

POLICY

(59_ADM_POL_V.0_Records_and_Information_Management)

Name	Records and Information Management Policy
Purpose	To support Code Blue for Autism’s (CBFA) privacy and confidentiality processes and ensure compliance with relevant privacy legislation and principles.
Scope	This policy and procedure applies to CBFA as a whole.
Policy	CBFA organises, stores, accesses and disposes of the various kinds of information gathered in the course of delivering our services and running the organisation. It is important to us to ensure the privacy and confidentiality of service users and staff, and also vital to business continuity and accountability. In the event of any claim against the organisation (legal or otherwise), good information management enables us to track and demonstrate our decision-making process. Finally, it is integral to quality assurance and the control of documents, such as policies and procedures, which guide our organisation and the decisions we make.
Procedure	<p>Client and Staff Records and Information / Electronic Data</p> <p>CBFA electronic data including client and staff records and information are both stored in two secure digital locations:</p> <p>Location 1 – a Master spreadsheet located within the CBFA secure Microsoft Teams channel (protected by Microsoft Defender)</p> <p>Location 2 - secure Brevity software (NDIS compliant software with data encryption)</p> <p>Data stored on OneDrive, Teams, SharePoint and Exchange (Microsoft 365) are regularly backed up via our third party Information Technology provider (Monocera).</p> <p>Management Team members conduct a monthly manual back up of data stored locally on their laptops to an external hard drive that is kept in their lockable desk drawers.</p> <p>Brevity conducts in house back up of data which can be recovered if required. Brevity utilises Amazon Web Services (AWS) as a hosting platform for its cloud software. Your Data will be processed and stored within the AWS Australian data centres located in Sydney, Australia. Brevity utilises live data replication across multiple locations for redundancy all located in Sydney, Australia.</p>

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Management Team members laptops are password protected, as is access to Brevity.

Only Management Team members have direct access to the Master spreadsheet and Brevity.

Client information is provided to other staff on an “as needed” basis e.g. contact information for clients enrolled in programs that they are Facilitating to enable communication of weekly update emails, communication in the event of an emergency etc.

Staff information is provided to other staff on an “as needed” basis e.g. contact information for those working an out of hours Chill Out event, food allergy information for catered work events etc.

Accessing and amending records

Clients and staff have the right to:

- request access to their personal information, without providing a reason;
- access this information; and
- make corrections if they consider the information is not accurate, complete or up to date.

Clients are made aware of their right to access their personal information via the Participant Handbook.

The decision as to whether to grant access or to amend personal information can only be made by the CEO. All access and amendment requests must be directed to the CEO, who will assess the request within seven days.

Archiving and Record Retention

Our records are grouped as follows:

- client records
- staff records
- administrative records;
- financial records

The majority of CBFA documentation is stored in a digital format. Facilitator and Peer Mentors who keep a hard copy diary to record their client notes, give their full diaries to the Chill Team Manager who stores these in a staff area only onsite.

If a confidential record is printed or copied, once it is no longer required, it is disposed of via shredding.

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Roles and Responsibilities	<p>All Management Team offices are locked at the end of each day with only Management Team members having keys to these offices.</p> <p>Emails</p> <p>Emails form a significant part of our information system; it is our main form of correspondence, records of conversations, requests and actions.</p> <p>CBFA email accounts are to be used for business purposes only.</p> <p>If delivering information of a time sensitive, complex and/or sensitive nature, it is preferable to use face to face, videoconference or telephone communication as opposed to email.</p> <p>Emails that may need to be referenced in the future e.g. communication with clients/support persons regarding an issue, emails with staff members regarding a HR issue etc, should be saved within the appropriate record within Brevity.</p>												
Definitions and Abbreviations	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #d9e1f2;"> <th style="text-align: left; padding: 5px;">ROLE</th> <th style="text-align: left; padding: 5px;">RESPONSIBILITY</th> </tr> </thead> <tbody> <tr> <td style="padding: 5px;">Director/CEO</td> <td style="padding: 5px;">Ensure systems and processes are in place for records and information management</td> </tr> <tr> <td style="padding: 5px;">Manager, Operations</td> <td style="padding: 5px;">Ensure the appropriate access and retrieval of records and information</td> </tr> <tr> <td style="padding: 5px;">All Team Members</td> <td style="padding: 5px;">Compliance with privacy and confidentiality requirements</td> </tr> </tbody> </table> <table border="1" style="width: 100%; border-collapse: collapse;"> <tbody> <tr> <td style="padding: 5px;">CBFA</td> <td style="padding: 5px;">Code Blue for Autism</td> </tr> <tr> <td style="padding: 5px;">CEO</td> <td style="padding: 5px;">Chief Executive Officer</td> </tr> </tbody> </table>	ROLE	RESPONSIBILITY	Director/CEO	Ensure systems and processes are in place for records and information management	Manager, Operations	Ensure the appropriate access and retrieval of records and information	All Team Members	Compliance with privacy and confidentiality requirements	CBFA	Code Blue for Autism	CEO	Chief Executive Officer
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INFORMATION

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Purpose	To support Code Blue for Autism's (CBFA) privacy and confidentiality processes and ensure compliance with relevant privacy legislation and principles.
Audience	All CBFA team members
Category	Administration
Subcategory	Governance
Approval date	19.02.2024
Effective date	19.02.2024
Review date	19.02.2025
Policy advisor	Manager - Operations
Approving authority	Director/CEO

RELATED POLICY DOCUMENTS AND SUPPORTING DOCUMENTS

Legislation	<i>Information Privacy Act 2009 (Qld)</i> Information Privacy Principles <i>Right to Information Act (Qld)</i> <i>Privacy Act 1988 (Cth)</i> Australian Privacy Principles <i>Privacy Amendment (Notifiable Data Breaches) Act 2017</i>
Policy	Privacy and Confidentiality Policy
Procedures	N/A
Local protocols	N/A
Forms	N/A

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