

ISG Information Sharing Guidelines



Introduction

Generally an SLS incident report is made when an incident has occurred that can have an adverse effect on a consumer/patient/client.

However, under the [SA Health Information Sharing Guidelines for Promoting Safety and Wellbeing: SA Health ISG Appendix Policy Directive](#) SA Health staff are required to make an SLS report to record reasons for information sharing, in specific circumstances (see below). These are when:

- > information has been shared without a consumer’s consent, when there is a situation of risk, or
- > a request for information from an external organisation has been refused by SA Health, or
- > an external organisation/agency refused to share with SA Health.

This reporting is required even when information is shared appropriately.

Privacy and disclosing information

- > All consumers have the right to privacy.
- > Health services have a responsibility for appropriate use of personal information for provision of care and for the security of that personal information.
- > It is considered best practice for consent to be obtained from the consumer to share their personal information.

There are situations when a consumer’s information can be shared without their consent provided the necessary criteria are met. The Information Sharing Guidelines (ISG) outline when information can be shared with organisations external to SA Health when there is a situation of risk, and is explained in more detail below.

The ISG **does not** cover all sharing or disclosures by SA Health staff. It is one of many ways to share personal information legitimately, and is in addition to other powers and SA Health policies. Don’t neglect other reporting obligations or processes.

In SA Health there are numerous different powers and processes that allow staff to share consumer information if the relevant criteria and processes are met, and the ISG is one of these. The applicable power and process will depend on the individual case. For more information about the other appropriate ways to share consumer information [click here](#).



Information Sharing Guidelines: Sharing information when there is a situation of risk.

The Information Sharing Guidelines and SA Health ISG Appendix Policy Directive outline when and how it is appropriate to share consumer information with agencies external to SA Health with and without consent when there is a situation of risk, or a serious threat to a person(s) safety.

These can include:

- > Diverting a person from offending or harming themselves
- > Protecting a person or groups of people from potential harm, abuse or neglect
- > Protecting service providers in situations of danger
- > Helping a service provider more effectively address risks to safety & wellbeing
- > Alert other service providers to an individual’s need for assistance

Any decision to share information without consent, or to refuse to share information must be approved by an SA Health Senior Manager or Senior Clinician. Clinical judgement and the use of available risk assessment processes will assist in determining whether there is a legitimate reason for sharing information (i.e. when there is risk of harm).

Under the ISG, wherever possible, a consumer’s consent should be sought for information sharing, but their personal information may be disclosed without their consent when:

- > it is unreasonable or impracticable to seek consent; or consent has been refused, and
- > 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.

The risk must be serious for a consumer’s information to be shared without their consent. Disclosure under the ISG, however, does not necessarily require such a threat to be imminent before action can be taken. This allows for early intervention to prevent such threats escalating to the point of realisation.

For more information on the ISG Appendix Policy Directive, please [click here](#).

What is a serious threat?

A serious threat is one that poses a significant danger to an individual or individuals.

This can include a threat to a patient’s physical or mental health and safety. It could include a potentially life threatening situation or one that might reasonably result in other serious injury or illness. The threat may be to the life, health or safety of any individual and is not limited to the person seeking treatment and care.

Making an SLS report

Under the ISG Policy Directive it is a requirement that SA Health staff record the following information in the Safety Learning System (as well as in the medical record).

1. Enter basic information

Complete, date, time and location of the incident. Select Incident affecting patient.

Briefly describe the facts of the incident in ‘What happened?’ and ‘What was the outcome of the incident?’.

2. Classify the incident

Incident Classification	
* Level 1	Patient Information
* Level 2	Confidentiality of information
* Level 3	ISG Information Sharing Guidelines

3. Identify which type of event it is:

- > information has been shared without a consumer’s consent, when there is a situation of risk, or
- > a request for information from an external organisation has been refused by SA Health, or
- > an external organisation/agency refused to share with SA Health.

ISG Information Sharing Guidelines	
This section relates to situations in which it was unreasonable or impractical to seek consent or consent was refused AND sharing the information	
ISG Information Sharing Guidelines Category	<input type="text"/>
Which organisation initiated information sharing request?	Information sharing request was refused
External organisation involved	Information sharing occurred (without consent)
Name of contact person from external organisation	<input type="text"/>
Reason(s) why information sharing was requested	<input type="text"/>

4. Select the reason(s) why the information sharing was requested

Reason(s) why information sharing was requested	
Additional Information	
★ Was anybody else involved? This may include witness to the event	
	Divert a person from offending or harming themselves
	Protect a person/groups from potential harm, abuse or neglect
	Protect service providers in situations of danger
	Help service providers address risks to safety & wellbeing
	Alert service providers to an individual's need for assistance
	Other

5. When sharing information without consent, you will need to describe in the free text field why the risk was serious enough to share information without consent.

In these situations, the onus is on SA Health to justify its reasonable belief that the disclosure of personal information was necessary to lessen or prevent a serious threat, and SLS will be used to document this information.

Incident managers are expected to review the notifiers entry for accuracy and finally approve.

For further information or advice:

- > the Safety, Quality and Risk Management Unit (or equivalent) within the LHN or SA Ambulance Service
- > Legal Governance and Insurance Services within the Department for Health and Ageing
email: HealthLegalRequests@sa.gov.au.
- > the ISG Appendix Policy Directive, please [click here](#).

For more information

SA Health

Safety and Quality Unit

Telephone: 08 8226 6539

Email: safetylearningsystem@sa.gov.au

www.sahealth.sa.gov.au/SafetyLearningSystem

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www.ausgoal.gov.au/creative-commons

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