

Documentation – Clients

Purpose *To ensure that information about clients is recorded and maintained according to all legal and ethical requirements.*

Policy Statement *ASC will have consistent systems to:*

- 1. Set up and maintain information*
- 2. Ensure regular monitoring and review of information*
- 3. Store and access information*
- 4. Archive and dispose of Information*

Documentation practices and formats regarding client information will adhere to the philosophies and beliefs expressed in the ASC Statement of Principles, Code of Ethics, Rights of Clients and Confidentiality policies.

All recorded information is legal documentation, will remain confidential, and will comply with legal requirements (Freedom of Information and Protection of Privacy Act (FOIP) and other legislation as applicable).

ASC will follow all contractual requirements for records management including reporting protocols for loss or theft of personal information.

All employees will be trained to ASC Documentation policy, procedure and guidelines.

Refer to Human Resources Section – Confidentiality Policy for legal guidelines regarding the handling of personal information.

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Documentation – Clients

Guidelines for What and How to Write:

1. When documenting, employees will ensure all entries are written in a professional manner. All documentation is to:
 - Meet agency requirements
 - Be respectful to the person it is written about
 - Be valuable and pertinent to the person(s) it is written about and the person(s) reading it
 - Be factual and accurate
 - Be clear and concise
 - Be free of symbols, acronyms, abbreviations, slang, and initials
 - Be legible
 - Be in proper English (e.g. grammar and spelling)
 - Be in permanent blue or black ink
 - Be dated and signed with a full signature
 - Be forwarded as applicable

2. Personal information as defined by the FOIP Act means “recorded information about an identifiable individual”, and includes:
 - The individual’s name, home or business address or telephone number
 - The individual’s race, national or ethnic origin, or religious or political beliefs or associations
 - The individual’s age, sex, marital status or family status
 - An identifying number, symbol assigned to the individual
 - The individual’s finger prints, other biometric information, blood type or inheritable characteristics
 - Information about the individual’s health and health care history, including information about a physical or mental disability
 - Information about an individual’s education, financial, employment or criminal history, including criminal records where a pardon has been given
 - Anyone else’s opinion about the individual, and
 - The individual’s personal views or opinions, except if they are about someone else

3. Documentation in progress should be completed in a designated area ensuring privacy and respect for the client(s).

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Understanding FOIP (Freedom of Information Protection of Privacy):

1. The FOIP Act is Alberta legislation that protects a person’s information by setting out rules regarding the collection, use and disclosure of personal information. As a service provider ASC must follow FOIP legislation. That means that any personal information recorded about a client supported by ASC is protected by the FOIP Act.

2. Here are some basic guidelines to follow to ensure the privacy of client information in ASC documentation:
 - Personal information includes but is not limited to: full name; address; phone number; race; religious or political beliefs; gender; marital or family status; health or health care history; blood type; information about physical or mental disability; educational, financial employment or criminal history; anyone else’s opinion about the client; or the clients personal views or opinions
 - Documentation pertaining to a client must never contain personal information about a ‘third party’. ‘Third party’ means someone other than the primary client. *For example, if documentation regarding John Doe included personal information about another client, the other client is the ‘third party’*
 - If it is necessary to make reference to third party (another client) when completing any documentation (contact notes, incident reports, etc.) use only the first name of the third party. *For example John Doe’s contact notes may read ‘John is planning a camping trip with his friend Frank’*
 - Include only facts versus opinion about situations or circumstances, especially if referring to the third party. *For example, if reporting that John Doe was injured during an altercation with his roommate Rick it may read: “During a physical altercation with his roommate Rick, John was hit in the face with what appeared to be an open hand. After the altercation John was observed for injury and his right cheek was red and warm to the touch. A cool cloth was placed on his cheek for about five minutes.”* Note all of the information in this documentation is factual and pertains only to John. It does not include any opinion or speculating as to the reason why Rick would have hit John

Guidelines for Correcting Errors:

1. Never change another person’s documentation.

2. Stroke out your error with a single line, initial, and write the correction above or beside the error.

3. Correction fluid/tape (white out) is prohibited on all documentation.

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4. In the event documentation is not understandable or incorrect, the employee will be asked to re-write the documentation. If the employee is unavailable to do so the Manager, Coordinator/designate will take responsibility to clarify the information.

Monitoring and Review:

1. All persons responsible for the handling of written information are accountable for meeting documentation guidelines.
2. All documentation will be monitored and reviewed regularly (including daily, weekly, monthly or yearly) by the employees working with the client, the Team Manager and other ASC management as required.
3. At the start of their shift and prior to commencing duties, employees are to read back through the information to their last shift worked and initial beside each entry to indicate they have read and understood the documentation.
4. Employees who work only occasionally in a service area will read back one week of information and initial beside each entry. As time permits they should read all information back to their last shift worked.
5. Employees are to read only information pertinent to their area of work and job duties.
6. Access to information specific to the client(s) is limited to the client, guardian, employees working with the client, Team Manager and other ASC management employees as required.
7. Access to information in offices is limited to those employees with authorization only.
8. Clients and their guardian may request access to information pertinent to that client. Exceptions would be sensitive information in progress. Requests will be handled by the Area Coordinator, Program Director or Executive Director and will be subject to the FOIP Act and other legislation as applicable.

Set-Up and Maintenance:

1. Information specific to clients/service areas will be set up and maintained in an approved consistent format.. (See applicable work instructions, guidelines and manuals).
2. Information must remain in the worksites and employees need to take all necessary precautions as per ASC’s Confidentiality Policy and Procedure to ensure the confidentiality of the information.

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3. Originals of all forms/reports are to be stored on the main files and copies kept in the service areas for short term retention.
4. Removal of any information related to clients/service areas will be by employees as designated by their supervisor for emergency or special circumstances only.
5. Information is considered to be sensitive and extra efforts for privacy are made if:
 - A guardian or client requests that specific information only be accessed through the Executive Director/designate
 - It could be harmful to the person
 - It could violate their rights if the information is known
 - There might be some legal concerns
6. Access to this sensitive information must be requested through the FOIP Act and other legislation as applicable.
7. In circumstances where information may need to be transported, employees will take the necessary precautions to secure materials and use appropriate safeguards, e.g. transport information in a closed container and locked vehicle, and not leaving information unattended.

Service Area:

1. Binders contain legal information and are used for daily information sharing and short term retention of documentation.
2. Information for the current year and up to one year past may be retained in areas where the client is currently receiving services.
3. Information will be forwarded for year-end filing as per the direction of the Information and Records Management Clerk. Duplicates are not forwarded for filing and must be shredded.

Main Files:

1. Accessibility to the main file room is limited to those employees who have been issued keys. If an employee does not have a key to the file room, authorization may be given by a request made to Service Area Coordinators and/or the Program Director/ Executive Director.

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2. Files may be taken out of the main file room but may not be taken out of the buildings. A sign out sheet is located in the file room and must be completed every time a file, or portion of the file, is removed from the file room. Files taken from the file room must be returned to the file room the same day.
3. Exceptions to the above may be: removal of information from a file by a designated employee for emergency purposes or special circumstances only.
4. Sensitive files are established by the Executive Director and will be filed separately from active files.
5. Only the Executive Director will hold keys for the storage area of sensitive files.
6. All documentation relating to one sensitive incident may be filed together in one envelope and the envelope containing the sensitive information will be labeled with:
 - Name(s) of who the information is about
 - Date
 - Identifying number
7. If a client has information on a sensitive file, a cover sheet will be placed on their active file indicating the date and the identifying number of the sensitive file envelope.

Information Created on Computers:

1. All computers or portable devices containing client information will be password protected.
2. While work is ongoing, information related to client(s) may be saved on computers or other electronic devices.
3. All information in progress specific to clients will be protected by a password.
4. All computers should be virus protected and steps taken to prevent the system from being compromised.
5. Employees need to take the necessary precautions to ensure confidentiality of the information that is saved on computers or other electronic devices.
6. Employees need to take the necessary precautions to ensure confidentiality when using email or the internet.
7. Confidential and sensitive information must be completed in the appropriate work site areas and not on home computers.

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8. Financial information stored on hard drives or electronic devices is accessible only to the accounting personnel, the Executive Director or designate.
9. Completed documents will be filed as per ASC filing procedures.
10. All information on computers is treated as per ASC confidentiality policy, the FOIP Act and other applicable legislation.
11. All information created on computers is considered transitory and all documents will be printed and retained on the client’s main file.

Archive and Disposal:

1. Back files are boxes containing historical information on clients who are currently receiving services. Back files are:
 - Filed according to ascending date order
 - Placed in a file folder labeled with name/year
 - Boxed, labeled “Back Files”, and maintained on site
2. Closed files contain information about clients who are no longer in service. These include pending files which have not reached commencement. All information is:
 - Removed from current and back files
 - Sorted by year
 - Shredded (if duplicated)
 - Filed alphabetically in a box dated with the year of closure
 - Files are returned/archived as per applicable contract/funder requirements

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