

Quality and safeguards in the NDIS?

**An NDIS Provider Guide
Promoting the human rights of people with
disability and meeting NDIS Commission
requirements**

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Background to the guide

Compliance helps to promote the human rights of people with disability and is especially important in preventing harm to people supported. Indeed, many providers will choose to go beyond mere compliance with minimum practice standards and some of the other safeguarding mechanisms the NDIS Commission uses to facilitate safe, respectful and inclusive support provision.

Three approaches Providers can take:

- Compliance with required standards
- ‘Best practice’ as traditionally conceived, i.e., going beyond compliance. This might be in particular areas (‘We are going to excel in area X because it is consistent with our strategy’) or across the board
- ‘Purpose driven’ i.e., an emphasis on simplifying policy and procedures to improve uptake in practice

Intended audience of this guide

The target of this guide is existing NDIS registered providers that are seeking guidance with meeting the National Disability Insurance Scheme (NDIS) Commission requirements, (including achieving Certification against the Practice Standards-Core Module) and those providers interested in promoting and protecting the safety and rights of NDIS Participants.

About the guide

This guide will assist leadership teams to determine their processes and practices for operating in the (NDIS) Quality and Safeguards Commission environment.

The guide will be useful for a range of size and type of service providers as the content is not prescriptive. Organisations may take what they need and customise their systems for their own circumstances. In smaller organisations, a process might simply require creating one item on a checklist; in larger organisations, a detailed process might be needed.

This document is a companion resource to two new National Disability Services guides –

- NDS' *Business Analysis Tool* : This provides information to assist providers to be flexible and thrive in the context of the NDIS framework
- NDS' *People with Disability and Supported Decision-making* : Information about supporting the rights of people with disabilities to make their own decisions

NDS hopes that these three new documents provide practical and thought-provoking information for NDIS registered providers. When organisations are complying with requirements and reflecting best practice, then they can have greater confidence that their systems are enhancing positive outcomes for people with disabilities and organisational performance.

The scope of the guide is the NDIS Practice Standards Core Module and Supplementary Module 2A, as these modules affect most providers. Of course, similar action items arise across the modules.

What parts of my quality and safeguards processes might need to be reviewed?

This guide focusses on the following NDIS Quality and Safeguards Commission requirements¹:

- Conditions of registration
- NDIS Practice Standards CORE module
- Incident management and reportable incidents
- Complaints management and resolution
- NDIS Code of Conduct and guidelines for providers and workers
- Restrictive practices and behaviour support
- Worker screening

How to use the guide

This guide can be used as a checklist for the requirements of the NDIS Quality and Safeguards Commission above. For each requirement, it addresses:

- General implications for providers
- Roles and responsibilities – Identifying people or roles that have specific responsibilities
- Information for participants – Identifies required information that must be available for participants
- Essential documents – Identifying key documents providers will be required to develop and maintain for the organisation and the Commission
- Staff training – Identifying staff training requirements.

Suggested steps in reviewing your systems and processes

Determine how and to what extent you will involve participants in the design of your policies and processes: at a minimum, participants must have an opportunity to

¹ <https://www.ndiscommission.gov.au/providers>

contribute to organisational policy and processes about providing supports and for protecting Participant rights.

1. Read this guide and determine what action is required
2. Hold a meeting of senior leaders to allocate responsibility. This will need to involve – as a minimum – the CEO or leader with overall responsibility for disability services, and the leaders responsible for operations, quality management, human resource management, and learning and development
3. Scope the resources, which will be required to complete the work: this might include people, software to host the quality management system and for incident reporting and the budget allocations for these
4. Seek comments on the drafts, and incorporate feedback as appropriate
5. Where necessary, conduct a pilot of the new procedures and amend your procedures as required
6. Seek board endorsement for the policies that are reserved to the board
7. Implement new processes with staff and continue to monitor effectiveness

Provider Registration

Requirements to register

The organisation must register to be a provider with the NDIS Commission if:

- ✓ it supports NDIS participants who have their plan managed by the NDIA
- ✓ it delivers specialist disability accommodation, uses restrictive practices, or develops behaviour support plans
- ✓ it delivers supports to older people with disability who are under the Commonwealth Continuity of Support Programme relating to Specialist Disability Services for Older People

Implications for providers

- ✓ Review the NDIS Commission provider re-registration (NDIS providers) requirements²
- ✓ Ensure your organisation and key personnel meet the suitability requirements³
- ✓ Review the support categories your organisation is currently registered to provide as this will determine the NDIS Practice Standards your organisation will be required to meet⁴
- ✓ Ensure you establish an NDIS Commission Portal account, to engage with the Commissions functions⁵
- ✓ Commence your NDIS re-registration once the NDIS Commission has advised your organisation of a registration expiry date. This includes identifying the supports you wish to provide.
- ✓ Complete and submit your application online via the Portal, including your Self-Assessment against the relevant NDIS Practice Standards

² <https://www.ndiscommission.gov.au/document/996> Registration Renewal Process Guide

³ <https://www.ndiscommission.gov.au/document/1001> Suitability Assessment Process Guide

⁴ <https://www.ndiscommission.gov.au/document/1006> Registration Requirements by supports and Services

⁵ <https://www.ndiscommission.gov.au/document/1476> and <https://www.ndiscommission.gov.au/providers/provider-registration/ndis-commission-portal> NDIS Commission Portal

- ✓ Select an auditor, perhaps seeking a couple of quotes, as their costs can vary widely. The NDIS Commission website lists the current approved auditors to be used⁶
- ✓ Suggested questions to ask when selecting an auditing body;
 - What does the quote cover? What is included and excluded (for example additional surveillance/mid-term audits and travel to all sites)?
 - What is their experience of working with disability service providers?
 - What are their strategies and approaches to communicating with people with disability who have complex communication requirements?
 - Are they available at the time you need them?
- ✓ Ensure you have a process for identifying when a 'material change' (a change of circumstances that materially affects a provider's ability, or the ability of any of the Provider's key personnel, to provide the supports or services the provider is registered to provide) must be reported to the NDIS Commission as per s 13 of the *Provider Registration & Practice Standards Rules*⁷

Roles and responsibilities

- ✓ Identify the person who, or positions which will keep up to date with NDIS Commission policy and guidelines developments, register with the NDIS Commission's Portal and implement the associated implications for your organisation
- ✓ Amend job roles and position descriptions as required

Information for participants

- ✓ Inform participants how your organisation meets the NDIS Commission's requirements.
 - Your complaints management system, which includes NDIS Commission contact details How they can contribute to the development of organisational policy and processes and service planning
 - Informing participants that the organisation is a registered NDIS provider

⁶ <https://www.ndiscommission.gov.au/resources/ndis-provider-register/auditors> List of Approved Auditing Bodies

⁷ <https://www.legislation.gov.au/Details/F2018L00631> Provider Registration and Background Rules

- Making the NDIS Code of Conduct available and stating that all staff are required to meet the code
- Assuring that worker screening is conducted for all staff in accordance with the requirements of the *Worker Screening Rules*
- Confirming that mandatory worker orientation is in place for all staff
- Describing your incident management system
- Stating a commitment to reducing and eliminating the use of restrictive practices

Essential documents

- ✓ A template Service Agreement or service agreements covering:
 - The supports you agree to provide
 - In what circumstances a support will be suspended or ceased
 - Prices as per current NDIS Price Guide
 - For specialist disability accommodation (SDA) providers, details about rent and 'other expenses' arrangements

Staff Training

- ✓ Ensure all staff are aware of the supports you deliver and that they have the skills and experience required for delivering those supports
- ✓ Ensure you have a strategy for all staff to complete the mandatory NDIS worker orientation program '*Quality, Safety and You*', available on the NDIS Commission website. The module covers human rights, respect, risk, and the roles and responsibilities of NDIS workers ⁸

⁸ <https://www.ndiscommission.gov.au/workers/support-for-workers/training-course>
Quality Safety and You

NDIS Practice Standards

Implications for NDIS providers

- ✓ Determine which of the modules of the NDIS Practice Standards (PS) apply to your organisation according to the supports you are registered to provide⁹. This is also determined by completion of the Commission's on-line self-assessment process
- ✓ Identify practices you may already have in place from your experience with your state Quality Framework requirements and any gaps that need to be addressed in relation to the requirements of the NDIS Practice Standards¹⁰
- ✓ The Practice Standards (Core Module) require that information is communicated to participants in a 'mode' or language that they can access e.g., easy English
- ✓ Facilitate the access of participants to an advocate, especially in situations that involve:;
 - making informed choices
 - allegations of violence, abuse, neglect, exploitation or discrimination
 - giving feedback or making a complaint to a provider
 - a participant is affected by a reportable incident
 - Making a complaint to the Commission

Roles and responsibilities

- ✓ Although quality is everyone's business, it needs leadership and coordination. Ensure it is clear who has responsibility for providing leadership on quality and safeguarding and who will coordinate the work to be done
- ✓ Amend job roles and position descriptions as required to reflect these responsibilities

Participant information

- ✓ Ensure you can demonstrate you provide each participant with information that reflects the requirements of the Practice Standards regarding the following:

⁹ <https://www.ndiscommission.gov.au/document/1006> Registration requirements by supports and services

¹⁰ <https://www.ndiscommission.gov.au/document/986> NDIS Practice Standards and Quality Indicators

- the supports you will provide and the circumstances in which supports can be withdrawn;
- the way you will treat participants' personal information, including what will be collected and why; how this information will be stored and used; how each participant can access or correct information held about them; as well as your commitment to treating that information confidentially;
- that consent is sought to collect, use and retain participant's information and to disclose their information;
- access to an advocate in specific circumstances as described earlier;
- your processes for participants to give feedback or make a complaint;
- information about incident management, including how incidents involving the participant will be managed;
- support to understand the service agreement and terms and conditions of service delivery.

Essential documents

- ✓ Ensure you have a mechanism to gain and document consent (or lack of) from each participant to allow quality auditors to conduct interviews and/or examine client files, records or plans as part of the audit process¹¹
- ✓ Ensure you have a mechanism to gain and document consent (or lack of) from each participant with a Behaviour Support Plan, to share information that will assist providers to collaborate in delivering positive behaviour supports;
- ✓ Where you deliver supported independent living (SIL) supports to participants in (SDA) dwellings, ensure you have documented arrangements in place with each participant and the specialist disability accommodation provider;
- ✓ Ensure you have a system to identify, plan, facilitate, record and evaluate the effectiveness of staff training.

Staff training

- ✓ Demonstrate the requirements for mandatory staff training in the following areas is in place

¹¹ <https://www.legislation.gov.au/Details/F2018N00114> Approved Quality Auditor Scheme Guidelines

- All workers are aware of, trained in, and comply with the Commission's required procedures for complaints handling and for preventing and responding to incidents, including reportable incidents;
- All workers responsible for administering medication understand the effects and side effects of the medication and the steps to take in the event of an incident involving medication;
- An orientation and induction process is in place for new employees that includes the mandatory NDIS worker orientation program '*Quality, Safety and You*', available on the NDIS Commission website¹²
- Staff involved in the management of waste and hazardous substances receive training to ensure safe and appropriate handling including in the use of personal protective equipment (PPE);
- Where a participant has specific needs which require monitoring and/or daily support, workers are appropriately trained and understand the participant's needs and preferences;
- If your organisation provides High Intensity Daily Personal Activities and is required to meet the NDIS Practice Standard Supplementary Module 1 (High Intensity Daily Personal Activity), ensure you support workers to meet the requirements set out in the accompanying High Intensity Skills Descriptor document¹³

¹² <https://www.ndiscommission.gov.au/workers/training-course> Worker Orientation Module

¹³ <https://www.ndiscommission.gov.au/document/1026> High Intensity Skills Descriptor

Incident Management and Reportable Incidents

Registered NDIS providers must implement and maintain a system to record and manage all incidents that occur in connection with providing supports or services to people with disability. Some of these incidents are reportable incidents, which must be notified to the Commission¹⁴.

Implications for NDIS providers

- ✓ Review your incident management policies, procedures forms and systems to ensure they comply with NDIS Commission requirements¹⁵
- ✓ Ensure you review and reflect the NDIS Commission's definition of a reportable incident in your practice¹⁶.
- ✓ Confirm your processes for the identification, assessment, management, and resolution of incidents specifies the following:
 - how incidents are identified, recorded and reported
 - the people to whom incidents must be reported
 - how people with disability affected by an incident will be supported and involved in resolving the incident
 - that a response plan is developed when incidents occur
 - when corrective action is required
 - when an investigation is required, and
 - how incident data can inform your quality management system and implement improvements to avoid future incidents
- ✓ Ensure you are familiar with the NDIS Commission reportable incident notification process including the portal-related roles of Authorised Reportable Incidents Notifier and Authorised Reportable Incidents Approver, who both have responsibilities for meeting providers' reporting obligations. The Approver may – but doesn't have to – be the same person who is required by the Rules to be

¹⁴ <https://www.ndiscommission.gov.au/document/596> Reportable Incidents Guide

¹⁵ <https://www.ndiscommission.gov.au/document/1086> Incident Management System Guide

¹⁶ www.ndiscommission.gov.au/document/596 Reportable Incidents Guide

identified as the person who reports incident to the Commission (now known as the 'Specified Personnel').¹⁷

- ✓ Ensure the required timeframes for reporting are followed;
 - for reportable incidents other than unauthorised use of a restrictive practice: 24 hours¹⁸
 - for unauthorised use of a restrictive practice: 5 days¹⁹
 - unless the incident also involved other reportable aspects: 24 hours²⁰
- ✓ Become familiar with the NDIS Commission's Portal functionality on Managing your Reportable Incidents²¹
- ✓ Ensure you maintain records and related evidence about incidents;
- ✓ Make effective use where possible of information and communication technologies and systems that collect data and track the progress of incident responses;;
- ✓ Review safety provisions for participants, e.g. prevention strategies, safe locations after an incident;
- ✓ After an incident occurs, provide support and assistance to people with a disability affected by an incident as the highest priority, including access to advocates;
- ✓ Review workforce management systems e.g. training, ratios, roster changes after an incident, and the effectiveness of your Employee Assistance Program (EAP)
- ✓ Develop mechanisms to cross-reference incidents that are also the subject of a complaint, and/ or work health and safety investigations;
- ✓ When required by the Commission, be prepared to engage an independent expert to investigate and report on incidents.

¹⁷ <https://www.ndiscommission.gov.au/providers/provider-registration/ndis-commission-portal> NDIS Commission Portal

¹⁸ <https://www.ndiscommission.gov.au/document/1466> Create an Immediate Notification

¹⁹ <https://www.ndiscommission.gov.au/document/1471> Complete the 5 day notification form

²⁰ <https://www.ndiscommission.gov.au/providers/reportable-incidents> Reportable Incidents (NDIS Providers) information and links to reporting forms

²¹ <https://www.ndiscommission.gov.au/document/1476> Managing My Reportable Incidents

Roles and responsibilities

- ✓ Ensure you identify which positions will be responsible for reporting, recording, conducting internal investigations and undertaking remedial action related to incidents. Providers have responsibilities to nominate people with the appropriate skills to become Reportable Incident Authorised Notifiers within the organisation. The NDIS Commission suggests the 'Authorised Reportable Incidents Notifier' is a supporting team member who can assist the 'Authorised Reportable Incidents Approver' to collate and report the required information²².
- ✓ Amend all staff job roles and position descriptions as required to reflect new practices;
- ✓ Designate staff responsible for incident management and reportable incident practices

Participant information

- ✓ Provide information to participants on how incidents will be managed
- ✓ Identify to participants (possibly in your service agreement) the circumstances in which you are obliged to share information with the NDIS Commission, such as those involving reportable incidents

Essential documents

- ✓ Document your system for the management of incidents;
- ✓ Ensure that this system records and tracks evidence of incidents and actions taken in response to these incidents;
- ✓ Establish a policy for worker disclosure (see below in staff training) e.g. Whistle Blower Protection Policy. If a policy on whistle-blower protection already exists, update it for the new quality and safeguarding system
- ✓ Review Service Agreements to ensure they include your reporting obligations to the NDIS Commission in relation to incidents and the impact on participant's privacy.

²² <https://www.ndiscommission.gov.au/document/1486> Detailed Guidance. Expectations of Workers providing services in incident management and reporting incidents

Staff training implications

- ✓ Train workers in the use of, and compliance with your incident management system;
- ✓ Advise staff that they can make a complaint on behalf of a person with disability to the NDIS provider or to the NDIS Commission;
- ✓ Ensure all workers comply with the incident management system and are aware of their roles and responsibilities in identifying, reporting, managing and resolving incidents and in preventing incidents from reoccurring²³

Complaints Management and Resolution

Implications for providers

- ✓ Review your complaint management policies and procedures to ensure they reflect good practice for effective complaints management and the NDIS Commission's requirements²⁴
- ✓ Ensure your organisation has determined who will liaise with the NDIS Commission about any complaints they may receive about the organisation²⁵
- ✓ Ensure your organisation has procedures for dealing with an incident that is also the subject of a complaint. This may require integration of your complaints and incident management systems;
- ✓ Ensure that your incident and complaints management systems have the capacity to collect and track key data relating to complaints, use of restricted practices, incidents and near misses.

Roles and responsibilities

- ✓ Identify who will receive complaints and what initial actions they need to take
- ✓ Identify who will conduct investigations
- ✓ Amend job roles and position descriptions accordingly

Participant information

- ✓ Ensure your information for participants covers your own complaints management process and how people with concerns can contact the NDIS Commission to make a complaint²⁶

Essential documents

- ✓ Clearly identify in Service Agreements what can and will be delivered by your organisation
- ✓ Ensure information about your complaint process is easily and publicly available
- ✓ Ensure that your complaint management and resolution arrangements afford procedural fairness to all parties when managing a complaint

Staff training implications

- ✓ Train all workers in the use of, and compliance with your complaints handling

system

- / Determine the training requirements of staff who will undertake investigations

²³ <https://www.legislation.gov.au/Details/F2018L00633> National Disability Insurance Scheme Incident Management and Reportable Incident Rules 2018, s 12(1) and (2).

²⁴ <https://www.ndiscommission.gov.au/sites/default/files/documents/2018-10/complainthandlingguidelinesforproviders.pdf>

Effective Complaint Handling Guide for NDIS Providers

²⁵ <https://www.ndiscommission.gov.au/document/581> Complaints Management and Resolution Guidance

²⁶ <https://www.ndiscommission.gov.au/document/806> Fact sheet. How to make a complaint

NDIS Code of Conduct

Implications for providers

- ✓ Review the NDIS Commission's requirements of providers and workers regarding the Code of Conduct , to identify any gaps in current policies, procedures and practice²⁷
- ✓ Ensure you identify all 'Code Covered Persons' in your organisation having in mind the the Code's wide definition of 'workers' which includes (but is not limited to) employees, key personnel, sole-traders, contractors, sub-contractors, agents , and volunteers
- ✓ Review existing human resource and governance arrangements to ensure they comply with the Code
- ✓ Check whether operational policies and procedures, and training activities reflect the Code
- ✓ Have a mechanism to ensure workers adhere to the Code
- ✓ Investigate and take appropriate action to address any alleged breaches of the Code

Roles and responsibilities

- ✓ Communicate with your workforce via your human resource and governance systems that responsibility for implementing the Code of Conduct is distributed across all the 'workers' in your organisation
- ✓ Ensure that staff have understood and agreed to meet their responsibilities under the Code of Conduct
- ✓ Amend job roles and position descriptions as required to reflect the above requirements

Participant information

- ✓ Make available the NDIS Code of Conduct
- ✓ Specify what participants can expect of workers in relation to the Code

²⁷ <https://www.ndiscommission.gov.au/document/566> NDIS Code of Conduct_Guidance for Providers

Essential documents

- ✓ Document information about the Code of Conduct and how it is implemented across your organisation

Staff training

- ✓ Assist and support workers to understand and to meet their obligations under the Code²⁸
- ✓ Establish mechanisms to guide workers about potential ethical dilemmas under the Code e.g. how to observe the duty of care and ensure dignity of risk

²⁸ <https://www.ndiscommission.gov.au/document/571> The Code of Conduct_ Guidance for Workers

Restrictive Practice and Behaviour Support Implementation

Implications for providers

These suggestions are for providers that use restrictive practices in the course of delivering supports.

- / Review the NDIS Commissions requirements for registered providers that are implementing restrictive practices²⁹
- / Review policies and procedures to reflect the Commission's definition of restrictive practices³⁰
- / Review the requirements for informing the NDIS Commission of existing regulated restrictive practices that you are using in behaviour support plans, in transitioning to the NDIS Commission³¹
- / Review the requirements for informing the NDIS Commission of the existing use of regulated restrictive practices that are not in behaviour support plans or for which there is no state or territory authorisation³²
- / Review the requirements of the relevant Behaviour Support Supplementary Module 2A in the NDIS Practice Standards³³
- / Ensure there are policy and processes for
 - o Lodging behaviour support plans that contain restrictive practices with the NDIS Commission
 - o Keeping records of the use of restrictive practices and their outcomes
 - o Monthly reporting on the use of restrictive practices, via the Commission's portal

²⁹ <https://www.ndiscommission.gov.au/participants/your-rights/behaviour-support/behaviour-support-video>

³⁰ <https://www.ndiscommission.gov.au/regulated-restrictive-practices> Regulated Restrictive Practices

³¹ <https://www.ndiscommission.gov.au/document/1436> Notification s26 form

³² <https://www.ndiscommission.gov.au/document/1431> Notification s28 Form

³³ <https://www.legislation.gov.au/Details/F2018L00632> Restrictive Practices and Behaviour Support Rules

- Other requirements about data collection and reporting of specialist behaviour support practitioners, relevant jurisdictional authorisation reporting bodies or the Commission
- ✓ Review the transition arrangements in place for providers of behaviour support that uses restrictive practices. For NSW and SA³⁴ and for Vic, Tas, Qld, NT and ACT³⁵
- ✓ Ensure that the use of restrictive practices meets your states authorisation processes
- ✓ If employing specialist behaviour support practitioners ensure they are deemed suitable by and registered with the NDIS Commission
- ✓ During intake of new customers, including customers transferring from other providers, identify potential or known requirements for behaviour support and whether there is a budget for behaviour support assessment and planning in the new environment and for coordinating consent processes
- ✓ If the organisation operates in more than one state or territory, and participants transfer between jurisdictions, identify if there are authorisation requirements for the other state and how these will be funded
- ✓ Collaborate with specialist behaviour support practitioners in the development of behaviour support plans
- ✓ Ensure that unauthorised use of a restrictive practice, including in emergencies to protect customers defined as a reportable incident, is reported to the NDIS Commission via the Reportable Incidents mechanism³⁶
- ✓ As a stakeholder in the aim to reduce and eliminate the use of restrictive practices, ensure you are familiar with the Positive Behaviour Support Capability Framework, that guides the expectations of behaviour support practitioners³⁷

³⁴ <https://www.ndiscommission.gov.au/providers/behaviour-support/implementing-behaviour-support-nsw-sa>

³⁵ <https://www.ndiscommission.gov.au/providers/provider-responsibilities/behaviour-support#01>

³⁶ [https://www.ndiscommission.gov.au/providers/reportable-incidents/Incident-Management-and-Reportable-incidents-\(NDIS-Providers\)](https://www.ndiscommission.gov.au/providers/reportable-incidents/Incident-Management-and-Reportable-incidents-(NDIS-Providers))

³⁷ <https://www.ndiscommission.gov.au/sites/default/files/documents/2019-06/ndis-commission-pbs-capability-framework-v4-may-2019-final-june-publication-v50.pdf>

Roles and responsibilities

- ✓ Identify which person or position will keep up to date with NDIS Commission behaviour support developments and their implications for practice
- ✓ Ensure you designate roles within your organisation with responsibility for lodging a behaviour support plan with the NDIS Commission³⁸
- ✓ Amend job roles and position descriptions as required to reflect the above requirements

Participant information

- ✓ If a Participant has a behaviour support plan, ensure that a statement of intent to use a restrictive practice is given to the person and their supports in an accessible format
- ✓ Determine the participant's capacity to consent to the use of a restrictive practices
- ✓ If the participant does not have capacity, determine who can authorise the use of the practice

Essential documents

- ✓ Through both intake and Service Agreement discussions, and associated documents, you require the participant or their representative to inform you if there are behaviours of concern and/or a previous behaviour support plan in place. Ensure the Service Agreement states that, where behaviour support plans are required, the organisation will claim or charge for resulting work (for example, collaboration with specialist behaviour support practitioners and other service providers, for implementing the behaviour support plan, and reporting in relation to the use of restrictive practices)
- ✓ Adopt a behaviour support plan template that accommodates the NDIS Commission's information and communication technology system.

³⁸ <https://www.ndiscommission.gov.au/document/1451> Lodging a Behaviour Support Plan User Guide

Staff training

- / Ensure relevant workers have access to appropriate training to enhance their skills in, and knowledge of positive behaviour support practice, restrictive practices and the risks associated with those practices
- / Implement a system for developing the skills of staff in positive behaviour support to minimise and/ or eliminate the need for restrictive practices

Worker Screening

Implications for providers

- ✓ Review the NDIS Commission worker screening requirements and the relevant acceptable checks in your state³⁹
- ✓ Ensure your recruitment, selection and screening processes reflect these requirements
- ✓ Undertake a risk assessment of all roles and identify which roles require worker screening check⁴⁰
- ✓ Update policies and procedures for worker screening.
- ✓ Develop an implementation plan for when the worker screening check commences on or before 1 July 2020⁴¹
- ✓ Develop a recording system to ensure worker checks are maintained
- ✓ Monitor and review any sub-contracting arrangements to ensure their worker screening meets NDIS requirements
- ✓ Ensure you have appropriate safeguards in place if you hire a worker that is yet to provide the result of their clearance check⁴²

Roles and responsibilities

- ✓ Identify people or roles responsible for checking, maintaining and recording current worker screening checks
- ✓ Amend job roles and position descriptions as required to reflect these

Information for participants

- ✓ Information about what is included in the worker screening checks

Essential documents

- ✓ Policy requiring employees and volunteers who have more than incidental contact with people with a disability to undergo an NDIS worker screening check

³⁹ <https://www.ndiscommission.gov.au/providers/worker-screening> Worker Screening

⁴⁰ <https://www.ndiscommission.gov.au/providers/worker-screening> Worker Screening

⁴¹ <https://ndis.nsw.gov.au/ndis-worker-screening/> NDIS Worker Screening

⁴² <https://www.ndiscommission.gov.au/providers/provider-responsibilities/worker-screening#04>

- ✓ Ensure you keep records, with specific information, showing verification of worker screening checks for all risk assessed roles⁴³

⁴³ <https://www.ndiscommission.gov.au/providers/provider-responsibilities/worker-screening#04>