

These questions should be completed in consultation with staff, managers, participants and other stakeholders where appropriate.

COLLECTING, STORING, USING AND DISCLOSING PERSONAL INFORMATION

1. What personal information does FABIC collect? Is any of the information sensitive information?

All information collected from clients is either on forms (initial intake forms, information release forms, documents clients provide to us or client summary forms) and via verbal collection in interviews. All data is kept on Cliniko.

2. How does FABIC collect this information?

Initial forms are emailed to the client who will either (1) complete online and return to us online, (2) print and returned scanned copy, or (3) complete a hard copy and return via post prior to their first appointment.

At the time of the first and/or ongoing appointments, clients/guardians provide other relevant documents they would like the clinicians to be aware of. All clients/guardians provide them at their own free will.

3. Is information collection fair, lawful and non-intrusive? Do staff properly inform participants of the name of the person/organisation collecting the information?

All information is provided to FABIC by the client and is by client choice. As they are either responding to a FABIC email and/or direct to a FABIC staff it is clear to the client the information is being provided to FABIC.

4. Where and how does FABIC store this information?

All client information is stored in Cliniko and on Dropbox.

5. Who has access to information collected? Is it the appropriate people only (who have a legitimate reason to access information) and how do they have access to it? Do they have access electronically or in hard copy form? Is the information safe from misuse?

FABIC clinicians have access to all client notes and information they directly provide to the clinician. The FABIC administration team are typically the people who receive the original documents from clients and are responsible for uploading them into the client's file. If clients do not take the original documents, then all original documents are shredded after scanning has been successfully uploaded.

6. What measures does FABIC have in place to protect personal information from unauthorised access?

Access to Cliniko is password and account specific protected and thus only authorized personnel will have access to Cliniko files.

No hard copies of client files are kept on the premises as we keep all electronic files.

7. Why does FABIC collect the personal information it collects? Is it needed for a particular function or activity?

Information that is relevant to understanding and supporting a client during treatment is all that is needed.

8. Would participants know that FABIC is collecting the information?

Always – no information is collected without clients/guardians providing it to us.

9. How does FABIC use the information?

All information is used to support gaining understanding of the client and this is then used to form best practice in treatment for the client and training where required.

10. Does FABIC give the information to anyone outside FABIC and if so, for what purpose?
Information is only ever provided once a client/guardian has provided written consent.
Information is used for reports and training purposes, all to support the client to live and reach their full potential.
11. Does FABIC contract out any functions or activities involving personal information? What measures are taken to protect this information?
No
12. Does FABIC make individuals aware of the intended uses and disclosures of their information?
Yes – always
13. Is information collected by FABIC going to contribute to the quality of the service and how?
Yes – All information is used to supporting gaining understanding of the client and this is then used to form best practice in treatment for the client and training where required.
14. How accurate is the information being collected, how complete is the information and how up-to-date is the information? What mechanisms does FABIC have in place for routinely updating or checking this information?
The information provided is always provided by the client/guardian and thus is as accurate as they choose to provide.
15. Does FABIC transfer any personal information overseas? If so, to whom, and what countries?
Only for clients that are residing overseas ... FABIC see clients from outside of Australia via web or when clients travel specifically to see us.
16. Do staff obtain informed consent from participants, their guardian or power of attorney to release information for a secondary use?
Yes as guided in our information release form.
17. How accessible is FABIC's Privacy and Confidentiality Policy and Procedure and where is FABIC's Privacy Statement displayed?
FABIC's policies and procedures can be made accessible to any client should they choose to review it.
FABIC's privacy statement is displayed on FABIC's website and available at reception.

HANDLING PARTICIPANT INFORMATION ACCESS REQUESTS

18. Are FABIC participants aware from the outset of their rights to access their information?
Yes this is explained during client sessions.
19. How can participants request their information (e.g. verbally, in writing, etc.)?
We request that clients seek their information in writing ... this allows for a permanent record of their request. Clients would typically do this via email and their email would be saved in their Cliniko file.

20. How do FABIC staff process a request if a participant requests access to their information?

If a client requests their information we provide the information to them.

21. Does FABIC have a procedure in place to be able to respond to such requests?

We do not have a written document outlining this; albeit verbally clients are made aware.

22. Does FABIC have a designated privacy officer to manage privacy requests and management of personal information?

This is handled by the clinician that works with the client. Should that clinician not be available, the requests will be handled by FABIC Director, Tanya Curtis.

23. Are all staff aware of the procedures to be followed?

Administration staff have in the past emailed the clinicians when a client has requested information.

24. Will accessing information incur a cost to participants?

No

25. Are participants encouraged to be specific about which aspect, service or dates they want information on, in order to limit time, expense and potential confusion?

Cliniko files allow a client's history to be provided very simply, thus all information would be provided.

26. If all information on a participant's file is requested, how does FABIC facilitate this?

Cliniko has a function called 'history' that allows client records to be downloaded and then provided to the client.

27. How are participants provided access to information (e.g. read the information directly, provided a copy, summary report written, etc.)?

A client's history is downloaded and then emailed / posted to the client, depending on their preferred manner of receiving.

28. If participants read their information directly are they provided with a support person to ensure their wellbeing?

This has not been our typical procedure, albeit can be integrated if clients would prefer to receive their notes during a clinical consultation. Although it is not common for clients to request their notes, the few occasions this has occurred has been for the benefit of another therapist and not primarily for the client.

29. Where an information request is made by a third party, how does FABIC ensure that the participant has given their permission, or that the person is entitled to request that information?

FABIC will not pass on any information to a third party unless the client has provided written consent via the information release form to do this.

PRIVACY PRACTICE

30. Is FABIC using its own created identifiers on files and not Commonwealth Government identifiers to identify participants? (For example, DVA, Tax File, Medicare etc.)

All clients in Cliniko are set up via the client's first and last name. No government identifiers are used.

31. Do staff maintain the participants’ anonymity wherever possible, in all conversations in all contexts wherever possible?

Only when a client has provided written consent via the information release form, will the client be discussed with a third party.

32. Do you collect sensitive information? Do you have a lawful permission to collect that sensitive information?

We only collect information that has voluntarily be provided to us by the client/guardian.

IDENTIFIED AREAS FOR IMPROVEMENT:

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| Date audit commenced: | Thursday 30 th June 2022 | |
| Date audit completed: | Friday 1 st July 2022 | |
| Staff member/s responsible for audit: | Name: Tanya Curtis | Signature:  |
| Date identified improvements entered into Continuous Improvement Register: | | |
| Staff member/s responsible for Continuous Improvement Register: | Name: Tanya Curtis | Signature:  |