

Client Records Policy



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Version:	4
Endorsed by:	Operational Management Group
Issue date:	28 October 2024
Review date:	28 October 2026

1. Purpose

The purpose of this policy is to detail how Women's Housing Ltd (WHL) records and stores client records including case notes and documentation. This includes the standards and requirements of maintaining case notes. This policy should be read in conjunction with WHL's *Privacy & Confidentiality Policy*, which provides more information about how WHL keeps client data secure.

2. Statement of Commitment

A well-maintained records management system is a key component of quality service delivery.

Women's Housing Ltd (WHL) is committed to:

- High performance and continuous improvement in maintaining records and file notes pertaining to clients and renters
- Maintaining accurate and comprehensive databases relating to all rent collected
- Abiding by relevant privacy laws and best practice guidelines
- Providing access to personal information for renters as required by law
- Maintaining information and financial integrity

3. Scope

This policy applies to all employees, volunteers, students, board members and contractors of WHL who interact with clients or renters, handle renter or client information, or process rent.

Information about how WHL keeps client and renter information secure can be found in WHL's *Privacy and Confidentiality Policy*. Information about records and privacy pertaining to employee information can be accessed in WHL's *HR Policy*.

4. Case notes

A case note is a written record of information about a client or renter that captures information such as communications with them or about them. Case notes are designed to keep an authentic record of the client or renter's situation.

Case notes are treated as confidential and are only used for official purposes.

4.1 When case notes are required

Case notes must be written in the following circumstances (not limited):

- Any written or verbal interaction **with** clients or renters, including correspondence sent or received

- Any written or verbal interaction **about** the client or renter
- Decision making processes about a client or renter
- Events or situations that impact the client or renter, such as a housing offer, referral, support letter or VCAT notice
- Incidents involving the client or renter
- Safety concerns relating to the client or renter

4.2 How to write case notes

Case notes must be a factual, objective statement that accurately reflects the situation without imposing any bias or interpretation. Staff should use clear and concise language and avoid typos or slang (unless quoting verbatim). Any abbreviations should be clarified in the first instance so that the information can be interpreted easily. Case notes should be completed as soon as reasonably practicable to ensure they are accurate and up to date.

The key information to include in a case note is:

- The renter / client's details
- The type of contact
- Details of the issue or interaction
- An action plan if relevant

Standard case notes reflecting inspections, regular communications and administrative matters must be completed within 5 working days.

Case notes pertaining to complaints, grievances, incidents, safety issues, support queries or similar matters must be completed within 48 hours.

4.3 Requests for access to case notes

There may be situations where a client or renter's case notes are requested. This could occur due to a Freedom of Information Request, or a request from police or courts. If this occurs, it should be immediately escalated to the Operations Manager for consultation about the appropriate action. Renters who wish to make a Freedom of Information request should contact their Tenancy Officer in the first instance.

Due to the possibility of case notes being requested, it is important to uphold the highest ethical and best practice standards.

5. Digital storage systems

5.1 SharePoint

WHL maintain digital files via SharePoint for renters and rental applicants to store relevant documentation. Files are only accessible via WHL's secure server which is stored securely in the cloud and protected by a range of IT controls.

5.2 Chintaro

WHL utilise the software system Chintaro to maintain information about the following stakeholders:

- Renters
- Ex-renters
- Rental applicants
- Household members
- Next of kin for renters or ex-renters
- Support agencies

All case notes are completed on Chintaro, and staff are responsible for ensuring that renters within their portfolio have information that is up to date and accurate at all times. This includes inputting information such as:

- | | |
|---------------------|-----------------------|
| • Case notes | • Inspection records |
| • Personal details | • Incidents or alerts |
| • Household members | • Rental calculations |
| • Income details | • Rental payments |
| • Bond details | |

Line Managers regularly complete audits of Chintaro profiles to ensure all information is accurate and up to date.

5.3 SHIP

WHL utilises the Specialist Homelessness Information Platform (SHIP) to maintain information about service users accessing the Statewide Entry Point Service, Housing Pathways Program and Women’s Justice Diversion Program. Staff are responsible for completing case notes through SHIP.

5.4 PIMS

WHL utilises the Property Information Management System (PIMS) to complete property inspections. Photographs or videos taken during inspections are stored in the PIMS system and data is uploaded to Chintaro. Renters will be provided notice before routine inspections to enable them to remove any items they would prefer not to be photographed. No photographs will be used to advertising purposes unless personal belongings are removed, or consent is obtained.

6. Physical records

WHL no longer maintains physical records for clients or renters. Any hard copy documentation is digitised and destroyed immediately after. WHL maintain some hard copy files from ongoing tenancies that pre-date the transition to digital records. Where this occurs, records are either archived through a professional company or locked in a secure cabinet at WHL’s office.

7. Rent records

WHL maintains accurate rental ledgers via Chintaro. Ledgers will reflect accurate information about rent charges, rental amounts paid, rent refunds and other charges that renters may be liable for. Renters will be provided with a copy of their rent ledger upon request and whenever correspondence is issued to renters regarding rental arrears.

8. Retention periods

8.1 Clients or renters

The retention period for client or renter files is seven years, with two exceptions:

- If the client is under 18 years of age, the file must be kept until the client is 18.
- If a client file has been subpoenaed by a court, documents are retained indefinitely.

8.2 Rental applicants, ex-renters or ex-clients

WHL may retain some information from rental applicants, ex-renters or ex-clients when this information is being stored for a specific purpose. This might include retaining information for future housing opportunities, retaining data about unsuccessful applications or maintaining records of ex-renters who may re-enter WHL's service.

This data is treated with the same level of privacy and confidentiality as other client or renter data and utilises the same retention period as above.

9. Responsibilities

9.1 Operations Manager

- To oversee the quality of case noting and records management at WHL
- To develop and review client record management systems
- To provide advice and information to Line Managers about best practice
- To handle escalated Freedom of Information (FOI) requests

9.2 Line Managers

- To audit and review staff case notes and client records
- To role model best practice in client record management
- To identify and implement client record systems as required
- To handle complaints relating to this policy

9.3 All staff

- To understand and implement this policy
- To maintain accurate and up to date client records at all times
- To remain abreast of best practice techniques for case notes and record management
- To accept and escalate complaints or FOI requests to relevant managers
- To provide information to service users about their rights under this policy

10. Reviewing

Every two years or earlier when new policy or legislation requires.

11. Related Documents

- WHL Privacy and Confidentiality Policy
- WHL IT Policy
- WHL Human Resources Policy

12. Relevant Legislation

- Privacy and Data Protection Act 2014 (Vic)
- The Privacy Act 1988 (Cth)
- Freedom of Information Act 1982
- Charter of Human Rights and Responsibilities Act 2006 (Vic)