

# Anti Discrimination Policy

Policy number	1	Version	1
Drafted by	Tony Herbert	Approved by	13/5/2018 manager
Responsible person	Tony Herbert	Scheduled review date	13/5/2019

## Introduction

This policy exists to explain to any person receiving service, their supporters, other stakeholders and staff how the service views the issue of discrimination in the conduct of business and delivery of services. The policy relates to the expectations the service has in applying fair and equitable practices to any person to be free of discrimination in their dealings with Life Connect Disability Services.

## Purpose of this Policy

The aim of this policy is to describe the types of services and supports available to service users to which this policy applies. The policy also aims to articulate the ethical, legislative, legal and complaint practice standards Life Connect Disability Services works to.

The policy describes options for complaint, redress or feedback available to clients, family and other interested stakeholders receiving service from Life Connect Disability Services feel they have been unfairly discriminated against. The policy also sets a minimum set of standards any person receiving services can expect in terms of protection for their rights to be treated fairly and equally.

This policy is written from the point of view of a person or supporter receiving services from Life Connect Disability Services in the core business of National Disability Insurance Scheme (NDIS) funded community based individualised skills building services.

The context of receiving services also includes any intake procedure where a person may have been declined or delayed service which the person believes may have amounted to discrimination against them.

### **Scope of Policy**

This policy applies to all staff including contractors and covers all work-related functions and activities including external training courses sponsored by Life Connect Disability Services.

### **Policy**

The objective of Life Connect Disability Services Equal Opportunity Policy is to improve business success by:

- providing a safe, respectful and flexible work environment
- delivering our services in a safe, respectful and reasonably flexible way

This policy describes and defines how services are to be delivered to reach this objective including definitions of what defines discrimination and how a person who believes they are been discriminated against by Life Connect Disability Services can address that situation.

### **Discrimination, Sexual Harassment and Bullying**

Life Connect Disability Services is committed to providing a service delivery environment free from discrimination, sexual harassment and bullying.

Behaviour that constitutes discrimination, sexual harassment or bullying will not be tolerated and will lead to action being taken.

For the purposes of this policy, the following definitions apply:

#### **Discrimination:**

**Direct discrimination** occurs when someone is treated unfavourably because of a personal characteristic that is protected under Victorian law.

**Indirect Discrimination** occurs when a rule seems neutral, but has a discriminatory impact on certain people. For example a minimum height

requirement of 6 foot for a particular job might be applied equally to men and women, but would indirectly discriminate on the basis of sex, as women tend to be shorter than men.

**Sexual harassment** includes unwelcome conduct of a sexual nature in circumstances in which it could reasonably be expected to make a person feel offended, humiliated or intimidated a reasonable person, having regard to all the circumstances, would have anticipated that the person harassed would be offended, humiliated or intimidated.

### **Equality of Service**

Life Connect Disability Services provides equal service opportunity to people without discrimination based on a personal characteristic protected under state and federal equal opportunity legislation.

Under State legislation they include:

- age
- breastfeeding
- carer status
- disability
- employment activity
- gender identity
- industrial activity
- lawful sexual activity
- marital status
- parental status
- personal association with someone having any of these characteristics
- physical features
- political activity/belief
- pregnancy

- race
- religious activity/belief
- sex
- sexual orientation

Any employee of Life Connect Disability Services found to have contravened this policy will be subject to disciplinary action, which may include dismissal.

### **Reasonable adjustments**

Reasonable adjustments are changes that allow people with a disability to receive service safely and productively. To not make reasonable adjustments to help a person receive service may amount to discrimination. Life Connect Disability Services will make reasonable adjustments for a person with a disability or their supporters who:

- Receive services.
- requires the adjustments in order to participate in the service delivery process.

Examples of reasonable adjustments can include:

- reviewing and, if necessary, adjusting the performance requirements of a service offered.
- arranging flexibility in service provision hours.
- providing telephone typewriter (TTY) phone access for clients with hearing or speech impairments
- Purchasing or sourcing screen reading software for clients with a vision impairment
- Providing regular breaks for people with chronic pain or fatigue

When thinking about reasonable adjustments Life Connect Disability Services will weigh up the need for change with the expense or effort involved in making it. If making the adjustment means a very high cost or great disruption to the service delivery , it is not likely to be reasonable.

## **Legislation and Regulations**

Life Connect Disability Services will work to the provisions and stipulations of:

- Disability Act, 2006 (Victorian)
- Carers Recognition Act, 2012 (Victorian)
- Equal Opportunity Act, 2010 (Victorian)
- Disability Discrimination Act, 1992 (Cwlth)
- Racial and Religious Tolerance Act, 2001 (Victorian)
- Charter of Human Rights and Responsibilities Act, 2006 (Victorian)
- Australian Human Rights Commission Act, 1986 (Cwlth)
- Age Discrimination Act, 2004 (Cwlth)
- Racial Discrimination Act, 1985 (Cwlth)
- Sex Discrimination Act, 1984 (Cwlth)

## **Procedures**

Life Connect Disability Services will work to the following procedures to effectively manage and eliminate the incidence of any person experiencing discrimination in the applying for or receiving services.

- Any person can go to the web site for information on how to lodge a complaint of discrimination including how to access the resources of the Disability Services Commissioner of Victorian and the Human Rights Commissioner of Victoria.

- Any person applying for service will receive information on the criteria used for accepting people for service. Alternately, anyone can review our intake criteria on the company web site.
- Any person who feels they are experiencing discrimination can lodge a grievance with the service who will help the person report the matter for investigation by Life Connect Disability Service or to another agency.

# CHILD SAFE POLICY

Policy number	1	Version	1
Drafted by	Tony Herbert	Approved on	29/7/2018
Responsible person	Tony Herbert	Scheduled review date	29/7/2019

## INTRODUCTION

This policy describes how Life Connect Disability Services will keep children safe while delivering capacity building services on a 1:1 basis in the community setting.

## PURPOSE

The policy seeks to make a clear and public commitment to child safety by describing how Life Connect Disability Services will address risks to child safety including how the service will address the cultural safety of Aboriginal Children and children from linguistically diverse backgrounds and the safety of children with a disability.

The policy also seeks to make it clear how the service will respond to any incidence or suggestion of unsafe practices that have harmed children or have the potential to harm children. The policy outlines how the service will put steps in place to prevent this harm where possible and respond to any harm be it physical, sexual, emotional, psychological, neglectful in nature or racial, cultural or religious in terms of the harm.

## COMMITMENT TO CHILD SAFETY

All children who receive service from Life Connect Disability Services have a right to feel and be safe. The welfare of the children we work with will always be our first priority and we have a zero tolerance to child abuse. We aim to create a child safe environment where children feel safe to grow and develop in community based activities.

## POLICY

This policy puts into clear and actionable terms how the service will deliver its policy purpose and commitment to child safety to children receiving service and their supporters. The following terms of this policy statement describe what the service will do to keep children safe.

### 1. A Child's Right to Have a Say

© 2018: This work is copyright. Apart from any use permitted under the Copyright Act 1968, no part may be reproduced by any process, nor may any other exclusive right be exercised, without the permission of Tony Herbert, PO Box 44, Ballarat, Victoria, 3353, 2018.

The service commits to each child who receives services having the opportunity to receive information on how the service will keep them safe including the opportunity to ask for service in a way that suits their needs. We use a range of forms and personal consultations as well as provide on-line resources on our web site to meet this obligation.

## **2. How Risk to Children is Managed.**

The service commits to only delivering service to children in the public domain and where ever possible avoiding situations where the service deliverer is alone in any secluded place with a child. The service also commits to doing risk assessments on any activity or proposed place that may propose a risk to children receiving service.

No one will be permitted to deliver service without having received a police check clearance as well as a disability workers exclusion scheme clearance and be in possession of a current working with children check. No staff member will be recruited to work for the service without having undergone interviewing and reference checking. The service will keep and maintain policies on staff recruitment and management that any person can ask to see at any time.

The service also manages risk by highly publicising any risks to children such as inappropriate grooming or other behaviours. Children or any other person can go to the service web site to review risk management procedures recommended by the Commissioner for Children and Young People.

## **3. How the Service Will Respond to Complaints or Suspected Child Abuse.**

Any child receiving service or their supporters can complain direct to Tony Herbert the manager of Life Connect Disability Services who is the dedicated Child Safety Person. They can do this verbally, in writing with a complaints form or on-line by email or via the service web site. Alternately, the service will arrange other means of assisted communication if the person requires help making a complaint.

Should this person not feel safe to do this they can go to agencies such as the Disability Services Commissioner or Commissioner for Children and Young People whose details can be found on the service web site.

Where the complaint can be managed between the service and the young person and their supporter the service provider will manage the complaint according to the Life Connect Disability Services Complaints policy which can be viewed on the services web site.

Where the matter is urgent or appears to be criminal in nature the service will refer the matter onto the appropriate authorities such as the Victorian Police. This referral where urgent in nature will be made to comply with best practice guidelines such as immediately contacting emergency services on 000 and/or informing the Department of Human Services Child Protection Crisis line on 13 12 78. This report will be made

by the service regardless of whether the reported abuse is against the service provider or other person. The service provider will also comply in non urgent cases with the requirements of any adult in Victoria to report any suspected sexual abuse of a child under sixteen to the Victorian police and/or child protection crisis line.

While the service is not regarded as a mandatory child abuse reporter the service has chosen to comply with those conditions where any member of the service believes on reasonable grounds that a child has suffered or is likely to suffer significant harm as a result of physical injury or sexual abuse the service will report and record this reporting to the relevant agencies which may include; Victoria Police, the Victorian Department of Human Services and the National Child Abuse Hotline.

### **SCOPE OF POLICY**

This policy applies to any person delivering service on behalf of Life Connect Disability Services in any capacity. Any person who delivers any service is responsible for ensuring that the actions described in this policy are carried out.

### **PROCEDURES**

The service will apply the provisions of this policy and the associated Child Safe Code of Conduct in every day operation. Those procedures are detailed in the Life Connect Disability Services Guidelines. These guidelines can be viewed upon request by any person. A minimum of procedure for any person receiving service who is a child is that this person be informed of this policy and the resources available on the service providers web site.

### **RELATED DOCUMENTS**

Any interested person can review the service providers web site and Child Safe Code of Conduct.

# Life-Connect

GREAT JOBS AND SOCIAL LIFE FOR EVERYONE

## Life Connect Disability Services Complaints Policy

### Purpose of this policy

The aim of this policy is to describe the types of services and supports available to service users to which this policy applies. The policy also aims to articulate the ethical, legislative, legal and complaint practice standards *Life Connect Disability Services* works to. In particular the articles of the Disability Act, 2006 (Victorian), The Privacy and Data Protection Act, 2014 (Commonwealth) and the Charter of Human Rights and Responsibilities Act, 2006 (Victorian) relate to this policy.

The policy describes options for complaint, redress or feedback available to clients, family and other interested stakeholders receiving service from *Life Connect Disability Services*.

### Scope of Policy

This policy relates to any work practice carried out on behalf of *Life Connect Disability Services* by any person acting on behalf of the service be it as a direct employee, agent, contractor or person purporting to represent the service. The practices and intent of this policy also relate to any client or other stakeholder involved in the receipt of service from *Life Connect Disability Services*.

A disability service provided by Life Connect Disability Services means a service specifically for the support of persons with a disability which is provided by Life Connect Disability Services as a registered disability service provider in accordance with the Disability Act, 2006 (Victorian), Section 3 (1).

A client or other stakeholder is defined as a the person receiving service, their family, carer and other persons who are significant in the life of the person with a disability who is receiving service in accordance with the Disability Act, 2006 (Victorian), Section 5(3) (h).

# Life-Connect

GREAT JOBS AND SOCIAL LIFE FOR EVERYONE

## Objectives of Policy

The objectives of this policy are to ensure that the management of complaints by *Life Connect Disability Services* satisfies the following criteria.

- ❖ Clients and significant others are aware of their rights to complain and responsibilities that go with those rights
- ❖ Clients, significant others and staff are aware of effective feedback systems in place and know how to access those systems.
- ❖ *Life Connect Disability Services* has responsive systems in place for assessing and investigating complaints or feedback about service.
- ❖ *Life Connect Disability Services* has and demonstrates an improvement focussed and service excellence approach to managing complaints.

## The Clients Right to Give Feedback or Complain about Service

Any person has the right to make a complaint about the service delivered by *Life Connect Disability Services*, regardless of whether they are the client or not. Any complaint can be made direct to the service and/or to the Disability Services Commissioner of Victoria. A complaint must be made within 12 months of the incident unless the Disability Services Commissioner accepts there was a good reason for the delay. A person can complain about any action or inaction arising out of the provision of a disability service or about *Life Connect Disability Services* not properly investigating a complaint. A person making a complaint also has the right to be protected by an recriminations towards them as a consequence of making the complaint.

## How to Make a Complaint and What Happens Next

A complaint can be made orally, in writing or in any other way that suits the persons needs. Staff from *Life Connect Disability Services* will accept any complaint regardless of how it is received. The person making the complaint can lodge a complaint on-line via the business website. A complaint can be lodged in writing using a Life Connect Complaint Form. A complaint can be made over the telephone using the contact details on-line, in company advertising and listed on the NDIS portal. If none of these communication methods suit your need a representative from *Life Connect Disability Services* will arrange a different way to record your complaint.

Any complain received whether it be by *Life Connect Disability Services* and/or the Disability Services Commissioner may be resolved by conciliation between

© 2018: This work is copyright. Apart from any use permitted under the Copyright Act 1968, no part may be reproduced by any process, nor may any other exclusive right be exercised, without the permission of Tony Herbert, PO Box 44, Ballarat, Victoria, 3353, 2018.

# Life-Connect

GREAT JOBS AND SOCIAL LIFE FOR EVERYONE

the parties involved or a legally binding order may be made by the Disability Services Commissioner. If the Disability Services Commissioner makes a binding order on what must be done to fix the basis of the complaint the Commissioner may investigate whether that has happened at a later time.

*Life Connect Disability Services* will acknowledge receipt of your complaint within 48 hours of receiving it in writing. The matter will be assessed , investigated and resolved within 14 days unless extenuating circumstances make it not possible for this to happen. You will receive a written notice of steps *Life Connect Disability Services* propose to take at that time. If you accept these steps a report noting that a complaint was received and resolved will be forwarded to the Disability Services Commissioner. If you are not satisfied with the resolution offered by the service, staff from *Life Connect Disability Services* must help you contact the Disability Services Commissioner. The Disability Services Commissioner will then assess the complaint and may investigate it further.

## Our Quality Culture of Learning from Complaints

Any person or significant other who makes a complaint about service which is then resolved will be offered the opportunity to help us understand how to provide a better service in the future. A staff member will offer you the opportunity giving feedback about areas for improvement. You can do this verbally, in writing or other means suitable to you. A staff member will also ask you permission to use de-identified data about the type of complaint and other details that may help us identify trends in less than adequate service to address.

GREAT JOBS AND SOCIAL LIFE FOR EVERYONE

## Life Connect Disability Services Customer Service Charter

### **Purpose of this Charter**

This charter gives our clients, supporters and other stakeholders information about services they can expect from *Life Connect Disability Services*. We are a person centred, forward thinking organisation who want to work cohesively and collaboratively with our clients, their families/carer and other organisations.

We also want to maintain the highest standards of integrity, transparency and purity of purpose. Our aim is to give the best service to our clients including how we manage complaints, engage with advocacy services, other agencies and refer clients onwards to other services.

This charter details how we do this, who we offer services to, when and where that service is available and how clients can access more information.

This Charter shows our commitment to providing skills development and training activities at your home and in the community. It shows our commitment to developing goal orientated personal plans to help you take the necessary steps towards gaining quality outcomes.

Life Connect Disability Services are committed to continuous improvement. We do this to be the best service we can be. This helps the service strive to meet section 4 of the Victorian Disability Act, 2006 on providing a high quality disability service. We also strive to meet the National Disability Insurance Scheme Act, 2013 vision of 'innovation, quality, continuous improvement, contemporary best practice and effectiveness in the provision of supports to people with disability are to be promoted.'

### **Objectives of this Charter**

- To explain our range of services available
- Why our services should be considered
- Who we offer services to.
- How our clients can expect to be treated if they decide to receive a service from us.
- How we communicate with service users
- Features and limitations of our services available for example, cost of services.

## GREAT JOBS AND SOCIAL LIFE FOR EVERYONE

- The rights and responsibilities of parties involved in the service transaction
- Our organisation's Mission, Vision, Values, Strategies, culture and service delivery ethos
- Courses of action available to an aggrieved service user.

## OUR ORGANISATION

This Charter will tell you about *Life Connect Disability Services* and our commitment to providing excellent services to people with disability and their families/carers. We believe that the better we know each other, the better we can work together to achieve your goals.

Our organisation is accredited by the Victorian Department of Human Services, and we focus on safety and work to meet the highest standards to ensure your health and well being and that of our workers.

Our services include

- Individual employment support.
- Developing daily living and life skills at home and in the community.
- Public transport training.
- Support co-ordination to address barriers connecting supports together.
- Life transition planning including mentoring, peer support and individual skill development.

All these services are designed to meet your needs.

We will work best in partnership with you. Sharing what we know means that together we can make good decisions. Our communication is honest and open. Everything we record is agreed with you.

If there are limits to what we can do, we will disclose them.

Before you agree to use our service, you are entitled to make sure that we can deliver on our promises. If you or we feel that we cannot do this, we will refer you to an organisation that can better meet your needs.

GREAT JOBS AND SOCIAL LIFE FOR EVERYONE

We know that people who use our services generally have limited funds, so we do everything we can to reduce costs and maximise outcomes. We will provide you with regular, detailed information about how your money has been spent. All our services are funded by the National Disability Insurance Scheme (NDIS) with no out of pocket cost to clients.

By its nature, our work requires you to provide highly sensitive information about yourself and your family. We assure you that we will respect your right to privacy, confidentiality and dignity at all times.

We welcome opportunities to continually improve, and encourage you to tell us if you are displeased or concerned about your service.

We will use this valuable feedback to help us keep improving our services.

## **Our Mission**

To overcome the personal, structural and attitudinal barriers that prevent people with a disability from participating in community life; and work to make our community more inclusive, accessible and welcoming. To help people with a disability take on a valued role in society in line with their personal goals and expectations.

## **Our Vision**

An inclusive community that welcomes and values people of different abilities, cultures, backgrounds and beliefs.

We commit to this vision for all Victorians with particular respect paid to the traditional land owners; Aboriginal Victorians whose culture, spiritual identity and reconnection we support with access to Aboriginal community events for all Victorians where possible.

## **Our Core Values**

### **We believe in being:**

**Inclusive** because everybody has something to offer & their gifts enrich us all

**Informed** because information, knowledge & a culture of life-long learning & improvement are the building blocks of excellent outcomes

GREAT JOBS AND SOCIAL LIFE FOR EVERYONE

**Tenacious** because the best results will only be achieved through persistence & hard work

**Transparent** because without openness and honesty, nothing is durable

**Sensitive** because everyone is owed dignity & respect, irrespective of their language, culture, religion or beliefs.

**Integrity in all we do:** conducting all dealings in an open and honest manner and in accordance with the code of conduct.

**Empowering ourselves & others:** working towards your goals and building on your strengths to help you achieve.

**Showing respect for others:** understanding your rights to take risks and to guide your own life

**Being accountable:** to our clients, families, carers and stakeholders for ethical, honest and open service.

## **Our Services:**

*Life Connect Disability Services* is a small, responsive organisation. We come to you at your place or work with you out in the community to reach your goals.

We can work with you to build your skills to understand the world of work with activities that get you ready for work or overcome barriers that might stop you from getting to that dream job. For example, we can help you identify what you are good at and what sort of training might help you succeed. We can help you figure out how to use public transport without the anxiety of not knowing where to go or how to organise it.

We can work with you at home or out in the community to develop a plan for increasing your skills and abilities. For example, we can help you identify new technologies like speciality bar code readers to help you identify stuff in your kitchen at home. Or we could help you make a plan and set a course for action to join a community group like a dance group or other group you fancy.

We can work with you to bring all those other supports together if it seems to be overwhelming to pull the pieces together. For example, we could set a goal to have your community transport driver, local dance group and doctor working off the same plan to get you where you want to be.

GREAT JOBS AND SOCIAL LIFE FOR EVERYONE

All our work is carried out in accordance with all the relevant legislation and quality standards not only of the National Disability Insurance Scheme but of the Australian Psychological Society, The National Disability Services Association and the Australian Health Practitioner Regulation Agency.

## Our Clients

Our clients include people with a disability, their families and carers. We only service clients who are funded by the NDIS. We offer an obligation free assessment of your needs and services we might offer. If we are unable to offer a service we will gladly refer you onto another service provider.

## Our Service Standards

We pride ourselves on providing professional and high quality services. Our services include: programs tailored to your needs and interests.

We particularly work towards supporting Aboriginal persons participation in cultural and spiritual events. To achieve this we use *Enabling choice for Aboriginal People living with disability, Promoting Access and Inclusion*, Disability Services, Department of Human Services, March 2011 as a guideline for our service standards along with other best practice resources.

## Details of Our Services and Practices Used

*Life Connect Disability Services* offer a variety of services that are goal orientated and person centred helping to build client skills through training and experience. Information about our services is available on our web site at: [life-connect.com.au](http://life-connect.com.au), over the the phone, in person, in our advertising brochures or we can organise another way to help you review what we offer.

We give a guarantee of service and in turn have expectations from our clients and others such as;

- Our service helps clients develop plans to increase their own ability to do thinks around the house more efficiently and enjoy life in the community. We aim to achieve the outcomes of; developing skills, building confidence and achieving goals. We cannot guarantee that clients will reach every goal but you will receive the finest of service towards doing just that.

## GREAT JOBS AND SOCIAL LIFE FOR EVERYONE

- We will prepare an individualised service agreement with each client using the standard Service Agreement Form from the NDIS. This form will detail the date range, type of service, fees and other conditions. Information on NDIS service agreements can be viewed on line at:  
<https://www.ndis.gov.au/document/service-agreements-providers>
- We do not charge any fees other than the standard billing rates allowed by the NDIS. These rates will vary depending on which service you engage us to perform. Each NDIS participant plan approved by the NDIS before you contact us should contain a statement of supports detailing funds available to you to pay for our services.
- We request payment for our services within 7 days of you receiving the service. We will invoice you for our services to your Participant Inbox in the NDIS Participant Portal.
- We will charge a cancellation fee amounting to 20% of the service fee due to us on that day where a client fails to show up for a service or cancels with less than 24 hours. We will make all reasonable efforts to ensure your safety when you do not show up. For example we may check on your house or ring friends. In the event that you do not show up or fail to give adequate notice in excess of 8 times in one calendar year we may review and/or discontinue your agreement with use. These conditions will be recorded in your NDIS service agreement with us.
- We will take all reasonable steps to protect your confidentiality and privacy, including securing all personal information and receiving authority from you before sharing any information. Full details of our privacy policy can be viewed on our web site.
- We (service provider) or you (client) can exit our service arrangement at any time provided at least 14 days notice is given. No fees will be charged for early exit from the service. A client can also exit the service at completion of an agreed service arrangement and review of an agreed personal goal plan.

## Our Assessment Process

We will do a thorough assessment of each clients needs. This will start with an obligation free assessment of each person inquiring for service's needs and whether our service will suit those needs. We will offer advice either over the phone, by email or in person to confirm if:

- The inquirers NDIS funding statement of support is within our authorised list of services we can offer.

## GREAT JOBS AND SOCIAL LIFE FOR EVERYONE

- Whether we have current availability of services or how long a participant might have to wait.
- A written overview of services we might potentially offer
- If we might better service the person by referring them onto another service.
- If the individual seeking service requires the assistance of an advocacy service before entering into an agreement with us or at any state afterwards as well as what steps we can take to make that happen.

If the person inquiring wishes to engage our services after this initial assessment we will then prepare a service agreement to be signed by *Life Connect Disability Services* and the client. From this point forward we will require payment for our services via the NDIS.

Following this we will work with the client to achieve the following during the assessment process.

- A face to face meeting with the client, family/carer and significant others
- A planning interview assisted by use of specialist questionnaires to help us identify the clients goals, needs and aspirations.
- Preparation of an individual goal plan from *Life Connect Disability Services* documenting the clients person goals and agreed strategies to reach this goal.

As part of this assessment process the client and supporters will be given copies of the following documents and asked to sign for their receipt.

- *Life Connect Disability Service's* Customer Service Charter
- *Life Connect Disability Service's* Code of Conduct
- *Life Connect Disability Service's* Informed Consent Statement on Privacy
- Individual Goal Plan.
- Authority to Release Information Form

All these documents will be explained to the client in terms they can understand or alternative forms of communication sourced to facilitate understanding.

## **Our Service Delivery Process**

Once the assessment process is complete we will then begin working with clients, families, carers and significant others on individual goals.

The representative from *Life Connect Disability Services* will work with the client to establish a series of appointments and planned activities. These appointments will be confirmed by the service provider using the messaging service on the NDIS participant on line portal. Detail of how the activity will take

GREAT JOBS AND SOCIAL LIFE FOR EVERYONE

place will also be confirmed on the portal messaging service. For example, whether the provider will pick up the client from their house or other arrangement.

During each meeting, the *Life Connect Disability Service's* representative will discuss the clients individual case plan with the client to review progress. Results of this review will be recorded by the *Life Connect Disability Service* representative on a case file note form which will be kept electronically in a secure client file. Each month or by agreement the service provider and client along with supporters will review the individual plan to see if it is proceeding to the clients satisfaction.

When service ceases as the client has finished working towards his or her plan or for any other reason, the service provider will give a written report detailing the activities and results of the plan.

## Our Process for Receiving Comments and Complaints

At *Life Connect Disability Services* we know things don't always to to plan so we have an open and easy to use way of dealing with feedback and complaints.

We are duty bound by the provisions of the Disability Act, 2006 (Victorian) and oversight of the Disability Commissioner of Victoria for our actions and/or inactions that may be cause for complaint.

You can get more information on our complaints policy on our web site. You can also give us feed back or make a complaint in a number of ways including;

- Tell us in person
- On-line via our web site
- By email or telephone
- By writing a letter to us

If you do not feel comfortable contacting us you can contact the office of the Disability Services Commissioner of Victoria directly. Alternately, any other person can contact us or the Disability Services Commissioner to lodge a complaint.

In the event that we receive a complaint about our services whether it be from a client, other person or an investigating agency we have a number of processes in place to deal with complaints including'

- Protection of complainants from recriminations such as withdrawal of service or criticism based on the complaint process.

## GREAT JOBS AND SOCIAL LIFE FOR EVERYONE

- We will give the person complaining a written receipt for lodgement of the complaint within 48 hours of us receiving the complaint.
- We will try and rectify the basis of complaint, where ever possible within 14 days of receiving the complaint.
- We will give you in writing our proposal for fixing the basis for the complaint in writing explaining our reasons and intended actions.
- Where the person is not happy with our offer to fix the basis of complaint we will assist that person to contact the office of the Victorian Disability Services Commissioner to lodge a complaint.

# GOVERNANCE POLICY

Policy number	1	Version	1
Drafted by	Tony Herbert	Approved by Board on	7/9/2017
Responsible person	Tony Herbert	Scheduled review date	7/9/2018

## INTRODUCTION

Governance in the community sector is concerned with the systems and processes that ensure the overall direction, effectiveness, supervision and accountability of an organisation.

The owner of Life Connect Disability Services takes ultimate responsibility for the governance of the organisation. However, governance is also concerned with the way Life Connect Disability Services work with service users and other stakeholders to ensure the organisation is effectively and properly run and meets the needs for which the organisation was set up.

## PURPOSE

This Governance Policy is intended to clarify the underlying principles of governance approved by the Life Connect Disability Services organisation.

## POLICY

Life Connect Disability Services is a sole trader organisation engaged in the delivery of individualised skills building, community based disability services.

The function of the sole trader and operator of Life Connect Disability Services is to ensure the delivery of the organisation's objects, to set its strategic direction, and to uphold its values. The sole trader and operator is responsible and accountable for ensuring and monitoring that the organisation is performing well, is solvent, and is complying with all its legal, financial, and ethical obligations.

The responsibilities of the sole trader that cannot be delegated to any other person or body include

- Compliance monitoring – ensuring compliance with the objects, purposes and values of the organisation, and with its constitution
- Organisational governance – setting or approving policies, plans and budgets to achieve those objectives, and monitoring performance against them

- Strategic planning – reviewing and approving strategic direction and initiatives
- Regulatory monitoring – ensuring that the organisation complies with all relevant laws, regulations and regulatory requirements
- Financial monitoring – reviewing the organisation's budget, monitoring management and financial performance to ensure the solvency, financial strength and good performance of the organisation
- Financial reporting – considering and approving annual financial statements and required reports to government;
- Risk management – reviewing and monitoring the effectiveness of risk management and compliance in the organisation; agreeing or ratifying all policies and decisions on matters which might create significant risk to the organisation, financial or otherwise
- Dispute management – dealing with and managing conflicts that may arise within the organisation, including conflicts arising between the sole trader and service users.
- Social responsibility – considering the social, ethical and environmental impact of all activities and operations and ensuring that these are acceptable

### **Relationship with management**

The sole trader should focus on the strategic direction and the core policies of the organisation, and be involved in day-to-day operational decisions.

# Intake and Assessment Policy

## Purpose of Policy

Life Connect Disability Service values the guiding principles of equality, choice, diversity and non discrimination and embraces the application of these principles in all aspects of service provision.

In line with this commitment, the purpose of this policy is to outline how clients are accepted into the service, including how relevant legislation impacts on on this process. The law governing how the service assesses the needs and personal situations of people seeking service means that some groups will be given preference over others.

Where the governing law of the state or commonwealth or an operating procedure of Life Connect Disability Services gives preference to one person over another, it will not necessarily follow that this person will be given service sooner. It may be the case, that obligations on the service mean that the person given preference may have their situation assessed and referred onto another service.

Life Connect Disability Services is an individualised skills building disability service offering capacity building skills to adult clients who are receiving National Disability Insurance Scheme funding. The context of our business will be considered during our intake procedures along with legislative requirements described in this policy document.

People reading this policy should be able to:

- Identify if they belong to a unique group receiving priority of assessment.
- Ensure that all members of society receive equal access to services as dictated by legislation and procedures including referrals to other services where needed.

### **Scope of Policy**

This policy is applicable to all Life Connect Disability Services staff, contractors (excluding environmental contractors), students and volunteers or other persons working for or providing services on behalf of Life Connect Disability Services, regardless of their employment status.

## **Definitions**

### *Accessibility*

The ability of any person to safely and independently approach, enter, operate or participate in any building, facility, program or service.

### *Inclusively*

The belief and practice of taking into consideration the diversity of individuals to ensure that all persons are equally able to participate within the community and activities of daily life, irrespective of their needs.

### *Eligibility*

All members of the community are able to access services provided by Life Connect Disability Services, limited only by the specific requirements of funding or other service agreements and policies regarding eligibility and priority of access which may apply from time to time.

### *Right to Participation*

Life Connect Disability Services is committed to client centred care, encouragement and support. All clients and community members have a right to be heard in relation to their views on the adequacy and sufficiency of services and their delivery. Opportunities exist through both formal and informal client feedback, program evaluations, client surveys and community participation for people to have their views heard. In both the planning and assessment of programs/services and in the preparation of individual care plans clients have the right to be active participants in the design and delivery of services. This includes the real consideration and investment of client's views in care and exit plan preparation and review as well as the evaluation of services. The principles of client self management are to be considered and emphasised at all times.

## Policy Statement

Life Connect Disability Services makes the following commitments and undertakings in how it determines the provision of services to people applying for service.

- The service may need to prioritise access to services based on comparative need, waiting lists, or urgency of need.
- The service will make fair and consistent decisions about resource allocation and service delivery for each client using a recognised set of assessment tools guided by legislation and procedure.
- The service will inform people who are not allocated a service verbally and in writing of the reasons why this is the case.
- The service will offer people who are not immediately offered a service the opportunity to go on a waiting list.
- The service will assist people who are not allocated a service assistance to access other services
- The service will analyse service and client data by reviewing legislation, disability population data and through feedback from clients and their supporters to inform allocation procedures.

## Procedures

### Compliance with Legislation

In support of these statements Life Connect Disability Services will aim to ensure that the guidelines and procedures in the Victorian State Disability Plan 2017 – 20120, Disability Act 2006 (Vic), Equal Opportunity Act 2010 (Vic), Mental Health Act 1986 (Vic), National Disability Insurance Scheme, 2013 Cwlth), Disability Discrimination Act, 1992 (Vic), Charter of Human Rights and Responsibilities, 2006 (Vic) and the National Mental Health Strategy together with all provisions of funding and service agreements regarding access, eligibility and priority of access will be adhered to.

The service also adheres to the Victorian Privacy and Data Protection Act, 2014, Health Records Act, 2001, Charter of Human Rights and Responsibilities Act, 2006 and Freedom of Information Act, 1982 in how it

collects data to determine assessment and intake along with the protection of peoples rights when receiving service.

The rules and articles of the Equal Opportunity Act, 2010 as they relate to protected attributes of vulnerable persons and special measures taken by service providers are applied in the intake of people seeking services from Life Connect Disability Services.

These measures may include priority given to people identified as; Aboriginal or Torres Strait Islander, people with a disability, women, young people, people experiencing poverty or risk of homelessness, geographic isolation, skill shortage or from a culturally and linguistically diverse community.

Life Connect Disability Services uses the Power Diary software to record all persons seeking or inquiring about service. This intake function will record any inquiries regardless of whether they proceed to be active clients or not.

### **Other Related Policies**

- Life Connect Disability Services service delivery policy
- Life Connect Disability Services privacy policy
- Life Connect Disability Service complaints by clients policy.

# Anti Discrimination Policy

Policy number	1	Version	1
Drafted by	Tony Herbert	Approved by	13/5/2018 manager
Responsible person	Tony Herbert	Scheduled review date	13/5/2019

## Introduction

This policy exists to explain to any person receiving service, their supporters, other stakeholders and staff how the service views the issue of discrimination in the conduct of business and delivery of services. The policy relates to the expectations the service has in applying fair and equitable practices to any person to be free of discrimination in their dealings with Life Connect Disability Services.

## Purpose of this Policy

The aim of this policy is to describe the types of services and supports available to service users to which this policy applies. The policy also aims to articulate the ethical, legislative, legal and complaint practice standards Life Connect Disability Services works to.

The policy describes options for complaint, redress or feedback available to clients, family and other interested stakeholders receiving service from Life Connect Disability Services feel they have been unfairly discriminated against. The policy also sets a minimum set of standards any person receiving services can expect in terms of protection for their rights to be treated fairly and equally.

This policy is written from the point of view of a person or supporter receiving services from Life Connect Disability Services in the core business of National Disability Insurance Scheme (NDIS) funded community based individualised skills building services.

The context of receiving services also includes any intake procedure where a person may have been declined or delayed service which the person believes may have amounted to discrimination against them.

### **Scope of Policy**

This policy applies to all staff including contractors and covers all work-related functions and activities including external training courses sponsored by Life Connect Disability Services.

### **Policy**

The objective of Life Connect Disability Services Equal Opportunity Policy is to improve business success by:

- providing a safe, respectful and flexible work environment
- delivering our services in a safe, respectful and reasonably flexible way

This policy describes and defines how services are to be delivered to reach this objective including definitions of what defines discrimination and how a person who believes they are been discriminated against by Life Connect Disability Services can address that situation.

### **Discrimination, Sexual Harassment and Bullying**

Life Connect Disability Services is committed to providing a service delivery environment free from discrimination, sexual harassment and bullying.

Behaviour that constitutes discrimination, sexual harassment or bullying will not be tolerated and will lead to action being taken.

For the purposes of this policy, the following definitions apply:

#### **Discrimination:**

**Direct discrimination** occurs when someone is treated unfavourably because of a personal characteristic that is protected under Victorian law.

**Indirect Discrimination** occurs when a rule seems neutral, but has a discriminatory impact on certain people. For example a minimum height requirement of 6 foot for a particular job might be applied equally to men and women, but would indirectly discriminate on the basis of sex, as women tend to be shorter than men.

**Sexual harassment** includes unwelcome conduct of a sexual nature in circumstances in which it could reasonably be expected to make a person feel offended, humiliated or intimidated a reasonable person, having regard to all the circumstances, would have anticipated that the person harassed would be offended, humiliated or intimidated.

### **Equality of Service**

Life Connect Disability Services provides equal service opportunity to people without discrimination based on a personal characteristic protected under state and federal equal opportunity legislation.

Under State legislation they include:

- age
- breastfeeding
- carer status
- disability
- employment activity
- gender identity
- industrial activity
- lawful sexual activity
- marital status
- parental status
- personal association with someone having any of these characteristics

- physical features
- political activity/belief
- pregnancy
- race
- religious activity/belief
- sex
- sexual orientation

Any employee of Life Connect Disability Services found to have contravened this policy will be subject to disciplinary action, which may include dismissal.

### **Reasonable adjustments**

Reasonable adjustments are changes that allow people with a disability to receive service safely and productively. To not make reasonable adjustments to help a person receive service may amount to discrimination. Life Connect Disability Services will make reasonable adjustments for a person with a disability or their supporters who:

- Receive services.
- requires the adjustments in order to participate in the service delivery process.

Examples of reasonable adjustments can include:

- reviewing and, if necessary, adjusting the performance requirements of a service offered.
- arranging flexibility in service provision hours.
- providing telephone typewriter (TTY) phone access for clients with hearing or speech impairments

- Purchasing or sourcing screen reading software for clients with a vision impairment
- Providing regular breaks for people with chronic pain or fatigue

When thinking about reasonable adjustments Life Connect Disability Services will weigh up the need for change with the expense or effort involved in making it. If making the adjustment means a very high cost or great disruption to the service delivery , it is not likely to be reasonable.

### **Legislation and Regulations**

Life Connect Disability Services will work to the provisions and stipulations of:

- Disability Act, 2006 (Victorian)
- Carers Recognition Act, 2012 (Victorian)
- Equal Opportunity Act, 2010 (Victorian)
- Disability Discrimination Act, 1992 (Cwlth)
- Racial and Religious Tolerance Act, 2001 (Victorian)
- Charter of Human Rights and Responsibilities Act, 2006 (Victorian)
- Australian Human Rights Commission Act, 1986 (Cwlth)
- Age Discrimination Act, 2004 (Cwlth)
- Racial Discrimination Act, 1985 (Cwlth)
- Sex Discrimination Act, 1984 (Cwlth)

### **Procedures**

Life Connect Disability Services will work to the following procedures to effectively manage and eliminate the incidence of any person experiencing discrimination in the applying for or receiving services.

- Any person can go to the web site for information on how to lodge a complaint of discrimination including how to access the resources of the Disability Services Commissioner of Victorian and the Human Rights Commissioner of Victoria.
- Any person applying for service will receive information on the criteria used for accepting people for service. Alternately, anyone can review our intake criteria on the company web site.
- Any person who feels they are experiencing discrimination can lodge a grievance with the service who will help the person report the matter for investigation by Life Connect Disability Service or to another agency.

# CHILD SAFE CODE OF CONDUCT

Policy number	1	Version	1
Drafted by	Tony Herbert	Approved by manager	12/6/2018
Responsible person	Tony Herbert	Scheduled review date	16/6/2019

## Introduction

This code exists to make sure any children receiving service from Life Connect Disability Services receive that service in a safe, transparent and easily understandable environment.

The code is written to be read by any children aged eighteen years or under who as part of their funding from the National Disability Scheme (NDIS) are receiving service from Life Connect Disability Services for one on one skills building services for participants in the public arena. The code is also written to be read by any family, carers, supporters, external stakeholders and staff of Life Connect Disability Services to understand what the service will do to keep children safe from abuse. The code can also be read by anyone considering receiving service from Life Connect Disability Services to understand the steps the service takes to keep children safe.

Life Connect Disability Services works with young people who may receive social skills building services including work related skills building services. The service primarily offers this service to secondary school students aged 16 or over who are eligible to work towards the transition from school years into social and work related experiences.

The aim of this code is for any one who reads it to have an understanding of all child safe principles Life Connect Disability Services will work to in delivering service including specific expectations of behaviour that must or must not be done by the service. Any person should be able to use this code as a ready reckoner to identify positive or inappropriate behaviour towards or children.

It should also be possible for that same person to understand ways of reporting behaviour that does not seem consistent with child safe principles and practices. It should also create a clear understanding of steps the service will take to create a safe place for children such as pre-employment checking so that children or their supporters feel safe and entitled to ask for proof of reputable service and protection by child safe strategies in place during service delivery.

## **Purpose**

The code seeks to embed a child safe way of delivering skills building services in the community to disabled children as part of NDIS funded packages. It seeks to do this by setting a framework around the Child Safe Standards of Victoria of strategies, intentions and aspirations Life Connect Disability Services sets itself to meet each of the following aspirational goals and standards:

1. Embedding a culture of child safety through effective leadership.
2. Making a commitment to child safety with a policy or statement.
3. Having a clear code of conduct that establishes appropriate behaviour with children.
4. Screening, supervision and training for staff, to reduce the risk of child abuse.
5. Clear processes for responding to and reporting suspected child abuse.
6. Identifying child abuse risks and ways to reduce them.
7. Empowering children to share their feedback and experiences about feeling safe.

## **Ethos of this Code of Conduct**

The ethos of this code of conduct is that child safety and zero tolerance to abuse or dangerous practices that put children in unsafe positions will be promoted and worked to in delivering community based skills building services. Life Connect Disability Services commits to:

- taking all reasonable steps to protect children from abuse
- treating everyone with respect
- listening and responding to the views and concerns of children, particularly if they are telling us that they or another child has been abused and/or are worried about their safety or the safety of another
- promoting the cultural safety, participation and empowerment of Aboriginal children.
- promoting the cultural safety, participation and empowerment of children with culturally and/or linguistically diverse backgrounds when working in public on skills building programs.
- promoting the safety, participation and empowerment of children with a disability when working in public providing skills building programs.
- ensuring as far as practicable that adults delivering service for Life Connect Disability Services are not left alone with a child in any private place not within view of the general public or a supporter of the child.
- reporting any allegations of child abuse to the police or child protection agencies.
- if an allegation of child abuse is made, ensure as quickly as possible that the child or children are safe
- encouraging children to 'have a say' and participate in all relevant organisational activities where possible, especially on issues that are important to them.

## **Intention of this Code of Conduct**

© 2018: This work is copyright. Apart from any use permitted under the Copyright Act 1968, no part may be reproduced by any process, nor may any other exclusive right be exercised, without the permission of Tony Herbert, PO Box 44, Ballarat, Victoria, 3353, 2018.

Life Connect Disability Services commits to complying with Victoria's compulsory child safe standards by:

- Promoting the cultural safety of Aboriginal children
- Promoting the cultural safety of children from culturally and/or linguistically diverse backgrounds.
- Promoting the safety of children with a disability.
- Provide a child safe service led from the top in its policies, processes and leaderships through to an embedding of a culture into everyday practice that makes child safety paramount.
- Apply strong governance, documenting how duty of care responsibilities to children will be met that any child or other person can easily obtain and understand.
- Make child safety a top priority in the organisation's operations
- Acknowledge the vulnerability of children with a disability and ensure child safe procedures always err on the side of safety to the child.
- Keep all mandatory certifications, training and licensing current and applicable such as suitability vetted staff with National Policy check, Working with Children Checks, Disability Worker Exclusion Scheme Checks and a commitment to ongoing child safe training.

## Scope

This policy relates to all staff of Life Connect Disability Services whether delivering a service or outside of service delivery times. There are no exceptions.

The consequences for any person delivering service on behalf of Life Connect Disability Services for not complying with this code of conduct may include disciplinary action resulting in dismissal or reporting to the relevant authorities depending on the nature of non-compliance.

## Principles of Conduct

This code declares the service commitment to the vulnerability of children with a disability by agreeing to show in words, deed and action that we believe that:

- a. Children with disability have the same right as other members of Australian society to respect for their worth and dignity and to live free from abuse, neglect and exploitation.
- b. That this right extends to special consideration for the vulnerability of disabled children reflected in practice.
- c. Children with disability should be supported in all their dealings and communications with the service so that their capacity to exercise choice and control is maximised in a way that is appropriate to their circumstances and cultural needs
- d. Children with disability should be supported to participate in and contribute to social and economic life to the extent of their ability
- e. Children with disability should be supported to exercise choice, including in relation to taking reasonable risks, in the pursuit of their goals and the planning and delivery of their supports
- f. Children with disability should have their privacy and dignity respected
- g. Children with disability should be supported to receive supports outside the National Disability Insurance Scheme (NDIS), and be assisted to coordinate these supports with the supports provided under the NDIS
- h. The role of families, carers and other significant persons in the lives of children with disability is to be acknowledged and respected
- i. Innovation, quality, continuous improvement, contemporary best practice and effectiveness in the provision of supports to children with disability are to be promoted
- j. Children with disability should be involved in decision making processes that affect them, and where possible make decisions for themselves

- k. The cultural and linguistic circumstances, and the gender, of children with disability should be taken into account, and
- l. The role of advocacy in representing the interests of children with disability is to be acknowledged and respected, recognising that advocacy supports people with disability by:
  - i. Promoting their independence and social and economic participation
  - ii. Promoting choice and control in the pursuit of their goals and the planning and delivery of their supports, and
  - iii. Maximising independent lifestyles of people with disability and their full inclusion in the community.

At Life Connect Disability Services we give practical meaning to these principles of how we conduct our services in the public arena to help children with disabilities build skills. This means that we acknowledge that children with a disability may experience and be vulnerable due to:

- Social isolation
- Limited access to developmentally appropriate information on relationships and sexuality
- Low levels of expectation about capacity to identify and report concerns
- Inaccessible pathways to reporting concerns
- Communication Difficulties
- Personal care needs involving different levels of supervision
- Signs of abuse regarded as signs of the child's disability.

To keep our client safe we identify and respond to these unique potential experiences of our NDIS participants by having in place a child safe culture with risk assessment of activities along with sound and safe recruiting and operating procedures for staff. We also respond to our responsibilities with a strong provision of information on our web site for children to understand how to make a complaint along with our form and policies to help this process including special communication assistance.

### **Legislation and Regulations**

Anyone that receives service from Life Connect Disability Services can expect that the service delivered will comply relevant legislation and guidelines including with the conditions and requirements of:

- Child Well-Being and Safety Act, 2005 (Victoria)
- Victorian Charter of Human Rights and Responsibilities Act, 2006

- Disability Act, 2006 (Vic)
- National Disability Insurance Agency Act, 2013 (Cwlth)
- Victorian Child Safe Standards, 2018.

## Procedures

Our procedures are how we put this code of conduct into action every day when we deliver services. Where ever possible any intake procedures including referring children and their supporters will be done in the presence of an adult who is valued and accepted as a supporter by the child. Where ever possible our service delivery will be planned with a responsible adult or acting on an initial exchange of information with that adult who is supporting the child about what service for each occasion will entail. We will as soon as possible after each time we deliver service to a child make a case note on our client management system about what was done and why it was done so there is a clear record of how we are working to this code of conduct.

As an examples of our everyday practices we commit to informing and alerting children and their supporters to not only what we will do but what we will not do. For example, the following examples of inappropriate behaviour are not part of our procedures:

- develop any 'special' relationships with children that could be seen as favouritism such as the offering of gifts or special treatment for specific children.
- exhibit behaviours with children which may be construed as unnecessarily physical such as 'play wrestling' with a child during service.
- put children at risk of abuse such as locking doors.
- do things of a personal nature that a child can do for themselves, such as toileting or changing clothes
- engage in open discussions of a mature or adult nature in the presence of children such as discussing personal social activities.
- use inappropriate language in the presence of children
- express personal views on cultures, race or sexuality in the presence of children
- discriminate against any child, including because of culture, race, ethnicity or disability
- have contact with a child or their family outside of our organisation service delivery shifts such as baby sitting or catching up for a coffee without delivery of service.
- have any on-line contact with a child or their family except where for a legitimate purpose such as arranging or changing appointments.
- ignoring or disregarding any suspected or disclosed child abuse.

A full list of our operating procedures is contained in our record holdings and can be viewed by any child or their supporter if requested. Any person can also go to the Life Connect Disability Services web site which gives an overview of how to make a complaint about any action or inaction that may put a child in danger. The web site also includes information on signs of possible endangerment of children that children or their supporters can use to identify an unsafe practice.



# CODE OF CONDUCT

Policy number	1	Version	1
Drafted by	Tony Herbert	Approved by manager	13/5/2018
Responsible person	Tony Herbert	Scheduled review date	13/5/2019

## Introduction

This code of conduct exists to describe the ethical standards of behaviour, governance and service delivery Life Connect Disability Services models. It is developed to be read in the context of how the service delivers individualised, community based skills building services to National Disability Insurance Scheme (NDIS) funded participants.

It is a condition of employment that all staff read and sign this document acknowledging their commitment to abide by the principles of the document.

## Purpose

Anyone reading this document should be able to understand the following about how Life Connect Disability Service delivers service in terms of its structure, ethos and service delivery process.

This code of conduct is a ethical statement of organisational description and intent for all staff to work towards in discharging their duties. The code sets the ethical context of how the organisation delivers service for the understanding of clients, supporters and others. It states the ethical, legal and client centred responsibility framework the business uses.

## Policy

The ethos of this policy hinges on the following underpinning features of how Life Connect Disability Services delivers disability services in the community. Any person dealing with the service has a right to expect these minimum ethical standards or practices be adhered to.

- The service operates as a sole trader enterprise with all responsibility and direction vested in the manager and operator.
- The service works to a person centred philosophy of service delivery whereby the client is at the centre of all processes.
- The service uses straight forward and transparent governance procedures that any person has the right to ask for information on.
- The service adopts a complaints tolerant approach to receiving, dealing with and learning from complaints about service.
- Every NDIS participant receives a goal orientated plan describing what they wish to achieve from services.
- Every NDIS participant receives information to help them assess how suitable our services are and ongoing information on our services.
- The service has a zero tolerance approach to abuse of people with disabilities.

## Scope

This policy applies to all Life Connect Disability Services staff including permanent and temporary staff, agency staff, casuals, contractor, consultants, students are any person acting in any capacity whereby they are taken to be representing Life Connect Disability Services and its interests.

## Declaration of Intent

- Our ethical intent is to put the clients interest before our own. We do this to ensure our clients have access to the same opportunities for quality of life as any other person in terms of their right to free choice and control. For e.g., where conflicted over a clients right to take a risk with dignity we will defer to the clients wishes.
- We commit to explaining information provided to a service recipient, supporter or other person in the language, mode of communication or terms which the person is most likely to understand.
- We will ethically and diligently comply with all legal requirements of our mandate to our clients. For e.g. we will faithfully comply with all standards laid down in the National Disability Standards. We will also comply with the standards and clauses of governing legislation such as the Disability Act, 2006 (Victoria) and the National Disability Insurance Scheme, 2013 (Commonwealth).
- We commit to each service recipient receiving at an early stage an individualised plan directed by the person with a disability. Also that where relevant we will include the views and rights of family, carers and other significant persons to help families and carers of a person with a disability support the person.
- We commit to providing each service recipient with information on our services including costs, conditions and procedures for making a complaint to the Disability Services Commissioner of Victoria. We commit to provide this information as soon as the person commences to use our service.
- We support and carry out our responsibilities to everyone we encounter as part of our duties in a fair, deliberate, open and inclusive manner. For e.g. we commit to not speak, write or otherwise act directly or by omission in a way that discriminates against a co-worker.
- We commit to keep all mandatory certifications, training and licensing current and applicable to industry standards of the highest quality. For e.g. staff commit to have a valid employee working with children, National Police and Excluded Worker Check at all times when representing Life Connect Disability Services.
- We understand that in the event any member of staff does not comply with this Code of Conduct they will be liable to disciplinary action. This may include but not be limited to immediate termination, counselling or other action compatible with our mandate and the law.

## Principles of Conduct

Any person receiving service from Life Connect Disability Services can expect to receive service delivered in accordance with the following principles.

- a. People with disability have the same right as other members of Australian society to respect for their worth and dignity and to live free from abuse, neglect and exploitation
- b. People with disability should be supported in all their dealings and communications with the service so that their capacity to exercise choice and control is maximised in a way that is appropriate to their circumstances and cultural needs
- c. People with disability should be supported to participate in and contribute to social and economic life to the extent of their ability

- d. People with disability should be supported to exercise choice, including in relation to taking reasonable risks, in the pursuit of their goals and the planning and delivery of their supports
- e. People with disability should have their privacy and dignity respected
- f. People with disability should be supported to receive supports outside the National Disability Insurance Scheme (NDIS), and be assisted to coordinate these supports with the supports provided under the NDIS
- g. The role of families, carers and other significant persons in the lives of people with disability is to be acknowledged and respected
- h. Innovation, quality, continuous improvement, contemporary best practice and effectiveness in the provision of supports to people with disability are to be promoted
- i. People with disability should be involved in decision making processes that affect them, and where possible make decisions for themselves
- j. The cultural and linguistic circumstances, and the gender, of people with disability should be taken into account, and
- k. The role of advocacy in representing the interests of people with disability is to be acknowledged and respected, recognising that advocacy supports people with disability by:
  - i. Promoting their independence and social and economic participation
  - ii. Promoting choice and control in the pursuit of their goals and the planning and delivery of their supports, and
  - iii. Maximising independent lifestyles of people with disability and their full inclusion in the community.

### **Legislation and Regulations**

Anyone that receives service from Life Connect Disability Services can expect that the service delivered will comply relevant legislation and guidelines including with the conditions and requirements of:

- Victorian Charter of Human Rights and Responsibilities Act, 2006
- Disability Act, 2006 (Vic)
- National Disability Insurance Agency Act, 2013 (Cwlth)

### **Procedures**

The code is not a manual on procedure for performing duties on behalf of Life Connect Disability Services. Where procedural advice is required by any staff member various companion documents are available on the Life Connect Disability Services web site ([www.life-connect.com.au](http://www.life-connect.com.au)). Staff are expected to check with those sources for full information on policies, legislation and other standards impacting on the service we deliver.

# CONFLICT OF INTEREST POLICY

Policy number	1	Version	1
Drafted by	Tony Herbert	Approved on	14/5/2018
Responsible person	Tony Herbert	Scheduled review date	14/5/2019

## INTRODUCTION

Life Connect Disability Services is committed to high standards of ethical conduct and accordingly places great importance on making clear any existing or potential conflict of interest. This policy exists to explain how the service will deal with an actual or perceived conflict of interest encountered while delivering service to National Disability Insurance Scheme (NDIS) participants. The policy is developed and published for the benefit of NDIS clients, supporters, stakeholders, oversight authorities and staff working with Life Connect Disability Services.

## PURPOSE

This policy seeks to achieve a clear aim of establishing a service ethos that puts the rights of participants, supporters, funding authorities and the public to receive unbiased and fair service as our number one priority. It aims to do this by establishing a number of objective bench marks to guide users of this policy in understanding the following:

- What constitutes a conflict of interest.
- How to identify the underpinning causes of an actual or perceived conflicted interest and steps the service has in place to avoid any perception of conflicted interest in how service is delivered.
- How a participant or supporter can identify and report a conflicted interest that has the potential to negatively effect the quality of service received.
- What steps Life Connect Disability Services will take to deal with that conflict of interest.
- Where participant and their supporters can get help dealing with a conflict of interest from bodies from Life Connect Disability Services or by other avenues if they need to do so.

## SCOPE OF POLICY

This policy relates to any work practice carried out on behalf of Life Connect Disability Services by any person acting on behalf of the service be it as a direct employee, agent, contractor or person purporting to represent the service. The practices and intent of this policy also relate to any client or other stakeholder involved in the receipt of service from Life Connect Disability Services.

© 2018: This work is copyright. Apart from any use permitted under the Copyright Act 1968, no part may be reproduced by any process, nor may any other exclusive right be exercised, without the permission of Tony Herbert, PO Box 44, Ballarat, Victoria, 3353, 2018.



## **GUIDELINES AND RESOURCES RELATING TO THIS POLICY.**

Life Connect Disability Services in this policy complies with the NDIS Terms of Business and the Guidelines of the Department of Human Services Funded Organisations as they relate to the fair and unbiased delivery of service to participants.

### **POLICY**

Any person delivering services on behalf of Life Connect Disability Services or acting in any way on behalf of the service is expected to act in the best interests of NDIS participants. This policy goes towards informing and empowering our practice and the knowledge of participants receiving service so they can have choice and control in receiving service.

This knowledge is expected and desired to be in the form of participants understanding what action Life Connect Disability Services must take to ensure that any conflicts of interest do not harm the best interests of the participant.

A conflict of interest may arise from any action, omission to act or other influence exerted by someone exerting influence on the receiving of service that may alter that service been delivered to a participant in a way that best serves their interests over the interests of Life Connect Disability Services.

Examples of a conflicted interest working to benefit the service provider might include a direct benefit such as delivering a service to a participant where another service provider with special skills could better deliver that service to benefit the participant.

A conflict of interest by omission might also occur in situations such as when a service provider fails to mention a personal relationship with a service provider the participant is referred onto for service.

Where ever a participant feels they were not given the full range of information potentially available to help them make a decision the potential for a conflicted interest situation exists.

Life Connect Disability Services commits to having steps in place to identify clearly to participant aspects of its business and relationships through information and declaration of interests that are available and easily understood.

The steps we will take are described in how we manager our internal and external procedures in a clear and transparent fashion.

## PROCEDURES

Before requesting service or at any time after, a participant and their supporter can view our website. The site clearly explains our organisational focus on skills building along with a description of our professional qualifications. Any one is also able to view all our policies about how we deliver service on the web site.

These policies including our Code of Conduct, Customer Service Charter and Delivery of Services Policy display our commitment to ethical conduct. Prospective clients can also view this Conflict of Interest Policy on-line which describes how we will manage, document and report on individual conflicts.

This will allow prospective participants to make an informed decision on our services with the information they need. The web site also gives links to advocacy and other groups able to give unbiased information on service available and qualifications that best suit those services.

When receiving a no obligation quote for service, participants are given a written estimate and description of services along with a referral to available advocacy services to help them make an informed decision on our services. When applying for or receiving service the participant can ask for or go on-line to view a copy of our Anti-Discrimination Policy.

Participants applying for service will also receive a client details and intake form to fill in. This form gives a short summary of our intake criteria to understand how and why we make decisions around intake of clients.

Any person receiving service will receive an itemised service agreement identifying the agreed regime for service including all costs associated. This agreement will declare any notice periods or cancellation terms. Participants are not bound to engage our services after reviewing our pricing and conditions offer in the agreement.

Prices charged to participants do not exceed the price level prescribed for that support in the NDIS Pricing Guide. No other charges are to be added to the cost of the support, including credit card surcharges, or any additional fees including any 'gap' fees, late payment fees or cancellation fees. These requirements apply whether funding for the support is managed by the participant, or managed by a Registered Provider, or managed by the Agency.

We submit claims for payment within a reasonable time (and no later than 60 days from the end of the Service Booking). We do not charge cancellation fees, except when specifically provided for in the NDIA Price Guide. We do this to give participants all the knowledge around pricing and processes they need to make a decision. The service agreement also contains information on who to contact if not satisfied with any offer of services made or intake criteria applied.

As part of our endeavours to remain fair and unbiased in our service delivery no one acting on behalf of Life Connect Disability Services is able to receive

gifts, gratuities or other benefit outside allocated NDIS payments. We do this to avoid any systematic influence that may affect how we deliver services or make decisions around this service delivery.

We also keep a register of any perceived conflicts of interests along with a register of community groups and agencies in the local area. Any person can ask to see these registers or ask about information regarding a specific service or individual on that register to explore any perceived conflict of interest. We do this to be clear in who we work with and to give an overview of services available in the wider area. If asked we can also help anyone interested in receiving service or currently receiving service who wants to explore the NDIS Provider portal to identify services available in the local area.

Where we refer you to or recommend a service we will declare any relationship we have with that person or business. Where that person is a family member or other close relative we will place that information on our conflict or interest register for viewing.

If a prospective or current client wishes to report an experience of conflicted interests receiving during service from Life Connect Disability Services they can go to the service web site at any time. This web site has resources for contacting advocacy and other support groups able to help the person understand their rights and to review the actions of Life Connect Disability Services.

Any person can ask for a complaint and compliments form from Life Connect Disability Services to report a conflict of interest experienced with harmed the level or quality of service received. This form can be given to a representative of Life Connect Disability Service who will investigate the matter and give you a written reply within 14 days.

If you are not happy with this reply or do not feel comfortable with this approach the service will help you contact oversight bodies such as the Victorian Department of Human Services, National Disability Insurance Scheme and the Victorian Disability Services Commissioner. You can seek advice and/or action from them regarding any conflict of interest that you believe has harmed the service you have received.

## **RELATED DOCUMENTS**

People delivering service on behalf of *Life Connect Disability Services* should read the *Life Connect Disability Services Guidelines* for information on the processes involved in delivering service free of conflicted interest.

# Life-Connect

GREAT JOBS AND SOCIAL LIFE FOR EVERYONE

1

## Delivery of Services Policy

### *Policy Overview*

The aim of this policy is to identify and articulate the ethical, legislative, legal and practice standards and how service is delivered by *Life Connect Disability Services*. The policy relates to service delivery ranging from initial contact with a client going through to assessment, service delivery and finalisation of client services. This policy should be read and worked towards in conjunction with the listed companion documents.

### *Intent of Policy*

The policy is written with the intention to provide a minimum set of expectations for *Life Connect Disability Services* employees, clients and other stakeholders participating in services provided by *Life Connect Disability Services*.

### *Scope of Policy*

This policy relates to any work practice carried out on behalf of *Life Connect Disability Services* by any person acting on behalf of the service be it as a direct employee, agent, contractor or person purporting to represent the service. The practices and intent of this policy also relate to any client or other stakeholder involved in the receipt of service from *Life Connect Disability Services*.

### *Objectives of Policy*

The objectives of this policy are to ensure that services provided by *Life Connect Disability Services*:

- a. Help advance the inclusion and participation in the community of clients.
- b. Facilitate the planning and provisions of services, programs and initiatives for clients.
- c. Promote and protect the rights of persons accessing disability services
- d. Support the provision of high quality disability client services.
- e. Make *Life Connect Disability Services* accountable to persons accessing services.
- f. Promote culturally safe service environment.

### *Companion Documents*

This policy should be read, considered and enacted by staff with consideration and compliance to the Disability Act, 2006 (Victoria); National Disability Insurance Scheme Act, 2012 and the *Life Connect Disability Services Delivery of Services Guidelines*.

# Life-Connect

## GREAT JOBS AND SOCIAL LIFE FOR EVERYONE

2

### *Helping Advance the Inclusion and Participation in the Community of People with a Disability*

When receiving services from *Life Connect Disability Services*; staff, clients and other stakeholders can have an expectation that services delivered or received will involve:

- ❖ Plans and actions that are designed to help reduce barriers to clients accessing goods, services and facilities as well as barriers to persons with a disability obtaining and maintaining employment.
- ❖ Plans and actions that are designed to help reduce barriers to clients accessing goods, services, facilities and training to assist with and build independence of the client in doing tasks at home.
- ❖ Advance the inclusion and participation in the community of clients with the aim of achieving their individual aspirations as recorded in individual goal orientated plans.
- ❖ Helping clients participate in a range of education, recreation, leisure, cultural and community events that reflect their interests, strengths and preferences and involve any unique group the client identifies with.

### *Facilitate the planning and provisions of services, programs and initiatives for persons with a disability.*

When receiving services from *Life Connect Disability Services*; staff, clients and other stakeholders can have an expectation that services delivered or received will involve:

- ❖ Individualised person centred and directed plans and services that are flexible and responsive to the individual needs and goals of the client that maximise the choice and independence of the client. Assessing for and understanding these needs of the client will be the first stage of any planning process.
- ❖ Plans and services that enable the client to access services as part of their local community and foster collaboration, co-ordination, integration and service development with other local services.
- ❖ Plans and services that consider and respect the role of families, carers and other persons who are significant to the client and where possible involve those people in service planning delivery and also where possible work towards strengthening the capacity of those people to support the client.
- ❖ The management of their personal information in a sensitive and professional manner, including how that information is released to other people or how other may be involved in the receiving of service acting as a support for the person if the person receiving service gives written consent for this to happen by signing their individual plan to that effect and also signing a consent to participate form.
- ❖ Person requesting service will be accepted or declined service within 14 days of receipt of that request with reasons for declining of any service given in writing to the person requesting service.

# Life-Connect

## GREAT JOBS AND SOCIAL LIFE FOR EVERYONE

3

- ❖ Where a person requesting service accepts an offer of service from *Life Connect Disability Services* the client can expect a written plan for service within 60 days of starting to receive services. Also that any written plan for service can be reviewed at any time at the request of *Life Connect Disability Services* or the client or at a minimum of every 3 years.
- ❖ Where a client finalises receiving services, a final review of the clients plan must be conducted by *Life Connect Disability Services*.

### *Promote and protect the rights of persons accessing disability services*

When receiving services from *Life Connect Disability Services*; staff, clients and other stakeholders can have an expectation that services delivered or received will involve:

- ❖ A client or their supporter has the right to receive an advice, notice or information given to them in the language, mode of communication and terms which the client is most likely to understand. Also that any explanation given must be given both orally and in writing where reasonable.
- ❖ A client or their supporter has the right to immediately receive written information which is relevant to the services to be provided. This information must include information about the type of services, cost, conditions that apply and procedures for making a complaint to *Life Connect Disability Services* and the Disability Services Commissioner of Victoria.
- ❖ A client or their supporter receiving services has the right to an advocate including advice from *Life Connect Disability Services* on how to contact one.
- ❖ A client or their supporter receiving services has the right to privacy of information given to *Life Connect Disability Services* for the purposes of delivering service.
- ❖ A client or their supporter receiving services has the right to dignity of risk in choosing to an action or inaction during the course of service informed by *Life Connect Disability Services* of the risks involved to the best of the ability of the service.
- ❖ A client or supporter receiving services has the right to access their records held by *Life Connect Disability Services* as well as the right to make feedback about the service received.
- ❖ A client or supporter receiving services has the right to expect *Life Connect Disability Services* to take all reasonable steps to keep them safe from abuse, neglect, violence and preventable injury.
- ❖ A client or supporter receiving services has the right to expect that strategies that Life Connect Disability Services use are based on the least restrictive options and are contemporary, evidence based, transparent and capable of review.

### *Support the Provision of High Quality Disability Services*

When receiving services from *Life Connect Disability Services*; staff, clients and other stakeholders can have an expectation that services delivered or received will involve:

# Life-Connect

## GREAT JOBS AND SOCIAL LIFE FOR EVERYONE

4

- ❖ A client or supporter receiving or requesting services will receive services most appropriate to their needs through timely, responsive, service integration and referral. Where a client requesting service cannot receive service for reasons of a waiting list or inability of *Life Connect Disability Services* to provide the service a referral will be made to another provider within 14 days of the initial inquiry.
- ❖ All clients receiving services will receive a goal orientated plan including strategies to achieve stated goals. Each plan will include an assessment of the clients needs and regular reviews of plan progress.
- ❖ All persons requesting services will be offered a comprehensive intake assessment of their needs involving a verbal interview and use of questionnaires to estimate the needs of the client.
- ❖ We will maintain a current and relevant service network to make sure you receive the highest of services. We will do this by developing new relationships based on what our clients tell us they need. We will keep checking in with these services and you to make sure their service is still current and meets the needs of our clients.

### *Promote a Culturally Safe Environment for Individuals Seeking and Receiving Service.*

When receiving services from *Life Connect Disability Services*; staff, clients and other stakeholders can have an expectation that services delivered or received will be culturally aware and guided by any special needs or supports that individuals and their supporters may need for this cultural safety to happen.

In practical terms this means that:

- ❖ We will ask you at intake if you identify as an Aboriginal or Torres Strait Islander person or as a person from any other unique community. This community can be as diverse as coming from a non-english speaking background through to identifying as a group such as a member of the LGBTI community.
- ❖ When doing any assessment of your needs we will invite any supporters, advocates or other agencies you ask us to contact to be involved in planning how you receive service. This might involve us referring you to an agency or using their services to make sure you understand what you are been told about the service you might receive. It might involve having people present the whole time you are receiving service to support you.
- ❖ If you need us to we will use tools such as cultural competence check lists tools specifically to make sure we do not miss an aspect of a person's indigenous culture that could play an important part in making your plan.
- ❖ You will receive a written plan or it may be in another format to help you understand that plan. Whatever format it is in, it will be recorded to show what cultural safety steps you have asked for and how we will provide that cultural safety for you when receiving service.

# INFORMATION MANAGEMENT POLICY

## INTRODUCTION

Life Connect Disability Services is committed to protecting the privacy of personal information which the organisation collects, holds and administers. Personal information is information which directly or indirectly identifies a person. How we manage that information plays a large part in how secure the information is and how that protects your privacy. The aim of this policy is to describe how information is managed by Life Connect Disability Services in the variety of forms it is received, held, disseminated and disposed off by the service.

## PURPOSE

The purpose of this document is to provide a framework for Life Connect Disability Services staff in dealing with information management. It also describes to our customers, supporters and stakeholders how their information is managed and secured.

The policy also outlines the process for individuals and organisations to access client information from Life Connect Disability Services and the procedure to follow when dealing with these requests to make sure information is managed safely.

Aspects of how we protect your privacy in other ways is dealt with in more detail in our privacy policy. This information management policy describes the physical steps we take to keep your information safe when we have it in our possession or when we release it to other parties.

This policy should show how client information is handled by Life Connect Disability Services in the following situations.

- ❖ When a client has provided consent for the handling of that information.
- ❖ What security measures Life Connect Disability Services will take to protect client information received.
- ❖ What we will do with your information once the program is finished and/or the information is no longer required.
- ❖ How Life Connect Disability Services will deal with the security of electronic data flows received and stored in systems used by the service.

Any person, employee, stakeholder, customer or other interested party reading and working to the detail of this policy should understand the following:

- The state and federal legislation and its requirements that Life Connect Disability Services works to meet and report on where required.
- The peak government and other bodies mandated by law or other requirement that Life Connect Disability Services answers to and frameworks held by those organisations that the service works to meet.
- The principles of information management that Life Connect Disability Services works to meet.

## **POLICY**

Life Connect Disability Services recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – protected on one hand, and made accessible to them on the other. The organisation has adopted the following minimum standards in relation to handling personal information to reflect that ethos of secure information management.

Life Connect Disability Services will

- Collect only information which the organisation requires for its primary function i.e developing skills building plans for participants.
- Ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered;
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- Store personal information securely, protecting it from unauthorised access; and
- Provide stakeholders with access to their own information, and the right to seek its correction.
- Manage electronic data flows to ensure effective and secure management of information.

## **Who this Policy Relates to (Scope):**

This policy relates to any work practice carried out on behalf of Life Connect Disability Services by any person acting on behalf of the service be it as a direct employee, agent, contractor or person purporting to represent the

© 2018: This work is copyright. Apart from any use permitted under the Copyright Act 1968, no part may be reproduced by any process, nor may any other exclusive right be exercised, without the permission of Tony Herbert, PO Box 44, Ballarat, Victoria, 3353, 2018.

service. The practices and intent of this policy also relate to any client or other stakeholder involved in the receipt of service from Life Connect Disability Services.

## **Responsibilities:**

The responsibilities for action lie with any person described as an employee or representative of Life Connect Disability Services as described in the scope description above.

## **What Legislation Must The Service Work to ?.**

- Privacy and Data Protection Act 2014 (Vic) (PDP Act)
- Health Records Act 2001 (Vic)
- Public Records Act 1973 (Vic)
- Privacy Act 1988 (Cwlth)
- Freedom of Information Act, 1982 (Vic)

## **Guiding Documents and Regulations the Policy Will Work To**

- Service Information Kit for Funded Agencies, *Victorian Department of Health and Human Services, 2018.*
- Guidelines to protecting the security of personal information: 'Reasonable steps' under Information Privacy Principle 4.1, Office of the Victorian Information Commissioner
- Privacy and information security guideline for funded agency staff, Victorian Department of Human Services, 2018.
- The Victorian Protective Data Security Framework, 2016, *Office of the Victorian Information Commissioner.*
- *The Victorian Protective Data Security Standards, 2018, Office of the Victorian Information Commissioner.*
- The Privacy Amendment (Notifiable Data Breaches) Act 2017

## Procedures

### How We Handle Client Information With the Clients Consent

Any staff or other person acting on behalf of *Life Connect Disability Services* must not ask for or receive any personal information from a client unless:

- ❖ It is legitimately required to facilitate providing a service to the client.
- ❖ The client signs an information release form authorising receipt of the information.
- ❖ The client is given a copy of the Informed Consent Disclosure Statement explaining the reasons for receiving information, handling and conditions for release of information.

Personal information is described as any information, or an opinion about an individual whose identify is apparent, excluding health information. Examples include a persons name, address, telephone number and bank account details, Privacy and Data Protection Act, 2014 (Victorian).

Health information is defined as information relating to an individual's physical, psychological or mental health, Health Records Act, 2001 (Victoria). This health related information is deliberately omitted from the Privacy and Data Protection Act with a higher level of need required for a service to receive it.

It is likely that Life Connect Disability Services will ask to collect personal and health related information from you for the purposes of delivering a service to you.

This means we will receive information from you in the form of hard copy forms or information we may ask you to email to use.

### How we Distribute and Handle Information Going to other Services.

Any staff or other person acting on behalf of Life Connect Disability Services must not disseminate any personal or health information from a client unless:

- ❖ It is legitimately required to facilitate providing a service to the client.
- ❖ The client signs an information release form authorising receipt of the information.
- ❖ Life Connect Disability Services has received a written request from that agency or service on an official letterhead including; name, contact details and address of the client for whom the agency is seeking information,

name and signature of the officer, date of the request, information required, specific purpose for which the information is required and legal power enabling receipt of the information.

That information will only be transmitted to another agency by using a secure email communications to the recipient or by handing hard copy information to the intended recipient.

### **How we Secure Your Hard Copy Information**

Client files are held in secure IT systems and a lockable cabinet or case which is accessible only to authorised personnel. Client files may contain information that is relevant to the service being provided, in addition to personal information such as name, address, and contact phone numbers. Information gathered as part of the assessment will only be accessible to authorised personnel nominated by the client on an information release form.

These hard copy files will only be retained as long as it is necessary for the transfer of those files to electronically holding storage facilities. The Life Connect Disability Services Policy is to not retain any hard copy files after they have been electronically stored.

### **How we Secure Electronic Data**

Data stored and/or transferred electronically is done so in accordance with the Victorian Protective Data Security Framework and Standards published by the Victorian Information Commissioner. Electronic data will be stored in password protected storage accessible only by authorised employees of Life Connect Disability Services.

We will also comply with the provisions of the Privacy Amendment Act as it relates to notifiable data breaches in the Commonwealth Privacy Act of 1988. Where a data breach involving an unauthorised access to information meeting the criteria of the amended act the Office of the Australian Information Commissioner (OAIC) will be notified.

### **How we Dispose of Your Information:**

We will comply with Public Records Office, Victoria, Document Destruction Guidelines on how long we keep your records and how we dispose of them. This means that once we have finished delivering service and there is no administrative reason for maintaining the records we will destroy them. For example, any documents held in hard copy form will be destroyed or any cloud based documents will be deleted from our records.

### **Related Documents**

Any person handling information on behalf of Life Connect Disability Services should consult the Life Connect Disability Services Guidelines for procedural information on processes for dealing with information.

# Life-Connect Disability Services

## Occupational Health & Safety Policy

*Life Connect Disability Services* will, as far as practicable, provide a safe work environment for the health, safety and welfare of our employees, clients, contractors, visitors and members of the public who may be affected by our work.

To do this, *Life Connect Disability Services* will:

- develop and maintain safe systems of work, and a safe working environment
- consult with clients, supporters and other stakeholders on safety
- provide information and training for clients, supporters and other stakeholders where required to undertake a service activity.
- assess all risks before service delivery begins, for example, using an approved Work Safe Victoria risk assessment tool to consider risks in a service activity such as travel training for a client with mobility issues.
- remove or control unacceptable risks to safety including workplace, travel, individual's home environment and weather conditions (i.e. extreme weather).
- make an entry of any risk identified along with maintaining, updating and learning from incidents we keep a record of in a risk register.

Ultimately, everyone at the workplace i.e. the service delivery environment is responsible for ensuring health and safety at that workplace.

All *Life Connect Disability Services* staff responsible for the delivery of service activities to clients, supporters or other stakeholders are accountable for:

# Life-Connect Disability Services

- identifying practices and conditions that could injure employees, clients, members of the public or the environment
- controlling such situations or removing the risk to safety. If unable to control such practices and conditions, report these to their manager
- making sure workers and clients use personal protective equipment (PPE), training workers and clients to use PPE correctly where needed.
- making sure PPE is maintained and working properly.

*Life Connect Disability Services* demands a positive, proactive attitude and performance with respect to protecting health, safety and the environment by all employees, irrespective of their position.

## **Manual handling policy**

It is *Life Connect Disability Services* policy to provide all employees, clients, supporters and other stakeholders with a safe and healthy workplace by identifying, assessing and controlling manual handling risks.

While management is responsible for the health, safety and welfare of all staff, clients, supporters and stakeholders, those persons must report potential and actual manual handling hazards.

Never lift or manually handle items larger or heavier than you can easily support. If you are in any doubt, do not hesitate to ask for help.

## **Workers' compensation policy**

All employees may be eligible for workers' compensation benefits if injured while at work.

# Life-Connect Disability Services

## Injury procedure

If there is an injury:

1. The first priority is medical attention. The injured client, worker or other person should contact one of *Life Connect Disability Services* first aiders. For a serious injury also call an ambulance.
2. Any employer, client or other person who is injured during service delivery, experiences a safety incident or a near miss, must report the incident to their *Life Connect Disability Services* staff member.
3. The *Life Connect Disability Services* staff member must write a report in the Register of Injuries, Incidents and Near Misses. This standard report must include:
  - Persons name and details
  - time and date of injury
  - exact location the injury/incident occurred
  - how the injury/incident happened
  - details of the injury/illness and the part/s of the body injured
  - names of any witnesses
  - name of the person entering details in the Register
4. *Life Connect Disability Services* will let the injured person know in writing that we have received notification of any injury or illness reported in the Register.

*Life Connect Disability Services* must report serious injuries to WorkSafe immediately.

# Life-Connect Disability Services

## **Smoking policy**

*Life Connect Disability Services* has a non-smoking policy. Smoking is not permitted on *Life Connect Disability Services* property or in offices at any time. This includes public places where staff are present delivering services and are unable to remove themselves from the vicinity of any person who chooses to smoke.

## **Alcohol & drugs policy**

*Life Connect Disability Services* will do its utmost to create and maintain a safe, healthy and productive workplace for all employees, clients, supporters and other stakeholders receiving services. *Life Connect Disability Service* has a zero tolerance policy in regards to the use of illicit drugs on their premises or the attending of other business related premises (e.g. clients) while under the influence of illicit drugs. Contravening either of these points may lead to termination of the service delivery on the day and a review of the viability of continuing the service delivery over time.

# Privacy Policy

Policy number	1	Version	1
Drafted by	Tony Herbert	Approved by manager	13/5/2018
Responsible person	Tony Herbert	Scheduled review date	13/5/2019

## Purpose

This policy exists to explain to clients, supporters and other stakeholders how Life Connect Disability Services protects the privacy of clients and other people and agencies it works with. The steps the service will take to protect information and privacy when receiving information are described.

The processes the service takes to protect privacy when individuals and organisations seek to access client information from Life Connect Disability Services are also explained. The policy also outlines the requirements of Life Connect Disability staff in seeking to access personal information about clients from agencies, providers or other sources external to Life Connect Disability Services.

The policy also explains what sort of private information can be asked for according to legislation and the reasons for the service doing this.

This policy can be read in conjunction with our information management policy which describes steps we take to handle and secure information we deal with while delivering service.

The core business of Life Connect Disability Services is delivering individualised skills building community based services to people with disabilities receiving National Disability Insurance funding. This policy should be read in that context on the grounds that any information the service asks for should serve a purpose towards delivering these community based disability services.

## Scope

© 2018: This work is copyright. Apart from any use permitted under the Copyright Act 1968, no part may be reproduced by any process, nor may any other exclusive right be exercised, without the permission of Tony Herbert, PO Box 44, Ballarat, Victoria, 3353, 2018.

This policy relates to any work practice carried out on behalf of Life Connect Disability Services by any person acting on behalf of the service be it as a direct employee, agent, contractor or person purporting to represent the service. The practices and intent of this policy also relate to any client or other stakeholder involved in the receipt of service from Life Connect Disability Services.

## **Objectives of the Policy**

The objectives of this policy are to ensure that the management of client information by *Life Connect Disability Services* satisfies the following criteria.

- ❖ What information Life Connect Disability Services may ask clients or other stakeholders to provide.
- ❖ What protections are in place according to law in terms of what information the service may ask for and handle while delivering service.
- ❖ How client information is handled when a client has provided consent for the handling of that information.
- ❖ What happens to client information held by Life Connect Disability Services when a client requests the information, either for their own purposes or to be forwarded to a third party.
- ❖ What happens when Life Connect Disability Services is required to deal with client information to prevent or lessen a serious and imminent threat the health, safety and welfare of the client or the public.
- ❖ What happens when Life Connect Disability Services is required by law by or for a law enforcement agency for a prescribed purpose.
- ❖ What security measures Life Connect Disability Services will take to protect client information received.

Each of these objectives should be complied with stringently to ensure that within the limits of law, a persons privacy is protected by processes and procedures that treat information about a person as confidential.

## **What Legislation Must The Service Work to ?.**

Articles of the Health Records Act, 2001 (Victorian), the Privacy and Data Protection Act, 2014 (Victorian), Freedom of Information Act, 1982 (Victorian) and Privacy Act 1988 (Cwlth) relate to how client information is dealt with by Life Connect Disability Services.

## **What is Personal Information ?.**

Personal information is described as any information, or an opinion about an individual whose identity is apparent, excluding health information. Examples include a person's name, address, telephone number and bank account details, Privacy and Data Protection Act, 2014 (Victorian).

Health information is defined as information relating to an individual's physical, psychological or mental health, Health Records Act, 2001 (Victoria). This health related information is deliberately omitted from the Privacy and Data Protection Act with a higher level of need required for a service to receive it.

It is likely that *Life Connect Disability Services* will ask to collect personal and health related information from you for the purposes of delivering a service to you.

## **How We Use Your Information**

We may ask you for personal information so we can work with you to develop your own plan for the skills that you want to develop. We may ask you about your health, symptoms and/or experiences of your life challenges through disability. We may ask you to fill in forms that give us details on this and other features of your life. We may also send personal information onto other agencies where you ask us to if it is going to help you work towards your plan. For example, if you were to tell us about your mental health challenges and wanted us to refer you to a specialist mental health agency we would ask you for details so we could fill in a referral form and send it to that agency.

## **What Information Must You Provide**

You are not obliged by any legislation or other guidelines that *Life Connect Disability Services* work with to provide any information to us. We will however ask for a minimum of information that helps us determine if we can provide you with a service and to help determine how that service looks. We will use the provisions of the Disability Act, 2006 (Vic) and the National Disability Insurance Agency Act, 2013 (Cwlth) to help us determine a minimum of information we will need from you. For example, we will ask you if you have a funding package from the National Disability Insurance Agency and ask for evidence of that package. If you choose not to provide this information we would not be able to offer you a service.

## **How We Handle Client Information With the Client's Consent**

Any staff or other person acting on behalf of *Life Connect Disability Services* must not ask for or receive any personal information from a client unless:

- ❖ It is legitimately required to facilitate providing a service to the client.

- ❖ The client signs an information release form authorising receipt of the information.
- ❖ The client is given a copy of the *Informed Consent Disclosure Statement* explaining the reasons for receiving information, handling and conditions for release of information.

## How we Distribute Information to other Services.

Any staff or other person acting on behalf of *Life Connect Disability Services* must not disseminate any personal or health information from a client unless:

- ❖ It is legitimately required to facilitate providing a service to the client.
- ❖ The client signs an information release form authorising receipt of the information.
- ❖ *Life Connect Disability Services* has received a written request from that agency or service on an official letterhead including; name, contact details and address of the client for whom the agency is seeking information, name and signature of the officer, date of the request, information required, specific purpose for which the information is required and legal power enabling receipt of the information.

## When Might We Release Your Information Without Consent

*Life Connect Disability Services* are obliged in some circumstances by law to release your information regardless of your wishes. This circumstances include:

- ❖ Where we believe there is reasonable ground for which the release of information is necessary to prevent or lessen a serious and imminent threat to your life or the life of another person. For example, where we believe on reasonable grounds you may be about to harm yourself in the near future we may notify the police or other agencies.
- ❖ In some instances such as when the police, ombudsman or other agency produce proof of a legislative authorisation to receive your information we are obliged to release it.

## How You can Receive Your Own Information

We are authorised by law to provided what is known as 'informal access' to your own records you have provided us. For example where you have given us copies of medical reports we can give them to you without any further authorisation. Where information has come to us by other means such as from another agency, even though it may be about you we may need to work with you to lodge a Freedom of Information Request as we cannot release another agencies documents.

## How we Secure Your Information

Client files are held in secure IT systems and a lockable cabinet or case which is accessible only to authorised personnel. Client files may contain information

that is relevant to the service being provided, in addition to personal information such as name, address, and contact phone numbers.

Information gathered as part of the assessment will only be accessible to authorised personnel nominated by the client on an information release form. Any electronic information we receive will be secured and password protected using a secure case management server based in Australia.

# Life-Connect Disability Services

1

## Professional Conduct and Abuse Policy

### Purpose and Principles of this policy

The aim of this policy is to describe the types of services and supports available to service users to which this policy applies. The policy also aims to articulate the ethical, legislative, legal and compliance practice standards *Life Connect Disability Services* works to.

*Life Connect Disability Services* has adopted the Zero Tolerance Framework Developed by the National Disability Services Association for dealing with misconduct and abuse. The framework and this policy endorse the right of each person to be free from abuse, neglect, violence and preventable injury.

The articles of the Disability Act, 2006 (Victorian), the Charter of Human Rights and Responsibilities Act, 2006 (Victorian), Mental Health Act, 2014 (Victorian), Guardianship and Administration Act, 1986 (Victoria) and the Crime Act, 1958 (Victoria) relate to this policy.

The policy describes options for complaint, redress and protection available to clients, family and other interested stakeholders receiving service from *Life Connect Disability Services* who have experienced professional misconduct amounting to abuse and/or abuse or are at risk of abuse from any other person.

Abuse is defined for the purposes of this policy as any action or inaction by any person that would if proven amount to an offence punishable to criminal law if proven in Victoria. This may amount to actual or threatened violence, neglect or abuse as defined below.

- ❖ Violence is behaviour towards a person that is physically, sexually, emotionally, psychologically or economically abusive. It also includes behaviours that are threatening or coercive, or in any other way control or dominate the person and cause that person to feel fear for themselves or another person.
- ❖ Neglect includes intentionally or negligently failing to take care of a person's physical, psychological or financial wellbeing in breach of a duty of care.
- ❖ Abuse is the violation of an individual's human rights resulting from the act or actions of any other person or persons

Professional Misconduct is defined for the purposes of this policy as as any action or inaction by an employee of a disability service provider during the

© 2018: This work is copyright. Apart from any use permitted under the Copyright Act 1968, no part may be reproduced by any process, nor may any other exclusive right be exercised, without the permission of Tony Herbert, PO Box 44, Ballarat, Victoria, 3353, 2018.

# Life-Connect Disability Services

2

course of service delivery that would amount to an offence punishable by criminal law if proven.

This abuse or misconduct can relate to any member of *Life Connect Disability Services*, partner agencies or other person who is reasonably suspected of having committed an act of professional misconduct or abuse towards a person receiving service.

## Scope of Policy

This policy relates to any work practice carried out on behalf of *Life Connect Disability Services* by any person acting on behalf of the service be it as a direct employee, agent, contractor or person purporting to represent the service. The practices and intent of this policy also relate to any client or other stakeholder involved in the receipt of service from *Life Connect Disability Services*.

A disability service provided by Life Connect Disability Services means a service specifically for the support of persons with a disability which is provided by Life Connect Disability Services as a registered disability service provider in accordance with the Disability Act, 2006 (Victorian), Section 3 (1).

A client or other stakeholder is defined as a the person receiving service, their family, carer and other persons who are significant in the life of the person with a disability who is receiving service in accordance with the Disability Act, 2006 (Victorian), Section 5(3) (h).

## Objectives of Policy

The objectives of this policy are to ensure that the management of misconduct and abuse by *Life Connect Disability Services* satisfies the following criteria.

- ❖ There is an awareness of what defines abuse and/or professional misconduct by promoting and applying human rights, education and training to understand abuse, neglect, exploitation and violence and risks factors and signals of Abuse.
- ❖ That there are practices and safeguards in place which can help prevent abuse including policy and practice that protect peoples rights by empowering people with a disability through a supportive organisational culture.
- ❖ That there are systems and processes in place for addressing risk for specific groups and service settings with targeted approaches for groups

at increased risk of abuse along with understanding service settings that increase risk and understanding behaviours of concern.

- ❖ That there are systems and processes in place for early intervention and response to abuse that support the person and meet organisational requirement.
- ❖ That *Life Connect Disability Services* maintains and fosters a culture of analysis, learning and improvement that deals with instances of abuse to feed into continuous improvement in eradicating abuse.

## Abuse Awareness, Human Rights and Risk Factors for Abuse.

*Life Connect Disability Services* is committed to upholding human rights for clients and all others involved in the delivery of service. We accept that people with a disability, particularly those with intellectual disability, dementia or other cognitive impairment, are more likely to experience violence, abuse, neglect and exploitation than the general population. For this reason any clients satisfying this criteria will be considered vulnerable when conducting risk assessments on any proposed service delivery practice or process.

## Practices and Safeguards in Place

*Life Connect Disability Services* takes the following approaches to eliminating where possible the potential or actual even or abuse during the delivery of services.

We provide information and options for feedback to to our clients in person, on our website and in our advertising literature describing what constitutes abuse and services available to any person experiencing abuse. We have a staff education policy on identifying and responding to abuse. We use safe employment screening processes such as police checks. We submit willingly and work closely with oversight agencies such as the Disability Services Commissioner and Victoria Police where necessary. We protect and support the rights of people identified as whistle blowers who have reported abuse.

## Addressing Risk for Specific Groups and Service Settings

In addition to having a risk mediation approach to disability generally we also identify specific practices that pose a risk for potential abuse. For example, our practices where possible exclude remote and unsupervised service provision

© 2018: This work is copyright. Apart from any use permitted under the Copyright Act 1968, no part may be reproduced by any process, nor may any other exclusive right be exercised, without the permission of Tony Herbert, PO Box 44, Ballarat, Victoria, 3353, 2018.

putting potentially vulnerable client at risk; instead preferring to deliver service in public places where practical.

## Responding to abuse

Where we form a reasonable suspicion of abuse by another person upon a client we will implement early intervention responses. For example, if the suspected perpetrator is a staff member all contact with the client will be immediately suspended and the matter reported to Victoria Police. If a staff member forms a reasonable suspicion of abuse against a client by any other person the matter will also be reported to Victoria Police.

Included in our early intervention procedures will be evidence gathering and record keeping. We will make notes of what we see, hear or otherwise perceive and may give these notes to an investigating authority. We will similarly notify specialist support service such as advocacy, medical or counselling services if we become aware of suspected abuse.

We are not able to keep suspected abuse quite if the client asks us to where we have formed a reasonable suspicion of abuse taking place. It will be reported to investigating authorities, family members and support agencies where it is appropriate.

## Analysis, Learning and Improvement

We will adopt a continuous learning approach to dealing with abuse. Any client reporting abuse will be offered the opportunity to give feedback on their experience if appropriate for us to improve our processes. With the permission of the client we will use de-identified data of reported abuse to help us identify system issues we can address to stop abuse happening again.

# RISK MANAGEMENT POLICY

Policy number	1	Version	1
Drafted by	Tony Herbert	Approved by manager	13/5/2018
Responsible person	Tony Herbert	Scheduled review date	13/5/2019

## INTRODUCTION

This policy exists to demonstrate to clients, supporters, stakeholders and staff of Life Connect Disability Services how the service manages risk. How the organisation does that in delivering community based skills building services to participants funded by the National Disability Insurance Scheme (NDIS) is explained.

The policy defines how the service establishes and prioritises what constitutes a risk to service delivery and who that risk applies to. The policies, processes and checks the service puts in place for any person likely to be exposed to a risk are described in this policy. The policy also describes processes for improving how the service future plans for dealing with risk.

The policy is not a definitive list of each risk identified and managed by the service. It is a descriptive framework document that describes the underpinning ethos and focus of risk management in the operating context of a small community based service delivery organisation that delivers individualised one on one community based disability services. Any one can ask for information from the service on specific steps in place for specific risks where required.

The policy can be read, understood and complied with by authorised staff in conjunction with procedural guidelines in the Life Connect Disability Services guidelines. Those authorised staff should also familiarise themselves with risk controls identified and managed using an approved *Risk Management and Controls Model* designed in accordance with the ISO 3001: 2009 Risk Management Standard. These guidelines, the Life Connect Disability Services

Risk Control Model and a spreadsheet risk management tool can be found in service corporate data holdings.

## **PURPOSE**

The purpose of this document is to explain and define what a risk is. Also to explain how we categorise risks and the criteria we use to identify and respond to risks. The document explains our operating environment and our ethos, approach and focus of what areas of risk we prioritise to manage. It describes the strategies and steps we take to do that and how we review our performance to make sure that is happening. It gives examples of how the service meets its obligations to deal with risk ranging from the governance level through to actual procedures used in the field with clients.

## **POLICY**

Our ethos and prime purpose of our risk management strategy is to identify, manage and mitigate risk to clients, supporters, funding agencies and the public in that order. We put this before our business sustainability processes which also manage risk to our viability and success in the market place.

Our strategies for addressing this direction lie in how we comply with legislation, funding body guidelines, safety oversight agencies, our own policies, guidelines and risk identification processes.

## **Our Operating Environment**

We define ourselves as a small, community based organisation using our risk management and control model across six key areas or elements of activity, informed by the Australian Business Excellence Framework (ABEF).

- Leadership
- Strategy and planning
- Financial Management
- Innovation, Quality and Improvement
- People
- Client and market focus

In this environment, the service has developed a range of policies, guidelines, tools and everyday processes that show how we identify and manage risk.

This policy reflects steps we have in place in terms of broad strategies in each element area that focus on how we focus our risk management towards protecting our customers, funding agencies and the public. This is our risk management system using our risk management framework.

Each key element area also contains strategies for how we work in the individualised one on one community disability service delivery setting to improve how we manage risk. This is our risk improvement system.

Each key element area is broken down into a series of identifiable actions or omissions that can be rated in terms of risk. We call this our risk identification matrix. We use this matrix to identify how likely a risk is to a person or organisation and how well we are managing that risk.

## **WHY WE MANAGE RISK**

We manage risk to meet the following objectives.

- To reduce the likelihood and/or consequences of potential adverse events.
- To maximise the results of positive events.
- To provide people with information to assess risk in receiving service from us.
- To add value to how well we deliver our service
- To ensure that we deliver cost effective service that complies with the expectations of clients, funding bodies and the public interest.

## **DEFINITIONS**

“**Risk**” is the probability that an occasion will arise that presents a danger to our organisation, our staff, our volunteers, our clients, or the general public. It includes, but is not limited to,

- Physical hazards
- Financial hazards
- Reputational hazards
- Legal hazards

**“Risk Framework”** is the process used to deal with risks. This means that the standards we comply with, the policies we develop and the service we deliver are all done with a view to identifying how these steps respond to possible risks in service delivery. We do this by:

1. Identifying risk
2. Assessing risk
3. Eliminating, treating, reducing and mitigating risk
4. Evaluating, reviewing and improving dealing with risk.

### **“RISK MATRIX”**

Is the calculations we do to identify how likely a risk is to occur and how serious a threat that risk is to person receiving service. When we identify a risk to how we deliver service using our risk framework we give that risk a rating of how likely it is to happen and what the outcome will be. We prioritise risks to our clients including the wider public over our own business concerns when delivering service.

### **HOW WE APPLY OUR RISK MANAGEMENT MODEL TO OUR KEY ELEMENT AREAS.**

#### **LEADERSHIP**

We manage and prioritise how are leadership relates to our our clients through how transparent our governance procedures with evidence of how we do this. For example, our compliance with standards of the Victorian Disability Code of Conduct, Victorian Department Funded Agency Channel and Victorian State Disability Plan can be viewed in our Code of Conduct, Customer Charter and Service Delivery charter which can all be viewed on our web site. Also for example, we use a opportunity for improvement form which clients can fill in at any time. We will use this form to help build our quality improvement plan which reviews how we can improve our service including risks identified to our service delivery.

#### **STRATEGY AND PLANNING**

Our strategy and planning reflects how well the service has been set up and built to manage risk to our service users. For example, any one can review our ASIC business registration on-line or our registration to the Victorian Human

Standards listed on line with the Victorian Department of Human Services. Any one requesting service can request to see evidence of our insurance policy protections for managing risk in how we deliver service. We keep a register of all systemic risks we identify to receiving service along with a qualifications register. Any one can ask to see these records to be sure of our suitability to manage risk and delivery disability services.

## **FINANCIAL MANAGEMENT**

Managing financial transparency and risk of improper financial dealings impacting on the client and wider public is addressed in our procedures. For example, any person can review our terms and conditions on our web site which explain how we bill for our services. Also for example, each person receiving service is given a service agreement itemising costs before committing to service and is then invoiced for each individual service delivered.

## **INNOVATION, QUALITY AND IMPROVEMENT**

We manage risk in the flexible and changing environment of community based service delivery by been flexible in supporting the needs of people with disabilities. For example, the service uses a complaints and feedback form which any person can request and submit at any time.

The procedures we use reflect the importance of monitoring how we handle risk and improving our risk management processes. For example, we use an on-line server protected software compliance program to conduct regular reviews of how well we are giving our participants the information they need and how we comply with regulations and legislation.

## **PEOPLE**

How the service attracts and retains skilled and competent employees to deliver safe services to clients in accordance with the values of the organisation is an important part of how risk is managed. For example, any person can go to the service web site and view the Staff Recruitment Policy for the service. Also for example, the service uses approved national police checking, qualifications and reference checking services before employing staff. No one is able to deliver service without a current working with children check, police check and clearance from the Disability Worker Exclusion scheme. Also for example, any one can go to the web site and view the service Occupational Health and Safety Policy including an explanation of risk assessments and forms used by staff to keep clients safe when receiving service.

## **CLIENT AND MARKET**

How effectively the service meets the needs of the client and market place is an important part of how well it manages the risk poor service poses to a clients well being. For example, the service identifies and manages this risk by using a person centred approach to developing an individual plan for the client. This plan is regularly reviewed including how well the service is meeting the clients needs to be kept informed of options for service available to them.

Our Occupational Health and Safety policy; also on our web site shows how we protect our clients and others during the delivery of service.

## **SCOPE**

This policy relates to any work practice carried out on behalf of Life Connect Disability Services by any person acting on behalf of the service be it as a direct employee, agent, contractor or person purporting to represent the service. The practices and intent of this policy also relate to any client or other stakeholder involved in the receipt of service from Life Connect Disability Services.

## **RESPONSIBILITIES**

Any person carrying out work on behalf of Life Connect Disability Services is responsible for complying with the procedures and aspirations of this policy. Those persons are also responsible for working with the guidelines and risk management model tools to manage risk available to them as part of their employment or relationship with the service.

Any person receiving service from Life Connect Disability Services is responsible for informing the service of any likely risk that a reasonable person

might expect would effect the receiving of service in an individualised community disability setting.

#### **LEGISLATION AND GUIDELINES THIS POLICY COMPLIES WITH**

This policy aims to meet prescriptive requirements of each listed resource. For a further explanation of specific aspects of those requirements people can go to those resources or request an explanation from Life Connect Disability Services:

- Victorian Disability Act, 2006
- Victorian Department of Human Services Funding and Service Agreement
- Victorian State Disability Plan, 2017-2010
- Standards for Disability Services in Victoria, 2007
- Occupational Health and Safety Act, 2004 (Vic)
- Occupational Health and Safety Regulations, 2017 (Vic)
- National Disability Insurance Agency Act, 2013 (Cwth)
- Victorian Disability Workers Code of Conduct, 2018
- National Disability Insurance Scheme Terms of Business
- National Disability Insurance Scheme Provider Registration Guidelines

#### **PROCEDURES**

Life Connect Disability Services will take all reasonable steps available to it to put the intent of this policy into day to day practices. This means that any staff member receiving an inquiry for service or delivering service should aim to:

- Not deliver any service or inquiry for service without receiving the appropriate workplace safety checks such as national police check and other clearances listed in this policy and the guidelines.
- Advise any person requesting service or receiving services of the resources on the service web site including service policies.
- Refer any person requesting information on insurances and accreditations of the service with access to the relevant resources such as the ASIC portal.

- Advise any person requesting specific information on risk management practices of the service's response using the risk management model tool.
- Provide any person requesting facilities to provide feedback or complaint on how to improve services with the forms or other resources to do that.
- Refer any person seeking clarification on pricing to the resources available to them with the NDIS on pricing protocols and give an individualised breakdown of any funding provided or proposed to be provided.

## STAFF RECRUITMENT POLICY

Policy number	1	Version	1
Drafted by	Tony Herbert	Approved by	13/5/2018 manager
Responsible person	Tony Herbert	Scheduled review date	13/5/2019

### INTRODUCTION

The success of Life Connect Disability Service in any future role as an employer of staff relies on its ability to conduct probity and security checks that are fair, efficient, and effective and then to develop and monitor those staff members.

Those same probity checks and ongoing awareness of safe working procedures relate to the sole trader and manager of Life Connect Disability Services who is required to have the relevant protections in place to deliver services to clients in a safe manner.

These staff screening procedures adopt and put into practice the zero tolerance for abuse principles of Victoria's Disability Abuse Strategy as contained in the amended Disability Act, 2006 (Victorian). These screening checks take a pro-active approach to eliminating the pre cursors of financial, emotional, physical, sexual and abuse by neglect the hiring of unsuitable people presents.

The aim of this policy and associated processes is to ensure that the best people are employed to deliver services in a safe, legal and professional fashion to NDIS participants and their supporters. This checking process also aims to ensure that no person or organisation working with Life Connect Disability Services who may pose an actual or potential risk to customers or their supporters will be engaged to work on behalf of Life Connect Disability Services.

© 2018: This work is copyright. Apart from any use permitted under the Copyright Act 1968, no part may be reproduced by any process, nor may any other exclusive right be exercised, without the permission of Tony Herbert, PO Box 44, Ballarat, Victoria, 3353, 2018.

The policy also aims to create a platform to design, establish and consolidate staff development, monitoring and support practices for any person performing duties for Life Connect Disability Services. We do this with the intention of having workable, transparent and equitable systems that develop and oversight the work of people who represent Life Connect Disability Services.

This policy does not describe how Life Connect Disability Services manages the performance of staff after recruitment. Those details are described in the Human Resources Policy which is yet to be created.

## **PURPOSE**

The Staff Recruitment Policy has been established to ensure that Life Connect Disability Services shows transparency in staff recruitment as the basis for ongoing support and oversight of staff procedures for the safety of clients, supporters, staff and other stakeholders.

Any person, employee, stakeholder, customer or other interested party reading and working to the detail of this policy should understand the following:

- The state and federal legislation and its requirements that Life Connect Disability Services works to meet and report on where required.
- The peak government and other bodies mandated by law or other requirement that Life Connect Disability Services answers to and frameworks held by those organisations that the service works to meet.
- The principles of service delivery and staff recruitment management that Life Connect Disability Services works to meet.
- The specific legislated and best practice safe working checks that Life Connect Disability Services uses to hire, develop and manage staff to make sure service is delivered in a safe environment to anyone receiving or been involved with the delivery of service by or on behalf of Life Connect Disability Services.

## **POLICY**

Life Connect Disability Services is committed to providing high quality programs and services clients in our community. The service is delivered primarily in the public domain on a one to one basis between representatives

© 2018: This work is copyright. Apart from any use permitted under the Copyright Act 1968, no part may be reproduced by any process, nor may any other exclusive right be exercised, without the permission of Tony Herbert, PO Box 44, Ballarat, Victoria, 3353, 2018.

of Life Connect Disability Services and eligible participants of the National Disability Insurance Scheme. This service is delivered with an emphasis on enabling the client to build personal skills and independence in the community.

Our service ethos as it relates to the hiring, supervising and management of human resources is putting the interests of the client paramount to all other issues or contingencies. To support the achievement of this objective we recognise the importance of staff been the most suitable and safe person to deliver services. This client centred approach recognises the vulnerable nature of people with disabilities and the need for stringent checks and ongoing supervision of staff.

### **SCOPE**

This policy applies to all *Life Connect Disability Services* staff including permanent and temporary staff, agency staff, casuals, contractor, consultants , students are any person acting in any capacity whereby they are taken to be representing *Life Connect Disability Services* and its interests.

## RESPONSIBILITIES

The requirements detailed in this policy relate to all Life Connect Disability Services personal including management and others described in the scope statement above. All persons are responsible for having read and accepted the contents of this and other documents contained in the Life Connect Disability Services Staff Induction Pack before delivering services in any capacity.

## RELEVANT LEGISLATION

Any person working to this policy must be aware of the following legislation as it relates to the safety of clients, supporters, stakeholders, staff and others involved with service delivery by Life Connect Disability Services.

- Children, Youth and Families Act 2005 (Vic.)
- Working With Children Act, 2005 (Vic)
- Sex Offenders Registration Act 2004 (Vic.)
- Disability Act, 2006 (Vic)
- Privacy and Data Protection Act 2014: (Vic)
- Australian Human Rights Commission Act 1986 (Cth)
- Australian Human Rights Commission Regulations 1989 (Cth)
- Working with Children Regulations 2016 (Vic)
- National Disability Insurance Scheme Act, 2013 (Cth)

## RELEVANT GUIDING DOCUMENTS

In addition to the requirement of legislation relating to what information on prospective or current staff Life Connect Disability Services must or can ask for and how that relates to the rights of the person been asked to provide that information the following resources are also adhered to in the delivery of this policy.

- The Disability Worker Exclusion Scheme Instruction, 2017, *The Victorian Department of Human Services*.

- NDIS Provider Registration Guide to Suitability, 2017
- NDIS Quality and Safeguard Framework (Pending)
- Code of Conduct for Disability Workers, Victorian Department of Human Services, 2018.
- Service Information Kit for Funded Agencies, *Victorian Department of Health and Human Services, 2018.*
- Victorian Disability Abuse Prevention Strategy, 2018.
- Victorian State Disability Plan, 2017-2018.

### **Operating Systems Adopted by this Policy**

This policy adheres to the principles and instructions laid down in the *Funded Organisation Monitoring Framework*, operated and overseen by the Victorian Department of Human Services.

The policy particularly complies with section 4.5 of the framework as it applies to the safety screening requirements for funded organisations. All staff should make themselves familiar with the provisions of that clause contained in the Service Information Kit for Funded Agencies, *Victorian Department of Health and Human Services, 2018.*

### **PROCEDURES**

*Life Connect Disability Services* will take all reasonable steps to ensure that staff may be safely entrusted with the duties of their position. This will include a requirement that any person delivering client services must have the following:

- A valid Working With Children Check - Employee
- A current national police check certificate.
- Proof of checks and eligibility to be employed as a disability worker under the Victorian Disability Worker Exclusion Scheme.
- Proof of checks and eligibility to perform duties as a carer not excluded under the provisions of the Disqualified Carer Check where relevant.
- Reference and proof of qualifications checks with a registered agency to establish employment history.

- Suitable qualifications and experiences to deliver services to clients in accordance with business rules of the National Disability Insurance Agency and the Victorian Department of Human Services.

We do this by using the services of the CrimCheck and Virtual Ref Check services who are authorised to conduct the relevant checks for the National Criminal Certificate and reference and qualifications checking as described in this policy.

No person can commence employment without the following safety checks.

### **Pre-employment safety screening checks**

Pre-employment safety screening checks involves the following tasks:

- Disability Worker Exclusion List check (applicable to all disability services) (if required)
- Disqualified Carer check (also known as Carers' Register – applicable to out-of-home-care of children) (if required)
- Employment history including disciplinary action disclosure
- Police record check (including Proof of identity check)
- Qualification check (if relevant)
- Confirmation of a Working With Children Check (WWCC) receipt followed by sighting the WWCC card Referee Checks.

### **Related documents**

Staff working to the ethos and procedures of this policy can also see the Life Connect Disability Services procedural guidelines for safety checking procedures when recruiting and working with staff.

# TRAINING AND CONTINUING PROFESSIONAL DEVELOPMENT POLICY

Policy number	1	Version	1
Drafted by	Tony Herbert	Approved on	7/8/2018
Responsible person	Tony Herbert	Scheduled review date	7/8/2019

## INTRODUCTION

This policy exists to explain the purpose, direction and framework used by Life Connect Disability Services to train internally, maintain and improve the quality of the client experience in receiving community based 1:1 services from Life Connect Disability Services.

The policy also exists to describe the targeted service type and level the service is working towards in its commitment to a high quality standard of training and professional development.

## PURPOSE

Any client, potential client, supporter, professional body or other interested party should be able to understand the structure, focus and training framework of Life Connect Disability Service through reading this policy.

Life Connect Disability Services is a sole trader organisation managed and delivered to customers on a 1:1 basis by Tony Herbert. This service delivery takes place working in the community. The focus of service delivery is using a client focussed, strengths based model of skills building working in collaboration with allied health professionals.

The service has a secondary focus on delivering services in the community over a variety of NDIS registration groups independent of allied health professional dependent on the needs of the client.

The collaborative first line approach to training and development compliments working from shared collaboratively developed training plans between allied partners, clients and Life Connect Disability Services. The objective of these enterprises are to extend the power and gains of therapy delivered in office settings into the community setting.

The service takes a therapy service approach to clients in that it builds on therapeutic direction while not infringing on on client confidentiality and working arrangements between allied health professionals including

psychologists, occupational therapists and applied behaviour analysis therapists. This therapeutic collaboration is enhanced by progress recording of shared services using a recognised case management and noting approach. This shared approach and case noting takes place in the space of support items designated as therapy group items by the NDIS that facilitate the shared work between therapists and Life Connect Disability Services. The service does not claim any payment as a member of any professional therapy association nor does it claim to be delivering therapy services as a psychologist, occupational therapist or applied behaviour analysis therapist.

Tony Herbert (sole trader) has undergraduate and post graduate qualifications in psychology as well as qualifications in training and disabilities. The sole trader is a member of the Australian Psychological Society and maintains an obligation to professional development with that organisation held by all members.

His work experiences include working in the community mental health, disability and public training sectors. This academic and work based skills set is used as the basis for working collaboratively in receiving training; class and peer supervision based from partnered allied health professionals.

### **SCOPE OF POLICY**

This policy relates to any training and/or professional development experiences of the sole trader. This means that any person may ask to review at any time evidence of initial qualifications and ongoing professional competencies.

### **GUIDELINES AND RESOURCES RELATING TO THIS POLICY.**

Life Connect Disability Services in this policy complies with the NDIS Terms of Business and the Guidelines of the Department of Human Services Funded Organisations as they relate to the fair and unbiased delivery of service to participants.

### **POLICY**

Life Connect Disability Services commits to specialise in working with clients in the following groups to a level of qualification and continuing professional development evidenced as well grounded and suitably supervised by competent learning and peer supervision:

- People with intellectual disability
- People with a learning disability
- People with attention deficit disorder

- People on the Autistic Spectrum
- People with an acquired brain injury
- People with a psychiatric disability

This means that the first line approach to working with anyone identifying with any of these groups will be offered to clients as a collaborative approach working within the NDIS therapist registration group range of services. Therefore the service commits to maintaining a standard of qualification and continuing professional development that exceeds minimum standards held in other registration groups in the NDIS.

These actions include subscriptions and annual compliance to mandated on-line professional competency training with professional bodies including the Australian Psychological Society and the National Disability Services. It also means the service is mandated to meet minimum annual qualification standards set down by both services for training and peer supervision by allied health professionals in the disciplines of psychology, occupational therapy and applied behaviour analysis. Any one can ask to review the professional training compliance calendar maintained by Life Connect Disability Services at any time.