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INFORMATION MANAGEMENT

Policy Statement

Enhanced Lifestyles (EL) and Lifestyle Assistance and Accommodation Service (LAAS) regards its business information as a critical corporate asset, vital both for ongoing operations and in providing valuable evidence of business decisions and transactions. The organisation is committed to maintaining fit-for-purpose, cost-effective information management practices and systems to ensure control over the creation, maintenance and protection of reliable information.

The term information as used in this document refers to business records produced and/or retained by management and Operations Team members in a controlled manner including but not limited to working files, reports, correspondence, emails, plans and minutes.

This document complies with NDIS 2018, standard 2.1 Governance and Operational Management, and ACIS 2013, section 2.1 Governance and Operational Management. This document is readily available to all clients and employees of Enhanced Lifestyles and Lifestyle Assistance and Accommodation Service including The Boards.

Policy context: This policy relates to	
Privacy Act 1988	Privacy Act 1988
Contractual obligations	Service Agreement Customer Service Agreements

Process Definition

An organisation in control of its information can realise significant benefits including:

- improved business efficiency
- structured management of records retained for legal and regulatory purposes
- access to information to enable informed and effective decision making
- retention of a corporate memory of transaction and actions taken by the organisation
- identification of information required for permanent preservation and archive

The primary aim of information management is to ensure that the right information is available to the right person, in the right format and medium at the right time.

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Hard Copy Vs Online Management

It is an Executive directive that all business information shall be retained electronically wherever possible and practical. It is understood that certain information must be retained in hard copy after being scanned and appropriately filed where it must be retained due to legislative or regulatory requirements.

Scope

This document defines the controls associated with the following information management attributes and components:

- Information management principles
- Directory management
- Information control register
- Communication plan
- Meetings
- Marketing and training information
- Business email
- Information disposal

Out of Scope

Quality Management System (QMS) document control is defined in Q006 - Quality Document Control Procedure. QMS documents and forms will be retained in the document control register.

Controls associated with data produced and retained in business applications are defined in procedural manuals relevant to those applications (e.g. Customer Information Management System (CIMS); payroll and billing systems using the NAV application).

Forms completed as part of a business process (i.e. feedback forms, continuous improvement forms, WHS incident reports etc.) will be scanned and filed for secure retention. Hard copies will only be retained for legal or regulatory purposes (i.e. WHS forms forming part of a WorkCover claim).

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Responsibilities

Assigning responsibilities for information management ensures the information is appropriately identified and managed throughout its lifecycle and is accessible to appropriate stakeholders.

The Executive Officer is ultimately responsible for the management of information and will promote compliance with this policy

Managers are responsible for the visible support of, and adherence to, this policy by promoting a culture of compliant information management within the organisation.

All employees are responsible for the creation and management of information as defined by this policy.

Information Management Principles

Organisational information is to be created, collected, classified, and organised in a manner that ensures its integrity, quality and security.

Secure retention of electronic records will be achievable using the information control register. Information integrity will be addressed through the version control rules defined in the document Q007 - Style Guide.

Information is a corporate resource to which all employees may have access, except where the nature of the information requires restriction. All employees are required to sign a confidentiality agreement as an understanding and commitment to the correct handling of confidential information where restrictions and exceptions apply.

The Enhanced Lifestyles Privacy Policy (Q108) defines the procedures that apply regarding information privacy.

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Classification of Information

1. Information of permanent significance

Information that requires permanent retention include:

- any information required to be retained in accordance with legal obligations
- items of historical significance to the organisation
- emails creating or recording permanent legal relationships
- items recording significant policies or precedents

2. Administrative Correspondence

Enhanced Lifestyles (EL) and Lifestyle Assistance and Accommodation Service (LAAS) administrative correspondence includes, but not limited to, confidential management information, employee-related information, and project-related correspondence.

3. Fiscal Correspondence

Enhanced Lifestyles and Lifestyle Assistance and Accommodation Service fiscal correspondence includes all information related to revenue and expense for the organisation.

4. General Correspondence

Enhanced Lifestyles and Lifestyle Assistance and Accommodation Service general correspondence covers information that relates to Customer/Client interaction and the operational decisions of the organisation.

5. Personal Information – Working Documents/Files

This is the largest category and includes emails, documents and files dealing with the work of the day. Information owners may destroy this category of information only after it no longer is required for business purposes.

Directory Management

Management rules explicitly direct users in the organisation's preferred means of managing records.

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Directory Structure

The directory structure that is established on the G Drive reflects the structuring of folders (with meaningful titles) containing individual and group business records.

The directory structure must contain the following attributes:

- a structure that is easily interpreted and which discourages users from placing records in inappropriate locations
- typically, a 'functional' directory structure will have three levels (or layers) of folders that act as segregations for information. These levels represent the functions, activities and transactions of the organisation
- simple names that identify the logical element of the filing structure
- upper folders or 'Classification Folders' that never contain records

Naming Convention

Naming conventions help identify records and folders using common terms and titles. Names for records must be meaningful, and convey an idea of the content as defined in document Q107 – Style Guide.

Version Control - Date Formatting

These controls will be applied as defined in document Q107 – Style Guide.

Responsibility

Management is responsible for the creation and maintenance of functional directories and folders.

Management and Operations Team members can create and save information records in individual or group directories and folders as required.

Authors are responsible for securely retaining masters of all forms of business information.

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Information Control Register

The Enhanced Lifestyles Information Control Register is a central repository of all business-critical information that enables information to be managed in a secure, structured and consistent manner. The control process for the register is defined in Q272a – Information Control Register.

Communication Plan

A communication plan details all business-critical information flows. It is intended to be comprehensive strategy for information transactions relating to business planning and management in varying mediums.

Meetings

Procedures for Board and Committee meetings, including agenda and minute formats and scheduling, are defined in the respective Terms of Reference documents. Agendas and minutes are set by the relevant Chairperson. Document 272c contains a summary of all types of meetings.

Marketing and Training Information

The Communications Officer, in consultation with the Executive Officer, is responsible for the control of all marketing information and material. The Quality and Services teams are responsible for the control of all training information and materials.

However, marketing and training business correspondence, reports and data will be controlled in accordance with that category of information as defined in this document.

Business Email

Email is a primary tool of communicating information internally and externally.

In practice an email is no different to any other electronic record containing content and is as unique as any document. Where emails can be part of an audit trail for a key business transaction/decision or evidence for compliance to something they must be controlled until no longer required (e.g. retained in group directories as an .rtf file).

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Business emails must contain the correct language as detailed in the Style Guide. They must be written in terms and content appropriate to the intended audience. As with all business information due consideration must be given to privacy and confidentiality characteristics of every email. The naming convention for emails is to be the same as the naming convention for documents. It must incorporate both an appropriate subject title and the date of requested action where necessary.

Functional/group email addresses must be used when emails are broadcast to a wide audience particularly where responses are requested.

Information Disposal

Reliable and useable information is created and managed, and are kept for as long as they are needed for business, accountability or historical purposes.

Electronic document retention management needs to meet multiple objectives:

1. that information retention does not materially degrade IT system performance
2. that important information remains accessible for operational purposes
3. that legal document retention requirements are met
4. that *Privacy Act* obligations to delete certain personal information is complied with

Legal Requirements

The first step is to consider whether there is a particular legal obligation to retain information for a minimum period of time.

1. Australian Charities and Not for Profit Commission Act 2012 (Cwlth)

Section 55-5 requires a registered entity to keep for 7 years written records that correctly records its operations, so as to enable any recognised assessment activity to be carried out.

2. Destruction of evidence

In South Australia under the *Criminal Law Consolidation Act 1935* (SA) s 243, it is an offence to conceal or destroy anything that may be required in evidence at judicial proceedings with the intention of influencing a decision by a person whether or not to institute judicial proceedings or to influence the outcome of judicial proceedings (whether proceedings that are in progress or proceedings that are to be instituted at a later time).

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3. Correspondence involving intellectual property

Any correspondence that involves the creation of any significant intellectual property rights shall be retained at the discretion of the Executive Officer.

4. Correspondence relating to litigation (or anticipated legal proceedings)

When legal proceedings are in process (or reasonably to be anticipated), particular considerations apply to document retention. This would include correspondence relating to any threatened or likely legal action against Enhanced Lifestyles and Lifestyle Assistance and Accommodation Service, relating to any alleged or likely misconduct by Enhanced Lifestyles and Lifestyle Assistance and Accommodation Service or its employees. It is the responsibility of the Executive Officer to inform employees should these considerations be applicable.

5. Privacy Act 1988 (Cwlth)

Under the Australian Privacy Principles implemented in accordance with the *Privacy Act 1988* (Cwlth), an APP entity (i.e. an entity that is obliged to comply with the Australian

Privacy Principles) must take such steps as are reasonable in the circumstances to destroy personal information, or to ensure that the information is de-identified, if the entity no longer needs the information for any purpose for which the information may be used or disclosed by the entity. The *Privacy Act* only applies to information about an individual (i.e. a human) and it does not apply to information about entities.

Archiving

Whilst business information is disposed of when it reaches the end of its required retention period authors and/or management may decide to archive information where it may be used for future reference. ATSI files are not destroyed as per legislation. ATO records are kept for a minimum of 7 years being destroyed. All hard copy arch are kept offsite at Recall.

Storage

It is the responsibility of the Executive Officer to ensure arrangements exist for secure information and data backup through a formal support arrangement. Where physical back-up media is used (rather than cloud storage) the Executive Officer will delegate the task of periodic off-site storage of a set of discs taken out of the rotation from onsite equipment.

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Knowledge Management

Knowledge management is the process of creating, sharing, using and managing the knowledge and information of an organisation. Enhanced Lifestyles and Lifestyle Assistance and Accommodation Service knowledge management efforts typically focus on the organisational objective of continuous improvement.

Knowledge management is essentially about getting the right knowledge to the right person at the right time. Knowledge management may also include new knowledge creation, or it may solely focus on knowledge sharing. The overall objective is to create value and leverage and refine knowledge assets to meet organisational goals.

The benefits are that:

- It helps the organisation learn from the past successes and mistakes.
- It better exploits existing knowledge assets by re-deploying them in areas where the organisation stands to gain something.
- It promotes a long-term focus on developing the right competencies and skills and removing obsolete knowledge.
- It enhances the organisation's ability to innovate.
- It enhances the organisations ability to protect its key knowledge and competencies from being lost or copied.

SIL Hardcopy Management

Folders containing hardcopies of EL/LAAS policies and procedures about key Customer/Client rights will be kept and maintained at each Supported Independent Living location. These folders are for the benefit of Customers/Clients and their support networks to understand the policies and procedures of EL/LAAS and what rights the Customer/Client has under the State and Federal government legislation.

These folders will be reviewed each quarter and documents replaced where a newer version is available.

These folders will contain the following documents:

- NDIS complaint form hardcopy
- NDIS Handling Complaints and Fixing Problems – Easy Read
- NDIS Complaints poster – Easy Read
- NDIS Complaints brochure – Easy Read

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- NDIS Complaints brochure
- NDIS Complaints brochure – Large Print
- NDIS Practice Standards 2020
- QF241B Feedback and Complaints Form
- Q269 Feedback and Complaints Management Policy
- Q325 Incident Management Policy
- Q108 Privacy Policy
- Q109 Customer Records Policy
- Q120 Surveillance Camera Policy (any site with cameras)
- Q115 Providing Customer Advocacy and Support Policy

Documentation

Documents related to this policy	
Related policies	Q108 – Privacy Policy
Forms, record keeping or other organisational documents	Q007 – Style Guide Q272a – Information Control Register Q272c – Meeting Schedule