

INFORMATION MANAGEMENT POLICY AND PROCEDURE



Policy Statement

To provide guidance to all staff and volunteers regarding compliance to Pathways SouthWest information management systems and the organisations responsibilities to comply with the Privacy Act 1988 and the Freedom of Information Act 1992.

Pathways SouthWest has an effective information management system in place for all service users secure storage of data - this is SMS, which is managed by Alchemy Technology (a software development and support company).

Scope

This policy applies to clients, their nominated support persons and all staff including permanent and casual, contract workers, students and volunteers. This policy is owned by the Management Team.

Definitions

- **Carer:** Under the Carers Recognition Act 2004 a carer is a person who (without being paid) provides ongoing care or assistance to another person who has a disability, a chronic illness or a mental illness, or who is frail
- **Clients:** For the purposes of this policy and procedure clients are Pathways Southwest consumers and carers.
- **Consumers:** Consumers are people with a lived or living experience of mental health challenges and receiving a service from Pathways SouthWest
- **Documents:** For the purposes of this policy these are any policy and procedure, form, template, data base, spreadsheet or matrix and publications.
- **Freedom of Information Act:** The Freedom of Information Act **1992** (FOI Act) provides a general right of access to documents held by Pathways SouthWest. The release of these documents is subject to a number of exemptions prescribed by the FOI Act (see useful links section)
- **MHC:** Mental Health Commission. The Western Australian Mental Health Commission is the government body responsible for planning and purchasing mental health, alcohol and other drug services.
- **SharePoint:** Is a web-based collaborative platform primarily used for building corporate intranets, document and content management, and file sharing.

Date deployed:
Revalidate:
Approved by CEO
Signature

May 2026
May 2029

Owner:
Author:

Management Team
Coordinator Quality and Service Improvement

Version 7.0

- **Redacting** – Redacting information in documents for a Freedom of Information (FOI) request involves removing sensitive information so that it can't be read or identified. Redaction can be done manually
- **SMS:** Service Management System (SMS) is a comprehensive and innovative management software provided via SaaS and is developed explicitly for agencies delivering community care. Owned by Alchemy Technology who are a Software Development and Support company.

Principles

1. Communication Strategy:

Underpinning the management of information at Pathways SouthWest are the following communication strategies:

- Regular and structured meetings that involve all staff.
- Regular reporting to relevant Government and funding bodies.
- Training for staff in relevant policies and procedures.
- Involvement of staff and service users in the continuous improvement process.
- Involvement of staff in planning processes.
- Newsletters.
- Emails to staff as required.
- Letters and notices to Clients/family members as required.

2. Structure of Pathways SouthWest Documents

Pathways SouthWest has a policy and procedure and forms template which is to be used for all newly developed and or reviewed and updated documents. A style guide controls the appearance of all documents. All superseded documents are archived. All documents once printed are no longer a controlled document.

The active documents are published as read-only documents (PDF) in the Policies and Procedures folder or Form/Documents folder on Pathways SouthWest SharePoint.

3. Access to Documents

Staff can access all Pathways SouthWest documents either through their own computer terminal or through the shared terminals available to support workers and volunteers.

There are times when client records must be kept confidential from staff. These records will be entered as usual and then secured by the Chief Executive Officer (CEO), Manager Business Services (MBS) and SMS Systems Administrators. To obtain access to these client notes staff must contact the CEO and or MBS and provide reasonable grounds to request this access.

4. Updating Documents

The need to update documents or other material may occur through:

- Changes in legislation or regulations.
- Changes in funding or funding guidelines and requirements.
- Feedback.
- Management decisions.
- Adverse event reports.
- Audits and
- Scheduled document reviews as per quality standard requirements

- Regular policy reviews ensure legal compliance, internal alignment, and staff clarity.
- Annual reviews are the baseline for all risk, financial decision policy and procedures - but risk, compliance, or feedback can trigger earlier updates.
- A policy review register keeps updates timely and accountable.
- Involving staff in feedback improves relevance, clarity, and adoption.

5. **The process for updating Pathways SouthWest Documents**

- When the need for changes are identified these are discussed with the CEO or MBS and the Coordinator Quality and Service Improvement (CQ&SI).
- The CQ&SI develops draft changes with the permission of the CEO
- Draft changes are reviewed by CEO within the policy and procedure or form document. The final copy is then presented to the Pathways SouthWest Board or Management Team.
- When changes have been approved by the Board or Management Team and the CEO. The CQ&SI is advised of the acceptance of the updated version.
- The document is amended and old versions are archived in P/Drive [Pathways SouthWest Team Site - ALL Policies, Procedures, Forms and Documents use SharePoint Versions - All Documents](#). All superseded copies are removed from SharePoint and replaced with the new document.
- Staff are advised of changes to the document either through a staff meeting, an email or a training session. Clients are advised, as appropriate and necessary, through staff and the Pathways SouthWest newsletters.
- Major changes are reviewed after an appropriate time to ensure they have achieved the required outcome.

6. **Control of Pathways SouthWest Documents**

- Electronic read-only copies (PDF) of current documents and materials (i.e. brochures) are accessible to staff via SharePoint
- Only the CEO and CQ&SI can initiate changes to the original files if minor changes are required.
- Printed pages of documents can be made for staff to refer to but are uncontrolled documents once printed.

7. **Review of Documents**

Policies and procedures, forms and documents are reviewed according to the Register of Policies and Procedure and Document located in [Pathways SouthWest Team Site - Documents - Register of Policies Procedures and Documents - All Documents](#)

8. **Principles for the Collection of Client Information**

All client information is managed within the Pathways SouthWest policies that comply with standards applicable to the National Safety and Quality Mental Health Standards for Community Managed Organisations and Privacy Act 1988.

9. **Sharing of Information and Access by Clients of Information (Freedom of Information Act 1992)**

When sharing a person's information with another service, staff must at all times comply with the Freedom of Information Act 1992. <https://www.oaic.gov.au/freedom-of-information> (accessed 17/2/2026) and the grounds on which it can be refused – which are:

- You reasonably believe that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety
 - Giving access would have an unreasonable impact on the privacy of other individuals the request for access is frivolous or vexatious
 - The information relates to existing or anticipated legal proceedings between you and the patient, and would not be accessible by the process of discovery in those proceedings
 - Giving access would reveal your intentions in relation to negotiations with the patient in such a way as to prejudice those negotiations
 - Giving access would be unlawful
 - Denying access is required or authorised by or under an Australian law or a court/tribunal order
 - You have reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to your functions or activities has been, is being or may be engaged in and giving access would be likely to prejudice the taking of appropriate action in relation to the matter
- Giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body
- Giving access would reveal evaluative information generated within your organisation in connection with a commercially sensitive decision-making process.
 - Give priority to a person's best interests, including consideration of the need to maintain a person's health, protect them from harm, protect their rights and promote their development.
 - Exercise professional judgment – use their professional skills, knowledge and experience in deciding what action to take regarding a vulnerable person; and consult with MBS and or CEO where they are unsure of what to do.
 - Complete the Release of Information Application Form and have it approved by the Pathways SouthWest CEO and or MCS before any information is provided.
 - If Pathways SouthWest refuse to give access to the information, or refuse to give access in the manner requested, Pathways SouthWest must:
 1. Take reasonable steps to give access in a way that meets both your own and the clients' needs
 2. Give the Client a written notice setting out the refusal grounds and complaint mechanisms.

If a client consents to their personal information being disclosed to a third party and it is considered that the disclosure of that information may put that person at risk of harm it should be brought to the attention of the Chief Executive Officer (CEO) and or the Manager Client Services (MCS). The CEO and or the MCS will consider whether the information is appropriate to be released.

The processing steps upon receipt of the Release Of Information Form (ROI) application are:

1. Receipt of and log the ROI application
2. Scoping the application where necessary with approval of CEO.
3. Redacting the document – label where redaction occurred- this may be indicated by Black Out/Strike Out of sensitive details on the documents requested.
4. Providing the information to the CEO and or the MCS for approval and release after finalizing the documentation to ensure it complies with professional standards and the Freedom of Information Act 1992.

5. Arranging the release with the client.
6. Uploading the document into the clients document folder in SMS with an entry into client notes (see below General Tips).

Manual redaction

- Cover up the information with a solid box
- White or black out the information
- Physically remove the information
- Print the document and rescan it to create an electronic copy

Tips: General tips

- Make a copy of the original document – upload this copy into SMS and label it “redacted document for (clients name)”
- Ensure that the redacted information can't be seen or guessed
- Delete personal information completely and permanently
- Protect metadata
- Keep a record of the redaction

Personal information that may need to be redacted includes names, addresses, birth dates, and maiden names and gender.

10. Information Release to External Agencies

Whenever information is shared with a person or agency outside of Pathways SouthWest (e.g., government departments, law enforcement, or other service providers), it must be done securely and in accordance with relevant privacy legislation.

10.1 Requirements for Information Sharing

- **Consent:** Pathways SouthWest relies on informed client consent. Before disclosing personal or sensitive information to a third party, staff must obtain explicit, documented consent from the client or their legal representative, except where statutory exceptions apply.
- **Lawful Exceptions:** Client consent is not required if the disclosure of information is authorised or required by law (e.g., a mandatory court subpoena, child protection requirements, or to prevent an imminent threat to life, health, or safety).
- **Cross-Border/Inter-Agency Transfers:** Personal information must only be transmitted to external agencies using secure communication methods (e.g., secure email platforms or file-transfer protocols). Physical hard copies must be handed directly to the client or their authorised recipient or sent via registered mail.

10.2 Referral to External Agencies

When a client is referred to an external agency, the sharing of relevant personal or case management information must follow these steps:

1. **Assessment:** The assigned staff member must assess what information is strictly necessary for the external agency to successfully receive the referral.
2. **Consent Documentation:** The staff member must ensure the client signs the Pathways SouthWest Release of Information Form before the referral is submitted.
3. **Transmission of Records:** The approved records (e.g., case notes, risk assessments) must be securely transmitted to the external service provider or agency.

4. **Record of Disclosure:** Staff must log all outgoing information transfers in the clients SMS (client information management client notes and documents folder) *what* information was shared, *who* it was shared with, *the date*, and the *authority* providing this to appropriate ongoing services (e.g., client consent or legal mandate) for the disclosure. The information may include with the clients consent a written summary of services provided. If the client requests a follow-up contact with Pathways SouthWest, this will be diarised and referred to nominated staff member.

11. Management of Client, Staff and Operational Information

Pathways SouthWest complies with all legal and professional standards regarding client notes. All client notes must be **accurate, factual, objective, legible, and contemporaneous.**

Core Content Standards for Client Notes:

- **Contemporaneous entries:** Staff must write notes as soon as practically possible afterwards meeting or having any dialogue with Pathways SouthWest clients.
- **Objective factuality:** Staff must document observed facts and verbatim statements (in quotation marks) rather than personal value judgements.
- **Professional tone:** All client notes must remain respectful, culturally safe, and free from demeaning, derogatory, or biased remarks.
- **Essential data:** Every client note entry must include the date, time, practitioner identity, clinical/recovery history, recovery, service, social plans and activities, and informed consent.
- **No shortcuts:** Avoid cutting and pasting old entries, as this frequently introduces inaccuracies and irrelevant information.

Record Corrections and Amendments – (this is a automatic process controlled by Alchemy Technologies SMS system.)

- **Never erase data:** You must not delete, white-out, or obliterate existing entries- all client notes and documents within SMS are controlled by SMS System Administrators.
- **Digital tracking:** SMS captures modifications via an un-editable audit trail.
- **Active complaints:** Do not alter, add to, or amend a client record in any way once you become aware of an active legal claim or formal complaint.

Paper records:

Pathways SouthWest is moving towards a paperless organisation, all new documents including referrals will be stored P/Drive [Pathways SouthWest Team Site - P Drive Documents - All Documents](#) those clients accepted into Pathways SouthWest services will have their referral uploaded into their SMS client document folders. Paper copies will be disposed of via shredding.

Access to Information:

Clients and or designated legal guardians, may request access to their records as per [Freedom of Information Act 1982](#) [Freedom of Information Act 1982 - Federal Register of Legislation](#) (accessed 17/2/2026)

Staff Records:

Staff files are kept in a locked filing cabinet in the MBS office and are available only to the MBS and CEO. The filing cabinet is locked when the office is unattended. All staff can access files through the MBS and or CEO. All files are moved into SMS (Alchemy) worker documents and paper copies will be disposed of via shredding

Minutes of Meetings:

Minutes of meetings are maintained in P/Drive via SharePoint home page.

Other Administrative Information:

All other administrative information including funding information, financial information and general filing is maintained in the filing cabinets in the CEO office. The cabinets are locked out of hours or when the office is unattended and over time are moved into P/Drive via SharePoint home page.

Records Management – Archiving:

Clients are made inactive in SMS (Alchemy).

Staff members are listed as inactive in SMS (Alchemy).

This complies with archiving of all related documents and files.

Exited clients are de-activated in SMS and re-activated if they return to the service. Any client and staff hard copy records are archived and destroyed as per the legislative timelines

12. Computers:

12.1 Standard Operating Environment

The standard operating environment for Pathways SouthWest is:

- Windows 11PRO and accessible via remote VPN
- Software as follows on each workstation:
 - Microsoft Office 365
 - Adobe Reader
 - Internet Explorer
 - Microsoft Outlook Version: 1.2026.120.300
 - Consumer Version: 20260206002.09
 - WebView2 Version: 144.0.3719.115 (Stable)

12.2 Manager Business Services has access to:

- Accounting software - XERO

12.3 Data Storage:

- The IT Service Provider is an external contractor.
- All Pathways SouthWest data is secured in the “cloud”, with third party contract to secure and protect our data.
- Alchemy Technology back up all client data stored in SMS.
- Xero back up all finance documents

12.4 External Programs/Drives/USB devices:

No programs, external data or utilities are installed onto any workstation without the permission of the CEO or MBS. Installing programs or other external data or utilities can introduce viruses into the workplace and can cause serious problems with the computer system.

12.5 Security, Passwords and Logon Credentials:

Staff are assigned their logon credentials by the MBS or CEO.

All log in's are based on Multifactor Authentication (MFA) protocols.

12.6 Email:

1. Staff may send and receive minimal personal emails.
2. All emails relating to Clients must be copied and stored into SMS client notes
3. If illicit email or other junk email is received it is to be deleted without viewing it. Under no circumstances are staff to respond to it.
4. Suspicious emails are to be reported to the CEO immediately.
5. Pathways SouthWest uses Trend Micro™ Email Security which actively protects your mailbox by quarantining malicious, suspicious, and other unwanted email messages.

12.7 Internet:

1. Internet access is restricted to work related purposes.
2. Under no circumstances are staff to access pornographic or sex related sites.

12.8 Getting Help and Reporting Issues:

1. Pathways SouthWest maintains an ongoing support agreement with the relevant Software and IT consultants to monitor and maintain the computer system. This includes software installation and updates and monitoring backups.
2. If staff experience any problems with a program or computer or other piece of equipment they must in the first instance contact the MBI who will report the issue.

13. Monitoring Information Management Processes and Systems:

Information management processes and systems are regularly audited as part of the Pathways SouthWest audit program and staff, clients and other stakeholders are encouraged to provide ongoing feedback on issues and areas where improvements can be made.

14. Security Camera Use:

The *Privacy Act 1988* covers Pathways Southwest to ensure any personal information we collect through a surveillance device must comply with the Australian Privacy Principles. The Privacy Act covers Pathways SouthWest, in such we must:

- Tell you that your image may be captured before you're recorded
- Make sure recorded personal information is secure and destroyed or de-identified when it is no longer needed

There are State and territory surveillance and monitoring laws that cover surveillance devices (Surveillance Devices Act 1998) [WALW - Surveillance Devices Act 1998 - Home Page](#) (Accessed 17/2/2026)

Key Contacts

Questions about how to implement this procedure should be directed to Pathways SouthWest CEO on ceo@pathwayssouthwest.org.au or phone 97911257

Related Policies and Other Documents:

- Business Continuity and Risk Planning
- Continuous Improvement Policy and Procedure
- Compliance Policy and Procedure
- Governance Policy and Procedure
- National Safety and Quality Mental Health Standards for Community Managed Organisations
- National Regulatory Community Housing Standards

- Tenant Handbook
- Volunteer Handbook
- Western Australian Community Housing Regulatory Framework

Relevant Legislation

- Accounting Standard AASB 1048 Interpretation of Standards (December 2017)
- Age Discrimination Act 2004
- Anti-Discrimination Act 1991
- Australian Auditing Standards Australian Human Rights Commission Act 1986
- Building Regulations 2012
- Carers Recognition Act 2004 (WA)
- Carers Recognition Act 2010
- Charter of Health Care Rights
- Corporations Act 2001
- Disability Services Act 1993 (WA)
- Electricity Act 1945
- Electricity Regulations 2012
- Environmental Regulations Amendment (Work Health and Safety) Regulations 2022
- Equal Opportunity Act 1984 (WA)
- Fair Work Act 2009
- Fair Work (Registered Organisations) Act 2009
- Fair Work Amendment (Corrupting Benefits) Act 2017
- Freedom of Information Act 1982
- Health Records (Privacy and Access) Act 1997
- Housing Assistance Act 1996 (COM)
- Human Rights Act 2004
- Mental Health Act (WA) 2014
- National Construction Code 2022
- National Housing and Homelessness Agreement (2018) – Bilateral Agreement with WA Schedule E4
- National Regulatory Code for the National Regulatory System of Community Housing 2022
- Privacy Act 1988
- Public Sector Ethics Act 1994
- Racial Discrimination Act 1975
- Racial Hatred Act 1995
- Residential Tenancies Act 1987
- Surveillance Devices Act 1998
- Quality of Care Principles 2014
- Work Health and Safety Act 2020
- Workplace Gender Equality Act 2012

Useful Links

- ISO9001 Quality Management Systems [ISO - Standards](#) (accessed 14/2/2026)
- ISO45001 OH&S Management Systems [OHS | Citation Group](#) (accessed 14/2/2026)

- ISO27001 Information Management Systems [ISO 27001 Information Security Management Systems | Audit & Certification | Intertek SAI Global Australia](#) (accessed 14/2/2026)
- ISO55001 Asset Management Systems [ISO 55001 Certification Australia | Asset Management Systems](#) (accessed 14/2/2026)
- ISO37000:2021 Governance of organizations – Guidance information [Kiwa | Compass Assurance Services](#) (accessed 14/2/2026)

- WA Freedom of Information website https://www7.austlii.edu.au/cgi-bin/viewdoc/au/legis/wa/consol_act/foia1992222/sch1.html (accessed 17/2/2026)
- Australian Government Office of the Australian Information Commissioner or <https://www.oaic.gov.au/freedom-of-information> (accessed 17/2/2026)
- Office of Information Commissioner WA and West Australian Current Act – exemptions <https://www.oic.wa.gov.au/en-au/FA004> (accessed 17/2/2026)