

ISG Audit Tool

Assessing organisational ISG policies and procedures
for content and quality

ISG



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ISG Audit Tool

Assessing organisational ISG policies and procedures for content and quality



This is the third in a set of documents to assist organisations in implementing the South Australian Government's *Information Sharing Guidelines for promoting safety and wellbeing (ISG)*. It follows on from the *ISG*, and the booklet *A Guide to Writing an ISG Appendix*.

The primary purpose of this audit tool is to assist organisations to gather evidence to verify appropriate implementation and application of the ISG. However this document can also be used to assist with the drafting of the ISG Appendix document, as a final check when the Appendix is complete, or as an organisation's preparation for quality auditing processes such as the Australian Service Excellence Standards. It has been developed with extensive practical advice from agencies and organisations and experienced quality auditors.

Stages of ISG Implementation:

Consider the ISG as the state wide policy framework for information sharing where there are safety and wellbeing concerns. The ISG articulates the principles and practice that guide decision making and action. Following consideration of the ISG, organisations need to develop their own procedure for implementing the ISG; this document is called an ISG Appendix. Organisations are free to develop and customise their own ISG Appendix, however there are certain requirements that must be met and these are described in detail in the booklet *A Guide to Writing an ISG Appendix*. Once the ISG Appendix is completed, staff must be inducted, as they would for any organisational policy and procedure. Finally, this audit tool

can then be used as a final checklist for agencies and organisations to determine if their policies, procedures and practices are sufficient and fully aligned with the ISG.

This audit tool will be useful to all Government agencies that are required to implement the ISG. It will be of assistance to Local Government Councils implementing the ISG and those NGOs who are funded by the South Australian Government to provide services on behalf of government and are required to implement the ISG.

The Ombudsman SA website has copies of the *ISG* and the *Guide to Writing an ISG Appendix* for download. Check the website from time to time for other ISG resources: <http://www.ombudsman.sa.gov.au/isg/>

How to use this guide:

Each of the nine requirements and their sub-sections are listed in the left hand column and next to each sub-section is the evidence that demonstrates that the requirement has been met. There is a compliance check box for each requirement and the right hand column provides space for recording the action to be taken if the requirement has not been met.

1. ISG Appendix



RATING:	C = Compliant	PC = Partially Compliant	NC = Non-compliant
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The ISG Appendix is the procedure each organisation develops to explain to their staff, within the context of their organisation and services, how to interpret and implement the ISG.

REQUIREMENTS	EVIDENCE	RATING	CORRECTIVE ACTION REQUIRED
1.1 An ISG Appendix has been developed.	<p>An organisational procedure called an ISG Appendix has been completed. Its purpose is to provide guidance for implementing the ISG approach to sharing of personal information (sometimes referred to as 'disclosure of personal information').</p> <p>The ISG Appendix includes:</p> <ul style="list-style-type: none"> • appropriate information sharing processes (explanation of legislative requirements, related policies and procedures, and STAR principles) • ISG Decision Making Steps and Practice Guide • protocols for gaining consent from clients and for discussing limited confidentiality • following lines of approval/supervision • documentation practice and record keeping • cultural guidance • sample case studies 	<input type="checkbox"/> C <input type="checkbox"/> PC <input type="checkbox"/> NC	

Note: Related policies and procedures that need to be cross-referenced and updated to reflect the ISG may include: Confidentiality and Privacy, Supervision, Client Record Keeping, Staff Induction, Complaints, Supervision of Volunteers and Students on Placements, Child Safe Environments, Client Services Policy, Child Protection Policy, Cultural Competence Policy, Code of Conduct, Collaboration & Strategic Positioning, DV & Family Violence Policy, Client Safety Policy, Client Induction Checklist, Authority to Share Information form, Management of Personal Information, Student Placement and Work Experience, Information Sharing for Volunteers and Students.

2. Appropriate Information Sharing Processes



RATING:

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The ISG Appendix outlines legislative requirements for information sharing that apply to the organisation and outlines appropriate information sharing practice

REQUIREMENTS	EVIDENCE	RATING	CORRECTIVE ACTION REQUIRED
2.1 ISG principles are integrated with legislative provisions concerning information sharing and confidentiality applicable to the organisation.	<p>Relevant legislation and privacy provisions that apply to the organisation are explained in simple terms.</p> <p>Circumstances where disclosure of information is prevented or restricted by law are outlined, where applicable.</p> <p>Circumstances where you must actively share information regardless of consent are explained. For example:</p> <ul style="list-style-type: none"> in the case of children if you SUSPECT abuse or neglect you must report it immediately to CARL by phoning 13 14 78 (under section 11 of the Children's Protection Act 1993). <p>Circumstances where information can be shared without consent are explained. For example:</p> <ul style="list-style-type: none"> where it is unreasonable or impracticable to obtain the individual's consent to the collection, use or disclosure; and the organisation reasonably believes that the collection, use or disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety, or 	<input type="checkbox"/> C <input type="checkbox"/> PC <input type="checkbox"/> NC	

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2. Appropriate Information Sharing Processes

RATING:	C = Compliant	PC = Partially Compliant	NC = Non-compliant
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REQUIREMENTS	EVIDENCE	RATING	CORRECTIVE ACTION REQUIRED
2.1 continued ISG principles are integrated with legislative provisions concerning information sharing and confidentiality applicable to the organisation.	<ul style="list-style-type: none"> where the organisation has reason to suspect unlawful activity, or misconduct of a serious nature and reasonably believes that the collection, use or disclosure is necessary in order to take appropriate action in relation to the matter. <p>Note: For detail see Commonwealth Privacy Act 1998 and SA Information Privacy Principles (IPPS) Instruction 2013.</p> <p>Situations where disclosure is authorised by the Chief Executive are outlined.</p>	<input type="checkbox"/> C <input type="checkbox"/> PC <input type="checkbox"/> NC	
2.2 Appropriate information sharing practice consistent with ISG is outlined.	<p>ISG STAR principles are followed: Secure, Timely, Accurate, and Relevant</p> <p>Secure:</p> <ul style="list-style-type: none"> all written records of information are shared and stored securely according to the organisation's requirements email is not used to disclose sensitive information information is de-identified where appropriate <p>Timely:</p> <ul style="list-style-type: none"> sharing information is not delayed emergency requests are clearly identified and actioned (eg with CARL or others as appropriate) 	<input type="checkbox"/> C <input type="checkbox"/> PC <input type="checkbox"/> NC	

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2. Appropriate Information Sharing Processes

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REQUIREMENTS	EVIDENCE	RATING	CORRECTIVE ACTION REQUIRED
2.2 continued Appropriate information sharing practice consistent with ISG is outlined.	<p>Accurate:</p> <ul style="list-style-type: none"> all efforts are made to ensure the information is up to date and accurate the organisation advises where the information is out of date and the limitations on the usefulness of historic information; appropriate records are made <p>Relevant:</p> <ul style="list-style-type: none"> the required amount of information provided is no more than the amount necessary to meet the objectives of information sharing information is appropriate to the purpose and does not include unnecessary detail. 	<input type="checkbox"/> C <input type="checkbox"/> PC <input type="checkbox"/> NC	
2.3 Early intervention and service coordination is enabled through interagency and interdisciplinary collaboration.	There is case file evidence that information sharing occurs within case management, for referral purposes and when planning services with other providers.	<input type="checkbox"/> C <input type="checkbox"/> PC <input type="checkbox"/> NC	

3. Protocols for Gaining Consent and Discussing Limited Confidentiality



RATING:	C = Compliant	PC = Partially Compliant	NC = Non-compliant
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The ISG Appendix includes guidance to staff and volunteers¹ about gaining informed consent and discussing limited confidentiality. Relevant policies and procedures are referenced.

REQUIREMENTS	EVIDENCE	RATING	CORRECTIVE ACTION REQUIRED
3.1 Guidance is provided about the general considerations and the value of informed consent.	<p>The Appendix describes the general considerations of obtaining and monitoring informed consent (see ISG p 14–16 and <i>A Guide to Writing an ISG Appendix</i> p 16).</p> <p>A statement similar to the following is used on consent forms:</p> <p><i>This agency/organisation will work closely with other agencies to coordinate the best support for you and your family. This means your informed consent to share information about you will be sought and respected in all situations unless:</i></p> <p>(1) <i>it is authorised or required by law, or</i></p> <p>(2) (a) <i>it is unreasonable or impracticable to seek consent; or consent has been refused; and</i></p> <p>(b) <i>the disclosure is reasonably necessary to prevent or lessen a serious threat to the life, health or safety of a person or group of people</i></p>	<input type="checkbox"/> C <input type="checkbox"/> PC <input type="checkbox"/> NC	

¹ Throughout this document, ISG principles applying to volunteers also apply to students on placement.

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3. Protocols for Gaining Consent and Discussing Limited Confidentiality

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REQUIREMENTS	EVIDENCE	RATING	CORRECTIVE ACTION REQUIRED
3.1 continued Guidance is provided about the general considerations and the value of informed consent.	Records of seeking consent are kept – this may include a signed consent form, client file notes or a written record of verbal consent. There is evidence staff have discussion with all clients about consent and their rights to privacy, at the earliest possible point in engagement with a service.	<input type="checkbox"/> C <input type="checkbox"/> PC <input type="checkbox"/> NC	
3.2 Guidance is provided about Privacy and Confidentiality principles and procedures, and also about appropriate information sharing practice when interacting with clients.	The Appendix describes how: <ul style="list-style-type: none"> • Clients are to be provided with information that explains their consent to share information will be sought unless it is unreasonable² or impracticable³ to do so • Clients are to be informed that their information may be shared without consent if it is anticipated a child, young person or adult may be at risk of serious harm, abuse, or neglect, or there is a risk to public safety • Clients are to be advised with whom their information may be shared, for what purpose and what may happen for them (or their family) as a result of the disclosure • Clients are to be provided with information about their right to complain and how to do so if they believe their information has been inappropriately disclosed. 	<input type="checkbox"/> C <input type="checkbox"/> PC <input type="checkbox"/> NC	

2 Not reasonable or rational; not guided by reason or sound judgement; not in accordance with practical realities, as attitude or behaviour; inappropriate.

3 Not practicable; incapable of being put into practice with the available means: impossible to do or carry out.

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3. Protocols for Gaining Consent and Discussing Limited Confidentiality

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REQUIREMENTS	EVIDENCE	RATING	CORRECTIVE ACTION REQUIRED
3.2 continued Guidance is provided about Privacy and Confidentiality principles and procedures, and also about appropriate information sharing practice when interacting with clients.	The key elements of consent are outlined and provide that consent is effective where: <ul style="list-style-type: none"> • it is given voluntarily • the individual is adequately informed of the implications of granting or refusing consent before granting or refusing it • the individual has the capacity to understand, provide and communicate their consent, and • consent is current and specific. 	<input type="checkbox"/> C <input type="checkbox"/> PC <input type="checkbox"/> NC	
3.3 Privacy and Confidentiality policies and procedures are in place.	Organisational Privacy and Confidentiality policies and procedures: <ul style="list-style-type: none"> • pay regard to the preservation of an individual's privacy whilst ensuring safety and wellbeing • outline responsibilities and provide direction about how to meet Privacy requirements as integrated with ISG and as applicable to the organisation, (see Commonwealth Privacy Act 1998 and SA Information Privacy Principles (IPPS) Instruction 2013). • provide guidance about seeking informed consent and explaining to clients the limits of professional confidentiality • note or cross-reference roles, resources and related policies that support staff and volunteers in making appropriate information sharing decisions. 	<input type="checkbox"/> C <input type="checkbox"/> PC <input type="checkbox"/> NC	

4. Following Lines of Approval and Supervision



RATING:	C = Compliant	PC = Partially Compliant	NC = Non-compliant
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Decisions to share information without consent or refusal to share information must be approved by an appropriate line manager. This section of the Appendix should clearly define relevant protocols and explain who can support and approve information sharing decisions.

REQUIREMENTS	EVIDENCE	RATING	CORRECTIVE ACTION REQUIRED
4.1 Policies and procedures are in place detailing the requirement to seek authorisation for the disclosure of personal information without client consent or when refusing to share.	<p>The ISG Appendix and related policies and procedures clearly describe:</p> <ul style="list-style-type: none"> • circumstances when information sharing without consent or refusing to share would be justified (see ISG pp 6 and 7) • the requirement for seeking support and approval to share information without consent and when refusing to disclose information • who to go to and how to seek authorisation for refusal or sharing without consent • what documentation is required • specific protocols for volunteers and who authorises and shares information for them when they have wellbeing and safety concerns. 	<input type="checkbox"/> C <input type="checkbox"/> PC <input type="checkbox"/> NC	

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4. Following Lines of Approval and Supervision

RATING:	C = Compliant	PC = Partially Compliant	NC = Non-compliant
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REQUIREMENTS	EVIDENCE	RATING	CORRECTIVE ACTION REQUIRED
4.2 Staff with responsibilities for supporting and approving information sharing decisions are identified and appropriately inducted.	<p>Job and Person specifications describe responsibilities for supporting and approving information sharing decisions.</p> <p>Staff responsible for authorising sharing without consent or refusal to share are aware of their responsibilities, have received appropriate training, and provide necessary support to operational staff and volunteers in questions, such as:</p> <ul style="list-style-type: none"> • whether there is a justified reason to share • what and how much should be shared • whether it is reasonable and practicable to seek consent • what evidence is available and what the risk assessment outcomes are • with whom and in what timeframe the information should be shared <p>Information is available that directs staff and volunteers to the people in the organisation who can assist them to make decisions about information sharing.</p> <p>If a relevant line manager is not available, information is available to clarify who else in the organisation can support information sharing decisions and provide necessary approvals.</p> <p>A process is in place for situations where there is disagreement between organisations about information sharing (ISG p 25–26).</p>	<input type="checkbox"/> C <input type="checkbox"/> PC <input type="checkbox"/> NC	

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4. Following Lines of Approval and Supervision

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REQUIREMENTS	EVIDENCE	RATING	CORRECTIVE ACTION REQUIRED
<p>4.3 Records of approval for sharing without consent and refusal to share information are kept. (see section 5 DOCUMENTATION PRACTICE).</p>	<p>Records are kept detailing:</p> <ul style="list-style-type: none"> • the purpose (the immediate or anticipated risk the information was intended to address) • why consent was not obtained • who authorised information sharing without consent or refusal to share • why information sharing was refused • what was shared and when • organisations and contact people involved • outcomes and/or follow up planned. 	<input type="checkbox"/> C <input type="checkbox"/> PC <input type="checkbox"/> NC	

5. Documentation Practice



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Step 9 of the ISG Decision Making Steps requires that you document the information sharing decision:

- You must record all decisions when information is shared without consent
- You must also record when you refuse a request to share information or when an organisation refuses to share with you

It is preferable that other important steps in information sharing are also recorded. Information sharing and documentation must be secure.

REQUIREMENTS	EVIDENCE	RATING	CORRECTIVE ACTION REQUIRED
5.1 Policies and procedures detailing processes for secure record keeping and sharing of client information are in place.	<p>The ISG Appendix and related organisational policies and procedures provide clear instruction for secure record keeping practice (this may include client files, case notes, electronic databases and paper forms).</p> <p>Staff and volunteers know what to record and where to record it.</p> <p>Client records are secure.</p> <p>Information sharing practice is secure.</p>	<input type="checkbox"/> C <input type="checkbox"/> PC <input type="checkbox"/> NC	

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5. Documentation Practice 5. Documentation Practice

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REQUIREMENTS	EVIDENCE	RATING	CORRECTIVE ACTION REQUIRED
<p>5.2 Protocols and systems ensure records of information sharing are kept.</p> <p>NOTE: as an absolute minimum, records must be kept when client information is shared without consent and when information sharing is refused to you or by you</p>	<p>Case files, client records, or other relevant forms of documentation used by the organisation record when client information is shared without consent or where refusal to share occurs.</p> <p>The Appendix and related policies and procedures state that it is preferable to record all significant information sharing actions such as:</p> <ul style="list-style-type: none"> • seeking and obtaining consent • risk assessment • reasons for overriding the client's wishes or for not seeking consent • advice received or requested from others (including staff at the Child Abuse Report Line) • reasons for not agreeing to an information sharing request • what information was shared and with whom • the purpose (the immediate or anticipated risk the request was intended to address) • why consent was not obtained • who authorised information sharing without consent or refusal to share • why information sharing was refused • agencies and contact people involved • outcomes and/or follow up planned 	<input type="checkbox"/> C <input type="checkbox"/> PC <input type="checkbox"/> NC	
<p>5.3 Documentation provides evidence of appropriate information sharing practice.</p>	<p>Documentation provides evidence that the <i>ISG Decision Making Steps And Practice Guide</i> is being followed by staff and volunteers.</p>		

6. Case Studies



RATING:	C = Compliant	PC = Partially Compliant	NC = Non-compliant
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Case studies should describe the practical application of the ISG and illustrate appropriate information sharing practice.

REQUIREMENTS	EVIDENCE	RATING	CORRECTIVE ACTION REQUIRED
6.1 Case studies describe circumstances where the ISG is appropriately implemented.	<p>Case studies follow approved organisational policies and procedures for sharing information and reflect the application of the <i>ISG Decision Making Steps and Practice Guide</i> (see ISG p 10–11).</p> <p>Case studies explain how evidence-based risk assessment leads to sharing information with and without consent.</p> <p>Case studies are taken from the organisation’s operational environment – based on real life or imagined situations.</p> <p>Case studies provide a variety of scenarios including:</p> <ul style="list-style-type: none"> • informed consent is sought and obtained • information sharing without consent is justified • approval to share without consent is sought and granted • where information sharing would be refused • seeking consent is unreasonable⁴ or impracticable⁵ • improved service coordination is possible as a result of information sharing • potential consequences for clients of inadequate or inappropriate information sharing practice are described. <p>Case studies are de-identified.</p>	<input type="checkbox"/> C <input type="checkbox"/> PC <input type="checkbox"/> NC	

⁴ Not reasonable or rational; not guided by reason or sound judgement; not in accordance with practical realities, as attitude or behaviour; inappropriate.

⁵ Not practicable; incapable of being put into practice with the available means: impossible to do or carry out.

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6. Case Studies

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REQUIREMENTS	EVIDENCE	RATING	CORRECTIVE ACTION REQUIRED
<p>6.1 continued</p> <p>Case studies describe circumstances where the ISG is appropriately implemented.</p>	<p>Case studies illustrate the benefits of sharing information that is legitimate – for example:</p> <ul style="list-style-type: none"> • to give a more effective service in response to threats to safety and wellbeing • alert a provider to an individual's need for a service to protect safety and wellbeing • avoid duplication or compromising of services deemed necessary for safeguarding • divert a child, young person or adult from offending or harming themselves • protect a child, young person or adult from being abused or neglected • protect groups of people from potential harm • protect community members from potential harm • protect service providers in situations of danger. 	<input type="checkbox"/> C <input type="checkbox"/> PC <input type="checkbox"/> NC	

7. Cultural Guidance



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In order to respond appropriately to the needs of people from culturally diverse backgrounds, it is critical that agencies and organisations respond in a culturally appropriate manner and increase their level of cultural competence.

REQUIREMENTS	EVIDENCE	RATING	CORRECTIVE ACTION REQUIRED
7.1 There are resources available to support and guide staff and volunteers in responding to the needs of people from culturally diverse backgrounds.	<p>The ISG Appendix provides recommendations about sources for cultural guidance and promotes the principles of cultural respect.</p> <p>Information is available that directs staff and volunteers to the people who can assist them in cultural guidance, either in the organisation or cites external resources.</p> <p>Relevant organisational policies and procedures are cited/cross-referenced.</p> <p>Advice is given about available resources for cultural guidance (see <i>A Guide to Writing an ISG Appendix</i> p 25–27).</p>	<input type="checkbox"/> C <input type="checkbox"/> PC <input type="checkbox"/> NC	

8. Inducting Staff and Volunteers



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Training and induction to the ISG and Appendix needs to be provided to all relevant staff and volunteers.

REQUIREMENTS	EVIDENCE	RATING	REMEDIAL ACTION REQUIRED
8.1 Staff, volunteers and students on placements are inducted into ISG policies and procedures.	<p>Induction programs and training about information sharing are provided to all relevant staff and volunteers.</p> <p>There is evidence that staff and volunteers have been inducted into the ISG and that induction is ongoing.</p> <p>When they have concerns about safety and wellbeing, volunteers and students on placement know who in the organisation to go to for advice and, they are provided with appropriate supervision and authorisation for sharing information.</p>	<input type="checkbox"/> C <input type="checkbox"/> PC <input type="checkbox"/> NC	

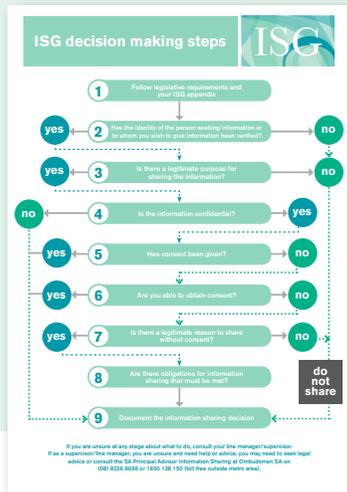
9. ISG Decision Making Steps and Practice Guide



RATING:	C = Compliant	PC = Partially Compliant	NC = Non-compliant
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The ISG Decision Making Steps is the process to be followed for appropriate information sharing. The Practice Guide assists staff in following the ISG step-by-step approach. Both of these documents should be included in the Appendix.

REQUIREMENTS	EVIDENCE	RATING	REMEDIAL ACTION REQUIRED
9.1 Staff and volunteers are provided and follow the ISG Decision Making Steps and Practice Guide.	<p>The <i>ISG Decision Making Steps and Practice Guide</i> are included in the organisation ISG Appendix.</p> <p>There is evidence (see documentation practice) that Decision Making Steps are followed.</p> <p>ISG resources including copies of the <i>ISG Decision Making Steps and Practice Guide</i> are available to staff and volunteers.</p>	<input type="checkbox"/> C <input type="checkbox"/> PC <input type="checkbox"/> NC	





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