

<b>Q109</b>	<b>CUSTOMER RECORDS POLICY</b>
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**Policy**

Enhanced Lifestyles (EL) and Lifestyle Assistance and Accommodation Service (LAAS) is committed to collecting, keeping and disposing of Customer/Client records in ways that protect privacy and ensure confidentiality is maintained. This policy will operate in conjunction with the organisation’s Privacy Policy. Enhanced Lifestyles and Lifestyle Assistance and Accommodation Service conforms to the *Federal Privacy Act (1988)* and *the Australian Privacy Principles* which govern the collection, use and storage of personal information.

Specifically, Enhanced Lifestyles and Lifestyle Assistance and Accommodation Service will:

- collect and keep information about Customers/Clients only when it is relevant and necessary to the provision of the service.
- ensure data about each Customer/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 Customer/Clients’ records for the required length of time.
- transfer or dispose of Customer/Client records correctly.
- give Customers/Clients an option to remain anonymous or use a pseudonym unless an exemption under the Privacy Act applies.
- provide information to Customers/Clients about how their personal information is managed.

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

This document complies with NDIS 2018, standard 1.3 Privacy and Dignity and ACIS 2013 standards, section 1.4 Confidentiality. This document is readily available to all Customers/Clients and employees of Enhanced Lifestyles and Lifestyle Assistance and Accommodation Service including The Boards.

<b>Policy context:</b> This policy relates to	
Legislation or other requirements	Privacy Act 1988
Contractual obligations	Customer Service Agreements

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**Actions**

**Collecting identifiable data**

All Customer/Client information collected is recorded and maintained in the organisation's customer information system (CIMS), a secure database.

This information is collected for the purpose of:

- service management and delivery, monitoring, evaluation and reporting (de-identified information only is used for this purpose)
- meeting the reporting requirements of funding bodies
- monitoring and management of service to individuals (case files)
- meeting the legal requirements of any regulatory bodies

This information may include audio and visual data where it is appropriate or relevant to the provision of services.

The Operations team will review the scope of information collected annually to ensure that only relevant information is being recorded.

Any member of the Service delivery team may collect customer information associated with any aspect of service delivery during the following events:

- Initial assessments
- Prior to commencing service provision
- Annual evaluations
- Ad-hoc meetings with Customers/Clients

When information is being sought from Customers/Clients, the employee seeking the information will request the person's VERBAL 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.

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The employee will ask the customer if they have any concerns or specific requests about the way their personal information will be recorded or managed.

**Storage and use of identifiable data**

All customer information collected is recorded and maintained in the organisation’s customer information system (CIMS), a secure database. All members of the Operations team are authorised to access CIMS files.

**Maintaining and verifying customer records**

The Service Delivery team is responsible for reviewing and updating customer records as required.

In recording personal information about Customers/Clients the Service Delivery team will ensure objectivity, prevent inappropriate comment and verify information with Customers/Clients.

<b>Documentation Documents related to this policy</b>	
Related policies	Q108 – Privacy Policy Q110 - Access to Confidential Information Policy
Forms, record keeping or other organisational documents	Customer Service Agreements Care Plans Customer files (CIMS)