

GUIDE TO CLIENT RECORDS POLICY TEMPLATE

ABOUT THIS POLICY AREA

This policy guides how the organisation manages records containing identifying information about individual clients.

A written client records policy is required as part of meeting Standard 4 (Confidentiality and privacy).

Standard 4 – confidentiality and privacy

The organisation develops, implements and reviews procedures for how the organisation keeps records of clients secure and up to date, and transfers and disposes of them appropriately.

Policy checklist

The following checklist will help you check that an existing policy covers this area adequately.

The policy should:

- explain how the organisation obtains and documents the informed consent of clients to the keeping of files with personal information
- describe how information about clients is kept securely and up to date
- describe how decisions to transfer and/or dispose of client records are taken
- cover the specific procedures for how client records are returned to the Department of Child Safety where the person concerned is a child or young person in care, or to the Department of Communities where the person is involved in the youth justice system
- contain clear procedures and actions
- indicate the timing of any actions
- show when it was approved
- show when it was last reviewed.

COMPLETING YOUR CLIENT RECORDS POLICY

Using the policy template

The template provides some example statements. You can adapt these statements and include them in your policy or write your own statements to better suit the operations and services of your organisation.

To customise the policy template, click on the shaded sections <<Insert text>> and insert the information that is specific to your organisation.

When you have completed the policy template, delete the shaded instruction sections such as: [Refer to the client records policy template guide for questions and/or examples to consider when customising this section.](#)

For further information on using the policy guides, refer to the information in *Using the policy templates and guides*.

Guidelines for each section of your policy

1. Purpose

When identifying the purpose of the policy, consider how it might apply to your client group/s and other agencies you work with. Do you need to make specific statements to ensure you are inclusive of particular groups, such as Aboriginal and Torres Strait Islander peoples, Australian South Sea Islanders, people from culturally and linguistically diverse backgrounds and people with a disability?

2. Scope

To determine the scope of the policy, consider the following questions:

- Does this policy apply to all your organisation's services and to all clients and agencies?
- Are both individual records and de-identified or collated client records covered by this policy?
- Are all forms of record keeping, whether paper-based or electronic, covered by the policy?

3. Policy statement

If you are adopting the policy statement in the template, consider whether there are any additional commitments your organisation wants to make.

In identifying the actions your organisation will take to implement this policy, you should include the following:

- collecting and keeping information about clients only when it is relevant and necessary to the provision of the service
- ensuring data about each client is up to date, accurate and secure, whether stored in hard copy or electronically, in accordance with privacy legislation
- taking account of any relevant cultural or religious sensitivities of people using our services in the way you collect, store and use information about them
- storing clients' records for the required length of time
- transferring or disposing of client records correctly.

4. Procedures

The procedures describe how your organisation achieves the aims and goals you have outlined in your purpose, scope and policy statement.

4.1 Collecting, keeping and using identifiable data about clients

Describe your procedures for collecting and storing identifiable data about individual clients/families, their needs and the service they receive from you:

- How do you make sure that your records about clients are appropriate, accurate, up to date and secure?
- How does the way you collect this information guarantee their privacy?

In particular, explain:

- **using client data:** What is your purpose in collecting information? How do you make sure that you collect and keep information about a client only when it is relevant and necessary? In what ways can information collected be used?
- **data collection:** What sort of information do you record? How do you make sure it is accurate and appropriate? What protocols do you have for writing about clients in file records, reports etc? When in your interaction with a client do you make records? How do you update the information you have and verify records with the client?
- **data storage:** How do you store data securely, in hard copy and electronically? What are your data entry processes when you keep personal records in computer storage systems? How do you make sure your information systems are in accordance with privacy legislation? How is client information kept secure and accessible only to those staff whose role permits this?
- **responding to individual needs:** How do you take account of any relevant cultural or religious sensitivities of people using your services in the way you collect, store and use information about them?
- **information provision to clients:** What information is provided to clients about records that are kept about them? How do you secure client consent to collecting, storing and sharing information about them?

4.2 Record disposal

How do you make sure records are kept for the required length of time and correctly transferred or disposed of?

Describe your procedures for disposing of identifiable records about clients. In particular, explain the following:

- What periods of time are you required to keep records? What does the privacy legislation say about this?
- How do you store records for people who are no longer using the service? Are they ever transferred to another agency?
- Why would you decide to no longer keep a record?
- How do you correctly dispose of records you no longer need to keep?
- If applicable, how and when do you return client records for a child or young person in care to the Department of Child Safety, or for a young person involved in the juvenile justice system to the Department of Communities?

4.3 Client records chart

It is good practice to keep a client records chart to show where and how records about clients are kept, updated and disposed of. This chart should cover all the hard-copy files, day books, diaries, staff notes etc. and all computer data systems where information about clients is stored. For each type of record, 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).

5. Other related policies and documents

List the other policies related to the client records policy. The policy should be linked to:

- privacy policy
- confidentiality policy
- access to confidential information policy.

6. Review processes

Consider how often the policy should be reviewed and the process for doing this:

- **frequency of review:** Most policies benefit from an annual review. The experience of implementing the policy is used to decide which changes are necessary. Consider reviewing your client records policy as part of an annual review of your organisation's policies or, if your organisation is small, perhaps over a three-year period. Critical incidents may prompt you to review the policy ahead of schedule.
- **responsibility for the review:** In most organisations, the person accountable for client service would be responsible for reviewing this policy. In small organisations, this may be the coordinator or manager. In larger organisations, this may be a client service manager or administration manager.
- **process for the review:** Decide which particular staff, volunteers, external people and organisations will provide input to the policy review, and how clients will be involved.
- **decision-making process:** Who will review draft changes to the policy and approve changes? What will be the timeframe for the review process?
- **documentation and communication:** What records of the policy review process are needed? How will changes to the policy be communicated to staff implementing the policy? In a small organisation, this may be as simple as noting the changes at a staff meeting. In a larger organisation, an email memo may be needed.
- **key questions for the review:** Is the policy being implemented? Are procedures being followed? Is the policy clear? What has changed that may prompt a change to the policy (for example, changes to the Privacy Act)? Have particular stakeholders had difficulty with any aspect of the policy? Can their concerns be resolved? How does the policy compare with that of similar organisations?