NATIONAL PRACTICE PRINCIPLES

IN SAAP CASE MANAGEMENT

Produced by the
National Case Management Working Group

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1. CONTEXT

1.1 Introduction

This document presents National Practice Principles in SAAP Case Management. It has been produced by the National Case Management Working Group.

With the introduction of case management in a large number of SAAP services across Australia, it is important to promote the establishment of uniform quality within various approaches to service delivery. It is expected that each State and Territory will use the framework as a basis upon which detailed State specific service standards are developed or ratified.

National practice principles which underpin SAAP case management need to be consistent with broader program initiatives, and be specific to case management. In order to be useful to service providers and result in better outcomes for service users, these principles need to be clearly linked to practice.

This document is set out as follows:-

Section 2 discusses the purpose, and types of practice principles.

Section 3 outlines principles for SAAP services generally, which should underpin all service provision. This provides the context for the development of specific SAAP case management practice principles.

Section 4 presents the National Practice Principles in SAAP Case Management and indicators of good practice.

2. PURPOSE OF PRACTICE PRINCIPLES FOR CASE MANAGEMENT

2.1 Purpose

The establishment of nationally agreed practice principles for SAAP case management are important for a number of reasons:

- To provide clear guidelines to all stakeholders on what can be expected from a SAAP service-
- To ensure clients know what they can expect from a SAAP service and to ensure clients receive consistent quality service.
- To inform practice, increase understanding of needs, provide feedback to services and develop more effective intervention.
- To assist In improving and assuring the quality of service provision.

- To promote a consistent quality of service provision across all SMP services-

- To provide a tool by which service delivery can be evaluated and reviewed, and which quality assurance strategies are implemented.

3. PRINCIPLES

3.1 Introduction

Case Management principles were identified in the 1994 Case Management Discussion Paper, circulated to all SMP service providers prior to the 1995 National case management consultations.

When these principles were work shopped nationally, the principles which were consistently affirmed as essential by service providers included:

Duty of care, including safety and security for clients and workers 8

Practice to be underpinned by a user rights culture incorporating empowerment, client focus, client directed service, and client involvement in planning and decision making

Needs-based service delivery incorporating flexibility in service models and all aspects of service delivery

Confidentiality and privacy

Culturally appropriate service provision.

Principles are generally articulated in or interwoven with SMP standards or similar guidelines at individual State/Territory levels.

It is important to note that 'principles' may often be accurately described as 'process' standards. They describe the good professional or organisational practices necessary to deliver quality services. They are focused on maintaining and promoting the civil, economic, political and social rights of clients.

Principles should be the overarching, guiding basis for practice. Within this, the development of more specific, measurable standards, which relate to the impact of the service on individuals, is essential.

The section proposes nine core principles for SMP service delivery overall. These provide a framework within which the practice principles specifically relating to case management have been developed.

3.2 Principles underlying SAAP service delivery

(i) Protection of human rights and freedom from abuse.

This includes:

- legal and human rights of each client and worker are upheld in relation to the prevention of sexual, physical, financial and emotional abuse within SAAP services
- each client is provided with opportunities for enhancement of dignity and a positive self image
- each client receives least intrusive, appropriate intervention from a SAAP service
- SAAP services ensure duty of care in all service delivery practices.

(ii) Confidentiality, privacy and access to personal information

This includes:

- each client's right to privacy and confidentiality is acknowledged and maintained
- each client is informed about confidentiality policies and practices at every stage of service delivery
- information about each client is collected by lawful, fair and non-intrusive means
- only information which is necessary for the delivery of the SAAP service is sought from clients
- each client is advised of the purpose for which information is requested, the type of information kept, and the person(s) to whom the information will be made available/disclosed
- each client has the right of access to personal information held by the agency/service, and is informed of steps to take if he/she wishes to obtain access
- clients are advised of the limitations of service's confidentiality policy eg subpoena to court, child protection notifications.

(iii) User rights upheld

This includes:

- utilisation of a dispute process which does not jeopardise the right to service
- each client is made aware of, is supported in, and has access to complaints and dispute resolution procedures
- each client is provided with information about the nature and choice of available services, rules and conditions
- .equity of access within what the service offers is assured.

(iv) Client self-determination

This includes:

- each client is supported and encouraged to achieve the maximum possible degree of independence and participation in the community that the client desires
- each client receives service which aims to enhance his/her self-reliance
- each client receives service which is client focussed and client directed, within the parameters of SMP
- each client participates in all stages of the case management.

(v) Needs-based service delivery

This includes:

- each client has access to service based on assessment of relative need and available resources
- each client receives a service which is designed to respond to his/her individual needs, which is timely and relevant, and which is planned with the individual
- each client receives a service which is holistic in approach, focussed upon client strengths, successes and achievements, and present and possible future needs
- each child accompanying adults to SMP services is provided with support, protection and services based on assessment of her/his individual needs within the family context
- each service will develop appropriate external networks to enhance positive outcomes
- SMP will offer flexibility within service models, and all aspects of service delivery, and responsiveness to individual need.

(vi) Non-discriminatory access and non-judgmental support

This includes:

- each client is provided with non-discriminatory access to SMP services, within the service scope and target group
- each client receives non-discriminatory support and response to needs, provided in a non-judgmental manner within the scope, target group and capacity of the service
- each service will be provided in settings which are comfortable and non-threatening to the client, and which encourage client participation.

(vii) Culturally appropriate service provision

This includes:

- each client receives a service that is sensitive to, and respectful of his/her cultural and linguistic background and values including the importance of preserving significant networks and/or relationships.

(viii) Effective and efficient management

This includes:

- service management which is efficient, transparent and accountable to all stakeholders
- service management which ensures co-ordinated, planned and reliable service delivery
- each client is provided with genuine opportunities for participation in consultation and planning of services
- each client receives services from trained and skilled service providers, delivering services in an ethical and professional manner
- each client receives predictable, consistent service provision based on articulated principles and standards.

(ix) Duty of Care

This includes:

- service management which exercises reasonable skill and competence
- the adoption of appropriate standards of care
- the development of guidelines/protocols and provision of opportunities for appropriate intervention to protect and assist the client
- safety and security procedures are implemented to ensure the safety of staff and clients.

4. FRAMEWORK FOR PRACTICE PRINCIPLES FOR SAAP CASE MANAGEMENT

The elements of case management (agreed to following the National consultation of the SMP case management process) have been used as the framework for developing national practice principles in SMP case management. These elements are:

4.1 Entry/Screening

4.2 Assessment

4.3 Planning

4.4 Direct Service

4.5 Co-ordination (including referral)

4.6 Monitoring and Review

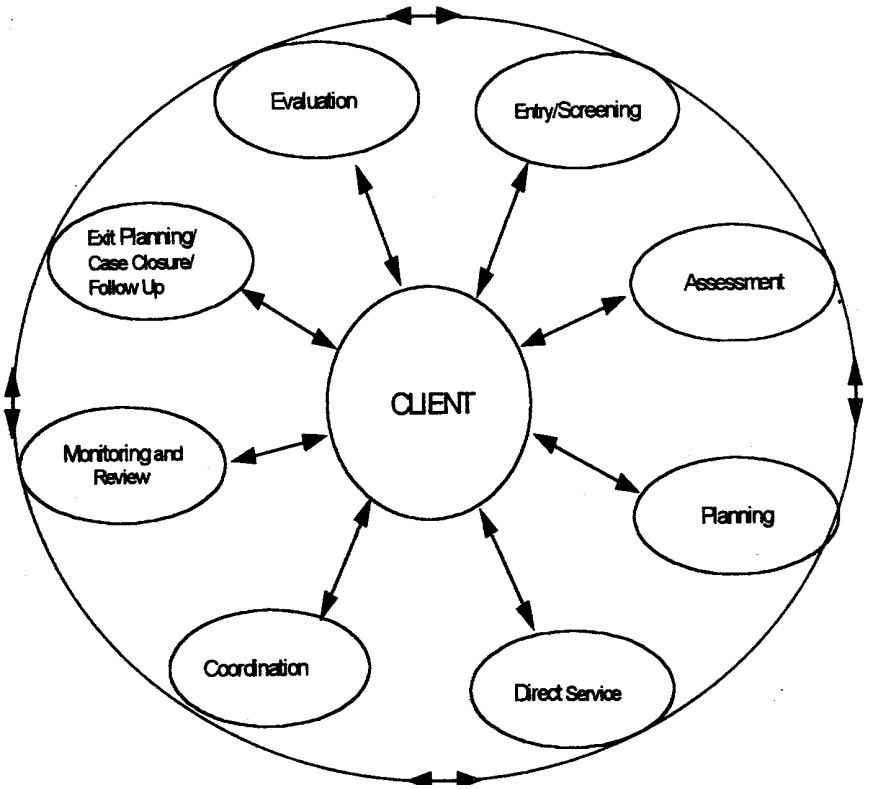
4.7 Exit Planning, Case Plan Closure and Follow-up

4.8 Evaluation

In addition, *Record Keeping* which is an important underlying tool in case management is assumed to be incorporated in the practices utilised in the eight elements of case management.

Each of these elements is included in the following standards. A number of principles have been developed for each element, and indicators of good practice are included.

The Elements of Case Management



4.1 ENTRY / SCREENING

DEFINITION	NATIONAL PRACTICE PRINCIPLES	GOOD PRACTICE EXAMPLES
A two way process between the service and the client designed to match service capacity with client need: *a) provide information to the client about the nature and range of services provided* *b) establish service is appropriate* *c) establish service is available eg. vacant room, appointment etc.* *Outcome:* *a) Client fits criteria* of service and support is initiated* *b) Client does not fit with criteria, or resources are not available, and is referred to an appropriate service. This may involve advocacy.* **criteria is based on your Funding Agreement which outlines target group and service models.* *Note: Each service documents inquiries and action taken in relation to entry/screening*	4.1.1 Each person receives a timely response on initial contact with the service.	People making inquiries are acknowledged and responded to in a timely manner, within the scope and resources of the service. The key functions and purpose of the agency/service are explained. Services recognise the critical impact of a client's first contact with the service and will ensure the provision of a non-judgmental response. People's initial needs are established through questioning and observation and other sources of information. Each client is provided with clear, consistent information on service criteria and eligibility.
	4.1.2 Each client is informed about the entry and screening processes and decisions that are made.	Each client's eligibility for service is assessed against agency criteria. Each client is given an explanation of the service in relation to their needs. Each client is informed about why they were not accepted into the service.

DEFINITION	NATIONAL PRACTICE PRINCIPLES	GOOD PRACTICE EXAMPLES
	4.1.3 Each person who is not accepted as a client is informed about alternative services and wherever possible will be referred on to a service which meets her/his needs.	Eligibility criteria are documented and readily available to the client and other services. Each service has a process in place to ensure the client understands the information provided. Each service has documented information about relevant services. Each client is assisted to be linked to the most appropriate service(s). When necessary, each client is provided with referral and advocacy as appropriate and these referrals are made in a timely manner. Each client receives information about alternative options in a timely manner.
	4.1.4 Each client accepted is provided with clear, consistent information on SAAP services to be provided, and rights and responsibilities of service providers, workers and clients.	Features of the service are clearly documented and explained to each client. Each client is informed and provided with a copy, of documented grievance procedures. The rights and responsibilities of the client are explained by the worker in an appropriate manner. Each client gains an understanding of the service and the role of the worker.

4.2 ASSESSMENT

DEFINITION	NATIONAL PRACTICE PRINCIPLES	GOOD PRACTICE EXAMPLES
A critical stage in the development of an effective plan for clients, designed to *a) address immediate situation - safety, health, well being* *b) involve the client, key stakeholders and service providers* *c) collect all relevant information on a client's living circumstances, needs and options* *d) contribute to the planning process* *Outcome:* *Understanding of the major factors or circumstances affecting an individuals ability to achieve or regain independence.*	4.2.1 Each client is given the opportunity to actively participate in and be supported in an assessment process.	Each client is provided with opportunities to develop an effective working relationship with worker(s). Each client is encouraged to identify her/his own needs and reasons for seeking support from a SAAP service. Each client's issues, needs, views and feelings are listened to actively and in a non-judgmental manner. Client needs are verified with the client for completeness and accuracy. Each client is provided with the opportunity to discuss her/his needs at a mutually convenient time and place. Assessment is paced at client's needs and taking into account the client's ability, readiness, and willingness to reveal and discuss important aspects of her/his lives. Each service regularly reviews documentation, with client input, to ensure that information is clear and concise and easily understood.

DEFINITION	NATIONAL PRACTICE PRINCIPLES	GOOD PRACTICE EXAMPLES
The following areas may be addressed in the assessment phase: *1. Client's presenting issues* *2. Crisis Resolution* *-restoring or maintaining family relationships and other informal networks* *- capacity to avoid or deal with future crisis (both social and economic)* *3. Reliable and Sufficient Income* *- sufficient income to meet housing and other basic needs in the long term* *4. Secure Affordable Housing* *- extent of homelessness and requirements to maintain independent housing*	4.2.2 Each client participates in a holistic assessment, focussed upon client strengths, past successful achievements, and present and possible future needs.	Each client participates in assessment which includes, as appropriate: client's presenting needs crisis resolution needs financial/income needs housing needs health needs life skills needs labour market participation needs/education needs needs of children needs of client as a parent Other relevant needs, including cultural, emotional, social and other support needs, are assessed, as relevant to each individual's transition to independence of the SAAP service.

DEFINITION	NATIONAL PRACTICE PRINCIPLES	GOOD PRACTICE EXAMPLES
5. Adequate Health - *attain and maintain adequate standards of physical mental emotional health* - *effective intervention re substance abuse* *Assessment continued...* - *recovery from emotional traumas causing or resulting from homelessness - including domestic violence* *6. Life Skills - including interpersonal skills* - *ability to relate to others and the community* - *development of essential life skills including literacy, household and financial management, appropriate education.* *7. Labour Market Participation* - *access to employment* - *development of education and training skills base for workforce participation.*	4.2.3 Each child has his/her needs assessed.	The needs of children are discussed with parents. Each child's needs are considered as part of a family oriented assessment. Relevant SAAP agencies demonstrate knowledge and understanding of children's developmental states and potential impact of homelessness and related crises. Each child's needs, views, feelings are actively sought in a non-judgmental manner. Work with children is supportive of parents in their parenting role.

DEFINITION	NATIONAL PRACTICE PRINCIPLES	GOOD PRACTICE EXAMPLES
8. Needs of children - *interventions to be supportive of parent in parenting role* - *developmental focus* - *awareness of potential health issues.* *Note: Services use a documented assessment tool, to identify client's individual needs. Each client's assessment is documented.*	4.2.4 Each client's assessment is enhanced by the involvement of external agencies, as appropriate.	SAAP agencies gain and demonstrate an understanding of relevant external agencies. With client consent, information is gathered from other key parties to assist in identifying their needs. Each client is assessed for potential risk factors which may necessitate a need for intervention and referral to external agencies.

4.3 PLANNING

DEFINITION	NATIONAL PRACTICE PRINCIPLES	GOOD PRACTICE EXAMPLES
Planning makes explicit the PURPOSE of the relationship between the service and the worker. *The planning process is undertaken jointly between worker and client designed to* *a) provide a structure for empowerment* *b) be holistic; incorporate strengths, hopes and preferences as well as needs* *c) be client focussed and client directed* *d) clarify goals and expectations* *e) agree on goals and set priorities* *f) identify the process to achieve goals*	4.3.1 Each client is given the opportunity to actively participate in and be supported in a planning process.	Service provider has endeavoured to obtain relevant knowledge about client's situation, options and choices. Each client is provided with an opportunity to negotiate and agree to a planning process, at a mutually convenient time and place. Each client is encouraged and supported to determine her/his own goals and priorities. Each client is provided with opportunities to explore and clarify issues with regard to her/his current situation. The nature and scope of identified issues are checked with the client for completeness and accuracy.
May involve a range of other agencies where specialised supports are required to achieve goals. *Outcome:* *A flexible personal support plan, client agreement or case plan which describes* *a) the key issues to be addressed* *b) assistance to be provided* *c) allocated roles and responsibilities* *d) an agreed time frame between the client and worker.*	4.3.2 Each client is provided with the opportunity to identify realistic immediate, short-term and long-term goals and action plans.	Each client has regular meetings with a worker to discuss issues relevant to identifying needs. Each client is provided with comprehensive information about options. Options are fully discussed. Each client is assisted to evaluate choices relevant to their own needs. Each client is offered the opportunity to negotiate with worker(s) on what the service can and cannot offer within the framework of client's needs.

DEFINITION	NATIONAL PRACTICE PRINCIPLES	GOOD PRACTICE EXAMPLES
		Each client is provided with the opportunity to develop goals and a plan which is realistic, achievable, and measurable, including time frames. Each client is provided with the opportunity to revise goals and renegotiate the plan as appropriate. Each client's plan will be based on a holistic assessment taking into account stages of development and ability, and include as appropriate: presenting needs of client:- crisis resolution income health housing life skills labour market participation needs of children needs of client as a parent other needs A clearly defined set of actions, identifying responsibilities of client, agency and others is developed.
	4.3.3 Each child has an individual support plan.	Each child is provided with a service which seeks to ensure his/her care and protection. Goals for each child are developed with consideration given to all developmental needs, eg. social, emotional, cognitive. Each child's needs for continuity of support and relationships are considered in the development of the case plan.

DEFINITION	NATIONAL PRACTICE PRINCIPLES	GOOD PRACTICE EXAMPLES
		Each child's emotional physical and cultural needs are considered in the development of the case plan. Decisions made as a result of the planning process which may affect the child are documented and reviewed through the case plans.

4.4 DIRECT SERVICE

DEFINITION	NATIONAL PRACTICE PRINCIPLES	GOOD PRACTICE EXAMPLES
Nature or method of direct provision or co-ordination of support services based on sound assessment and support planning. *For example:* *a) regular formal/semi formal one to one sessions* *b) group work* *c) workshops* *d) house meetings* *e) informal, opportunistic interaction.* *Outcome* *a) least intrusive appropriate intervention* *b) strengths focus; clients to act on own behalf whenever possible* *c) client offered resources and opportunities to achieve sustained change in self or circumstances.*	4.4.1 In critical situations, including violence, all efforts will be made to ensure client safety and the safety of others.	Each client who has suffered abuse is supported and responsive action is taken. Each SAAP service has a critical incident policy which includes procedures for responding to: - violence within the service - clients expressing self harming behaviour Each client expressing violence towards self is supported and provided with appropriate referral. The service can demonstrate understanding of its legal responsibility towards clients, and also the ethical context of the relationship between the service/worker and the client.
	4.4.2 Each client is provided with the least intrusive appropriate support to achieve her/his individual case plan.	Each client is provided with a service, consistent with the agreed plan, within the scope of the SAAP service. Each client is provided with practical assistance based on assessed and agreed need.

DEFINITION	NATIONAL PRACTICE PRINCIPLES	GOOD PRACTICE EXAMPLES
		Each client is encouraged to advocate on her/his own behalf wherever possible. Each client is provided with worker advocacy when requested and appropriate. Each client is provided with the opportunity to identify steps necessary to achieve identified goals, and the potential barriers to achieving these.
	4.4.3 Each client receives flexible service provision based on the changing needs, circumstances and wishes of the client, according to available resources and service scope.	Each client is supported to achieve sustained change in self and circumstances in line with client identified needs eg. assisted to gain access to income, health, life skills and labour market participation needs as appropriate. Each client is assisted to identify and secure ongoing support eg. counselling, accommodation, to meet identified needs.
	4.4.4 Each client receives relevant information regarding needs and options.	Each client is provided with information relevant to her/his expressed needs. Each client is provided with harm minimisation information and assisted to develop strategies. Each child accompanying adults is provided with direct service, consistent with the family assessment and case plan.

4.5 CO-ORDINATION

DEFINITION	NATIONAL PRACTICE PRINCIPLES	GOOD PRACTICE EXAMPLES
As the provider of counselling, outreach or accommodation support SAAP services will often be placed in the role of co-ordinating access to and delivery of a range of other appropriate support services. *Co-ordination of client services and supports will be based on sound assessment (see definition of assessment), knowledge of relevant external supports and networks and will be reflected in the individual client support plan.* *Outcome:* *Client has access to a range of relevant services, encountering as little duplication and as few barriers to external services as possible.*	4.5.1 Each client's interests will be served by the involvement of external agencies, as appropriate.	SAAP agencies gain and demonstrate knowledge and understanding of external agencies to which clients may be referred. SAAP services are co-ordinated and work co-operatively with external agencies and with each other. Each client receives clear information about access to external agencies and the service that will be offered. SAAP service develops links and protocols where required with relevant service providers to enhance the opportunity of effective referral; protocols include understanding of confidentiality boundaries. Each client is encouraged to access mainstream services where they exist if appropriate. Each client's support plan clarifies co-ordination between the SAAP service and external agencies.
Note: Co-ordination between the SAAP service and external agencies is documented in each client's support plan.	4.5.2 Each client receives co-ordinated service based on the case plan/agreed goals.	Each client provides consent for referral, advocacy, gathering and release of information undertaken by the service. The plan for the co-ordination of services is explored, developed and negotiated together by the client, SAAP services and other services. The plan for the co-ordinated services to be delivered is clearly explained to each client.

4.6 MONITORING & REVIEW

DEFINITION	NATIONAL PRACTICE PRINCIPLES	GOOD PRACTICE EXAMPLES
Linked to assessment and planning, reviews should occur at regular intervals agreed between the client and the worker; it is designed to: *a) check needs assessment and plan are relevant and consistent with current needs - which may change frequently; for example, does plan still reflect work being done with the client?* *b) acknowledge achievements* *c) identify barriers/impediments to the achievement of the plan* *d) mitigate against the 'drift' of clients through service systems*	4.6.1 Each client is provided with opportunities for ongoing assessment and reassessment of their needs.	Each client participates in reassessment of his/her needs and goals. Each client is assisted to identify barriers to achieving his/her case plan. Each client is offered strategies for maintaining positive and productive working relationships with workers and others.
May involve *a) co-ordination of key stakeholders* *b) a review of the case plan by a colleague or supervisor.* *Outcome:* *Maintenance of a relevant and flexible support plan* *Service identifies/confirms structural barriers confronting clients* *Service receives feedback on clients experience of support model*	4.6.2 Each client participates in monitoring and review of their case plan and direct service activities.	Each client has the opportunity to participate in client/service feedback regarding needs, planning and services received Each client is provided with opportunity to participate in information gathering for longer term planning. Each client is provided with opportunity to participate in assessing progress towards achieving goals Each client is provided with opportunity to participate in modifications to their case plan, as appropriate

DEFINITION	NATIONAL PRACTICE PRINCIPLES	GOOD PRACTICE EXAMPLES
Note: All direct service activities, including co-ordination with other services, are documented.	4.6.3 Each client is actively encouraged to provide feedback to the service throughout the support period.	Each client is provided with opportunity to re-negotiate actions/time line, as necessary. Each service includes opportunities for feedback on client's experience of support model.

4.7 EXIT PLANNING, CASE PLAN CLOSURE & FOLLOW UP

DEFINITION	NATIONAL PRACTICE PRINCIPLES	GOOD PRACTICE EXAMPLES
Planning to end the support period is an essential component of the service/client relationship. *Exit planning (eg. from an accommodation service) and support closure may be the same element in some services. The provision of follow up should be included in the earlier elements of assessment, planning and review.*	4.7.1 Each client is offered the opportunity to participate in exit planning.	Each client is aware of the time-limited nature of SAAP support Each client participates in planning for independence from the SAAP service, including developing agreed time frames and action plans Each client is supported during transition to accommodation exit points and/or longer term external supports Each client is assisted to self advocate to accommodation and/or other services as required Each client is provided with worker advocacy, as appropriate, within scope and capacity of service Each client is assisted to identify goals achieved and supported to maximise confidence and independence Each client is assisted to identify and develop supports and follow-up, necessary to attain and maintain independence of the SAAP service
Timing of support closure may be determined by the client, the service or as a joint decision.	4.7.2 Each client has a plan for case closure which maintains achievements and assists her/him to continue these achievements in the future.	Each client is provided with clear information about the time limited nature of the service/client relationship. Each client and other key parties are informed of pending SAAP service completion.

DEFINITION	NATIONAL PRACTICE PRINCIPLES	GOOD PRACTICE EXAMPLES
Exit planning should include: *a) provision for ongoing support* *b) planned termination with clients and relevant others* *c) notification to relevant agencies, and finalisation of file notes*		
Note: Case records are finalised and procedures documented for file storage and/or disposal. Records are completed according to organisational and legislative requirements.	4.7.3 Each client has the opportunity to participate in assessment of need for a follow-up strategy.	Each client is informed whilst in a SAAP service regarding follow-up. Each client is informed of processes/steps necessary for re-accessing SAAP service(s) and other services(s). Each client is provided with time-limited follow-up, as appropriate, consistent with exit plan and follow-up strategy.

4.8 EVALUATION

DEFINITION	NATIONAL PRACTICE PRINCIPLES	GOOD PRACTICE EXAMPLES
The logical end to a well planned service delivery model - hearing from clients about their experience of your service delivery. An evaluation mechanism should be designed to *a) encourage meaningful and honest feedback from clients* *b) provide the opportunity for clients to practice their assertion skills in a safe, receptive and responsive environment* *c) get a reasonable return rate* *Outcome:* *Honest feedback about all aspects of the Service which can inform* *a) service review and planning* *b) staff development* *c) Program review preparation* *d) maintenance of a work environment committed to evaluation and development*	4.8.1 Each client has the opportunity for, and is supported to take part in evaluation of the services provided.	Each client is provided with the opportunity, and is supported to participate in an evaluation which addresses key stages in the service delivery process (this includes intake, assessment, planning, service delivery, co-ordination, monitoring and review, and exit planning) Each SAAP service will evaluate the service delivery process in relation to each individual client, as a result of SAAP service delivery. Evaluation is undertaken with clear objective criteria, and recorded in an appropriate agency data system.

DEFINITION	NATIONAL PRACTICE PRINCIPLES	GOOD PRACTICE EXAMPLES
The principles in this section refer to all and any form of recorded information, hard copy or computer entry, pertaining to a client of your service. *It is assumed that record keeping will be incorporated in the practices utilised in the eight elements of case management.*	- Each agency has clearly documented policies and procedures.	Each agency has policies on what records are kept, how they are kept, how long records are stored, how they are accessed and disposed of. Advice about the legal requirement to keep case records is sought. Each service has procedures for security, handling and storage practices of personal client information, in and out of service. All key information regarding individual clients is documented. Each stage of service in dealing with individual clients is documented. All records are objective and non-judgmental, based on professional assessment, and phrased in simple language. Entries on case-files are dated and signed. Each agency has a policy on client consent for release of information and for seeking information from other services.
	- Each client's rights are upheld in relation to record keeping.	Each client is advised of the purpose for which information is requested, the type of information kept, and the person(s) to whom the information will be made available/disclosed. Each client's key information (needs, preferences) and decisions (priorities, plans, referral to another more appropriate service) are clearly documented with rationale for decision taken. Each client has the right of access to personal information held by the agency/service, and is informed of steps to take if he/she wishes to obtain access. Each client is provided with opportunities to change or challenge the content of recorded information. Each client's records must be kept secure against loss and misuse.