are committed to respecting client's privacy through ensuring consistent processes and practices are in place that protect the personal privacy and dignity of each client.

Management of each client's information ensures that it is identifiable, accurately recorded, current and confidential. Each client's information is easily accessible to the client and appropriately utilised by relevant staff.

Play Grow Flourish is committed to ensuring each client is explained the confidentiality policies in a format that they are most likely to understand, to support the principle of empowering them with knowledge and control of their information.

Policy

Play Grow Flourish will maintain effective information management systems that maintain appropriate controls of privacy and confidentiality for clients and staff.

Procedure

Client documentation procedure

- Each client's consent is obtained to collect, use, and retain their information or to disclose their information (including assessments) to other parties, including details of the purpose of collection, use and disclosure. Each client is informed in what circumstances the information could be disclosed, including that the information could be provided without their consent if required or authorised by law.



- Each client is informed of how their information is stored and used, and when and how each client can access or correct their information and withdraw or amend their prior consent.
- All Play Grow Flourish staff sign a Code of Conduct Agreement that outlines their commitment to maintaining client privacy in line with the information management.
- Play Grow Flourish staff responsible for providing, directing, or coordinating client care or support must document their activities.
- Client files will provide accurate information regarding their services and support and will contain, but is not limited to:
 - Client's personal details and "About Me"
 - Consent Form
 - Referral information
 - Medical Information and Administration/Management Plans (where relevant)
 - Behaviour Support Plans (where relevant)
 - Assessments
 - Goal Plans and Risk Assessment
 - Progress notes
 - Client's reviews
 - Environmental Risk Assessment (Home Visiting Safety Checklist)
- Staff must ensure that all relevant information about the progress of or support provided to a client is entered into that person's file notes in a factual, accurate, complete, and recorded in a timely manner.
- The client's profile must be added to Brevity within 24 hours of intake. All paper form documentation must be scanned and uploaded to Brevity and shredded as required.
- Staff must only use information collected from a client for the purpose for which it was collected.
- Play Grow Flourish is required to document the activities relating to care and support of clients and will be appropriately trained in documentation, Brevity, and record-keeping.
- Individuals are not permitted to document on behalf of another person.
- Client records will be audited regularly to ensure documentation is thorough, appropriate and of high quality.
- Client records will be stored in a safe and secure location, on a password protected customer relations Team leader with access available to authorised persons only.
- Client, family, and consented advocates have a right to access any of their personal information that has been collected. Staff will support such persons to access their personal information as requested.



Play Grow Flourish entry procedure.

- Staff are required to create a client file in Brevity to act as the central repository of all client's service information and interactions. This will only contain material relevant to the management of services or support needs including any other information sourced through the intake procedure. For example, Behaviour Support Plans, medication summaries, etc.

Ongoing documentation procedures

Staff are required to document client's information and service activities only on Play Grow Flourish approved forms and Brevity.

Documentation must include:

- The outcomes of all ongoing client's assessments and reassessment
- Changes or redevelopment of the client's goal plans, including revised goals or preferences.
- Any critical incidents or significant changes in the client's health or well-being
- Conversations (in person or via telephone) with the client, family members, their representative or advocate
- Conversations regarding the client, with any other providers, agencies, health/ medical professionals, family members or other individuals with interest in the client
- Conversations with internal staff regarding the client e.g. Supervision
- Activities associated with the client's admission and transition, including referrals.

Setting up and maintaining files for clients

Once a personal file for clients has been established, staff must maintain the file to ensure that all information is accurate, up-to-date, and complete.

Staff must document in the client's file, significant issues and events that arise during their work with the clients 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 client), staff will establish an archival file, and progressively cull non-current information into that file for storage in a secure place.

Play Grow Flourish will regularly audit the files of clients to ensure that:

- The file is up to date, including that all plans are current.
- Ensuring that all progress notes demonstrate relationship to goal plans.
- All forms are being used appropriately.
- The progress/file notes are factual, accurate, complete and in chronological order.
- When a client leaves the service, his/her personal file will go to the archival file information will be stored in a locked filing cabinet with authorised access.



Hard Copy Documents

Hard copy Documents are scanned into Brevity or cloud-based storage system as the first option. Should any document require the original copy to be maintained, this will be stored as per the below storage process.

Security of files and client information

Brevity is a secure database that is a central Client Relationship Program.

Any hard copy documents will be kept in a secured office space, in a lockable drawer to ensure that only authorised staff can gain access.

All electronic files are password protected to ensure confidentiality and security.

Files of client can only be taken from the service by relevant staff from Play Grow Flourish with the approval of the Director.

Staff must not undertake any of the following actions without express approval:

- Photocopy any confidential document, form, or record.
- Copy any confidential or financial computer data to any other computer or USB.
- Convey any confidential data to any other person(s).

Transporting hard copy files of clients

If for any reason the hard copy files of clients need to be transported from one location to another the files must be carried in a locked document container, provided by Play Grow Flourish.

Progress notes for clients

Progress and Communication notes for clients must include the following components:

- The date of entry
- The date of when the support was provided.
- The nature of the support and events in a factual, accurate, complete, and timely manner
- The surname of the person making the entry (printed in brackets).

Staff must ensure that all relevant information about the client is entered into the client's file notes in a factual, accurate, complete, and timely manner.

The Progress notes for each client should be written whenever support has been provided or communication has occurred and when a significant event occurs that may impact future support provision.

Whenever required, the client should be made aware of what has been recorded in their progress/file notes.



Access to client's files

Clients and/or their guardians must have access to their own records on request unless in areas of clinical harm.

Access to files of clients and staff is the direct responsibility of the Director. All files of clients are the property of Play Grow Flourish and, although clients and their guardians can access the file, it cannot be taken by the clients or their guardian or be transferred to any service external to Play Grow Flourish.

Copies of files that are legitimately released for any reason will be recorded and are required to be signed as a receipt by the recipient or their legal guardian.

Employee records

Employee files are kept in electronic form and held within an allocated online file and on Brevity. If the employee would like to review their file, a request should be made in writing. Support will be provided to access the information by the Director.

Minutes of meetings

Minutes of meetings are maintained in soft copy on a cloud-based storage drive with authorised access.

Other administrative information

Individual staff are responsible for organising and maintaining the filing of general information in accordance with their job descriptions.

Administrative information including financial information and general filing are maintained in the office.

IT and equipment

If staff experience problems with a program or computer or any other piece of equipment, they can, in the first instance, contact the Director.

If necessary, the Director will arrange for the IT Consultant(s) to provide assistance.

Social media

Social media (social networking sites; Facebook, Twitter or similar, video and photo-sharing sites, blogs, forums, discussion boards and websites) promotes communication and information sharing. Staff who work in the organisation are required to ensure the privacy and confidentiality of the organisation's information and the privacy and confidentiality of the client's information.

All social media posts must be sent to the allocated person who manages social media. The allocated person is provided with information about the various consents provided by participants in relation to information sharing.

Staff must not share any information related to their work through social media sites.



Staff are required to seek clarification from the Director if in doubt as to the appropriateness of sharing any information related to their work on social media sites.

Group Chat

All images and information shared within a group chat must not be shared. Any photos or images that are shared within the group chat platform must be deleted immediately from personal devices.

Monitoring information management processes and systems

Information management processes and systems are regularly audited as part of the organisation's audit program. Staff, clients, and other stakeholders are encouraged to provide ongoing feedback on issues and areas where improvements can be made.

Destruction of records

All Play Grow Flourish records/documents for destruction are to be:

- Cross shredded first and then placed in recycling bins.
- Deleted from the network.

Responsibilities

For the purpose of this policy, the Management Team includes the Director, Executive Team Leader and Human Resources Manager.

Management are responsible for:

- Reviewing and approving any changes to the Information Management Policy and updating the Policy Version Control Register accordingly
- The provision of secure IT systems and storage facilities
- Managing breaches of confidentiality.
- The provision of access to personal documentation on request from staff or clients.
- Ensuring staff are trained in secure information handling procedures, including Brevity and cloud storage systems.
- Overseeing the regular auditing of client and employee records for accuracy, completeness and timeliness.
- Ensuring systems are in place for documenting incidents, complaints and significant changes to client needs.
- Approving access to hard copy files when required to be transported off-site.
- Reviewing any breaches of information management and taking corrective action.
- Ensuring compliance with NDIS standards for record keeping, file retention and destruction.

Shift Managers are responsible for:



- Training team leaders and staff in secure information management processes.
- Uploading accurate current client documentation gaps, risks or potential breaches to management promptly.
- Ensuring consent forms are current and stored appropriately.
- Assisting with onboarding of new staff by ensuring they are aware of the Information Management Policy.

Staff are responsible for:

- Undertaking secure document processes in line with the information management policy and procedure.
- Always maintaining confidentiality and secure handling of both digital and physical records.
- Immediately reporting any suspected breaches of privacy or data security to their Shift Manager or to Management.
- Ensuring no confidential or identifying information is shared via group chat, text or social media platforms, except where time sensitive, essential updates are required to protect client safety or ensure informed support (e.g. revoked of consent for photos). In these cases, updates must be shared through approved internal communication channels and followed up with proper documentation.

Urgent Communication Expectations

In rare cases where critical updates must be shared quickly (such as changes to a client's consent status, medical needs or risk-related information), staff may communicate this information via internal group chat or text provided:

- The update is time sensitive and directly impacts client safety or dignity.
- Only necessary details are shared without full names or identifiable information when avoidable.
- The information is followed up immediately with correct documentation (e.g. progress notes, updates in Brevity).
- Management or the Shift Manager is informed as soon as practical.

This expectation does not apply to general updates, information discussion, or non-urgent matters, these must follow standard documentation and communication protocols.



References

- Privacy Act (1988)
- NDIS Practice Standards and Quality Indicators 2018

Related policies and documents

- Individual Planning Policy
- Occupational Health and Safety Policy
- Intake/About Me
- Goal Plan and Risk Assessment
- Progress notes
- Consent Form
- Environmental Assessment.
- Site inspection checklist

Review

Play Grow Flourish will review each policy through internal audit processes, client feedback or as contextual drivers determine the need for a review.

Release Date:	Version No:	Approved By:	Amendments:
January 2024	1.0	Director	Nil
Review Date:	Version No:	Approved By:	Amendments:
May 2025	2.0	Human Resources Manager	Updated responsibilities. New Section on Urgent Communication Expectations. See Master Register for Details.



PLAY GROW FLOURISH PTY LTD

NDIS Support services

Attachment 1

Disposal and Archiving of Documents

Function/Activity	Description	Retention/Disposal Action	Custody
Aboriginal & Torres Strait Islander	Documents relating to Aboriginal Health	Lifetime	Office
	Normal operational documents	7 years after the person's last contact with the service	
Paediatric Records	Children and youth under the age of 21	Records must be kept until the person turns 21 years old and for 7 years	Office
Business Information	Compliance notices Financial records	7 years	Office
Internal and External Audits	Audit schedule Audit reports	7 years	Office
Child and Family 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.	7 years	Office
Corrective Action	Corrective Action Requests	2 years	Office
Financial	Audits Budgets Receipts Cheques Petty Cash Documents and other financial records	7 years	Office
Management Review	Minutes of Meetings Monthly Reports	2 years	Held on PCs according to type of meeting