POLICY AND PROCEDURE

1. Purpose

This policy clearly defines the principles to which Subee Pty Ltd operates under current legislation of the Aged Care Act 1997 and the Disability Services Act 1986. Best practice is in line with the National Disability Insurance Scheme (Provider Registration and Practice Standards) Rules 2018 and Quality of Care Amendment (Single Quality Framework) Principles.

The service delivery policy and procedure sets minimum expectation, shaping the behaviours and culture of Subee employees'. The policy empowers participants in relation to their rights, decision making, choice and encourages and supports feedback.

2. Scope

This policy applies to all employees of Subee Pty Ltd.

Subee is committed to developing an organisational culture that supports the legal and human rights of clients and ensures they are able to exercise those rights as outlined in relevant legislation including the:

- Age Discrimination Act 2004
- Anti-Discrimination Act 1997
- Australian Human Rights Commission Act 1986
- Disability Discrimination Act 1992
- Racial Discrimination Act 1975
- Sex Discrimination Act 1984
- The New Charter of Aged Care Rights

3. Responsibility & Authority

The management team has responsibility and authority to ensure this policy is followed. Service Co-ordinators are responsible for reinforcing this policy with care staff. All employees are responsible for knowing and following this.

4. Policy Statement

Subee aims to provide information that is accessible and in an easy-to-understand format and language. This occurs from service commencement and includes what the organisation does, how clients can contact the organisation, client's rights, the service standards clients can expect and opportunities to provide feedback or make a complaint.

5. Client Rights

Subee places the client as the central focus for our service delivery. All clients are individuals and have different needs determined by age, gender, cultural background and life circumstance.

- Client:
- have the right to make choices in their life;
- have the right to dignity, respect, privacy and confidentiality;
- have the right to access services on a nondiscriminatory basis.

6. Human Rights

Subee Pty Ltd is accountable to the community and recognises the principles of relevant Acts and Legislation that promote inclusion.

Human Rights Principles:

- respect for the inherent dignity, independence of persons and individual autonomy, including the freedom to make one's own choices;
- non-discrimination;
- full and effective participation and inclusion in society;
- respect for difference and acceptance of persons with disabilities as part of human diversity and humanity;

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- equality of opportunity;
- accessibility;
- equality between men and women;
- respect for the evolving capacities of children with disability and respect for the right of children with disability to preserve their identities; and
- active partnerships between services and people with disability, and where appropriate, their families, friends, carers and/or advocates.

7. Choice

Subee will support clients to exercise choice and participate in service delivery and direction

Our Clients will decide which support options they prefer. Employees of Subee will provide client/ carers with information, advocacy and assistance in obtaining other services and planning a support package in partnership with them if required.

Subee is committed to:

- work with the client to identify support options which meet their needs now and in the future;
- provide support which is individual to the client's cultural, emotional and physical needs and choice;
- offer client a choice of staff, day and time of service and activities;
- follow only a plan that has the agreement of the client (or that of their guardian);
- respect a client's right to refuse a service.
- regularly review the support with the client so that the service meets their changing needs;
- keep clear, up-to-date and relevant information about the client and their support;
- only share information with other people or agencies involved in their support if the client agrees to that;

- ref<mark>er the</mark> client to other agencies for support if they wish us to do this;
- give the client a written support plan showing what services we agreed on;
- The client service coordinator will check with the client to see if the service they are getting are still what they need and change the support plan if needed.

8. Change in Service

- Continuity of support staff is developed during staff rostering and training. A group of workers ideally are allocated to a client so that in the event of worker absence or vacancy, a suitably qualified and/or experienced person performs the role that is also known to client.
- Procedure for staff rostering aims to ensure support is available to meet client's needs with minimal change or interruptions. Once again, a team of appropriately trained support workers are allocated to each client to provide continuity of care with minimal interruptions.
- If a change or interruption to the client's service is unavoidable, Subee contacts the client by phone to explain the situation and work with the client how to resolve the situation and provide alternative options that are agreed upon by the client.
- For clients that require continuation of critical supports an emergency plan is in place for disaster preparedness and planning measures. Service co-ordinators and rostering staff would prioritise clients with critical support needs during a potential disaster and aftermath.

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9. Conflict of Interest

- Conflicts of interest exist when it is likely that employees could be influenced, or it could be perceived that they are influenced, by a personal interest when carrying out a public duty.
- Conflicts of interest that lead to biased decision making may constitute corrupt conduct which will not be tolerated by Subee Pty Ltd.
- Some situations that may give rise to a conflict of interest include the following:
- In terms of NDIS there is an inherent Conflict of Interest between the COS (Co-ordinator of Support) function and also delivering the Support Services component of a plan.
- The COS needs to empower the client to determine how they reach their plan goals and provide them with choice and control over who they determine to be their service provider
- The NDIS requires the COS to document the process of offering client choice by providing them with a list (or assisting them to determine) a variety of other Support Providers out there.

If the client chooses Subee Pty Ltd, that also provides the COS, there is clear documentation that clients were given choice and options of alternative services. This should be evident in the client files where we are providing COS as well as delivering the core supports.

10. Feedback

- Subee values feedback as we believe feedback positive or negative supports continuous improvement as such, we will routinely ask the client for feedback on support and services provided to them. The client's right to express dissatisfaction or make a complaint will be supported, complaints will be dealt with fairly, promptly, confidentially and without prejudice. Refer to Subee Feedback Policy.

- Client feedback can be through Subee feedback forms in introduction packs or Subee webpage, by phone or by mail. In addition, client surveys will be conducted bi-annually
- Subee is in the process of working towards the process of co-design, actively engaging with clients to enable the design and innovation of processes and systems all the way from the 'ideas' stage, through to delivery and implementation. A Consumer Advisory Group and Quality Care Advisory Group have been developed in June and August 2023 respectively as a start to this process.

11. Service Provision

Subee Pty Ltd will ensure:

- Contact with the client to check how their support is going and whether they want to make any changes or tell us about any problems;
- Service Agreement will be updated every 12 months for NDIS clients.
- NDIS client support plans will be reviewed at least every twelve months, or more often if they or their coordinator thinks this is necessary.
- Any NDIS clients receiving Module 1 High Intensity Daily Personal Activity, client support plan will be reviewed by Subee Newlake Registered Nurse at least every 6 months as clinically determined.
- If a NDIS client receiving supports within the 'Assistance with daily personal activities' group Subee Newlake ensures that they are overseen by more than one support worker and have relevant allied health, social and medical oversight.

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- Risk assessment will be completed every 12 months.
 The risk assessment may be completed earlier than 12 months if incidents or feedback indicate a need.
- A Falls Risk Assessment Tool (FRAT) will be conducted on all aged care clients and NDIS clients suspected to be at risk.
- Home Care Package clients and their support plan is reviewed with them at least every six months, or more often if they or their coordinator thinks this is necessary.
- Level 3 & 4 Home Care Package clients support plans will be reviewed every 3 months with the Registered Nurse.
- at time of onboarding (or within first 2-3 weeks) all Home Care Package clients will have a baseline assessment that can be use moving forward to identify changes to a client's mental health, cognitive or physical function, capacity or condition.
- Staff attending services will be trained appropriately by qualified staff to meet clients needs safely and minimise risks
- All clients are aware of Subee Complaints and feedback procedure and support the client, carer, guardian or advocate in making any complaint about Subee.
- Subee monitor and record all feedback and complaints, and review our policies and procedures accordingly;
- Subee promptly, fairly, and confidentially respond to any feedback or complaints. If the client is unhappy with our response, we will tell them of other ways they

can give feedback, the client will not be disadvantaged because they make a complaint.

- inform the client of any issues of concern raised about them and give them the opportunity to put their side of the matter, so that the problem can be resolved as soon as possible.
- help resolve any conflict about our service between the client, their family, or friends if they ask us.
- ask the client to help evaluate the effectiveness of service provision through 6 monthly surveys, advisory bodies and feedback channels.

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