Abuse, neglect and exploitation

Version: 1
Published: 24 May 2022, 11:54 AM Approved: 24 May 2022, Jackie Kemp
Last edited: 11 Aug 2021, 3:08 PM

Introduction

Every person has a right to live a life free from the fear of violence, abuse, harm, neglect and exploitation regardless of their gender, age, disability, background or any other characteristic. We are committed to ensuring the safety and wellbeing of all participants we provide supports and services to.

Any alleged, suspected or act of abuse, neglect or exploitation is a reportable incident. It must be reported to the NDIS Commission, police and any other relevant authority (see: Report incident to NDIS).

It is our organisation's responsibility to respond to reportable incidents immediately (see: Incident management policy), and a notification process will be undertaken with the NDIS Commission and relevant stakeholders.

Documentation of all incidents will be recorded on an internal incident report and logged onto an internal incident register.

Records of incidents will be kept for a minimum of 7 years from date of incident.

Applicability

When
• applies at all times and in all locations.

Who
• applies to all representatives including key management personnel, directors, full time workers, part time workers, casual workers, contractors, volunteers.

Preventing abuse and neglect

- we will provide supports and services in an environment free of abuse and neglect
- we will ensure people with high support needs and/or communication difficulty are well supported to enable detection and prevention of abuse and neglect
- we will ensure staff are trained to recognise, prevent or minimise the occurrence or recurrence of abuse and neglect of participants.

Responding to abuse and neglect

We will respond to any case of abuse, neglect or exploitation by:

- promoting a culture of no retribution for reporting of suspected cases of abuse or neglect

- escalating all alleged or suspected incidents of abuse or neglect to key management personnel immediately
- ensuring any victim of suspected or alleged abuse or neglect is adequately supported by an independent person such as a relative, friend, advocate or legal practitioner
- responding promptly and sensitively where an alleged case of abuse or neglect has occurred, to protect the person from further harm, and coordinating appropriate responses in line with duty of care obligations
- where relevant (especially for criminal acts), preserving and recording the evidence and maintaining the scene of the incident by taking photos and protecting any personal articles relevant to the incident
- recording what is known about the incident including the services and people involved and any witnesses
- informing participants about what is going to happen before taking action and throughout any response to abuse and neglect
- ensuring appropriate physical, emotional and psychological support is available to and easily accessible by a person following a report or allegation of abuse or neglect
- ensuring the victim, family, guardian or other support person has the choice of pursuing the matter through the legal system and be supported to access advice and services required.

Abuse and neglect responsibilities

- all staff are responsible for providing supports and services in a manner consistent with the Code of Conduct and treating participants with respect and dignity at all times
- all staff are responsible for responding promptly and sensitively to protect the victim from further harm
- key management personnel are responsible for ensuring all staff and volunteers are aware of, trained in, compliant with, and implement the policies and processes to prevent and respond to abuse, neglect and exploitation of participants
- key management personnel are responsible for informing the appropriate authorities (e.g. police), and the victim's family, guardian or substitute decision maker of alleged or suspected incidents of abuse or neglect, unless the guardian or decision maker is the alleged or suspected perpetrator
- all staff and witnesses will cooperate with the investigations of police or other external agency.

What is not abuse and neglect

- to restrain a participant in accordance with an approved behaviour support plan authorised by a restricted practices authorisation mechanism
- to take reasonable steps to disarm a participant seeking to harm themselves or others
- to separate participants who are fighting
- to move a participant out of harm's way
- to restrain a participant from causing intentional damage to property, in self-defence, or in the defence of others.

Breach of abuse and neglect policy

Any workers found to be perpetrating any form of abuse or neglect will lead to disciplinary action including termination of employment.

Any attempt to cover up or failure to report suspected or actual incidents of abuse will lead to disciplinary action including termination of employment.

Access and equity

Last edited: 15 Dec 2022, 4:37 PM

Introduction

This policy outlines You Connect's commitment to ensuring equal access to facilities and services, with reasonable and appropriate learning support where required.

Where the learner group consists of new entrants to the workforce or inexperienced workers they may require a longer timeframe than learners with significant industry experience, and You Connect aims to ensure that all learners are provided with equal opportunities to learn regardless of their study mode or location.

Applicability

When
• applies at all times.

Who
• applies to all You Connect employees, volunteers and students.

Definitions

Term	Description
Access	Availability of You Connect to every person free from any discrimination.
Equity	Service delivery on the basis of fair treatment to all students/apprentices and trainees.

You Connect responsibilities

In order to ensure that all students have the best possible outcomes, You Connect will:

- ensure all students have access to courses regardless of education, gender marital status, sexual preference, race, colour, pregnancy, national origin, ethnic or socio-economic background, physical or intellectual impairment or religious/philosophical/political affiliation
- encourage and assist all people with disadvantages to participate in programs and courses
    - though access for all disadvantaged people may be limited by financial resources and available facilities, special arrangements will be made where practicable
- offer student support sessions (either individual or in a group) where required
- offer numeracy and literacy support where required

- refer students to other relevant or specialist agencies if You Connect cannot meet their learning needs
- provide additional support to apprentice/trainees attending external RTOs where required.

Employee responsibilities

All employees, trainers and the You Connect board of directors must:

- develop and implement training designed to meet the individual needs of each student
- promote a positive image of people with disabilities, indigenous or multicultural backgrounds, disadvantaged backgrounds and the general community of any age group
- provide a service which neither over-protects nor under-supports the student
- assist the student to develop and maintain skills which will enhance their independence and participation
- ensure skills and competency development takes place in real settings
- provide a service that is designed and administered so as to promote each student's competence and self-reliance
- develop a positive learning environment
- evaluate and monitor all courses and training
- respect and value the rights of the student
- encourage and assist staff to access training and develop expertise in the field
- develop sensitive and cooperative relationships with all stakeholders.

The executive team is responsible for ensuring equitable access to courses, and the RTO coordinator is the contact point for any issues regarding access and equity. You Connect welcomes any feedback in regards to this policy.

Reasonable adjustment

An adjustment is any measure or action required by a student (as a result of disadvantage) which assists them to participate on the same basis as other students and is considered reasonable if it achieves this purpose while taking into account factors such as the student's disability & views and the costs, benefits and potential effects of the adjustment. In relation to this, You Connect must:

- ensure its services are as inclusive as possible and do not unreasonably prevent any clients from accessing their services
- make all reasonable adjustments for people with a disadvantage
- take meaningful, transparent and reasonable steps to consult, consider and implement reasonable adjustments for students with a disadvantage.

Under section 22 of the *Disability Discrimination Act 1992*, it is unlawful for an education authority or provider to discriminate against a person or an associate of that person on the grounds of their disability.

Breach of this policy

Any breach of this policy may result in disciplinary action, up to and including termination of employment.

Child protection

Last edited: 22 Aug 2022, 11:54 AM

You Connect is committed to providing a safe environment for all children and young people. This policy outlines the responsibility of all staff under the *Children and Young Persons (Care and Protection) Act* (1998) and *Child Protection (Working with Children) Act (*2012).

Applicability

When
• applies during all interactions between You Connect staff and children/ young people.

Who
• applies to all You Connect staff and stakeholders including volunteers, trainees, students, apprentices and contractors.

Definitions

Term	Description
Working with Children Check (WWCC)	a requirement for people who work or volunteer in child-related work. It involves a national criminal history check and a review of findings of workplace misconduct.

Documents relevant to this policy

- Child Protection (Working with Children) Act 2012 (NSW)
- Children and young persons (Care and Protection) Act 1998 (NSW)
- Ombudsman Act 1974 (NSW)

Defining significant risk of harm

- a child or young person is at a significant risk of harm when circumstances that cause significant concerns for their safety, welfare or well-being are present
- 'significant' means that circumstances are sufficiently serious to warrant a response by an authorised party
- if a response is required, it is made irrespective of a family's consent
- staff at You Connect can determine significant risk of harm by:
    - listening to the child/young person
    - observing the behaviour of the child/young person
    - observing the behaviour of family and/or authorised guardians.

Organisational responsibilities

- ensure all staff are informed of all legal and organisational expectations relating protection of children/young people
- ensure that a child/young person at risk of significant harm is safe and supported
- ensure that all staff are informed that they must notify and investigate child abuse allegations in accordance with the *Ombudsman Act 1974*
- ensure compliance with *Child Protection (Working with Children) Act 2012* by maintaining evidence of current Working with Children Check clearance for all staff
- respond to reportable matters in accordance to all legislative requirements
- inform all staff of their obligations as mandatory reporters under the *Children and Young Persons (Care and Protection) Act 1998*
- protect all staff from false or unjust accusations of sexual abuse of minors
- ensure all staff have a current Working with Children Check and National Police Check.

Employee responsibilities

- plan safe and relevant activities with consideration for:
    - age
    - maturity
    - cultural factors
    - gender
- assess risks and implement effective risk minimisation strategies
- allocate the most relevant staff to respond to the specific needs of each child/young person
- be aware of signs of abuse and neglect in children
- undertake mandatory reporting of any possible risks of significant harm to children
- share private information only if it is absolutely necessary
- respect a child's right to privacy and comply with appropriate confidentiality policies
- follow relevant guidelines when providing information to external organisations and stakeholders
- have a current Working with Children Check and National Police Check.

Support worker responsibilities

- provide their WWCC number to key management personnel
- report to Family & Community Services any ongoing concerns about the circumstances of children/young people that are leaving YC.

Key management personnel responsibilities

- keep records of all staff that include their:
    - full name
    - date of birth
    - WWCC (or application number) and expiry date
    - date and outcome of online WWCC verification
- remove all staff that are barred from working with children
- enforce appropriate disciplinary measures.

National police checks

You Connect uses PRM Group (https://secure.prm.net.au/) to conduct national police checks.

Working with children checks

You Connect is committed to employing staff that do not have a conviction for a crime against a minor. Individuals with such criminal convictions will not be employed. If a conviction is discovered, the convicted staff member will have their employment terminated.

- a WWCC is needed:
  - before starting paid work in a child-related field
  - throughout a career in a child-related field
  - when undertaking new or continuing volunteer work, depending on industry standards and expectations
- the application process should begin here
- cleared applicants can use their WWCC for five years before renewal is required
- a cleared check must be provided with the surname and date of birth of the applicant for online verification purposes
- notification emails regarding the provision a WWCC will not be accepted as evidence of clearance
- once the online verification is completed, the staff member can start working with children immediately
- cleared applicants are still subject to record monitoring
- if required, relevant risk assessments of cleared individuals will be conducted by the Commission for Children and Young People
- breaches of law and policy could lead to a WWCC being revoked
- it is an offence for applicants without a WWCC to engage in any work with children/young people
- it is an offence to hire an individual that is not allowed to work with children in a child-related position
- staff will be will be reminded to renew their WWCC three months before expiry.

Mandatory reporting

- all staff, including volunteers, are considered Mandatory Reporters under the Children and *Young Persons (Care and Protection) Act (*1998) and *Child Protection (Working with Children) Act* (2012)
- it is mandatory to report concerns regarding significant risk of harm to children
- reporting significant risk of harm is not mandatory for unborn children or young people but should still be made if it is appropriate
- where possible, a young person should be involved in making the decision to report significant risk of harm
- it is not compulsory to tell a child under 16 about a report
- information about mandatory reporting is part of the induction process at You Connect
- all mandatory reporters are required to attend Child Protection Refresher Training, which is a part of the NSW AIS online module.

Recordkeeping

- keeping records ensures effective management and follow-up of reports relating to significant risk of harm to children/young people
- requests for records can be made in line with relevant registration
- paper copies of Form A and related documents should be placed in secure storage by the support worker and kept confidential
- records should be made available to future authorised support workers

- records relating to staff are kept in both electronic and paper formats
- records relating to staff are made available for audit and monitoring purposes.

Managing actions that cause significant harm

- Community Service Helpline should be consulted when reporting any individual that is under 18 years of age
- appropriate disciplinary measures must be considered if appropriate
- You Connect employees must contact Family & Community Services if they are concerned about risk of significant harm to a child/young person - to initiate proper contact, staff members must do the following:
    - notify key management personnel
    - utilise the online Mandatory Reporter Guide
    - a report must be made to the Child Protection Helpline (133 627)
    - if wait times exceed five minutes or if a phone call cannot be made, staff can use the Significant Risk of Harm Report Fax Form
- in cases of significant harm caused by a student, trainee or apprentice:
    - police should be notified if a student, trainee or apprentice engages in acts that could be viewed as sexual or physical assault
    - Community Service Helpline should be contacted if the reported individual is under 18 and at risk of significant harm
- in cases of significant harm caused by a staff member:
    - relevant management and authority personnel must be notified
    - the safety of the student must be ensured
    - Community Service Helpline should be contacted if risk of harm is associated with actions of any key management personnel.

Child safe

Version: 1
Published: 24 May 2022, 11:55 AM Approved: 24 May 2022, Jackie Kemp
Last edited: 11 Aug 2021, 12:31 PM

Introduction

The protection of children and young people is a cornerstone in safeguarding and improving the lives of children and young people with disability. While providing supports and services under the NDIS, workers are uniquely placed to identify and respond to the needs and vulnerabilities of children or young people with disability. Everyone has a responsibility to protect the wellbeing and safety of children or young people whom they have contact, and report any case a child or young person is suspected to be at risk of significant harm.

Policy objective

This policy aims to ensure that the organisation provides supports and services in a child-safe environment and that concerns about the welfare or safety of children and young people are responded to appropriately. The purpose of this policy is to:

- set out appropriate standards of behaviour and practices for people working and volunteering with children and young people (Code of Conduct)
- provide standards by which the organisation can be held accountable to workers, volunteers, parents, guardians, carers, children and young people that are involved with the organisation
- increase worker awareness of factors that create a risk of harm to children and young people and the strategies in place to minimise risks
- build worker knowledge of how to identify if a child or young person is, or may be, at risk of harm and how to respond appropriately to allegations, concerns or instances of harm
- ensure that all workers understand reporting requirements and processes to be followed when making a report.

When
• applies to all sites and services.

Who
• applies to all representatives including key management personnel, directors, full time workers, part time workers, casual workers, contractors and volunteers.

When is a child or young person at risk?

A child or young person is at risk when they have suffered, or there is a likelihood they will suffer, harm. The relevant harm may be physical, emotional or psychological. A child or young person is also at risk where the parent or guardian is unable or unwilling to care for the person.

Reporting concerns about children and young people at risk

All suspicions that a child or young person is at risk must be reported to key management. Suspicions that a child is at risk must also be reported to the appropriate state/territory child protection hotline.

All concerns that do not meet the threshold of child at risk, but which involve a concern about the welfare or safety of a child are to be reported to key management.

The below table provides a reference for local state/territory authorities and legislation related to reporting children and young people at risk.

State/territory	Local authority	Relevant local legislation
ACT	Child and Youth Protection Services	Children and Young People Act 2008 (ACT)
NSW	Department of Family and Community Services	Children and Young Persons (Care and Protection) Act 1998 (NSW)
NT	Territory Families Report child abuse	Care and Protection of Children Act 2007 (NT)
QLD	Department of Children, Youth Justice and Multicultural Affairs	Child Protection Act 1999 (Qld)
SA	Department for Child Protection	Children and Young People (Safety) Act 2017 (SA)
TAS	Department of Communities Tasmania	Children, Young Persons and Their Families Act 1997 (Tas)
VIC	Department of Health and Human Services	Children, Youth and Families Act 2005 (Vic)
WA	Department of Communities, Child Protection and Family Support	Children and Community Services Act 2004 (WA)

What is a child safe environment?

Child safe environments are safe and friendly settings where children and young people are protected and feel respected, valued and encouraged to reach their full potential. To provide an environment safe for children and young people, we will:

- take a preventative, proactive and participatory approach on child wellbeing and safety issues
- seek out and embrace the opinions and views of children and young people on issues relating to our services that they consider important or impact them
- take action to protect children and young people from harm.

Working with children and young people

The standards and requirements below identified the professional boundaries, ethical behaviours that are accepted and behaviours that are unacceptable. All staff are required to abide by and follow these standards and requirements.

Child safe code of conduct

- maintain professional and courteous relationships with children and their families
- provide services in a way that does not exploit or abuse our position
- listen to the views of children or young people and respect what they say and involve them when we make decisions, especially about matters that will directly affect them
- respect children and young people's rights, background, culture and beliefs as set out in the UN Convention on the Rights of the Child
- comply with all relevant commonwealth, state or territory laws protecting children and young people
- follow mandatory reporting requirements for children or young people suspected to be at risk of significant harm
- report any concerning staff conduct towards children or young people, including any suspected risk of significant harm to a child, to the key management personnel
- safeguard children or young people at all times and not place them at risk of abuse, or condone behaviour which is unsafe
- use appropriate language for the age and understanding of the child or young person, and avoid confusing or age-inappropriate discussions with sexual, discriminatory or violent references
- avoid any actions or words intended to threaten, intimidate, shame, humiliate, belittle, embarrass or degrade children or young people
- not attend work affected by illegal drugs or alcohol, consume them whilst on duty or supply them to children or young people in our care
- not smoke whilst on duty.

Recruitment and worker screening

The organisation will comply with and carry out working with children checks in accordance with state/territory requirements of the National Disability Insurance Scheme Act 2013 (Cth).

Our recruitment practices will take account of risks and other factors that impact on children and young people. We will review our recruitment and human resources management practices regularly to make sure that we are aligned with best practice approaches for the protection of children and young people.

Communication and review of children and young people protection policy and systems

All new workers, including volunteers and contractors, will be trained on the requirements of this policy.

All participants under the age of 18 and their families will be provided with information about this policy.

Breach of child safe policy

Breach of this policy, or the child safe code of conduct, may result in disciplinary action and/or referral to the appropriate government authority.

Code of Conduct

Introduction

This code of conduct policy provides principles for conducting business and dealing with internal colleagues and external stakeholders (such as students and clients), which are to:

- act with honesty, integrity, fairness and professionalism, exercising caution with the use of You Connect information and resources
- exercise fairness, equity, proper courtesy, consideration and sensitivity, and have proper regard for the rights, safety and welfare of all internal and external stakeholders
- avoid real or apparent conflicts of interest.

Applicability

When
▪ applies to all times.

Who
▪ applies to all You Connect employees, contractors, volunteers and students.

Documents

- Australasian Code of Ethics for Direct Support Professionals

Supporting Policy Directives

Mandatory conduct

All employees (including management) must:

- promote the services of You Connect to all stakeholders
- ensure all written and verbal communication is conducted with respect, honesty and professional regard for the individual
- uphold and reflect the core values of You Connect
- refrain from using inconsiderate or offensive language in the workplace
- perform their duties with skill, honesty, care and diligence
- use authority in a fair and equitable manner
- fulfil the role and responsibilities outlined in their job description
- not engage in secondary employment without approval
- abide by WHS legislation, You Connect policies and procedures, instructions and lawful directions that relate to their employment and duties
- utilise sustainable business practices to conserve the environment

- advocate acceptance of our client groups to business and the community
- contribute to a harmonious, safe and productive work environment by our work habits and professional workplace relationships
- not report for work under the influence of drugs or illicit substances
- maintain confidential client records
- maintain professional relationships with clients
- not receive gifts or benefits without managerial disclosure
- report conflicts to their direct line manager
- not disclose You Connect information on social media.

Management responsibilities

All managers of You Connect must:

- lead, model and promote the essence of this policy
- ensure the workplace culture practices and systems uphold ethical standards
- recognise and promote employee team conduct
- act and respond to breaches in policy
- ensure real or perceived conflicts are avoided or managed (assessed, controlled and reported appropriately)
- secondary employment and risk registers are maintained and reported to the appropriate governance committee.

Employee responsibilities

All You Connect staff must:

- provide a service to clients aimed at promoting their potential
- never discriminate based on race, religion, gender, age, sexual orientation or other protected characteristics
- promote the fundamental values of social inclusion, equity, social justice, equality, and human rights and freedoms - You Connect staff are expected to respect the human right and social inclusion of every individual within the service
- promote diversity and the principles of tolerance, encouraging all clients to participate and access services
- deliver a person-centred approach when working with You Connect students and clients - personal values, beliefs and morals of staff cannot impact delivery of services
- fulfil the requirements of their duty of care to You Connect clients at all times.

Legal and ethical framework

All You Connect employees must:

- establish and maintain professional relationships with clients and their families
- not form personal relationships or associate with You Connect clients outside of work hours unless approved by their manager or the CEO
- adhere to the Australian Code of Ethics for Direct Support Professionals.

Teamwork

All You Connect employees must:

- work together towards agreed work objectives and communicate regularly about progress
- look for wards to improve work methods and solve workplace and community issues
- give support and guidance to fellow employees, recognising their strengths and achievements

- avoid undermining teamwork through incivility (a lack of consideration through thoughts and actions), such as:
    - gossiping and rude behaviour
    - losing one's temper or yelling
    - withholding important information
    - sabotaging a project
    - arriving late to meetings
    - checking email or texting during a meeting
    - not answering calls or responding to emails in a timely manner
    - ignoring or interrupting a colleague in the workplace
    - lack of manners and courtesy towards other employees.

Conflict of interest

All You Connect employees must:

- avoid any conflict of interest while working such as dual relationships and dual commitments
- avoid any real or perceived personal, financial or other interest which may be in conflict with their duties and responsibilities at You Connect
- any interest which may constitute a conflict of benefit must be promptly disclosed to the CEO, or in case if the CEO, to the chairman
- not take part in a You Connect service or seek/accept reassignment of duties to avoid a conflict of interest.

Any employee undertaking external employment with another organisation including a board appointment or business activity must disclose this information to their CEO. Such an activity must not:

- cause a conflict of interest with their work at You Connect
- compromise the core values of You Connect
- involve information or any resources obtained from You Connect

Contact outside of the workplace

You Connect employees must:

- never give out their personal contact details, or those of colleagues, to clients
- not allow users to visit their homes
- not invite users to become online friends or otherwise participate in online social networking with users
- be pleasant and polite if approached by clients outside the workplace, but should not encourage prolongs social contact.

Gifts and favours

Employees may entertain or be entertained, and give or receive gifts in the course of their duties. Such expenditure or receipt must be approved by the CEO. Employees must:

- not offer or accept money
- not encourage gifts or favours for services provided in connection to their official duties for themselves or their family
- staff and volunteers can accept gifts or favours up to the value of $50 if given freely
- not accept gifts in the form of cash or negotiable instruments
- declare all gifts to their manager
- enter all gifts received into the gift register for recording purposes.

If staff/volunteers believe that a gift is given to induce favored treatment, their manager must be advised immediately, who shall report to the CEO. Gifts valued over $50 will remain the property of You Connect.

Invitations

Staff may receive invitations from other organisations to attend events, which may be accepted in consultation with management if attendance will be regarded as mutually reciprocal or enhance networking and under the knowledge that they are representing You Connect.

Invitations from clients/families will only be accepted on the following grounds:

- attendance must be pre-approved by management
- length of stay cannot exceed one hour
- approval will only be granted for goals, milestones or major events such as birthdays or graduations
- no drugs or alcohol may be consumed before or during the event
- attendance must be registered formally through the site specific participant event attendance register.

Compliance

Employees responsible for any funding or contractual obligation must ensure that all compliance and reporting obligations are met in a timely and accurate manner.

You Connect takes legal compliance obligations seriously and requires employees to do the same. This legislation includes but is not limited to:

Commonwealth Legislation

- Fair Work Act 2009
- Racial Discrimination Act 1975
- Sex Discrimination Act 1984
- Disability Discrimination Act 1992
- Age Discrimination Act 2004
- Privacy Act 1988
- Copyright Act 1968
- VET Regulation Act 2011
- Affirmative Action 1986
- EEO Act 1987
- Human Rights and Equal Employment Act 1986

NSW State Legislation:

- Anti-Discrimination Act 1977
- Work Health and Safety Act 2011
- Work Health and Safety Regulations 2011
- Child Protection Legislation Amendment Act 2003
- Commission for Children and Young People Act 1998
- Privacy & Personal Information Protection Act 1998
- Apprenticeship and Traineeship Act 2001
- BVET (Commonwealth Power 2010).

Attendance

In relation to attendance, employees must:

- attend work as agreed and outlined in their offer of employment
- take leave in compliance with the You Connect leave policy
- notify the human resources manager regarding any absence not covered under the leave policy
- have any changes to work time agreed to and approved in writing by the CEO.

Students studying with You Connect's Registered Training Organisation (RTO) or Australian apprentices employed by the Group Training Organisation (GTO) should contact the relevant persons to notify them of the absence.

Dress code

You Connect has a specific dress requirement as follows:

- a work shirt will be provided, the use of which is mandatory
- pants and skirts must not be shorter than knee length
- unstable or open toed footwear such as thongs or sandals should not be worn due to risk of falls, accidents or slips
- employees must properly care for clothing and equipment
- any items purchased by You Connect become property of the organisation.

Students studying through the You Connect RTO should wear clothing that is clean, tidy and appropriate for the type of course being conducted. This includes work health and safety requirements where applicable and in keeping with the image of the organisation, e.g. professional/business attire for accredited courses or neat casual clothing for craft or exercise classes.

Post-employment

When an employee ceases employment with You Connect, they must:

- return any documents/files, records, notes etc. relating to or obtained through employment with You Connect
- return any in-house resources such as manual, mobile phones, laptops, keys, security passes, uniforms etc.
- not divulge confidential information obtained during their employment.

It is also expected that in any dealings with former employees of You Connect, current staff will no give them favourable treatment or access to privileged information.

Breach of this policy

This policy establishes the standards of behaviour that should be met by all employees. When these standards are not met, disciplinary action will be taken.

Breaches involving serious misconduct may result in instant dismissal.

Breaches involving a break of any law will result in the relevant government authorities or the police being notified.

Complaint management

Last edited: 13 Jun 2019, 3:38 PM

Introduction

This policy is about complaints made to a provider, not complaints about the NDIS.

All complaints are taken seriously, all people treated fairly, and all corrective actions completed in a timely manner.

Definitions

A *complaint* is an expression of dissatisfaction with the provision of a service, including how a previous complaint was handled, for which a response or resolution is expected.

Applicability

When

- applies when participants want to submit feedback or make a complaint
- applies to all feedback and complaints received regardless of the source.

Who

- applies to all representatives including key management personnel, directors, full time workers, part time workers, casual workers, contractors and volunteers.

Documents relevant to this policy

- National Disability Insurance Scheme Act 2013 (Cth)
- NDIS (Complaints Management and Resolution) Rules 2018
- NDIS Terms of Business

Our commitment

We are committed to complaint handling. We will:

- implement and maintain a complaint management system
- make sure people can easily make a complaint
- deal with all complaints fairly and quickly
- have information available on how to:
  - submit a complaint
  - submit a complaint to the Commissioner
- keep records on all complaints received.

Who can make a complaint?

Anyone can make a complaint including:

- a participant
- a participant's family or guardian
- a participant's financial manager
- an advocate
- an employee
- a community visitor
- a professional
- a member of the public.

Complaints can be made:

- in person
- by email
- in writing
- by phone
- on the web.

Complaints help us:

- identify problems
- improve services
- provide better outcomes to participants.

Complaints can be made about any part of the quality or delivery of our services such as if there is dissatisfaction:

- with the way services are provided
- with decisions we have made
- about the conduct of our employees
- about personal information not kept private.

Complaints can be made anonymously. Complaints can be made to us or directly to the Commissioner.

Complaint monitoring

- all complaints should be monitored using a complaint register
- the complaint register should include up-to-date progress of each complaint and whether it is currently open or closed (resolved)
- if there is any doubt about the end resolution of a complaint, seek feedback from the person who made the complaint
- regular reports from the complaint register should be provided to key management personnel for review.

Complaint records and review

Accurate information of complaints received including decisions made, actions taken and eventual outcomes must be recorded and kept for 7 years from the date of the complaint which allows us to:

- enable reviews of any complaints received
- assist in identifying any systemic issues raised
- allow a response to the Commissioner, if required
- be stored securely and accessible only by the people handling complaints.

Complaint referrals

Complaints to the Commissioner may be referred to other agencies or bodies if needed including:

- non-compliance with the NDIS code of conduct
- inappropriate or unauthorised use of restrictive practice
- employee screening issues e.g. if an employee of the provider was found to have a criminal history (for more information, refer to the worker screening policy)
- incidents relevant to other bodies (police, consumer affairs agencies or other regulatory bodies).

Our complaints system

Our complaints system is documented and information on how to make a complaint is available to participants, their families, guardians or advocates in a way that is culturally appropriate.

We work to ensure participants:

- are aware of their right to make a complaint
- feel empowered to make a complaint
- are supported to make a complaint
- are involved in the resolution process after making a complaint
- know they won’t be adversely affected as a result of making a complaint.

Conflict of interest

Last edited: 12 Apr 2019, 10:36 AM

Introduction

This policy helps to identify, disclose and manage any actual, potential or perceived conflicts of interest. All representatives must be aware of their obligations to disclose any conflicts of interest that they may have. All representatives of the organisation must comply with this policy to ensure conflicts of interests are effectively managed.

Definitions

A *conflict of interest* occurs when a person's personal interests conflict with their responsibility to act in the best interests of the organisation and the people supported. Personal interests include direct interests as well as those of family, friends, or other organisations a person may be involved with or have an interest in (for example, as a shareholder, board member or business owner). A conflict of interest may be actual, potential or perceived and may be financial or non-financial. These situations present the risk that a person will make a decision based on, or affected by, these influences, rather than in the best interests of the organisation and must be managed accordingly.

Applicability

When
• applies to any situation which could affect a person's impartiality • applies to any situation which could affect a participant's choice and control.

Who
• applies to all representatives including key management personnel, directors, full time workers, part time workers, casual workers, contractors and volunteers.

Documents relevant to this policy

- National Disability Insurance Scheme (Code of Conduct) Rules 2018 (Cth)
- NDIS Terms of Business

Organisation responsibilities

- ensure organisational or ethical values do not impede a participant's right to choice and control
- manage, document and report on individual conflicts of interest as they arise
- ensure that advice to a participant about support options (including those not delivered directly) is transparent and promotes choice and control.

Responsibilities of representatives

- avoid conflicts of interest where possible
- identify and disclose any conflicts of interest
- carefully manage any conflicts of interest
- adhere to the conflict of interest policy and respond to any breaches.

Key management personnel responsibilities

- work with all representatives to avoid or manage any conflict of interest
- record all reported conflicts of interest in a register of interests document.

Gifts and benefits

- representatives of the organisation must not accept any offer of money, gifts, services or benefits that could cause them to act in a manner contrary to the interests of a participant
- representatives must have no financial or other personal interest that could directly or indirectly influence or compromise the choice of provider or provision of supports to a participant—this includes the obtaining or offering of any form of commission.

Examples of conflicts of interest

- financial interests
- personal and family relationships between employees/volunteers
- decisions regarding appointments, promotions or other decisions relating to employees
- acceptance of gifts or benefits e.g. monies, jewellery, make up, clothing, flights or holidays
- use of confidential and official information
- reproduction or use of copyright information for organisation's purposes only
- membership of, or employment in, another organisation that comes into serious competition with another organisation
- use of the organisation's facilities and equipment for personal benefit or the benefit of a third party.

What is not conflict of interest

- membership or affiliation with other organisations where there is no possible benefit or perception of benefit
- union representation or membership
- approved collaboration with other organisations.

Breach of conflict of interest policy

- failure to disclose a potential, perceived or actual conflict of interest is a breach of this policy
- disciplinary action may follow if it is deemed to be an incident of misconduct, wrongdoing or an abuse of power.

Customer service

Last edited: 24 Aug 2022, 3:51 PM

Introduction

This policy outlines You Connects commitment to continually improve service excellence and customer satisfaction. Clients expect to receive friendly and professional care, and You Connect aims to create an environment where the client knows their satisfaction is our main priority.

Applicability

When
• applies at all times.

Who
• applies to all employees and volunteers of You Connect.

Employee service standards

In order to meet You Connects service standards, employees must:

- be polite, friendly and welcoming
- respect and maintain awareness of diversity and differences in values, cultures beliefs and ages
- respect the dignity of all and show empathy and consideration in daily practice
- listen and respond attentively to participant enquiries
- protect the confidentiality of information
- acknowledge participants by name
- introduce themselves by name, title or role
- wear ID badges so they can be easily seen and read
- dress according to You Connects dress code
- maintain a clean and safe environment for employees and participants.

Customer interaction standards

When interacting with customers and participants, it is expected that all staff be actively involved in their work. In order to achieve this, employees will:

- play with participants
- participate in activities
- sit and eat with participants
- ‘be seen’ – employ active listening
- smile, have fun, and enjoy the interaction
- share their interests with clients

- show initiative - innovate and find new ways of doing things
- show flexibility
- think on their feet
- read body language and make changes accordingly
- be prepared
- under promise, over deliver – exceed participant expectations
- avoid using mobiles during interaction where possible.

Feedback, complaints and grievances

Introduction

This policy outlines You Connect's commitment to providing an effective mechanism for all stakeholders to express concerns or make complaints, and define the right and responsibilities of all parties during the complaint process. We want to ensure that work environments are harmonious and free from intimidation and harassment and aim to do this by promoting clear, honest and open communication ensuring any complaints that do arise are handled justly with the correct impartiality and sensitivity.

Applicability

When
▪ applies at all times.

Who
▪ applies to all You Connect employees, volunteers, clients and stakeholders.

Supporting Policy Directives

Individual responsibilities

All employees (including management) must:

- The CEO must:
  - provide leadership in demonstrating a commitment to the resolution of complaints
  - make and final decisions relating to complaints
- the Human Resources Manager must:
  - manage and monitor complaints handling
  - provide independent, impartial and confidential information to complainants about the procedure for dealing with complaints, including listening to issues and helping the person clarify facts
  - conduct internal reviews of complaints in both process and content
  - identify systemic issues arising from complaints and make recommendations to management
- managers and supervisors must:
  - exercise primary responsibility for receiving and resolving complaints/conflicts in their areas in a fair and timely way
  - advise people of their right to make a complaint where appropriate
  - provide advice and assistance to people who have a complaint

- Complainants and complaint respondents must:
    - provide a clear and honest account of their concerns and expectations for the outcome of their complaint, including providing all relevant information and documents to assist in the investigation and/or resolution of the matter
    - engage openly in the complaint handling process including participating in discussion with other parties to resolve the concerns
    - respond to You Connect requests for information in a timely manner
    - respect those individuals involved in the complaint handling process.

Complaint handling principles

Complaints and grievances are to be handled with the following principles:

- accessibiliy
    - the policy must be simple to understand for all employees to be able to receive and pass on complaints
    - compliants must be handled in a timely manner (taking into account the complexity and seriousness of issues) to ensure all parties have access to an appropriate resolution and opportunities or further concerns to arise are minimised
- natural justice and procedural fairness
    - ensure all parties to a complaint know what to expect during the complaint handling process
    - carry out the complaint handling process in a transparent manner
    - All parties must:
        - have equal opportunity to participate in the process
        - treat all parties in a respectful manner
        - provide reasons for decisions made
- equity
    - in managing any complaint received, You Connect will uphold any relevant legislation
    - no complainant will be disadvantages through lodging a complaint in good faith, regardless of the outcome
    - complainants and respondents will be entitles to be assisted by a support person which may be a family member, friend, carer or other person (not being a solicitor, barrister or other legally trained person)
- confidentiality and recording
    - privacy and confidentiality of parties will be respected to the practical and appropriate extent, with acknowledgment that matters may be subjects to subpoena
    - the complaint handler will ensure that accurate records will be forwarded to human resources to be kept in a file seperate to personnel files, including recording of reasons for all significant decisions
- resolution
    - where it is within You Connect's responsibility, fair and reasonable remedies will be offered where appropriate
    - operation of the complaints handling process and findings will be reported to the CEO to improve You Connect service delivery and workplace environment
- authority
    - individuals involved in handling complaints will have the necessary authority and management support to carry out the process effectively and will have appropriate access to the training and resources (e.g. mediation) to fulfil their role
- conflict of interest
    - individuals involved in the handling of a complaint, or investigating/adjudicating a complaint, must not act in any complaint in which they have a conflict of interests
- HACC complaints scheme
    - where a complaint regards You Connect disability services funded by the Commonwealth Government, complainants may also have the right to access the HACC complaints scheme.

Complaint handling procedure

The grievance procedure has four main stages, undertaken in order unless the nature of the grievance or wishes of the complainant determine otherwise. Progress to further stage happens only if resolution is not achieved and the complainant wishes to proceed with the internal grievance procedure. Complainants determine what action will be taken and may withdraw the grievance at any time, except in circumstances that pose a threat to health and safety of You Connect employees or circumstances that are potentially criminal in nature. The stages are:

Stage 1: Informal advice

- a person seeking information on an issue that may constitute discrimination/sexual harassment/bullying should obtain advice from an equity contact, their manager, or the Human Resources manager
- stage 1 is intended to provide complainants with the advice and knowledge necessary to deal with the situation personally - the following actions will only be pursued in appropriate circumstances and if the person seeking advice agrees and feels confident to move forwards.
- actions that can be taken include:
    - directly approaching the respondent, explaining the negative effect of their behaviour and asking them to stop
    - writing a confidential letter to the respondent setting out the negative effect of their behaviour and asking them to stop
    - requesting that the Human Resources Manager consider whether it would be appropriate to provide a general information session to a work team or group of students about the nature and effects of discrimination, sexual harassment or workplace bullying including information about relevant policies and codes.
- if no resolution occurs, complainants (in discussion with the human resources manager) may choose to:
    - not proceed
    - continue with the internal process and proceed to stage 2 (informal conciliation)
    - continue with the internal process but go straight to stage 3 (formal conciliation)
    - not continue with the internal procedures and take their grievance to an appropriate external agency.

Stage 2: Informal conciliation

- the complainant will be advised that the purpose of conciliation is to resolve the grievance, not to seek retribution
- there may be instances where the complainant does not wish to have their identity known, in this event:
    - the complainant may request that the conciliator approach the respondent of the Equal Opportunity Policy and other relevant policies and codes, and discuss the matter with them
    - no further action will be taken, but the situation will be monitored
- where the complainant agrees to make their identity known to the respondent:
    - they may request the conciliator approach the respondent on their behalf - the conciliator will convey the complainants concerns and reiterate the Equal Opportunity Policy and other relevant policies and codes without assessing the merits of the case, while also obtaining the respondent's version of events
    - the complainant may request that the conciliator arrange a meeting where the complainant and the respondent can attempt conciliation in the presence of the conciliator
        - further meetings will take place if necessary and by agreement of all parties
- if conciliation is achieved the conciliator may suggest appropriate follow-up actions in order to monitor the situation
- if no resolution occurs, the complainant (in discussion with the human resources manager).

Stage 3: Formal conciliation

- at this stage, the complainant must detail the nature of their grievance in writing
- investigation will not proceed unless the complainant consents to their identity being known to the respondent

- the conciliator will:
    - investigate the grievance acting at all times to make appropriate allowance for the rights and concerns of both the complainant and respondent in line with the principle of natural justice
    - inform the respondent of the allegation - intention and purpose of the conciliation process will be emphasised
    - consult with the respondent regarding their response to the grievance
- the respondent will be advised of the:
    - procedures in relation to grievance of discrimination/sexual harassment/bullying
    - possible implications of relevant state and federal legislation
    - availability of personal counselling
- if after investigation the grievance is not substantiated, the complainant and respondent will be advised that the matter cannot proceed
- if after investigation the grievance is substantiated, the complainant and respondent will be advised that the matter will proceed to conciliation
- during the formal stages of the procedure, the complainant and respondent may choose to be supported by another person
    - this person may be a friend, colleague or equity contact and must maintain strict confidentiality
    - this person should not be anyone who has a formal conciliation role under these procedures
    - as these are internal procedures aimed at conciliation, the support person should not be acting in a legal capacity
    - in the event the supporting person is acting in a legal capacity, You Connect reserve the right not to proceed further or to exercise general discretion as to how the matter should be dealt with which may involve departing from ordinary procedures
- in the event both parties agree to formal conciliation but believe that conciliation would be more likely with the appointment of an alternate counsellor, a request will be made to and considered by the human resources manager
    - the human resources manager will inform both parties of the outcome of this request
    - the human resources manager will appoint a conciliator who has expertise in the resolution of grievances
    - the appointed conciliator will provide a report to the human resources manager of the outcome
- if conciliation is achieved parties may agree to one of more actions, supported by You Connect as far as possible and appropriate
- if conciliation is not achieved, investigation has shown that the allegation is true on the basis of probability, and the human resources manager is satisfied that all reasonable avenues for conciliation have been explored but the complainant wishes to continue the grievance, then the matter must be referred to the CEO for formal determination
    - if conciliation is not achieved and the human resources manager believes that on the balance of property the grievance has grounds to warrant disciplinary actions, then with the consent of the complainant the matter will be referred to the CEO requesting that disciplinary measures be invoked.

Stage 4: Formal determination

- In referring the matter to the CEO for formal determination, the human resources manager will make available all details of the grievance, the respondent's reply, investigation findings and actions undertaken in attempting conciliation
- in determining the outcome of the grievance the CEO may:
    - determine the matter based on documentation provided by the human resources manager
    - act upon the conciliator's recommendation to invoke disciplinary procedures.
- if the CEO determining the outcome of the grievance is satisfactorily resolved, subsequent monitoring may be delegated to the human resources manager

- if the CEO determines the grievance is substantiated, they must:
    - take action to protect the complainant from victimisation for lodging the grievance
    - take action to protect the respondent from victimisation
    - direct that the respondent undertake appropriate counselling
    - initiate disciplinary proceedings
    - take other action as deemed appropriate
- if after consideration the CEO believes that the grievance is not substantiated but has been made in good faith, then the matter will be closed - in this event, the CEO will act to ensure that the complainant and respondent are not subjected to victimisation or any retaliatory action
- in the event that the grievance is not resolved by You Connect to the satisfaction of the complainant, the complainant shall be advised that the matter can be taken to the appropriate external agency.

Employee rights

You Connect employees are entitled at all times to be treated with respect and courtesy when handling complaints. Where a person involved in a complaint behaves in a threatening, rude or harassing manner towards employees, the CEO may decline to further consider the complaint and instead institute proceedings for misconduct against the person under applicable rules or policies of You Connect or refer the matter to an external agency.

Declining complaints

You Connect may decline to deal with a complaint at any time if the CEO forms the view that the complaint is:

- frivolous
- vexatious
- not made in good faith
- misconceived
- lacking substance
- lacking currency, i.e. the content of the complaint occurred more than 60 months beforehand or has previously been death with by You Connect in the past
- lodged with an external agency and is more appropriately dealt with by that agency.

Complaint referral

- in general, You Connect will consult with complainants to identify how they wish their complaints are handled and what outcomes they are seeking without reference of the matter to a third party
- where the complaint amounts to serious misconduct (e.g. serious risk to employee health and safety), a criminal offence, or where mandatory reporting is legislated, You Connect has an obligation to deal with the matter under the relevant rules and refer the matter to the relevant agency for investigation
- complaints to the commissioner may be referred to other agencies or bodies if needed including:
    - non-compliance with the NDIS code of conduct
    - inappropriate use of restrictive practice
    - employee screening issues e.g. if an employee is found to have a criminal history.

Records

- accurate information of complaints received including decisions made, actions taken and eventual outcomes must be recorded and kept for 7 years from the date of the complaint, allowing us to:
    - enable reviews of received complaints
    - assist in identifying any systemic issues raised
    - allow a response to the commissioner if required
    - be stored securely and accessible only by the appropriate staff
- in general, You Connect will consult with complainants to identify how they wish their complaints are handled and what outcomes they are seeking without reference of the matter to a third party
- where the complaint amounts to serious misconduct (e.g. serious risk to employee health and safety), a criminal offence, or where mandatory reporting is legislated, You Connect has an obligation to deal with the matter under the relevant rules and refer the matter to the relevant agency for investigation.

Time limits

The time limit set out in the You Connect complaints policy and processes must be complied with if reasonably practical. In exceptional circumstance where it is not possible for an action to be completed within the time limit, steps must be taken to ensure that the process is completed within a reasonable time. Under such circumstances, the complainant will be kept informed of any progress.

While employees must endeavour to comply with time limits, no action or determination made under the procedures is invalidated due to a time limit being exceeded. Any reference to days means working days: that is, days on which You Connect ordinarily opens for business unless otherwise stated.

Decision making

The overriding intent of the complaints policy and processes are to ensure that complaints are death with in a fair, impartial, timely and effective manner.

Where application of this would lead to a process or result that is inconsistent with the principles of natural justice or procedural fairness, or a different approach would lead to a timelier and more efficient resolution of a complaint, the delegated person handling the complaint may vary procedures to the extent necessary. In general, any decision to adopt procedures outside of those established in You Connect policy should be discussed with the CEO before implementation and communicated to the parties, including reasons for the decision.

Breach of this policy

Any breach of this policy could result in disciplinary action which may lead to the termination of employment.

Incident management

Introduction

This policy defines incidents including serious incidents and incidents which are reportable to the NDIS Quality and Safeguards Commission. This policy is compulsory to all our representatives while providing services including employees, contractors, volunteers and students on work experience.

An incident is broadly defined as:

- any event or circumstance that resulted, or could have resulted, in unintended and/or unnecessary harm to a person, or loss or damage to property
- a near miss which did not cause harm, but had the potential to do so
- a medication error involving a preventable event that may cause or lead to inappropriate medication use or harm to a participant while being supported
- any event which deviates from standard policy or procedure
- anything illegal (e.g. assault, sexual misconduct, fraud).

Applicability

When
▪ applies to supports and services provided to all participants.

Who
▪ applies to all representatives including key management personnel, directors, full time workers, part time workers, casual workers, contractors and volunteers.

Supporting Policy Directives

Our commitment

- we are committed to ensure the rights of people with a disability are upheld and supported
- we aim to provide a high standard of duty of care and to ensure the safety and well-being of each participant using our services, our employees and members of our community
- we will foster a culture of continuous improvement with a proactive approach to preventing incidents
- if an incident occurs, we will promptly and appropriately respond to the incident in an equitable, objective and fair manner
- we will record all incidents, report (if required) and investigate (if required)
- we will ensure the principles of procedural fairness are maintained by providing those affected an opportunity to give their side of the story and to comment on any adverse views
- we will maintain an incident management system to aid in recording, managing and resolving incidents
- the incident management policy and process is accessible to workers via the Centro ASSIST web app
- the incident management policy is provided to participants and stakeholders via email or hard copy during on-boarding and at any time by request.

Reporting incidents

Incidents that must be reported to the **NDIS Quality and Safeguards Commission** include any incident that involves:

- the death of a participant
- the serious injury of a participant
- abuse or neglect of a participant
- unlawful sexual or physical contact with, or assault of, a participant
- sexual misconduct committed against, or in the presence of, a participant, including grooming for sexual activity
- unauthorised use of a restrictive practice in relation to a participant.

Other incidents may require reporting to other agencies, for example:

- data breach or breach or personal information (**OAIC**)
- injury or death of a worker while on duty (local state or territory **WHS authority**).

Any incident involving crimes such as assault, theft and fraud must be reported to police.

Responsibilities of key management personnel

- ensure employees have the necessary skills to manage incidents
- record serious incidents
- manage escalated incidents and serious incidents
- report serious incidents to the NDIS Quality and Safeguards Commission
- respond to any media inquiries
- investigate incidents or arranging and external investigator to investigate
- review incidents and initiate improvements.

Reponsibilities of workers

- resolving incidents
- recording incidents
- escalating incidents they can't resolve to key management personnel
- escalating serious incidents to key management personnel.

Organisational responsibilities when responding to incidents

When responding to an incident it is the organisation's responsibility to:

- immediately respond to an incident to ensure the safety and wellbeing of participants and others at risk
- report to police (if appropriate)
- contact relevant support services e.g. sexual assault support services (if appropriate)
- preserve evidence of the incident
- notify relevant next of kin, family or guardian (as appropriate)
- plan and undertake actions to provide ongoing support to those affected by the incident
- document incidents in an internal incident register.

Privacy and confidentiality

Context

This policy ensures that You Connect protect and handle personal information in accordance with the NDIS and relevant privacy legislation. We acknowledge an individual's right to privacy while recognising that personal information is required to be collected, maintained and administered in order to provide a safe working environment and a high standard of quality.

The information we collect is used to provide services to participants in a safe and healthy environment with individual requirements, to meet duty of care obligations, to initiate appropriate referrals, and to conduct business activities to support those services.

This policy applies to all personal information, including sensitive personal information, used and held by the organisation for participants and employees.

Applicability

When
▪ applies to all personal information and sensitive personal information including the personal information of employees and participants ▪ applies to all company confidential information - that is any information not publicly available

Who
▪ applies to all representatives including key management personnel, directors, full time workers, part time workers, casual workers, contractors and volunteers.

What is personal information?

Personal information includes (regardless of its accuracy):

- name
- address
- phone number
- email address
- date of birth
- recorded opinions or notes about someone
- any other information that could be used to identify someone.

What is sensitive personal information?

Sensitive personal information can include personal information that is normally private such as:

- health information
- ethnicity
- political opinions

- membership of a political association, professional or trade association or trade union
- religious beliefs or affiliations
- philosophical beliefs
- sexuality
- criminal record
- biometric information (such as finger prints).

What is a data breach?

A data breach is a type of security incident where personal, sensitive or confidential information normally protected, is deliberately or mistakenly copied, sent, viewed, stolen or used by an unauthorised person or parties. A data breach where people affected by the data breach are at risk of serious harm as a result, is reportable to the Office of the Australian Information Commissioner.

Supporting Policy Directives

Privacy and confidentiality guidelines

- all confidential records, files and other documents including extra copies will remain the property of You Connect and must be returned on termination of employment
- all staff must sign the Workplace Confidentiality Agreement during the induction process
- employees must not disclose confidential information or make public statements concerning You Connect to the media
- we are fully committed to complying with the privacy requirements of the Privacy Act, the Australian Privacy Principles and for Privacy Amendment (Notifiable Data Breaches) as required by organisations providing disability services
- we are fully committed to complying with the consent requirements of the NDIS Quality and Safeguarding Framework and relevant state or territory requirements
- we provide all individuals with access to information about the privacy of their personal information
- individuals have the right to request access to their personal records by requesting this with their contact person
- where we are required to report to government funding bodies, information provided is non-identifiable and related to services and support hours provided, age, disability, language, and nationality
- employees must not share personnel files, client information, office documents or any information relating to clients with any unauthorised persons unless required by law (e.g. reporting assault, abuse, neglect, or where a court order is issued)
- participants have the option of being involved in external NDIS audits if they wish.

Security of information

- we take reasonable steps to protect the personal information we hold against misuse, interference, loss, unauthorised access, modification and disclosure.
- personal information is accessible to the participant and is able for use by relevant workers
- security for personal information includes password protection for IT systems, locked filing cabinets and physical access restrictions with only authorised personnel permitted access
- personal information no longer required is securely destroyed or de-identified.

Data breaches

- we will take reasonable steps to reduce the likelihood of a data breach occurring including storing personal information securely and accessible only be relevant workers
- if we know or suspect your personal information has been accessed by unauthorised parties, and we think this could cause you harm, we will take reasonable steps to reduce the chance of harm and advise you of the breach, and if necessary the Office of the Australian Information Commissioner.

Breach of privacy and confidentiality

- a breach of privacy and confidentiality is an incident - follow the Manage incident process to resolve
- a breach of privacy and confidentiality may require an investigation
- an intentional breach of privacy and confidentiality will result in disciplinary action up to and including termination of employment.

Staff responsibilities

All employees and managers must ensure that:

- safe information practices are implemented within the workplace and that all employees are educated on this policy
- confidential files are not displayed in plain sight, and stored in an appropriate locked place when not being used by staff and that all confidential information is not to be discussed with any persons outside of all You Connect sties without prior approval of general managers of the CEO
- Unneeded files are archived or destroyed appropriately
- any missing files or information is immediately reported to general managers or the CEO
- breach of this policy is reported to management and acted upon immediately.

Whistleblowers

Any employee/volunteer/contractor that has reasonable grounds for suspecting wrongdoing is encourages to raise any concerns with their immediate manager through normal reporting channels, who will then notify HR and/or the CEO.

Grievance Procedure

This policy is concerned with disclosure of information in the public interest, and must not be used for trivial or frivolous matters and does not replace the Internal complaint procedure for matters affect employment.

Whistleblower confidentiality

If a person makes a report of alleged or suspected wrongdoing under this policy, You Connect will endeavour to protect that person's identity from disclosure. This may not occur if confidentiality is not a practical option.

False reporting by a claimed whistleblower

Where it is shown a false report of wrongdoing under the guise of whistleblowing has been made, that conduct will be considered a serious matter and the person may be subject to disciplinary action including dismissal.

Investigation of the report

All reports of alleged or suspected wrongdoing made under this policy will be properly assessed and if appropriate, independently investigated with the objective of locating evidence that either substantiates or refutes the claims made by the whistleblower.

Short notice cancellations now 7 days

Short notice cancellations now 7 days

Previously, cancellations for service appointments were considered "short notice" when participants gave less than two (and for some supports, five) full days' notice to the provider. This is extended to seven days from 1st July 2022.

What does this mean for you?

Under the NDIS Cancellation Policy, providers can charge a cancellation fee and claim up to 100% of the agreed service cost.

If you're a participant, you'll want to give more than seven days' notice when cancelling service appointments to avoid unnecessary fees being charged to your funds (especially for high cost supports such as Short Term Accommodation and Respite). You may also want to check any service agreements you currently have in place with your service providers.

As per the NDIS Pricing Arrangements and Price Limits, You-Connect will charge 100% of the agreed fee associated with the activity from your plan where you have provided a short notice cancellation (or a no show).

A cancellation is a short notice cancellation if the participant:

- Does not show up for a scheduled support within a reasonable time, or is not present at the agreed place and within a reasonable time when the provider is travelling to deliver the support; or
- Has given less than seven (7) clear days' notice for a support

Where a participant will not be available to receive support for a period of more than 5 days (e.g supported holiday, family holiday) You-Connect requests that a minimum of 4 week's notification is provided. Failure to notify You-Connect of an extended absence will result in You-Connect making claims for payment of schedule of scheduled supports to meet industrial relations obligations to staff.

Emergency and Disaster Management

You Connect understand your safety is of paramount importance. You Connect has established emergency and disaster plans for each of our services in the event of an emergency or disaster (examples such as fire, flood, or pandemic). Where we deliver SIL services for our clients, we have site-based disaster contingency plans in place for extreme weather events. These site-based plans are supported by Personal Emergency Evacuation Plans where required, such as for clients using wheelchairs and other equipment.

Our COVID response unit oversees a range of other measures and procedures to manage COVID related risks and positive cases, including but not limited to training, PPE, hygiene, and infection controls. We follow our hygiene, cleaning and infection control procedures when providing support.

Additionally, if an emergency or disaster eventuates while delivering supports to a client our response may include contacting emergency services, providing first aid, enacting a personal evacuation plan or an individual client support plan as agreed to between you and You Connect, and as relevant to the type of supports provided.

Please contact You Connect on **admin@you-connect.com.au** if you would like further details of our **Emergency and Disaster Management Plans** relating to your individual service.