

NDIS PROVIDERS · COMPLIANCE · RECORD KEEPING

NDIS Record Keeping: The Calls Nobody Wrote Down

An NDIS audit is not a test of how well you support people. It is a test of whether you can prove it. And the single biggest hole in most providers' evidence is the thing they do most: talk to people on the phone.

Record keeping is the quiet reason providers fail audits. Not bad support, unprovable support. Under the NDIS Practice Standards, records must be **accurate, complete and contemporaneous**, kept for a **minimum of seven years**, and for participants under 18 kept **until they turn 25**. Reportable incidents run on a **24-hour notification, five-business-day full report** clock. Yet the largest single stream of participant contact in most services, **the telephone**, is usually the least documented thing in the organisation. Nobody types up the call where a mother raised a concern at 7pm, or the roster change agreed verbally on a Friday.

■ The short version

Obligation	What it means in practice
Practice Standard Outcome 2.4. Information Management	Assessed at every certification and mid-term audit. Records must be accurate, complete, and stored and managed so they are identifiable, accessible to those who need them and protected.
Contemporaneous records	Made at the time of the event or immediately after it. A note written a fortnight later is not a contemporaneous record, and an auditor can see the timestamp.
Seven-year retention	Records, including incident notifications and their supporting documentation, must be kept for a minimum of seven years.
Records for participants under 18	Kept until the person turns 25. Supporting a ten-year-old means that record has a fifteen-year life, longer than most systems you are running today.
Incident management system	You must record <i>all</i> incidents, not only reportable ones, including what happened, what was done, and how it was resolved.
Complaints management	Complaints must be recorded, actioned and closed out with an audit trail, including complaints made verbally, which is how most of them arrive.

■ Also worth knowing

Practice	Why it is the standard approach
Announce it at the start of every call	A clear automated message saying calls may be recorded, and why. It is the mechanism by which continuing the call becomes informed consent, and it is trivially easy to configure once.
Give a way to opt out	A caller who does not want to be recorded should be able to say so and have the call continue without it. Pause-and-resume recording controls exist for exactly this.
Write it into the service agreement	Participants and their families should learn about recording when they sign up, not when they hear a beep. Explain the purpose: accuracy of records, safeguarding, training.
Record purposefully, not universally	Many providers record intake, complaints and the on-call line, and do not record general chatter. Narrower recording is easier to justify, cheaper to store and less intrusive.
Pause for payment details	Never keep card numbers in an audio file. Pause the recording, take the detail, resume.
Control who can listen	Role-based access, an access log, and a policy that says who may retrieve a recording and for what reason.

The shift auditors have made

The Commission's emphasis has moved towards outcomes-based evidence rather than documentation compliance alone. That is generally good news, it means a tidy folder of policies nobody follows counts for less than it used to. But it raises the bar on the evidence trail, because demonstrating an *outcome* means showing the sequence: what the person wanted, what you did, what changed, who was consulted along the way.

■ Questions the full guide answers

- ☐ How long does an NDIS provider have to keep records?
- ☐ What does contemporaneous actually mean for record keeping?
- ☐ What are the reporting timeframes for a reportable incident?
- ☐ Is it legal to record phone calls with participants and families?
- ☐ Can AI notes replace a support worker's written record?
- ☐ Our staff use their own mobiles to call participants. Is that a problem?
- ☐ What is the fastest way to close the gap before our next audit?

This is the summary. The guide has the detail.

Every point above is worked through in full on our site, with the Australian context, the numbers and the exceptions. If you would rather talk it through, call **1300 881 662** or visit **unidenvoice.com/get-started**.