



Client Relocations – Quick Guide

March 2026

Purpose

This guide provides information for contracted hearing service providers regarding their obligations when managing relocations of clients under the Australian Government Hearing Services Program. It references legislative requirements, provider responsibilities, timelines and correct processes for transferring program client records

Client Records

A client record is the complete collection of information a service provider keeps about a program client. It contains all documentation needed to:

- Support program clients ongoing hearing care.
- A complete client record must substantiate all claims and services delivered under the program.
- A complete record can include clinical notes, test results, forms, device details, NOAH data, consents, correspondence and evidence supporting claims.
- A client record must be complete, legible, accurate, and current.
- All client records are **Commonwealth property**. Providers are temporary custodians of client records.
- The provider currently linked to the client is responsible for managing, securing, updating, and transferring the record.

Relocation Process

- Clients can relocate at any time with **informed consent** (from client or legal guardian/Power of Attorney (POA)).
- A copy of this consent must be included on the client file.
- Once a relocation request is lodged in the online portal, the **old provider has 7 business days** to send the complete record to the new provider.

Requesting (New) Provider Responsibilities

- Must ensure site details including address and contact information listed on the portal are correct.
- Must check the received record for completeness and timeliness.
- If not received within 7 business days, the new provider must:

- Follow up with the previous provider in the first instance.
- If still not resolved after another 7 business days, contact the Program - You are responsible for the record from the day of relocation unless you inform the Program of any issues.

Sending (Old) Provider Responsibilities

- Must review the record for completeness before sending.
- Must send within 7 business days.
- Submit all outstanding claims within 20 business days of the relocation date
- Cannot withhold the record for reasons such as:
 - Not having seen the client.
 - Record stored at head office.
 - The client having outstanding debts.
 - The record being archived.
 - Must notify the program if there are delays in sending the file.

Service Provider Queries & Common Issues

- Missing information in the client record – follow up old provider → notify program if unresolved.
- Incomplete record – identify missing components → follow up old provider → notify program if unresolved.
- Old provider says they don't have the file – treated as possible data breach please refer to [Section 33 of the Schedule of Service Items and Fees \(2025-26\)](#) for next steps
- A provider emails an unencrypted file to another provider. This is a potential data breach and must be reported per program requirements (refer above).
- What if a client record is stored offsite at our head office. Providers must still provide the record within 7 business days and estimate delivery time if archived or held offsite.
- If you send files by mail, ensure they are sent via registered post and you keep a copy of the tracking number until confirmation is received that the file has been received

Legislation & Compliance

- [Hearing Services \(Voucher\) Instrument 2019](#)
 - Section 26 – Records - addresses client record creation and management
 - Section 35 – Voucher holders relocating between contracted service providers
- [Service Provider Contract](#)
 - Clause 11 – records and documentation
 - Clause 17 – custody and access
 - Schedule A, Item C – a relocations policy must be in place
- [Schedule of Service Items and Fees 2025-26](#)
 - Section 17 – client consent and agreement
 - Section 18 – ownership and custody of client records
 - Section 30 – transferring a client record to a new provider