

# Clinical Governance Framework

## POLICY AND PROCEDURE

### Purpose

- Clinical governance is an integrated set of leadership behaviours, policies, procedures, responsibilities, relationships, and monitoring and improvement mechanisms that is directed towards ensuring the best possible clinical outcomes for clients.
- Subee Clinical Governance Policy ensures systems are in place to deliver evidence based safe and high-quality client care whilst continuously monitoring and improving services to meet client needs.

### Scope

The framework and systems throughout Subee Newlake aim to provide accountability for continuously improving the safety and quality of client care. Subee Newlake strives to achieve best clinical outcomes for clients.

The clinical governance at Subee Newlake requires action on multiple fronts, involving clients and/or their advocate, support workers, health practitioners and the non-clinical workforce of administration staff, and management.

Subee Newlake Clinical Governance Policy has been developed in accordance with:

- The National Disability Insurance Scheme (Incident Management and Reportable Incidents) Rules 2018,
- National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018
- The National Disability Insurance Scheme (Provider Registration and Practice Standards) Rules 2018

- The New Aged Care Quality Standards, with specific reference to Standard 3 Personal and Clinical Care & Standard 8 Organisational Governance.
- Australian Community Industry Standard (ACIS) 4.0.

### Definition

Clinical governance is a system through which Subee is accountable for continuously improving the quality of their services and safeguarding high Aged Care and NDIS standards of care. This includes clinical effectiveness, risk management, patient experience and involvement, communication, resource effectiveness, strategic effectiveness, and learning effectiveness.

The Clinical Governance framework which includes or refers to various policies and procedures should be a practical tool that can be used by Subee staff to understand what they need to do to support clinical quality and safety, and to be accountable for achieving this.

Specific to clinical care the clinical governance framework oversees the following areas, including but not limited to:

- Infection control and prevention
- Minimising exposing to and spread of COVID 19
- Minimising the use of restraint or restrictive practices
- Open disclosure
- Medication management
- Waste Management
- Complex wound care management
- Recognising and responding to deterioration
- Complex Bowel management
- Catheter care management
- Caring for people with dementia

P- Clinical Governance Policy and Procedure	Printed documents are uncontrolled. View current documents on the Subee Intranet	
V5	07/08/2023	Page 1 of 10



In-Home Care • NDIS Disability Support • Aged Care • Packages

Subee Unit 2, 84-90 Industrial Drive, Coffs Harbour NSW 2450  
02 6651 3153 | [www.subeenewlake.com.au](http://www.subeenewlake.com.au)  
[subee@subeenewlake.com.au](mailto:subee@subeenewlake.com.au)



In-Home Care • NDIS Disability Support • Aged Care • Packages

Newlake 3/11 Glenwood Drive, Thornton NSW 2322  
02 4966 8399 | [www.subeenewlake.com.au](http://www.subeenewlake.com.au)  
[newlake@subeenewlake.com.au](mailto:newlake@subeenewlake.com.au)

# Clinical Governance Framework

## POLICY AND PROCEDURE

- Mental Health Care and Management
- Dysphagia, safe swallowing, and mealtime preparation
- End of life and palliative care
- Enteral Feeding Management
- Subcutaneous Injections management
- Tracheostomy Care and management
- Seizure Care and Management
- Caring for people with Diabetes
- Bariatric Care and Management
- Managing Falls in the Community
- Antimicrobial Stewardship in the Community
- Psychotropic Medication in the Community

### Procedure

All Subee Newlake staff and support workers should be aware of and follow procedures that provide and promote client safety and quality of care. Procedures are accessible on TRACK, the staff portal or a hard copy can be obtained from the office.

All Subee Newlake staff are checked at time of employment to have appropriate industry standard credentials for their position. Community Support Workers Level 1, have the NDIS worker orientation module 'Quality, Safety and You' and "Supporting safe and enjoyable meals", current first Aid, NDIS workers screening clearance or a current criminal record check and working with children's check. In addition, Level 2-3 Community Support Workers have a minimum Cert III.

Clinical nursing staff are checked to hold a current industry specific registration and continuing professional development with the National Registration and

Accreditation Scheme. Credentials are verified on APHRA website, <https://www.ahpra.gov.au/> annually on 31<sup>st</sup> May.

Consumers are engaged in the development, delivery and evaluation of care and services and are supported in that engagement.

Subee aims to create and promote a culture of safe, inclusive, and quality care and services and is accountable for their delivery.

Best Practice standards are implemented for client care by Subee staff.

Staff training and competency performance measures around clinical best practice is carried out annually. Staff education is via Subee Registered Nurse or appropriate external services and Altura e-Learning Management System (LMS). Often a combination of learning modes is used to effectively teach clinical skills required.

Interim training is provided when identified by risk assessment from incident reports, staff, or client feedback or if there is a change to best practice procedure.

Because of the number and range of health practitioners that consumers of home care services can see, good communication, coordination and continuity of care are also important in this setting to maintain clinical quality and safety. This is done by detailed Admission summary and Client Support Plans, informative progress notes and case management meeting that network with all services involved in the client's care.

P- Clinical Governance Policy and Procedure	Printed documents are uncontrolled. View current documents on the Subee Intranet	
V5	07/08/2023	Page 2 of 10



In-Home Care • NDIS Disability Support • Aged Care • Packages

**Subee** Unit 2, 84-90 Industrial Drive, Coffs Harbour NSW 2450  
02 6651 3153 | [www.subeenewlake.com.au](http://www.subeenewlake.com.au)  
[subee@subeenewlake.com.au](mailto:subee@subeenewlake.com.au)



In-Home Care • NDIS Disability Support • Aged Care • Packages

**Newlake** 3/11 Glenwood Drive, Thornton NSW 2322  
02 4966 8399 | [www.subeenewlake.com.au](http://www.subeenewlake.com.au)  
[newlake@subeenewlake.com.au](mailto:newlake@subeenewlake.com.au)

# Clinical Governance Framework

## POLICY AND PROCEDURE

Clients are active partners in planning and decision making about their clinical care and the way in which it will be delivered.

Subee Newlake has a systemic approach to safety and quality, rather than reactive, short-term fixes.

Subee Newlake collects data via TRACK incident and risk register that can highlight trends and risk to client, staff, and business risks.

A risk register and Corrective Action Plan are developed to manage identified risks.

Subee Newlake draws on the experiences of clients and the contributions of all staff as well as organisation-level strategies through client and staff feedback.

Incidents or trends identified are dealt with via Subee Newlake Feedback Policy or Incident Management Policy.

Identification of quality improvement goals, the design and implementation of quality improvement initiatives and the evaluation of outcomes within Subee occur during monthly Management Meetings, monthly Admin Meetings and Strategic Planning and Development days.

Subee Promotes Clinical Governance by:

- Building a culture of clinical quality, best practice & safety
- Encouraging & facilitating clients to be partners in their clinical care.
- Organisational systems including policy and procedures, risk identification, and incident reporting,

recording and acting on all support clinical quality and safety.

- Clinical quality & safety is monitored and reported and a culture of openness and learning about clinical quality and safety
- Employing a workforce that can fulfil their clinical quality and safety roles and responsibility
- Ongoing training to ensure competent support staff

Clinical governance includes a weekly client intake meeting to assess current resources available to meet the client's individual needs safely

Client intake meeting facilitates:

- all service coordinators and rostering staff being aware of new and potential Subee Newlake clients and their individual needs
- -client needs and goals will be discussed at the weekly client intake meeting to allocate appropriate clinical support
- -If safe and competent support cannot be offered to the potential client, staff will assist to find alternative service options.
- The RN will be assigned to all clients with High Intensity Daily Personal Activity (HIDPA) needs along with a Service Coordinator
- The RN will visit all aged care clients within the first month of onboarding to complete baseline cognitive assessment and risks..
- The RN will complete a complex care plan with HIDPA clients and provide clinical competency training to relevant support staff
- ONLY Support staff who have received competency training in HIDPA area to be rostered on with client

P- Clinical Governance Policy and Procedure	Printed documents are uncontrolled. View current documents on the Subee Intranet	
V5	07/08/2023	Page 3 of 10



In-Home Care • NDIS Disability Support • Aged Care • Packages

**Subee** Unit 2, 84-90 Industrial Drive, Coffs Harbour NSW 2450  
02 6651 3153 | [www.subeenewlake.com.au](http://www.subeenewlake.com.au)  
[subee@subeenewlake.com.au](mailto:subee@subeenewlake.com.au)



In-Home Care • NDIS Disability Support • Aged Care • Packages

**Newlake** 3/11 Glenwood Drive, Thornton NSW 2322  
02 4966 8399 | [www.subeenewlake.com.au](http://www.subeenewlake.com.au)  
[newlake@subeenewlake.com.au](mailto:newlake@subeenewlake.com.au)

# Clinical Governance Framework

## POLICY AND PROCEDURE

who have high support needs to promote quality and safe care and minimise risk to client and staff.

- Clinical competency spot checks will occur with support staff by the RN

Reducing and eliminating the use of Restrictive Practice

Service Co-ordinators and support staff using restrictive practices in conjunction with an approved behavioural support plan are aware of and briefed on Restrictive Practice and Behavioural Support Policy. The Restrictive Practice Policy is on TRACK and the Staff Portal and can be viewed at any time. Restrictive Practices and restraints is part of Subee Newlake annual mandatory training for support workers.

NDIS clients with a Behavioural support plan (BSP) or interim BSP will be highlighted by ticking the appropriate restrictive practice tab on TRACK.

A Restrictive Practice Tab has been created for all progress notes related to the use of restrictive practices that is separate from general progress notes. This facilitates quick reference for recording and monitoring data required by service provider.

Service co-ordinators will communicate with support workers monthly to review any potential needs around BSP before sending the BSP data collection to the RPA portal.

Training for implementation of the Behavioural Support Plan will occur by the Behavioural Support Specialist who develops the plan. Staff should be encouraged to communicate any concerns over the BSP directly to the behavioural support specialist or through their Service Co-ordinator.

## Training

Subee Newlake has developed training and e-learning packages to help staff with the principles and processes of clinical risk management.

Mandatory training is provided through Altura Learning Management System (LMS), the Subee Newlake staff portal, internally through Subee Newlake Registered Nurse and when needed an external training provider with Cert IV Training and Assessing qualifications.

Additional training is offered specific to client needs or when gaps are identified with Subee RN, webinars, eLearning modules or external providers.

Clinical competency training through the RN will be directed at specific support staff working with individual client needs. For example, bowel care, enteral feeding, dysphagia management, seizure management, diabetes, dementia etc

From 1st August 2019 Subee Newlake introduced Altura Learning Management System (LMS) to provide e-learning modules and complement current classroom training.

An induction and ongoing training schedule for support workers, Registered Nurses, Enrolled Nurses and administrative staff is outlined in: P-Training Schedule for Support Workers & Clinical Staff and P-Training Schedule for Administrative Staff.

Ongoing annual mandatory training for support workers and clinical staff are: Medication Assist, Elder Abuse, Manual Handling, Infection Control & Waste Management and Restrictive Practices & Restraints and Report Writing will occur.

P- Clinical Governance Policy and Procedure	Printed documents are uncontrolled. View current documents on the Subee Intranet	
V5	07/08/2023	Page 4 of 10



In-Home Care • NDIS Disability Support • Aged Care • Packages

**Subee** Unit 2, 84-90 Industrial Drive, Coffs Harbour NSW 2450  
02 6651 3153 | [www.subeenewlake.com.au](http://www.subeenewlake.com.au)  
[subee@subeenewlake.com.au](mailto:subee@subeenewlake.com.au)



In-Home Care • NDIS Disability Support • Aged Care • Packages

**Newlake** 3/11 Glenwood Drive, Thornton NSW 2322  
02 4966 8399 | [www.subeenewlake.com.au](http://www.subeenewlake.com.au)  
[newlake@subeenewlake.com.au](mailto:newlake@subeenewlake.com.au)

# Clinical Governance Framework

## POLICY AND PROCEDURE

Recording and monitoring of training will be through the Altura LMS and Care Worker training register on TRACK.

Staff will be expected to complete all mandatory modules prior to the commencement of shifts.

12 hours of professional development per year is encouraged and outlined in the Employee Handbook.

Additional training may occur through performance appraisals, incident reports or professional development.

### **Who is responsible for Clinical Governance in Subee Newlake?**

**Clients:** Partners in the planning and delivery of care.

**Non-Clinical workforce:** Work within the clinical governance framework to support the delivery of safe and high-quality clinical care

**Health Practitioners:** Work directly with consumers and others to deliver clinical quality and safety. Ensure maintenance of up-to-date knowledge and skills to deliver safe and high-quality best practice clinical care

**Managers:** Lead and manage the operation of the organisation. Recruit, train and supervise the workforce, liaise with consumers and their family members, and implement well-designed systems for the delivery of clinical care. Promote a culture that reflects the importance of high quality and safe service delivery.

**Owner & Director:** Establish strategic direction and a policy framework, lead organisational culture, monitor organisational performance, and ensure organisational

accountability for the delivery of safe and high-quality clinical care

### **Clinical Staff at Subee Newlake**

Registered nurses (RN's) must be registered with the Nursing and Midwifery Board of Australia (NMBA) and meet the NMBA's professional standards to practise in Australia.

Professional standards define the practice and behaviour of nurses and midwives and include:

- codes of conduct,
- standards for practice, and
- codes of ethics.

It is the clinical staff's responsibility to maintain their relevant certification and professional standards.

Clinical Team meeting occur monthly to discuss clinical concerns around clients and clinical risk management. This may include identifying gaps in RN skills and sourcing relevant training.

The RN's will report to the CFO/Clinical Team Leader with any clinical concerns.

### **Scope of Registered Nurse**

The RN:

#### *Maintain the Capability to Practice*

RNs, as regulated health professionals, are responsible and accountable for ensuring they are safe, and have the capability for practice. This includes ongoing self-management and responding when there is concern about

P- Clinical Governance Policy and Procedure	Printed documents are uncontrolled. View current documents on the Subee Intranet	
V5	07/08/2023	Page 5 of 10



In-Home Care • NDIS Disability Support • Aged Care • Packages

**Subee** Unit 2, 84-90 Industrial Drive, Coffs Harbour NSW 2450  
02 6651 3153 | [www.subeenewlake.com.au](http://www.subeenewlake.com.au)  
[subee@subeenewlake.com.au](mailto:subee@subeenewlake.com.au)



In-Home Care • NDIS Disability Support • Aged Care • Packages

**Newlake** 3/11 Glenwood Drive, Thornton NSW 2322  
02 4966 8399 | [www.subeenewlake.com.au](http://www.subeenewlake.com.au)  
[newlake@subeenewlake.com.au](mailto:newlake@subeenewlake.com.au)

# Clinical Governance Framework

## POLICY AND PROCEDURE

other health professionals' capability for practice. RNs are responsible for their professional development and contribute to the development of others. They are also responsible for providing information and education to enable people to make decisions and act in relation to their health.

### *Comprehensively conducts assessments*

RNs accurately conduct comprehensive and systematic assessments. They analyse information and data and communicate outcomes as the basis for practice.

- conducts assessments that are holistic as well as culturally appropriate
- uses a range of assessment techniques to systematically collect relevant and accurate information and data to inform practice
- works in partnership to determine factors that affect, or potentially affect, the health and wellbeing of people and populations to determine priorities for action and/ or for referral, and
- assesses the resources available to inform planning.

### *Develops a plan for nursing practise*

RNs are responsible for the planning and communication of nursing practice. Agreed plans are developed in partnership with the client. They are based on the RNs appraisal of comprehensive, relevant information, and evidence that is documented and communicated

Th RN:

- uses assessment data and best available evidence to develop a plan

- collaboratively constructs nursing practice plans until contingencies, options priorities, goals, actions, outcomes, and timeframes are agreed with the client
- documents, evaluates, and modifies plans accordingly to facilitate the agreed outcomes
- plans and negotiates how practice will be evaluated and the time frame of engagement, and
- coordinates resources effectively and efficiently for planned actions.

### *Provides safe, appropriate, and responsive quality nursing care*

RNs provide and may delegate, quality and ethical goal-directed actions. These are based on comprehensive and systematic assessment, and the best available evidence to achieve planned and agreed outcomes.

- provides comprehensive safe, quality practice to achieve agreed goals and outcomes that are responsive to the nursing needs of people
- practises within their scope of practice
- appropriately delegates aspects of practice to enrolled nurses and others, according to enrolled nurse's scope of practice or others' clinical or non-clinical roles
- provides effective timely direction and supervision to ensure that delegated practice is safe and correct
- practises in accordance with relevant policies, guidelines, standards, regulations, and legislation, and
- uses the appropriate processes to identify and report potential and actual risk related system issues and where practice may be below the expected standards.

P- Clinical Governance Policy and Procedure	Printed documents are uncontrolled. View current documents on the Subee Intranet	
V5	07/08/2023	Page 6 of 10



In-Home Care • NDIS Disability Support • Aged Care • Packages

**Subee** Unit 2, 84-90 Industrial Drive, Coffs Harbour NSW 2450  
02 6651 3153 | [www.subeenewlake.com.au](http://www.subeenewlake.com.au)  
[subee@subeenewlake.com.au](mailto:subee@subeenewlake.com.au)



In-Home Care • NDIS Disability Support • Aged Care • Packages

**Newlake** 3/11 Glenwood Drive, Thornton NSW 2322  
02 4966 8399 | [www.subeenewlake.com.au](http://www.subeenewlake.com.au)  
[newlake@subeenewlake.com.au](mailto:newlake@subeenewlake.com.au)

# Clinical Governance Framework

## POLICY AND PROCEDURE

The RN uses the appropriate processes to identify and report potential and actual risk related system issues and where practice may be below the expected standards.

### Scope of Enrolled Nurse

Under the Enrolled nurse standards for practice an EN needs to practice within their scope of practice, in line with the relevant state drugs and poisons legislation and their own educational preparation and experience. ENs may administer medication if they have completed the required education and are competent to do so. ENs are also expected to work in accordance with the relevant policies of their employer.

Enrolled nurses (EN's) can administer medicines if they have completed medication administration education at some stage in their career. This is determined by APHRA.

An EN can administer medicines unless they have a notation on their registration which advises that they have not completed medication education.

Subee Newlake will check all ENs qualifications for administering medicine on the national register of practitioners (the public register).

The EN's will report to the RN or Clinical Team Leader with any clinical concerns.

The RN will delegate and provide supervision of EN nursing activities.

### Reviewing the Clinical Governance Framework

The Quality Manager ensure that existing quality processes work properly or reports their shortcomings.

The Quality Manager will also identify where there are no processes agreed and ensure that gaps are filled. The types of processes required include assessment of staff competency, evaluation of activities and review of clinical knowledge.

If the Clinical Governance Framework is effective if:

- Leaders at all levels in Subee set up and use clinical governance and safety and quality systems to improve the safety and quality of health care
- The safety and quality systems work effectively with management systems
- The workforce has the right qualifications, skills, and supervision to provide safe, high-quality health care to patients
- The environment promotes safe and high-quality health care for patients

### Related or relevant documents

- Incident Reporting Policy
- Feedback & Complaints Management Policy
- Restrictive Practice & Behavioural Support Plan Policy
- Staff Training and Development Policy
- Administration of Non-Oral Medication Policy
- Administration of Oral Medication Policy
- Enteral Feeding Management Policy & Procedure
- Risk Management Policy and Procedure

P- Clinical Governance Policy and Procedure	Printed documents are uncontrolled. View current documents on the Subee Intranet	
V5	07/08/2023	Page 7 of 10



In-Home Care • NDIS Disability Support • Aged Care • Packages

**Subee** Unit 2, 84-90 Industrial Drive, Coffs Harbour NSW 2450  
02 6651 3153 | [www.subeenewlake.com.au](http://www.subeenewlake.com.au)  
[subee@subeenewlake.com.au](mailto:subee@subeenewlake.com.au)



In-Home Care • NDIS Disability Support • Aged Care • Packages

**Newlake** 3/11 Glenwood Drive, Thornton NSW 2322  
02 4966 8399 | [www.subeenewlake.com.au](http://www.subeenewlake.com.au)  
[newlake@subeenewlake.com.au](mailto:newlake@subeenewlake.com.au)

# Clinical Governance Framework

## POLICY AND PROCEDURE

- End of Life Care Policy and Procedure
- Infectious Control Policy and Procedure
- Bowel Care Management Policy & Procedure
- Wound Care Management Policy & Procedure
- Catheter Care and management Policy & Procedure
- Tracheostomy Care & Management Policy & Procedures
- Bariatric Care and Management
- Antimicrobial Stewardship in the community
- Psychotropic Medication in the community
- Dementia Care and Management
- Diabetes Care and Management
- Dysphagia, safe swallowing and mealtime management Policy
- Seizure Management Policy
- Waste Management Policy

Diagram 1. 8 Domains to good clinical governance



P- Clinical Governance Policy and Procedure	Printed documents are uncontrolled. View current documents on the Subee Intranet	
V5	07/08/2023	Page 8 of 10



In-Home Care • NDIS Disability Support • Aged Care • Packages

**Subee** Unit 2, 84-90 Industrial Drive, Coffs Harbour NSW 2450  
02 6651 3153 | [www.subeenewlake.com.au](http://www.subeenewlake.com.au)  
[subee@subeenewlake.com.au](mailto:subee@subeenewlake.com.au)



In-Home Care • NDIS Disability Support • Aged Care • Packages

**Newlake** 3/11 Glenwood Drive, Thornton NSW 2322  
02 4966 8399 | [www.subeenewlake.com.au](http://www.subeenewlake.com.au)  
[newlake@subeenewlake.com.au](mailto:newlake@subeenewlake.com.au)

# Clinical Governance Framework

## POLICY AND PROCEDURE

P- Clinical Governance Policy and Procedure	Printed documents are uncontrolled. View current documents on the Subee Intranet	
V5	07/08/2023	Page 9 of 10



*In-Home Care • NDIS Disability Support • Aged Care • Packages*

**Subee** Unit 2, 84-90 Industrial Drive, Coffs Harbour NSW 2450  
02 6651 3153 | [www.subeenewlake.com.au](http://www.subeenewlake.com.au)  
[subee@subeenewlake.com.au](mailto:subee@subeenewlake.com.au)



*In-Home Care • NDIS Disability Support • Aged Care • Packages*

**Newlake** 3/11 Glenwood Drive, Thornton NSW 2322  
02 4966 8399 | [www.subeenewlake.com.au](http://www.subeenewlake.com.au)  
[newlake@subeenewlake.com.au](mailto:newlake@subeenewlake.com.au)

# Clinical Governance Framework

## POLICY AND PROCEDURE



P- Clinical Governance Policy and Procedure	Printed documents are uncontrolled. View current documents on the Subee Intranet	
V5	07/08/2023	Page 10 of 10



*In-Home Care • NDIS Disability Support • Aged Care • Packages*

**Subee** Unit 2, 84-90 Industrial Drive, Coffs Harbour NSW 2450  
02 6651 3153 | [www.subeenewlake.com.au](http://www.subeenewlake.com.au)  
[subee@subeenewlake.com.au](mailto:subee@subeenewlake.com.au)



*In-Home Care • NDIS Disability Support • Aged Care • Packages*

**Newlake** 3/11 Glenwood Drive, Thornton NSW 2322  
02 4966 8399 | [www.subeenewlake.com.au](http://www.subeenewlake.com.au)  
[newlake@subeenewlake.com.au](mailto:newlake@subeenewlake.com.au)