



KNC

Connecting Our Community

KATOOMBA NEIGHBOURHOOD CENTRE

POLICY & PROCEDURES INFORMATION & CLIENT RECORD MANAGEMENT

March 2015

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INFORMATION & CLIENT RECORDS MANAGEMENT POLICY #01

PRIVACY POLICY

POLICY STATEMENT

Katoomba Neighbourhood Centre (KNC) is committed to protecting and upholding the right to privacy of clients, staff, volunteers, members of the KNC Board and representatives of agencies we deal with. In particular KNC is committed to protecting and upholding the rights of our clients to privacy in the way we collect, store and use information about them, their needs and the services we provide to them.

KNC requires staff, volunteers and members of the KNC Board to be consistent and careful in the way they manage what is written and said about individuals and how they decide who can see or hear this information.

KNC as a provider of service under Commonwealth contract, conforms with the federal Privacy Act (1988) and endeavours to follow and comply with the *Australian Privacy Principles* which govern the collection, use and storage of personal information, in its information management practices.

Katoomba Neighbourhood Centre will ensure that:

- it meets its legal and ethical obligations as an employer and service provider in relation to protecting the privacy of clients and organisational personnel.
- clients are provided with information about their rights regarding privacy.
- clients and organisational personnel are provided with privacy when they are being interviewed or discussing matters of a personal or sensitive nature.
- all staff, volunteer and members of the KNC Board understand what is required in meeting these obligations.

This policy will apply to all records, whether hard copy or electronic, containing personal information about individuals, and to interviews or discussions of a sensitive personal nature.

This policy requires to be read and understood in conjunction with the following KNC documents:-

POLICY/DOCUMENT NAME
1. Confidentiality Policy
2. KNC Codes of Conduct
3. Access to Confidential Information
4. Client Records
5. Australian Privacy Principles

WHO THE KATOOMBA NEIGHBOURHOOD PRIVACY POLICY APPLIES TO

- Members of the KNC Board
- KNC staff
- KNC Volunteers
- Researchers, students, contractors working with KNC

PROCEDURE

Dealing with personal information

In dealing with personal information, Katoomba neighbourhood Centre staff will:

- ensure privacy for clients, staff, volunteers or members of the KNC Board and its sub committees, when they are being interviewed or discussing matters of a personal or sensitive nature
- only collect and store personal information that is necessary for the functioning of the organisation and its activities
- use fair and lawful ways to collect personal information
- collect personal information only by consent from an individual
- ensure that people know what sort of personal information is held, what purposes it is held it for and how it is collected, used, disclosed and who will have access to it
- ensure that personal information collected or disclosed is accurate, complete and up-to-date, and provide access to any individual to review information or correct wrong information about themselves
- take reasonable steps to protect all personal information from misuse and loss and from unauthorised access, modification or disclosure
- destroy or permanently de-identify personal information no longer needed and/or after legal requirements for retaining documents have expired.

Responsibilities for managing privacy

- All staff are responsible for the management of personal information to which they have access, and in the conduct of research, consultation or advocacy work.
- The KNC General Manager via the KNC Service support Coordinator are responsible for content in Katoomba Neighbourhood Centre publications, communications and web site and must ensure the following:
 - appropriate consent is obtained for the inclusion of any personal information about any individual including KNC personnel
 - information being provided by other agencies or external individuals conforms to privacy principles
 - that the website contains a Privacy statement that makes clear the conditions of any collection of personal information from the public through their visit to the website.

- The KNC General Manager is ultimately responsible for ensuring that the personal information of individual clients across all KNC service and programs is safeguarded appropriately, and that all client records are maintained in accordance with all relevant standards, principles and legislation.
- The KNC General Manager and the Manager Finance & Resources are responsible for safeguarding personal information relating to KNC staff, members of the KNC Board, members of Katoomba Neighbourhood Centre Incorporated and contractors of the Organisation.
- KNC service coordinators are responsible for safeguarding any personal information held on their individual service clients, service volunteers and where relevant and appropriate service specific contractors
 - Coordinator Katoomba Volunteer Home Visitors Service is responsible for safeguarding the personal information of Volunteer Home Visitors and clients of the Katoomba volunteer Home Visitors program
 - Coordinator of Community Visitors Scheme is responsible for safeguarding the personal information of Community Visitors Scheme clients & volunteers
 - Coordinator KNC Service support is responsible for safeguarding the personal information of KNC Community Hub, Community & Cultural Development & the Vale St program volunteers
 - Builder/Coordinator of Blue Mountains Home Modification & Maintenance Service is responsible for safeguarding the personal information of the BMHMMS service clients and the contractors utilised by the BMHMM Service
 - Coordinator of the Katoomba Neighbourhood Centre KOOSH service is responsible for safeguarding the personal information of Katoomba Out of School Hours Child Care Service volunteers, and parent details
 - Coordinator of the Blue Mountains HACC Service is responsible for safeguarding the personal information of the HACC program clients and contractors utilised by the HACC program

- **The Privacy Contact Officer:**

The KNC General Manager or their delegate will be responsible for:

- ensuring that all staff are familiar with the Privacy Policy and administrative procedures for handling personal information
- ensuring that clients and other relevant individuals are provided with information about their rights regarding privacy
- handling any queries or complaint about a privacy issue

Privacy information for clients

At the initial point of contact with the appropriate KNC service and or KNC Service Coordinator, prospective clients will be told what information is required to be collected, how their privacy will be protected and their rights in relation to this information. This process will routinely be attended via the initial phone contact with the client. In certain

circumstance this may be attended or completed at the initial assessment.

Privacy for interviews and personal discussions

Arrangements to ensure that staff and client privacy is protected when information of a sensitive or personal nature is being discussed, will differ according to where the interaction is taking place. KNC staff generally operate in open office arrangements sharing office space with other staff. All efforts will be made to ensure that face to face interactions of a sensitive or personal nature are conducted in private, wherever possible safe and practical to do so.

- The KNC staff member undertaking the interview/interaction will seek to maintain an appropriate environment by conducting the interaction either in the allocated office space of the staff member or in an allocated KNC group or counselling room if available and safe
- Interviews may be undertaken in the staff members office, if another staff member is present the second staff member may be asked to vacate the space for a contracted period of time to enable the interview. If this cannot be facilitated then the client/volunteer/contractor/staff member will be asked if they are comfortable continuing with the staff member present, reassuring the individual that all KNC staff must abide by the KNC Code of Conduct and maintain their confidentiality.
- If this arrangement is not acceptable then an alternative time and date for interview will be negotiated, ensuring that the interview can be conducted in private in an appropriate booked KNC meeting space, if assessed by the staff member as safe to do so.
- Phone conversations with clients/volunteers/contractors/staff members are undertaken at times undertaken in the presence of the other staff sharing the office. The interviewee will be informed that their information and privacy is safeguarded as all KNC staff and volunteers are bound by the Organisational Code of Conduct governing how they must maintain privacy and confidentiality. If this arrangement is not acceptable then an alternative time and date for phone interview will be negotiated, ensuring that the interview can be conducted in private.
- Assessments and interviews are undertaken in home environments for particular services. The Service Coordinators or delegated staff members of the specific service i.e. Katoomba Volunteer Home Visitors, Community Visitors Scheme, HACC Program, Home Modification & Maintenance Service will adhere to all aspects of the KNC Privacy Policy. If other family members, friends, carers are present at the time of interview, the KNC staff member will seek the clients consent for the interview to continue in the presence of the other members. If the client does not wish to continue in the presence of others, the KNC Service Coordinator/staff member can encourage the client to ask the other members to leave. In the event that a private safe space cannot be created for the client, the KNC Coordinator/staff member will reschedule the interview at a time when privacy can be assured.
- Any advance from clients/ community users/KNC staff to discuss matters of a sensitive or personal nature outside routine operating hours will be deferred by mutual agreement to a service operating day at a mutually agreed to time.

- Community members unknown to KNC service staff accessing the community hub information and referral service on a drop in basis are initially interviewed in the public reception area in the presence of the reception volunteer. The clients consent for this process to continue is sought. If this arrangement is not acceptable then an alternative time and date for interview will be negotiated, ensuring that the interview can be conducted in private in an appropriate booked KNC meeting space, if assessed by the staff member as safe to do so.

Participants in research projects

People being invited to participate in a research project will:

- be given a choice about participating or not
- consent to participating
- be given the right to withdraw at any time
- be informed about the purpose of the research project, the information to be collected, and how information they provide will be used.
- be informed on how the information they provide will be stored.
- consent to participate
- be assured that any information used in the research will be de-identified
- be given the option of receiving copies of any subsequent report/publication.

The collection of personal information will be limited to that which is required for the conduct of the project. Individual participants will not be identified.

Organisational participants in research projects will generally be identified in Katoomba Neighbourhood Centre research by position, unless the nature of a particular project requires anonymity or an organisation specifically requests it.

Limits to confidentiality

There are limits to confidentiality as required by law, and these are when:

- there is circumstance of immediate or grave danger to an individual - client, staff or other service user e.g. when there is reasonable belief that the individual is suicidal or homicidal
- there is reasonable suspicion of serious criminal activity
- there is recent or ongoing child abuse
- there is recent or ongoing abuse of a dependent adult
- there is reasonable suspicion of disease or conditions subject to mandatory reporting of a public health issues

Under these circumstances an individuals' right to privacy and confidentiality is replaced by requirements under the law.

VERSION HISTORY

Version	Approved by	Approval date	Amendment notes
Version one	KNC Board	2010	<ul style="list-style-type: none">• Privacy statements contained in the superseded confidentiality policy
Version two	KNC Policy & procedure subcommittee for use in draft	March 2015	<ul style="list-style-type: none">• Stand alone policy and procedures developed to sit behind the Organisational Governance policy
Version two	Slated for Board ratification May 2015		<ul style="list-style-type: none">•

INFORMATION & CLIENT RECORDS MANAGEMENT POLICY #02

CLIENT RECORDS POLICY

POLICY STATEMENT

Katoomba Neighbourhood Centre (KNC) 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. The Katoomba Neighbourhood Centre conforms to the *Federal Privacy Act (1988)* and the *Australian Privacy Principles* which govern the collection, use and storage of personal information.

Specifically, Katoomba Neighbourhood Centre 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.
- give clients an option to remain anonymous or use a pseudonym unless an exemption under the Privacy Act applies.
- provide information to clients about how their personal information is managed.

When the organisation collects, keeps and uses identifiable data about a client, the following procedures will be implemented to guarantee the privacy of the client, and to ensure that records are appropriate, accurate and secure.

This policy requires to be read and understood in conjunction with the following documents:-

POLICY/DOCUMENT NAME

- | |
|---|
| 6. KNC Privacy Policy |
| 7. KNC Access to Confidential Information Policy |
| 8. Australian Privacy Principles |
| 9. Federal Privacy Act 1988 |

WHO THE KATOOMBA NEIGHBOURHOOD CLIENT RECORDS POLICY APPLIES TO:

- Members of the KNC Board
- KNC management
- KNC staff
- KNC volunteers

- Researchers, students, contractors working with KNC and noting in client files

PROCEDURE

Collecting identifiable data

The organisation collects and records the following information about individual clients:

- General demographics - name, address, gender, age, next of kin, contact details, advocate details where appropriate,
- Service delivery details - GP and other service agencies involved in care, client goals, current plan of care determined with client, carer support plan (where appropriate), client consent to share information and enable service delivery, signed client service agreement, other information relevant to ongoing care
- Physical environment health & safety information – phone safety checklist, home safety check list, risk management plans (where relevant), signed code of conduct (where appropriate for specific KNC services e.g. Vale St program)

This information is collected for the purpose of:

- service monitoring, evaluation and reporting (de-identified information only is used for this purpose)
- meeting the reporting requirements of the relevant KNC funding bodies i.e NSW Department of Family & Community Services; Commonwealth Department of Social Services; Nepean Blue Mountains Local Health District, NSW Department of Education & Communities
- developing an accurate client record and client file
- monitoring and management of service to individuals
- enabling Organisational analysis of demographic profiles and service user trends, used for service planning

The individual Service Coordinators will review the scope of information collected on clients to ensure that only relevant information is being recorded, with recommendations provided to the KNC General Manager

On the confirmation of service eligibility, the staff member or Service coordinator undertaking the client intake either by phone or on initial face to face assessment, will request the following information from the client:

- name, address, gender, age, next of kin, contact details, advocate details where appropriate, country of origin, need for interpreter, living arrangements, DVA status, indigenous status, carer availability, pension status
- GP details, other service agencies involved in care, any required referrals
- consent to share information and client related report data
- phone safety checklist outlining details of the clients home environment

When information is being sought from clients, the staff member or volunteer 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.

The staff member or volunteer will ask the client if they have any concerns or specific requests about the way their personal information will be recorded or managed.

If identifiable information about a client will be shared with another agency, the staff member will obtain the client's consent for this and record the date of the verbal consent/obtain the client's signature on a consent form.

Storage and use of identifiable data

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

- All paper client records will be kept securely in a locked filing cabinet, in the office of the Service/Program Coordinator, in a security alarmed passcode protected building. Client records are updated, archived and destroyed according to the organisation's client records policy.
- When it is necessary to transport a clients' record/file from KNC to the client in the community, or from an off site community service back to the KNC main site, records are transported in a locked document satchel.
- The KNC electronic client document management system "PYNX", allocates a virtual room to a client in the cloud. All personal client information and care details are contained within their "room". Access to the clients' room is based upon permissions being given by the service administrator (the specific Service Coordinator). The permissions are granted to relevant care staff and volunteers for access to particular sections of the clients room. At all levels access is permission dependant and user name & password protected.
- The client is given full access to all levels and functions within the electronic records system (their "room").
- Only the service administrator and staff directly engaged in the clients care granted the relevant permissions by the service administrator can access client information in the electronic system.

The KNC General Manager or their delegate is authorised to access the hard copy and soft copy client files/records for all clients and past clients of KNC services

Individual Service Coordinators are authorised to access the hard copy and soft copy client files/records for clients in their specific services/programs

Staff and volunteers of KNC services, involved in the delivery of service to clients, may have access to the individual client file on the authorisation of the specific Service Coordinator. In

the absence of a Service Coordinator permission to access an individual client file may be granted by the KNC General Manager.

Clients can have access their files. The client needs to notify the relevant Service Coordinator that they wish to access their hard copy file. The Service Coordinator documents the request in the clients file and will then negotiate directly with the client or their guardian/advocate how best to facilitate access e.g. a photocopy or scanned copy of their file, access to the live file at a designated time and day. Clients will be given authorised permission to access their electronic record in PYNX, the KNC cloud based electronic client record documentation system

Maintaining and verifying client records

Each individual KNC Service Coordinator is responsible for ensuring review and update of client records. Client records will be updated against need for all clients. Routinely, client records will be reviewed and updated at a minimum six monthly interval for KVHV, CVS and Vale St program clients.

BMHMMS files are updated regularly during the period of an active job. On completion of a BMHMMS job the record/file is closed, reactivation can only occur on re referral from an Occupational Therapist following assessment or following assessment and referral from the My Aged Care Gateway or the Regional Assessment Service.

A file will be created for each client or client family in the case of KOOSH by or with permission of the relevant Service Coordinator, and used to record:

- General demographics - name, address, gender, age, next of kin, contact details, advocate details where appropriate, country of origin, need for interpreter, living arrangements, DVA status, indigenous status, carer availability, pension status
- Service delivery details - GP and other service agencies involved in care, client goals, current plan of care determined with client, carer support plan (where appropriate), client consent to share information and enable service delivery, signed client service agreement, progress notes, other information relevant to ongoing care, other relevant service assessments/correspondence e.g. OT assessment
- Physical environment health & safety information – phone safety checklist, home safety check list, risk management plans (where relevant), signed code of conduct (where appropriate for specific KNC services e.g. Vale St program)

In recording personal information about clients, Service Coordinators will ensure that:

- The details are correct and accurate and verified by the client and or their carer, advocate or guardian.
- The details being recorded are appropriate using appropriate and professional language and descriptors
- The content contained within the client record is issues based, reflects the clients goals and needs, is person centred and verified by the client i.e. care plans are signed off by the client.

File management

The relevant Service Coordinator is responsible for ensuring and managing the filing of client records, maintaining the list of client records and managing the archiving and disposal of client records. KNC records are maintained for 3-30 years depending on the requirements of the individual service, and then disposed of in line with the Australian Privacy Principles.

Each service will maintain an updated annual list of current clients/consumers indicating whether they are active, inactive or discharged/ closed, their referral date, referral request/action, who they have been referred to. The individual Service Coordinator is responsible for ensuring the maintenance of this information and the accuracy of the recorded client information and data.

The PYNX client documentation management system will store all client data in the cloud in the individual client room for active and inactive clients and social inclusion group data. This system will capture :

- staff and volunteer rosters and scheduled visits to clients where the records or data are stored
- client notes and updates, client consents, individual client care plan and or carer support plan, and which
- referrals and other involved service agencies with restricted access to enter client related information
- all client assessment and relevant physical environment checks and risk management plans

Staff diaries and calendars are also considered to be part of the client record system. Hardcopy diaries will be maintained and archived by the Service Coordinator, the KNC Service Support coordinator will ensure that electronic detail will be captured.

Record disposal

- KNC financial records work are kept for 7 years from the last point of service provision.
- BMHMMS records of building work are kept for 7-30 years from the last point of service provision, depending on the level of work undertaken.
- KOOSH child and family information is kept for 3 years from the last point of service provision.
- General client records for KVHV, CVS, Vale St program are kept for 3 years from the last point for service provision before discharge, file closure or death.

Records of clients who have left the service are archived according to the above timeframes and then destroyed.

Records of clients who have left the service are disposed of by placement in the locked commercial shredding bin and collected for disposal off site.

Lost or Damaged Records

In the event a client record is lost or damaged, it is the responsibility of the relevant Service Coordinator to:

- Notify the KNC General Manager
- Record in the Service report to the Board
- Notify the client and or their carer/advocate/guardian as appropriate
- Record in the new client file noting the loss or damage to the original client record

VERSION HISTORY

Version	Approved by	Approval date	Amendment notes
Version two	KNC Policy & procedure subcommittee for use in draft	March 2015	<ul style="list-style-type: none">• Stand alone policy and procedures developed to sit behind the Organisational Governance policy
Version two	Slated for Board ratification May 2015		

INFORMATION & CLIENT RECORDS MANAGEMENT POLICY #03

ACCESS TO CONFIDENTIAL INFORMATION POLICY

POLICY STATEMENT

Katoomba Neighbourhood Centre (KNC) is committed to transparency in its operations and to ensuring it is open to public scrutiny. The Organisation must balance this with upholding the rights of individuals to privacy and of the organisation to confidentiality on sensitive corporate matters.

Katoomba Neighbourhood Centre will prevent unauthorised persons accessing an individual's confidential records and enable individuals to access their own records when this is reasonable and appropriate. Accordingly, access to some Katoomba Neighbourhood Centre's documents and records will be limited to specified individuals and not be available to others for viewing.

This policy applies to the internal records, client records and unpublished materials of Katoomba Neighbourhood Centre

This policy requires to be read and understood in conjunction with the following KNC documents:-

POLICY/DOCUMENT NAME
10. KNC Codes of Conduct
11. KNC Board Code of Behaviour
12. KNC Privacy Policy
13. KNC Client Records Policy
14. Australian Privacy Principles

WHO THE KATOOMBA NEIGHBOURHOOD ACCESS TO CONFIDENTIAL INFORMATION POLICY APPLIES TO:

- Members of the KNC Board
- KNC management
- KNC staff
- KNC volunteers
- Researchers, students, contractors working with KNC

PROCEDURE

Client records

Client records will be confidential to clients and to those KNC staff members (paid and unpaid) directly engaged in delivery of service to the client(s).

Information about clients may only be made available to other parties with the consent of

the client or their duly appointed advocate, guardian or legal representative. The exception is a duly executed warrant/subpoena for access to a clients records from a NSW or National judicial body/court of law.

KNC is currently transitioning from a paper based client document and management system to a cloud based electronic e records system. All paper client records will be kept securely in a locked filing cabinet, in the office of the Service/Program Coordinator, in a security alarmed passcode protected building. Client records are updated, archived and destroyed according to the organisation's client records policy.

In the case of off site community and home based KNC services, when it is necessary to transport a clients' record/file from the site to the client in the community, or from a community service back to the KNC main site, records are transported in a locked document satchel.

With the roll out of the KNC electronic client document management system "PYNX", clients will be allocated a virtual room in the cloud. All their personal information and care details will be contained within their "room". Access to the clients' room is user name & password protected with varying levels of access to client information allocated depending on the designation of the staff member and the level of information access required to adequately care for the client. Overall client consent for sharing of information across staff and between services is necessary. The client is given full access to all levels and functions within the electronic records system (their "room").

Board/Management Committee

The minutes of the KNC Board are available to members of the organisation on request once they have been accepted by the Board. The exception is when the Board minutes contain sensitive content related to an individual (staff member, volunteer, client, student, contractor), or Organisation business considered sensitive, in which case the Board exercises the right to redact such information/content as deemed confidential, or they pass a motion to make any specific content discussed in a Board meeting as confidential.

All papers and materials considered by the KNC Board can be made available to members of the organisation following the meeting at which they are considered, except where the Board exercises the right to redact such information/content as deemed confidential, or they pass a motion to make any specific content discussed in a Board meeting as confidential.

The minutes, papers and materials from any Sub-Committee of the Board will be open to Board members and staff, but not members of the organisation, with the exception of information relating to any matter the Sub-Committee deems confidential.

Katoomba Neighbourhood Centre Membership Records

A list of current Katoomba Neighbourhood Centre Members will be available on request to KNC members, members of the KNC Board and KNC staff. Personal information about members (including address and contact details) is confidential and may only be accessed by the KNC General Manager or their delegate and the Manager Finance & Resources.

Personnel files

A personnel file is held for each staff member and contains:

- contact details and contact details in case of an emergency
- a copy of the employee's letter of appointment
- job description, signed KNC Code of Conduct
- induction checklist
- all correspondence relating to job description changes, contract variations, salary changes, leave entitlements such as long service leave, continuous service leave, unpaid and parental leave.
- Current Criminal Record Check and Working with Children check where appropriate

Access to personnel information is restricted to:

- the individual staff member accessing their own file
- the General Manager and Manager Finance & Resources,
- Service Coordinator accessing the personnel file of a worker directly under their supervision and management

Corporate records

Corporate records are those that contain confidential or commercially sensitive information about the organisation's business. They include:

- financial accounts and records
- taxation records
- corporate correspondence with funding bodies and the ACNC
- the corporate auskey and other access or user name information
- records of staff or other internal meetings
- project management files
- contracts, service agreement and memorandums of understanding between the organisation and other parties

Access to these records is limited to the KNC General Manager or their delegate, the KNC Manager Finance & resources and the KNC Board. The relevant Service Coordinators responsible for specific projects will also have access to project management files and relevant contracts/service agreements.

Requests for access – general records

All records and materials not falling into the categories above may be released to the public at the discretion of the General Manager or their delegate

Any request for access to information should be directed to the General Manager who will:

- make available to staff or KNC Board members information that they are entitled to access
- refer any request from KNC members or the public for access to the organisation's records or materials to the Board executive for approval prior to release.

In considering a request, the General Manager will take into consideration:

- a general presumption in favour of transparency
- the relevant provisions of the Katoomba Neighbourhood Centre's constitution regarding information to be made available to KNC members
- the business, legal, and administrative interests of Katoomba Neighbourhood Centre including commercial confidentiality and privacy obligations.

Where an external party requests access to information that requires staff to devote time to collating, copying or otherwise making material accessible, the General Manager may determine a fee to be charged.

Requests for access - client records

All clients and former clients have the right to access their records and advise the organisation about inaccuracies. KNC will ensure that:

- clients are aware of their rights around access to their records and are given appropriate and ready access to their information
- if a client is being cared for in a KNC service that currently maintains a hard copy file, the Service Coordinator responsible for their service can arrange access to or a copy of their client file on request. The request for access is to be noted in the clients file and the monthly Coordinator's Service report. Any inaccuracies identified by the client will be noted and amended accordingly by the relevant Service Coordinator
- clients are given copies of their individual service plans and plans of care reflecting their goals at commencement of service
- in the event a client request to access their file is refused by the General Manager, they have the right to appeal to the Chairperson of the KNC Board
- the cloud based KNC client document management system "PYNX", once implemented will enable client access to all the information held on them. Each client will be given a log in to their client record
- access to specific components of the client information held in the cloud based "PYNX" system can be made available to outside agencies also engaged in the clients care, with consent of the client. The level of access will be restricted to only those areas in the clients "room" that the outside agency needs to see in order to improve/enhance client care or experience

Requests for information about clients from outside agencies or individuals will be referred to the relevant Service Coordinator in the first instance for review and recommendation to the General Manager re the request. Before any information is released, the relevant Service Coordinator will contact the client, their guardian or legal representative to obtain consent for release of or access to information.

Appeals

Individuals who are refused access to their own records or information files may appeal by contacting the General Manager who will review the decision in the context of this policy. In the event the client remains unhappy with the decision following this process they can seek further consideration from the KNC Board Executive for consensus decision.

Limits to confidentiality

There are limits to confidentiality as required by law, and these are when:

- there is circumstance of immediate or grave danger to an individual - client, staff or other service user e.g. when there is reasonable belief that the individual is suicidal or homicidal
- there is reasonable suspicion of serious criminal activity
- there is recent or ongoing child abuse
- there is recent or ongoing abuse of a dependent adult
- there is reasonable suspicion of disease or conditions subject to mandatory reporting of a public health issues

Under these circumstances an individuals' right to privacy and confidentiality is replaced by requirements under the law. In these circumstances the General Manager after consultation with the Board Executive will facilitate release of personal information in the above circumstances

VERSION HISTORY

Version	Approved by	Approval date	Amendment notes
Version two	KNC Policy & procedure subcommittee for use in draft	March 2015	<ul style="list-style-type: none">• Stand alone policy and procedures developed to sit behind the Organisational Governance policy
Version two	Slated for Board ratification May 2015		

