



Information and Privacy Management Audit

Auditor to Complete:

Name and Position:	Date and Signature:
Audit Date:	Audit Area:
Relevant Aged Care Quality Standard: <ul style="list-style-type: none">• Standard 1• Standard 8	Relevant Policies and Procedures: <ul style="list-style-type: none">• Information and Policy Management• Privacy Program



Part A: Process Audit

Part A is designed to assess the systems and processes our organisation has in place to support compliance with and the implementation of the relevant Aged Care Quality Standards, and internal policies and procedures. Use a 'Y' to indicate if an audit criterion is **met** and 'N' if it is **not met**.

Audit Criteria		Y/N	Comments
1. Policy and Procedure Document			
1.1	The following policies and procedures have been reviewed in accordance with our policy management program (For more information, refer to the Information and Policy Management, Policy Management Process): <i>For each policy, note down the date the policy was last modified according to the policy's 'Page History' and/or the Audit Log records (in the Administration section).</i>		
	a) Information and Policy Management		
	b) Privacy Program		
1.2	Each of the following policies and procedures accurately outlines responsibilities of the governing body and workforce:		
	a) Information and Policy Management		
	b) Privacy Program		
2. Implementation of Policy and Procedure			
2.1	There is a system for managing the information collected, which tracks: a) Who the Home collects information from		
	b) What types of information is collected		
	c) How the information is used		
	c) The storage and maintenance of the information		
2.2	A Privacy Officer has been appointed, who is responsible for implementing the Privacy Program, and handling Privacy enquiries and complaints.		



2.3	Appropriately trained staff members have been appointed to be part of a Data Breach Response Team, responsible for responding to and managing suspected or actual data breaches.		
2.4	There is a security and backup system to protect all digitally stored personal information.		
2.5	Access to all digital personal information is password protected.		
2.6	There is a record archiving system that ensures all information and records held are kept for the minimum legislative record retention period (refer to the General Records Management Policy).		
2.7	There is a system for de-identifying and destroying records that have exceeded the minimum legislative record retention period.		
3. Collaboration with Other Service Providers			
3.1	There is a system to assess the quality of data collection, recording and security of third parties, before information is shared with them.		
3.2	Appropriately qualified professionals, including third party contractors, are engaged to establish and maintain our IT systems.		
4. Resident Dignity and Choice			
4.1	The Privacy Policy is part of residents' admission information/ handbook, which is explained to the resident in a way they can understand.		
4.2	There are resources to answer any questions residents might have in relation to their privacy/ our Privacy Policy.		
4.3	Where a resident and/or their representative consent to having their information shared with third parties, there is a system for ensuring they are informed of, and understand, how their information might be used and with whom their information might be shared with.		
5. Workforce Education and Competencies			



	The workforce receives orientation training/ongoing training/are assessed in the following areas:		
5.1	Handling information in accordance with the Privacy Program		
5.2	Information Sharing		
5.3	Privacy Officers receive additional, specialised training that enables them to carry out their responsibilities.		
6. Monitoring and Continuous Improvement			
6.1	There is a system for ensuring data that relating to resident privacy and privacy compliance is trended and analysed.		
6.2	Analysis of the data, including gaps and areas for improvement in care and services, are reported to the management team and governing body.		
6.3	Examples of improvements, based on assessment data and reporting, can be demonstrated.		<i>List examples:</i>



Part B: Practice Audit

Part B is designed to test the effectiveness of our organisation’s processes by assessing resident outcomes. Mark the box with ‘Y’ if the criterion is **met**, ‘N’ if **not met** and ‘N/A’ if the criterion is not relevant/does not apply to the resident being sampled.

<i>This section has two parts. See each part for instructions.</i>		
<i>Part A - consult privacy records from the date of the last audit and indicate whether each criterion has been met.</i>		
Criteria	Y/N	Comments
1. A Personal Information Management Audit has been conducted in the past 12 months to identify who we collect information from, how we collect it, what types of information we collect, how we use this information and how we store and keep this information secure.		
2. Where we use personal information for direct marketing, an “opt out” option is provided using a prominent statement within the material. (Note: Answer N/A for this item and the item below if your organisation does not send out direct marketing communications)		
3. Our information management systems do not use government-related identifiers (e.g. Centrelink number) as the primary identification method (i.e. to search for residents).		
<i>Part B: select a minimum of 5 staff members to assess whether each criterion is met. Tick the box if ‘Yes’.</i>		
Staff can:		
1. Confirm they have read and understand our Privacy Policy.	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<u>Comments</u>
2. Identify who the Privacy Officer(s) is/are, including where they can access their contact information.	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<u>Comments</u>



3. Describe the general procedure if they identify a data breach, including where they can access the contact details of the DBRT.	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <u>Comments</u>
4. Explain what security systems are in place to protect personal information, including their personal responsibilities (e.g. not sharing passwords etc.)	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <u>Comments</u>
5. Explain the information sharing process.	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <u>Comments</u>
6. Explain the Home's record keeping practices, including systems for archiving, de-identifying and destroying.	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <u>Comments</u>



Part C: Audit Outcome

This section is designed to identify specific process and practice areas for improvement by measuring the level of compliance.

Compliance Analysis

PART A	1 Policy and Procedure	2 Implementation	3 Collaboration with Other Service Providers	4 Resident Dignity & Choice	5 Workforce Education and Competencies	6 Evaluation and Continuous Improvement	Total
Total (Y)	/4	/10	/2	/3	/3	/3	
Compliance %							
PART B	(1)			(2)			Compliance %
	To 'score' this box, count the total number of (Y)s in Part B.			To 'score' this box, multiply the number of individual residents sampled by the number of criteria in Part B. To ensure the data is not misrepresented, minus any N/As from this score.			
OVERALL COMPLIANCE:							
<i>Add the Total % Compliance from Part A with the Total % Compliance from Part B, then divide it by two (2)</i>							



Summary of Identified Issues

Detail any criterion that scored a No (N) and recommend action(s) to rectify, if appropriate:

Issues Identified	Recommended Action

Administration

Audit Reviewed By:	
Signature:	
Date:	
Audit Reported to:	
Date of Report:	