



## **2. Children, Families and Key Stakeholders**



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## ***2.1 Rights and Advocacy***

### ***Policy***

Each client of PlayAbility will receive a service in an environment free from discrimination, abuse, neglect, and exploitation.

#### **Children's Rights**

PlayAbility upholds the dignity and rights of each child to learn and grow in an environment that offers opportunities which reflect the holistic way children learn and grow in the wider world of family and community, experiencing responsive and reciprocal relationships with people, places, and things.

Children with a disability share universal rights with all people and share the additional rights of all children as identified in the UN Convention on the Rights of the Child.

The specific rights of children with a disability are expressed in the UN Convention on the Rights of Persons with Disabilities.

Australia has its own legislation, at both national and at State and Territory levels, which supports the inclusion of children with a disability.

PlayAbility will at all times work with children and their families/carers to ensure that:

- Their dignity and privacy are protected.
- They feel empowered to be in control of their child's program and play an active role.
- They maintain their right to make decisions, including medical treatments and interventions. NOTE- PlayAbility staff are not permitted to administer medical treatments.
- Their culture, diversity, values, and beliefs are identified and sensitively responded to and the supported to practice their culture, values, and beliefs.
- They are encouraged and are made to feel comfortable to make suggestions and complaints.

#### **Advocacy**

PlayAbility recognises the importance an advocate and/or representative. PlayAbility ensures the right to use of an advocate/representative of the participants/family's choice is maintained.

Advocacy promotes, protects, and defends the welfare of and justice for either the person or group by:

- Being on their side and no-one else's.



- Being primarily concerned with their fundamental needs.
- Remaining loyal and accountable to them in a way which is empathic and vigorous.

Advocacy services can enable people with a disability to increase the power and control they have over their lives. Services encourage and assist people with a disability to achieve and maintain their rights as citizens and achieve equity of access and participation within their communities.

Information and access:

- The PlayAbility website provides information for children and their families on advocacy, their rights and how to access services.
- Clients are provided with [2.1 PlayAbility's Rights and Advocacy policy](#), [2.2 Inclusion policy](#) and [2.10 Feedback and Complaints policy](#) during the intake process. The [client intake form](#) provides for verification that this has occurred and that they understand it.
- Staff are appraised on their knowledge and understanding of advocacy as part of the ongoing Recognition, Training and Development Management process and will receive training upon starting employment with PlayAbility.
- PlayAbility staff can be requested by families to attend meetings with schools and other institutions such as Centrelink or the NDIA (National Disability Insurance Agency). Our role in these meetings above morale support is to ensure other parties and stakeholders understand and respect the points of view of the family and to provide professional input on current functioning, strategies and supports.
- PlayAbility encourages and supports participants to have an advocate provide feedback on their behalf or support them in any way with the PlayAbility feedback process.

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## **2.2 Inclusion**

### ***Policy***

Each family comes to PlayAbility with a unique set of circumstances, experiences, knowledge, and interests. PlayAbility seeks to build on family and child experiences and provide access to supports that engage their natural environments and enable inclusive and meaningful participation.

Every child is entitled to access and participate in programs which recognise them as active agents in their own lives and learning, respond to them as individuals, respect their families as partners and engage with their diverse backgrounds and cultures.

We advocate and support all children, without discrimination, irrespective of a child's race, language, religion, ethnic origin, disability, or other status.

### **Inclusion Definition**

The United Nations Convention on the Rights of the Child supports the broad view of inclusion which "...recognise(s) that a mentally or physically disabled child should enjoy a full and decent life, in conditions which ensure dignity, promote self-reliance, and facilitate the child's active participation in the community" (Article 23, 1989).

All children have a right to feel that they belong in the community regardless of race, culture, disabilities, or any other attribute.

Within the context of PlayAbility, inclusion means that all children, regardless of their background or ability, are given the chance to play, learn and interact together. Inclusion is an approach where every child is valued, supported, and given access to equal opportunities and learning experiences.

PlayAbility recognises the importance of children experiencing inclusion in their community. PlayAbility uses therapeutic approaches to engage a child's natural learning environment, where possible, and links with family's community and other support agencies to encourage inclusive, meaningful, and active participation in family and community life.

### **Principles of Inclusion**

The inclusion of families with young children with and without disabilities is based on the following principles:



Best interests of the child	In all actions concerning children, the rights and best interests of the child are paramount, and young children’s healthy development, learning and well- being must be a priority.
Importance of families	Children’s growth and learning occurs in the context of their primary relationships in their families and partnerships between PlayAbility, support professionals and families are essential.
Social inclusion	Every child has the capacity to make a unique contribution and to participate in a wide range of activities and contexts as a full member of a family, communities, and our society.
Diversity	Diversity and difference are valuable, as are the commonalities among people. Understanding the practices, values, beliefs, and cultures of families and acknowledging difference is fundamental.
Equity	Equity requires that each child receives the supports and resources needed to participate, engage, and succeed.
High expectations for every child	All children have the capacity to succeed, regardless of diverse circumstances and abilities. Children progress well when they, their families, early childhood educators and support professionals have high expectations for their achievement in learning and development.
Evidence-based practice	Evidence based practice in PlayAbility programs are informed by the knowledge and experience of educators and families as well as findings from current research.

(Adapted from the ECIA position statement 2013).

***Procedures***

Staff will:

- Discuss with parents/caregivers the benefits of their child being involved in a range of everyday family and other activities and explore ways in which their social experiences can be broadened, and exclusion can be overcome.
- Work collaboratively with parents/caregivers to identify the skills their child needs to participate meaningfully in everyday activities and explore ways of promoting these skills.



- Support parents/caregivers to engage with and respond to their children in ways that promote children’s attachment security and development, and that recognise and build on children’s strengths and interests.
- Encourage parents/caregivers to view children with developmental disabilities in terms of what they can do and like rather than what they cannot do.
- Identify and develop existing strengths of parents/caregivers to help them become effective advocates for their children’s inclusion in early childhood and community settings.
- Work in partnership with parents/caregivers to help develop ways of meeting the needs of their children and the family as a whole.
- Provide support to children and families to participate meaningfully in community activities, facilities, and settings.
- Work collaboratively with community service providers to plan ways in which their community activities, facilities and settings can be made more accessible to and welcoming of all children and families.
- Use the Self-reflection on inclusive practises: a tool for early childhood intervention practitioners to reflect upon the extent to which staff at PlayAbility support the inclusion and participation of young children with additional needs in home, Early Childhood Education and Care (ECEC) and other community settings.
- Assist parents/caregivers with assessing what risks are age appropriate.

## References

ECIA (2013) position statement on the inclusion of children with a disability in ECEC.

United nations (1989) UN convention on the rights of the child.

ECIA NSW (2014) Self-Reflection on inclusive practices: a tool for early childhood intervention partitioners.

### *Document Review*

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## ***2.3 Family Centred and Strengths Based Approach***

### ***Policy***

PlayAbility recognises the potential of all children and families and focus on the strengths, interests, capabilities, knowledge, language and culture of all children and families.

### ***Procedures***

- PlayAbility will ensure that the child and their family is at the centre of decision making when it comes to the supports and services they use.
- Interventions are based on families' self-determination.
- PlayAbility builds the capacity of the family or support network to achieve the desired outcomes identified with the family.
- PlayAbility staff will ensure, as far as practicable, that children and staff are safe and not exposed to health and safety risks.

### **Working with Aboriginal and Torres Strait Islander children and families**

PlayAbility wishes to recognise the Traditional Owners of the Land and the Aboriginal Communities served by our service. PlayAbility aims to provide services and supports that meet the needs of Aboriginal and Torres Strait Islander people. PlayAbility works with the client, the client's family, extended family, and community, with consent.

PlayAbility aims to create a safe and welcoming environment for all people. If required staff will collaborate with Aboriginal and Torres Strait Islander community members to support participants in the development and review of their service planning.

An inclusive approach is undertaken to engage the participant, their community and PlayAbility in procedures that promote the cultural safety of Aboriginal and/or Torres Strait Islander People.

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## ***2.4 Positive Behaviour Support***

### ***Policy***

PlayAbility does not provide specialist behaviour support services and does not implement restrictive practices.

PlayAbility does not condone any form of any physical punishment, the threat of punishment or any form of deprivation/withdrawal as punishment.

PlayAbility staff will provide positive guidance to children that nurture a child's self-respect, self-worth, and security. PlayAbility works in partnership with parents to find the most positive way to guide a child's behaviour.

PlayAbility staff will access professional development training on behaviour management and guidance regularly.

### **Behaviour as a form of a communication**

PlayAbility views behaviour – positive and negative – as a communication of social, emotional, or physical needs.

- Individuals use language to communicate; to let others know about themselves and to learn to understand others.
- Communication is more than speech. Communication includes vocalisations, facial expressions, gestures, body position and levels of attention and arousal.
- When we think about children and their behaviours, we need to remember that they are attempting to communicate their experiences, observations, emotions, needs and wants to us.
- It is our role to interpret their communication and reflect it back to them in conventional ways to reciprocate, support and enhance their social interactions.
- PlayAbility recognises negative behaviour in young children to be a form of communication from the child; particularly when the child has a speech and / or language difficulty.
- We endeavour to understand the triggers for the behaviour:
  - what the child is reacting to in the environment,
  - who or what they are reacting to; and
  - how our or other's responses to their behaviour reinforce or deflect it. This includes considering whether the negative behaviour is due to issues such as sensory processing difficulties, speech and language difficulties or psychological difficulties.

PlayAbility considers challenging behaviour to be:

- Physically harming another child, staff member, self-harm, parent, or visitor (e.g., biting, hitting, pinching, and punching).



- Aggressive or rude language to other children, staff members, family members and visitors.
- The violent destruction of PlayAbility equipment or furniture.

### *Procedures*

As PlayAbility does not implement restrictive practices, if a restrictive practice is required, or may be required, during provision of early childhood supports, therapeutic supports or community participation, the child will be referred to an appropriate service.

Methods that staff are to apply to minimise challenging behaviours:

- Acknowledgement of acceptable behaviour, by physical or verbal contact, e.g.: encouragement, thanks, smiles, and positive language.
- Role modelling by staff using appropriate language and physical gestures.
- Structuring the environment to suit children's individual needs.
- Planned patterns of restful and active play to prevent over-excitement.
- Staff using language that suits a child's developmental stage.
- The provision of flexibility in routines being consistent in setting limits and expectations.
- The encouragement from staff for children to be responsible for their own behaviour and to set their own limits.
- Staff will set aside a group time section for the program (for playgroups) to discuss reducing anxiety, promote resilience, encourage empathy and compassion for others.
- Develop simple rules in consultation with the children and parents.
- Staff will assist the children and parents with becoming familiar with these rules/limits and promote effective communication skills.

When challenging behaviours are exhibited:

- Staff and parents should try to distract the child, defusing the situation, and staff will attempt to redirect the child to another experience.
- Staff will use and model positive language when an unacceptable behaviour is displayed by a child, for example: "wait for mum and hold her hand across the road" instead of- "DON'T RUN OFF, IT'S DANGEROUS".
- Staff will use and model [Key Behaviour Strategies](#).
- Staff will help children to realise the consequences of their actions, at an appropriate time such as when the child has calmed down, for example: "When you bit Lucy, it made her hand very sore, and now there is a mark there" (to a three-year-old).
- Staff will consistently work with the parents and support them to understand what their child is communicating through their behaviour and to consider



alternative positive methods of diffusing any given situation: reducing anxiety for the child and family.

- Staff will work in partnership with the family on future strategies to support positive behaviour.
- Restrictive practices of any kind are prohibited. If an instance of use of restrictive practice were to occur in relation to PlayAbility's services, this is reported and investigated in line with the [2.13 Incident Reporting and Management Policy](#).

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## 2.5 Eligibility and Access

### *Policy*

PlayAbility provides access to Early Childhood Early Intervention (ECEI), Therapeutic Support, Plan Management, and Family Support services based on Government guidelines and Legislation specific to funded programs. ECEI, Therapeutic Support, Plan Management and Assistance with Social and Community Participation are delivered under the NDIS with the Practice Standards overseen by the NDIS Quality Safeguards Commission.

PlayAbility will prioritise vulnerable families including those in crisis, and/or with multiple vulnerabilities. PlayAbility supports the rights of parents / carers to have an advocate present throughout the intake and Service agreement interviews.

PlayAbility is committed to providing all information, documents and forms to clients and their support network in a way that is appropriate to their preferred language or mode of communication. PlayAbility employees must be respectful of cultural and linguistic needs and sensitive to each person's circumstances in their communications. PlayAbility employees will ask clients and their support network their preferred language and mode of communication. The preferred method is to be used wherever possible and will be recorded in the participants' file to ensure that communication is consistent, effective, and tailored to the participant.

Wherever possible, explanation will be provided orally as well as being available in writing. PlayAbility will determine whether assistive technology, an interpreter or translator may be needed and ensure that that capability is available for every interaction with that person.

### *Procedures*

Final decisions regarding access to services will be made by the Manager. The Manager will take into consideration current resources and the needs of the family. It may be the case, that on occasions, families may be denied access. Families will always be kept informed about this and all efforts will be made to find other appropriate services for families where PlayAbility is not able to provide support.

### *NDIS Eligibility*

ECEI and Therapeutic Support	<ul style="list-style-type: none"><li>• The child has met access to the NDIS and is a current participant with a funded NDIS plan.</li><li>• The NDIS plan has Core support funding in the category of Improved Daily Living</li></ul>
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Plan Management	<ul style="list-style-type: none"><li>• The child is a current NDIS participant with a funded NDIS plan.</li><li>• The NDIS plan has Capacity Building support funding in the category of Improved Life Choices</li></ul>
Assistance with Social and Community Participation	<ul style="list-style-type: none"><li>• The child is a current NDIS participant with a funded NDIS plan.</li><li>• The NDIS plan has Core support funding in the category of Assistance with Social and Community Participation</li></ul>

### Access

- PlayAbility will contact the participant's parents / carers within one week of receiving an enquiry or referral to begin the Intake process and arrange a time and place to meet. PlayAbility will support them to have an advocate present.
- PlayAbility to complete a [Registration/Intake for Early Intervention Form](#) with the participants parents / carers to gather basic information about the child and their family and to:
  - Identify any potential risks in providing services to the participant
  - Identify any cultural values or beliefs they would like incorporated or respected in the provision of supports
- PlayAbility will inform parents / carers about access to services under the NDIS. This will include information about PlayAbility's roles as a Plan Management agency and as a provider of Community Participation, Therapeutic Support and ECEI.
- Families will be informed that they are under no obligation to receive all service types from PlayAbility and referrals to other providers will be facilitated as directed by the family.
- PlayAbility will inform parents/carers about the potential influences of early intervention in early childhood development, the Key Worker model of service delivery, the trans-disciplinary approach and how we work in collaboration with other providers and agencies (such as schools and preschools) to support the participant to meet their developmental goals.
- PlayAbility will explain the following to the parents / carers and request their signatures to acknowledge their understanding.
  - Confidentiality and Privacy Policy
  - Child Safety Statement
  - Permission for the taking of photos
  - Rights and Advocacy, Inclusion, Feedback and Complaints Policies
- PlayAbility will request the parents / carers fill in the membership form for PlayAbility to meet the requirements under its structure.



- PlayAbility will discuss the subsequent steps and processes needed to access NDIS funded supports and the options they may want to consider before our next meeting
  - The therapy type or specialist they would prefer
  - How much of the plan they would like to budget for with PlayAbility?
  - The long- and short-term goals they would like to prioritise
  - How the role of Plan Management facilitates decision making around access to supports
- PlayAbility will arrange an appointment time to meet again with the parents / carers to negotiate the Service Agreement (see [2.6 Service Agreements](#)) and discuss the scheduling of services. PlayAbility will support them to have an advocate of their choosing present.

### Waiting Lists

- On occasions there will be a waiting list to access Early Intervention Services.
- Families will be kept informed of their progression on the waiting list and where appropriate other alternatives will be suggested.

Occasionally there will be the need to triage participants on the waiting list and this will be based on the vulnerability of the family/child and the level of need.

### Family Support

There are various programs under the Family Support section:

- Supported Playgroups
- Indigenous Family Support; and
- Mobile Parenting Support Service.

To access one of the programs, complete the [PlayAbility Family Support Intake/Registration Form](#).

#### *Family Eligibility*

Program Description	Eligibility
<p><b><i>Supported Playgroups</i></b></p> <p>Strength based programs for children and their families, focusing on the importance of creating a world where children feel connected to their community and culture allowing everyone to create their world. These play sessions are run by</p>	<p>Open to all parents, carers of children aged 0-6 years in the Bega Valley Shire.</p> <p>Priority Participants Include</p> <ul style="list-style-type: none"> <li>● Indigenous families.</li> <li>● Families from culturally and linguistically diverse backgrounds.</li> <li>● The child has a development delay.</li> <li>● The child/parent has a disability.</li> <li>● The child has challenging behaviour.</li> </ul>



Program Description	Eligibility
<p>qualified early childhood practitioners and family support workers, offering a range of different play experiences including storytelling, music, arts &amp; craft, excursions &amp; community activities</p>	<ul style="list-style-type: none"> <li>● Low Social Economic Status (SES) family.</li> <li>● Mental health issues for parents and/or children.</li> <li>● Families who are socially isolated or disadvantaged.</li> <li>● Grandparents or carers.</li> <li>● Families with child protection issues or chronic mental health.</li> <li>● Families who are homeless.</li> <li>● Refugees.</li> </ul>
<p><b><i>Indigenous Family Support</i></b></p> <p>These programs provide a range of services for Indigenous families across the region.</p> <p>These include:</p> <ul style="list-style-type: none"> <li>● Playgroups</li> <li>● One to one family support.</li> <li>● Workshops with parents/carers.</li> <li>● Support in children’s culture, learning and development.</li> <li>● Home-visiting.</li> <li>● Support to access other services.</li> <li>● Transport assistance</li> </ul>	<ul style="list-style-type: none"> <li>● Families with an Indigenous child.</li> <li>● Primary carers for Indigenous children.</li> <li>● Extended Indigenous families.</li> </ul>
<p><b><i>Mobile Parenting Support Service (MPSS)</i></b></p> <p>The MPSS offers a mobile toy resource library as well as advice and support to communities across the region. Parents and carers can borrow from a range of age-appropriate toys and resources.</p>	<p>Any parent/carer of a child that lives in the Bega Valley Local Government area 0 -7.</p> <p>Priority Participants Include:</p> <ul style="list-style-type: none"> <li>● Indigenous families.</li> <li>● Families from culturally and linguistically diverse backgrounds.</li> <li>● The child has a development delay.</li> <li>● The child/parent has a disability.</li> <li>● The child has challenging behaviour.</li> <li>● Low Social Economic Status (SES) family.</li> </ul>





Program Description	Eligibility
	<ul style="list-style-type: none"><li>● Mental health issues for parents and/or children.</li><li>● Families who are socially isolated or disadvantaged.</li><li>● Grandparents or carers</li><li>● Families with child protection issues or chronic mental health issues.</li><li>● Families who are homeless.</li><li>● Refugees.</li></ul>

### Child safety

The safety and security of children participating in PlayAbility programs is of paramount importance to PlayAbility. Therefore, PlayAbility reserves the right to exclude participants from its programs if there are serious concerns from a work, health, and safety perspective, which cannot be mitigated to PlayAbility's satisfaction.

It is important for PlayAbility to be aware of potential risks so they can take steps to cater for the relevant needs and challenges of participants in its programs, and to eliminate or minimise risks to health and safety. Risk management controls may include rejection of an intake application, and/or a participant's access to programs being revised, suspended and/or cancelled (regardless of how, when and through what means such information comes to PlayAbility's attention).

Any such information disclosed will be handled in confidence, in accordance with applicable legislation and PlayAbility's [2.9 Confidentiality and Privacy Policy](#). Should such information not be disclosed as required in the PlayAbility intake form as part of the registration, assessment and intake process but comes to PlayAbility's attention later (regardless of how, when and through what means such information comes to PlayAbility's attention), PlayAbility reserves the right to exclude participants from any or all its programs.

### Failure to use service

Should families not use a service for 3 months or more PlayAbility must be advised of a reason for this to avoid loss of allocation. Consideration of each case will be made by the manager. The manager will discuss the matter with the family and ensure this is documented in the family file and all relevant parties are informed. Should families not be satisfied with any decisions made then they should refer to the [2.10 Feedback and Complaints Procedure](#).





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## ***2.6 Service Agreement***

### ***Policy***

The [Service Agreement](#) is a written agreement between PlayAbility and the participant's parents / carers that clearly defines when, how and how much support is to be provided as well as clearly stating the responsibilities the provider has to the participants family and the responsibilities the family has to the provider.

PlayAbility will endeavour to communicate the process with the participant's parents /carers in language and terms they can understand for the process and the decisions are made in the participants interest as transparently as possible.

### ***Procedures***

- PlayAbility will arrange an appointment time to meet with the participant's parents / carers to negotiate the Service Agreement and discuss the scheduling of services.
- PlayAbility will request the family bring a copy of the participants NDIS plan to ascertain:
  - The NDIS number of the participant
  - The dates of the plan
  - The support item from which the provision of supports will be claimed
  - The plan management method chosen
  - The goals stated in the plan
- PlayAbility will explain the NDIS plan to the family as it relates to the provision of early intervention services, plan management and/or community participation, depending on the individual.
- PlayAbility will explain the purpose and scope of the Service Agreement and will read the Service Agreement document carefully with the participant's parents / carers to ensure they have a thorough understanding of the responsibilities of PlayAbility and their responsibilities as the participant's parent /carers within the agreement.
- PlayAbility will negotiate / discuss with the parents / carers the conditions for the provision of services under the NDIS including:
  - The measurable goals the parents / carers would like to prioritise
  - The therapist / specialist options or preferences
  - How, when and where the supports are to be provided
  - The cost of those supports
  - How long the supports will be provided for
  - When the plan is to be reviewed and the reports required
  - The parents / carers responsibilities under the agreement (such as letting PlayAbility know if they need to cancel the appointment)



- The responsibilities of PlayAbility under the agreement (such as letting the participant's parents/ carers know if the appointment is cancelled)
- PlayAbility policies relevant to the agreement
- How any problems or issues that may arise will be dealt with
- How the parents / carers or PlayAbility can change, amend, or end the Service Agreement
- Approval to access funds for the provision of services
- The Plan Management Agency and contact details if applicable
- At the end of the Service Agreement meeting, PlayAbility and the participant's parents / carers will sign the agreement with the participant's parent /carers keeping the original. In the case that the participant's parent /carers choose not to receive a copy of the Service Agreement a record will be made of the circumstances.
- Prior to the end of the Service Agreement timeframe a meeting will be arranged to review developmental progress with the view to negotiate a new agreement to facilitate continuity of supports.
- In the event the participant's parents / carers wish to discontinue supports through PlayAbility and access supports elsewhere the Keyworker will collaborate with them to facilitate a smooth transition to a new provider. This will include planning, risk management, communication and forwarding any information regarding the participant. Following the transition, the Keyworker will follow up with the family to review the transition process.

Other issues will be discussed at this meeting or a subsequent follow up such as:

- The development of an [Individual Service Plan \(ISP\)](#) to meet the participants goals
- The ways in which a particular therapy or discipline will address the participant goals / outcomes
- Any potential risks to the health and wellbeing of the child in the delivery of supports
- The provision of capacity building supports to caregivers across environments such as schools, preschools and in the home
- Points in time where the ISP or Service Agreement is to be reviewed with outcomes assessed against service delivery options and strategies
- The wait list and potential wait times for accessing a particular therapy or therapist / specialist and other options available to address goals / outcomes
- Options for targeted programs such as the Alert Program, It Takes Two To Talk and Therapeutic Listening.
- Options for rescheduling sessions when either the therapist / specialist is on leave, or the participant and their parent/ carers is unable to meet the scheduled appointment time



- Options for assigning a different therapist / specialist to cover sessions when the main therapists/ specialist is on leave
- How records and reports are generated and stored on Echidna
- The processes for communicating statements and billing for services
- The emailing of session notes by the therapist / specialist following each early intervention session
- The emailing of the Service Agreement to the Plan Management Agency and / or Plan Coordinator if applicable

### **NDIS Fee Management**

PlayAbility will only charge the rate set by the NDIS, nothing further.

Services are charged on a time basis and include in-person, non-in-person capacity building supports and travel.

Plan managed families are required to set up fee payment within 1 month of starting with PlayAbility. Services will be withdrawn after 1 month.

Payments for self-managed funds must be made monthly. If payment has not been made for 2 months or more services will be withdrawn.

PlayAbility staff may make recommendations for equipment and resources that may be beneficial to the client in reaching their goals. These are suggestions only; parents are to make the final decision on purchases. Staff will not suggest anything that will not be a financial gain to them.

### **Withdrawal or Termination of Services by a Participant**

PlayAbility acknowledges that participants and parents/carers have choice and control in the delivery of their supports. In line with this a Participant may terminate their Service Agreement at any time with a minimum of 1 month notice.

As part of our commitment to quality service delivery and continuous improvement, PlayAbility will endeavour to ascertain the reason for the termination of services.

### **Withdrawal or Termination of Services by the Provider**

The Service Agreement may be cancelled by PlayAbility due to:

- Failure to comply with the terms of the Service Agreement.
- Failure to comply with relevant policies, procedures and work health and safety rules.
- A staff member has been threatened or abused (physically or verbally).
- Payment for supports and/or expenses has not been received.



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**2.7 Cancellation and ‘No Show’ Policy**

**Policy**

PlayAbility aims:

- To reflect the most current NDIA Pricing Arrangements and Price Limits.
- To balance customer and organisational financial interests.
- To ensure staff have utilised their time effectively and efficiently.
- To reschedule appointments wherever possible.

**Procedure**

PlayAbility understands that it is sometimes not possible to make it to bookings/sessions. In such cases PlayAbility requires two clear business days’ notice.

- To cancel the family/carer should contact their nominated early intervention specialist/therapist within the business hours of 9.00am to 5.00pm. If the staff member is not available, they are to contact the administration office on 02 64961918 and leave a message. PlayAbility can also be contacted by email – admin@playability.com.au or via the Contact Us page on our website [www.playability.com.au](http://www.playability.com.au).
- Where two business days’ notice has not been provided, PlayAbility will charge 100% of the agreed price (unless waived with management approval).
- If a child has not arrived for their appointment the staff member will attempt to contact to determine if they are running late or not able to attend.
- If a child arrives late the session will run until the agreed end time.
- If a family/carer repeatedly cancels appointments, PlayAbility will contact the family to discuss alternatives times and/or arrangements.

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## 2.8 Referrals

### *Policy*

PlayAbility both makes and accepts referrals to other agencies. PlayAbility will aim to provide robust support in partnership with families to access other services as required.

### *Procedures*

The following steps will be adhered to:

- Confirm needs of family/client with the family.
- Confirm the consent of the family for the referral to be made
- Clarify any relevant history and gather relevant records.
- Ensure there is a clear understanding of the family's expectations.
- Develop a plan of action with the family and ensure the family agrees and signs documentation.
- Provide advice on referral options.
- Ensure the family understands any responsibilities they must undertake.
- Arrange referral to other agency and initial meetings with the family (as appropriate).
- Follow up with the family and agency to ensure smooth transition and positive outcomes.

**Note:** Interpreters will be arranged if required.

### **Document Review**

Version number 4	Last reviewed and approved: February 2022
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## ***2.9 Confidentiality and Privacy***

### ***Policy***

All parents, carers and children accessing supports from PlayAbility, staff, and volunteers, have the right to privacy and the protection of their personal information.

This policy is to protect the privacy and confidentiality of individuals by ensuring that all records and personal information about individuals including children, parents and carers, volunteers, and staff is collected, stored, disclosed, and disposed of in an open and transparent way in compliance with Australian privacy legislation, codes, and principles.

### ***Procedures***

- PlayAbility will gather information from parents and carers for the purpose of delivering safe and effective supports and services. This will include contact information, the nature of a child's disability or developmental delay, health and medical details, cultural and religious preferences, other agencies involved, providers engaged in supporting the family, goals and progress towards goals, feedback and complaints, referrals and information related to the safe delivery of supports.
- Consent for the collection, use, storage, and disclosure of information will be sought at intake or service agreement meetings. PlayAbility will explain the purpose information has been collected, how it may be used, accessed, and disclosed. A [summary of this Policy](#) is available on our website.
- PlayAbility will gather information from staff and volunteers for the primary purpose of recruitment, child safety, professional development, management, and exit. This will include contact information, resume, qualifications and references, information required by legislation, training records, incidents, and WHS.
- PlayAbility will take reasonable steps to protect personal information from misuse, interference, and loss. PlayAbility archives information for minimum periods required by law, then destroys information that is not required by law to retain.
- PlayAbility client data is stored on a secure, cloud-based system called Echidna. Cloud based systems enable file sharing, signing, and editing of documents without the need for hard copy or email. Echidna is operated by the Australian company InetSolutions, who are responsible for the backup and security of the data.
- Echidna online also has a closed file function that restricts access to confidential information to the writer and administrators only.
- Storage of registers and information such as client feedback, compliments and complaints are stored on a cloud-based system, Jotform.



- Storage of information pertaining to staff contact information, qualifications, training, and registration is kept on Echidna. Personal information such as employment contracts are kept on Microsoft OneDrive, a secure cloud-based system which is also used to store operational and program information. Emails are stored on Microsoft Outlook.
- Documents that have been generated on hard copy for the purpose of intake, registration or service agreements are kept no longer than 3 months in a locked file before being uploaded and the originals shredded.

### Key points

- When contacting PlayAbility individuals have the option of not identifying themselves or using a made-up name unless it is necessary under Australian law or required for the delivery of services
- All client and family personal and health information will only be collected, held, used, or disclosed for the purpose of safe and effective service delivery in compliance with the Privacy Act.
- PlayAbility will not collect information without consent unless required by law. Information received from another source without consent will be destroyed or de-identified.
- All client information that is stored on PlayAbility devices such as computers and smart phones, including emails, texts, and contact information, will be password protected.
- All client-based software must also be protected with the auto-fill function for the password disabled.
- Information will not be provided to other individuals, agencies, organisations, or Certification bodies without parent/carer consent, subject to applicable law.
- Parents/carers are provided the option to decline consent to their information being shared e.g., External audits.
- Hard copy documents of client personal and confidential information that staff use on a day-to-day basis for the purpose of planning and providing supports shall not be left visible on desks when not being used and shall be shredded when no longer required. Documents that need to be retained for up to a few weeks will be stored in a lockable drawer in the office when not in use.
- There may be times where PlayAbility is required to disclose that information without your consent (see Policy: [2.12 Information Sharing Protocols](#))
- PlayAbility will only disclose personal information to a public sector human services agency without consent in accordance with the Privacy Code of Practice 2003.
- PlayAbility will only disclose personal health information to a public sector human services agency without consent in accordance with the Health Records and Information Code of Practice 2005.





- Parents /Carers may request to access and correct their/their child's personal information in writing. PlayAbility will provide this information within 5 business days or provide a written explanation.
- Individuals will be notified immediately if their personal information has been compromised.
- Individuals have the right to lodge a complaint if they believe PlayAbility has breached their privacy by contacting the Australian Privacy Commissioner on 1300 363 992.
- PlayAbility staff will ensure all confidential conversations are held in an appropriate space
- Only the CEO, team managers and administration have access to personnel files.
- Information about staff members is only accessed by the Manager and individual staff member concerned, on an as needed basis.
- Apart from the official minutes, all matters discussed at staff, team or committee meetings will be treated as confidential.
- Staff and volunteers are required to protect the privacy and confidentiality of children/families and other staff members.
- All staff and volunteers sign a Confidentiality Agreement as part of their employment agreement/volunteer arrangement.
- When signing in the attendance sheet for school visits staff will not record any child's name with whom they are there to see.
- Any breach of this Confidentiality Policy is a breach of the Staff Code of Conduct and the NDIS Code of Conduct and will receive disciplinary action.  
[\(See Policy 4.12 Disciplinary Action\).](#)

### Management of Breaches

In the event of an actual or suspected Data Breach of either personal or sensitive Information, as defined by the Privacy Act 1988, these steps below are to be followed. Depending on the circumstances and seriousness of the Data Breach, some steps may be initiated or undertaken simultaneously. There are five key steps to follow when responding to an actual or suspected Data Breach:

- Step 1: Identify the Data Breach
- Step 2: Assess the impact
- Step 3: Contain
- Step 4: Notify
- Step 5: Review and Improve

Depending on the nature of the breach, notifications may include to those impacted, or likely to be impacted, by the breach, and to external bodies such as funding bodies and the Office of the Australian Information Commissioner.

All records associated with data breaches will be managed by the CEO.



*Document Review*

Version number 7	Last reviewed and approved: February 2022
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## ***2.10 Feedback and Complaints***

### ***Policy***

PlayAbility welcomes feedback and complaints. All complaints will be dealt with in a fair, efficient and effective manner. These are recorded in the feedback and compliments register and the data used to continually improve service performance systems and processes to ensure delivery of quality services for our clients and their families.

The confidentiality of those involved and implicated by the expression, investigation and resolution of complaints will, wherever possible and appropriate, be protected and free from unfair repercussions or victimisation (see [2.9 Confidentiality and Privacy Policy](#)).

### ***Procedures***

All children and families are informed of our complaints process at commencement, are welcome to access our Feedback and Complaints Policy and Procedure and will be given the option of receiving a copy when raising feedback or complaints. PlayAbility will ensure our complaints process is accessible, including facilitating access to interpreter services or advocates as required.

- Information and guidance regarding raising complaints, compliments or suggestions is explained and discussed as part of the intake meeting.
- The PlayAbility website contains information about providing feedback, and the option to lodge anonymous feedback on the online feedback form.
- Feedback, Compliments and Complaints forms will be placed close to the sign in book at each location.
- Staff will seek feedback from clients regularly, including at regular reviews, and will support them to provide feedback or make a complaint.
- Any feedback, compliments or complaints made to staff members during the delivery of service is to be submitted as Feedback with the permission of the parent / carer.
- Should a family/carers raise an issue or complaint, or a staff member believe that an issue may exist, the staff member will discuss all options available and provide any information or support needed. The way in which a complaint is received will in no way influence its treatment.
- Complainants will be provided with the contact information of external services that can assist in resolving complaints as needed.

### **How Complaints Can Be Raised**

Clients can raise a complaint in any form they are comfortable with (either themselves or through an advocate):

- Verbal – in person or via telephone
- Correspondence –email, letter, via PlayAbility’s website, or other private electronic messaging
- Via our feedback boxes located in both centres which can be used anonymously.
- By completing a [Feedback, Compliments and Complaints Form](#).

### Complaints Management and Resolution

- The complaint will be entered into the PlayAbility Feedback, Compliments and Complaints register within Jotform.
- The complaint will be brought to the attention of the Manager and the CEO. The CEO and Manager will determine the seriousness of the complaint and decide who will follow up with the complainant.
- The CEO, Manager, and staff members (where appropriate) will hold a meeting at the earliest opportunity (within 2 days) to clarify the details of the complaint.
- The CEO or Manager will complete the [Complaints Follow Up form](#) (by contacting the person making the complaint to:
  - acknowledge the complaint and involve the complainant in the resolution of the complaint
  - support the person to express the details of the complaint in their own words
  - ensure any person with a disability affected by the issue has expressed their views
  - describe any steps to be taken to resolve the issue/s in the complaint
  - discuss any further steps needed to resolve the issue and a timeline
  - ensure the person with a disability affected by the issue is kept appropriately informed of the progress of the complaint, actions taken, reasons for decisions made and options for review.
  - provide the option for raising the complaint with the NDIS Quality and Safeguards Commissioner, ombudsman, or funding body.
- If, during this or follow up conversations the person making the complaint is satisfied the complaint has been managed and resolved, the CEO or Manager will record this within the [Complaints Closure Form](#).
- If the complaint has not been resolved to the complainant’s satisfaction, the CEO will advise them in writing how PlayAbility will proceed to reach a resolution in a timely manner. The longest this should take is fourteen days. This may involve further meetings and discussions with the complainant/CEO/staff member.
- If the matter is not resolved at the CEO level through discussion the person making the complainant will be encouraged to present their complaint to the PlayAbility Management Committee.

**Note:** Matters the CEO deemed as being urgent may be presented to the Committee sooner.

- If the complaint cannot be resolved the person making the complaint will be supported to raise the complaint with the NDIS Quality and Safeguards Commission, Funding Body or Ombudsman depending on the nature of the complaint.
- Depending on the contentiousness of the complaint the PlayAbility Committee may seek advice from external legal services.
- When the complaint is resolved, the complainant will be provided with a clear and detailed explanation on the outcome, their right to take their complaint to an external body, and relevant contact details.
- The Feedback, Compliments and Complaints register will include details of the original complaint and action taken. These details are to be recorded in the minutes of the relevant Committee Meeting.
- The Manager will collate and analyse data collected as part of a formal process. The Management Committee will be presented with data analysis which will highlight any emerging trends.
- The Feedback, Compliments and Complaints registers will be reviewed annually as part of PlayAbility’s planning process to identify service enhancement opportunities.
- This policy will be reviewed annually following the review of the registers and following up with clients to demonstrate continuous improvement and incorporation of the views of clients.
- Managers will incorporate a review of this policy and update staff within one team meeting per year.

**Note 1:** How to raise a complaint to the NDIS Quality Safeguards, Ombudsman or Funding Body

**Further support and assistance**

Agency/ Organisation	Reason for contact	Contact details	Further information
NDIS Quality Safeguards Commission	Unresolved concerns or complaints including: <ul style="list-style-type: none"> <li>● NDIS services or supports that were not provided in a safe and respectful way</li> <li>● NDIS services and supports that were not</li> </ul>	Telephone: 1800 035 544  TTY: 133 677	<a href="http://www.ndiscommission.gov.au/about/complaints">www.ndiscommission.gov.au/about/complaints</a>



Agency/ Organisation	Reason for contact	Contact details	Further information
	<p>delivered to an appropriate standard</p> <ul style="list-style-type: none"> <li>• how the NDIS provider has managed a complaint about services or supports provided to an NDIS participant</li> </ul>		
Commonwealth Ombudsman	Dissatisfaction with the NDIS Quality Safeguards Commission response. The Ombudsman can look at how the complaint was handled but cannot change the decision	<p>Telephone: 1300 362 072</p> <p>Email: ombudsman@ombudsman.gov.au</p>	<a href="http://www.ombudsman.gov.au">www.ombudsman.gov.au</a>
Administrative Decisions Tribunal	Complaints may be made about some administrative decisions, for example, the funding of disability services or the refusal of a community service provider to implement a recommendation of the NSW Ombudsman.	Telephone: 1800 060 410	
Translating and Interpreter Service	Translation service for complaints who are non-English speaking	131 450	
National Relay Service	Information relay service for people who are deaf or who have a hearing or speech impairment	<p>TTY users' phone 02 9264 8050.</p> <p>Speak and Listen users' phone 1300 555 727 then ask for 02 9286 1000.</p>	



Agency/ Organisation	Reason for contact	Contact details	Further information
		NRS Internet relay users connect then ask for 02 9286 1000.	
Anti-Discrimination - NSW	Information about discrimination, sexual harassment, vilification, and victimisation	Telephone: 02 9268 5544 or 1800 670 812 Email: adbcontact@justice.nsw.gov.au	<a href="http://www.antidiscrimination.nsw.gov.au">www.antidiscrimination.nsw.gov.au</a>
Anti-Discrimination Board (ADB)	Complaints related to discrimination, harassment, and vilification	Telephone (02) 9268 5555 or 1800 670 812	<a href="http://www.lawlink.nsw.gov.au/ADB">www.lawlink.nsw.gov.au/ADB</a>
National Indigenous Australians Agency (NIAA)	Guidance	Telephone: 02 6271 5111	<a href="http://www.niaa.gov.au">www.niaa.gov.au</a>

**For Further Assistance, Advice or Advocacy**

Ability Links

[Department of Community and Justice Disability and inclusion Information](#)

[Disability Advocacy Finder](#)

[First Peoples Disability Network Australia \(FPDN\)](#)

[NDIS Feedback and Complaints](#)

[Multicultural Disability Advocacy Association of NSW](#)

***Document Review***

Version number 5	Last reviewed and approved: February 2022
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## ***2.11 Child Safe***

### ***Policy***

PlayAbility is committed to creating a child safe culture by providing a safe and friendly setting where children feel respected, valued, and encouraged to reach their full potential.

PlayAbility operates on the principle that all children have a fundamental right to safety and protection from all forms of abuse.

All PlayAbility employees must demonstrate a commitment to child safety, complying with PlayAbility's behavioural guidelines and attending regular child safe training.

PlayAbility actively promotes itself as a child safe organisation to deter offenders by displaying posters and signage and by publicising child safe policies on the website and in newsletters.

Children are defined as aged 0-15 years. Young Persons are aged 16 – 17 years. The terms child/ children are used within this document for both children and young persons unless otherwise stated.

### ***Procedures***

PlayAbility promotes a child safe organisation, and prevention of harm to children, through the following practices and processes:

- All PlayAbility staff, volunteers, students, and Committee members must work in compliance with this and related policies and procedure and the Code of Conduct.
- All staff complete an induction on commencement which includes child safety and required practices are discussed regularly at staff and team meetings to ensure they are applied consistently.
- PlayAbility staff are provided with regular child safety training to ensure they remain current and knowledgeable about abuse, neglect, grooming and mandatory reporting and continually grow their skills and knowledge regarding child safe practices.
- PlayAbility promote its commitment to being a Child Safe organisation in all job advertisements.
- PlayAbility's interview panels thoroughly screen all applicants during the interview process to ensure candidates share the same values on child safety, welfare, and wellbeing.
- Management completes a Child Safe Practice Referee Check on all short-listed candidates confirming previous employment history and any instances of inappropriate behaviour with children (see [policy 4.1 Recruitment](#)).





- All PlayAbility employees must hold a current Working with Children's Check. Operations will verify all Working with Children's Check and will keep track of expiry dates (see policy 4.5 Working with Children Checks).
- Breaches in failing to follow the Child Safe policies and Code of Conducts will result in disciplinary action including and up to termination of employment or cessation of engagement with PlayAbility (see [policy 4.12 Disciplinary Action](#)).
- PlayAbility Managers are appointed Child Safety Contact Persons to provide mentoring, support, and guidance to encourage child safe best practices in the workplace. This person will also manage concerns and complaints regarding a child's treatment and allegations of abuse or neglect within the organization or other environment.
- PlayAbility provide support to stakeholders who raise concerns, allegations or wish to make a complaint. All serious complaints of abuse are recorded and will be acted upon.
- PlayAbility maintain a risk management plan, which includes strategies and interventions to reduce risks, monitoring and reviewing.
- PlayAbility's physical environment is set up to allow for natural surveillance opportunities and open play spaces. Windows are not to be obscured with posters or frosted glass.
- PlayAbility encourage and support the inclusion of parents, families and carers in programs and decision making.
- Families are required to maintain full responsibility of their children when attending PlayAbility and remain present during Early Intervention sessions, Playgroups and any other services run by PlayAbility with no exceptions.
- If the child is 13 or older the parent /carer is not required to be present as long as the centre / room-based group program is being delivered by two or more PlayAbility staff, in which case the procedures will include:
  - the child is to be consulted regarding their parent/carers not being present
  - the child's decision is respected
  - the Early Intervention manager is to contact the parent / carer
  - risks and potential challenges are discussed and planned for with the parent / carer
  - the risks and the strategies to mitigate them are recorded and signed by the parent
  - the parent / carer to sign their child in and sign out at drop off and pick up.
- Playability staff are not to be left alone or in isolated areas with a child but are to remain in eyesight of a parent, carer, or staff member at all times. Please note: The exception to this point is for Disability Support Workers whose role will put them in close contact with children / participants with parents / carers not present.



- PlayAbility staff will be easily identifiable by wearing a PlayAbility name badge or polo shirt.
- Age-appropriate information such as OCG's safe series books, activities and posters will be used with children to convey the child safe messages and help children learn about what they should do if they feel unsafe, upset, scared, bullied, or intimidated.
- Staff are not to contact children and young people using their personal email accounts. If emailing a child or young person use your work email and CC another staff member in.
- No personal mobile phones are to be used when working with children.

NOTE: Free Child Safe eLearning is available on the NSW Government Office of the Children's Guardian [website](#). All staff are encouraged to complete this training and stay up to date with current child safe practices.

### Physical Contact

Physical contact guidelines will be readily available to staff and discussed regularly at staff meetings. These guidelines are:

- Be aware of cultural sensitivities in relation to contact between adults and children.
- Avoid being in a one-to-one situation with a child where possible.
- Never assume that physical contact is acceptable to a child.
- Respect signs that the child is uncomfortable with touch.
- Use verbal directions rather than touch i.e., ask a child to move to a certain area rather than physically direct the child to that area.
- Ask the child's permission prior to touching them. They may not be able to respond verbally but they will be able to indicate what they want nonverbally.
- Make sure the physical contact is appropriate to the activity.
- Discourage younger children from inappropriate expectations of hugs or cuddles. Do this sensitively and encourage the child to sit beside you rather than on your knee and a side hug is much more acceptable.

Physical contact is appropriate if it:

- is used to assist in skill development or encouragement
- is to assist a child with a disability
- is required for the child's safety
- is required to give practical assistance if a child is hurt or needs help i.e., provide first aid to treat an injury
- is for the child's benefit, not adult gratification
- occurs with the child or young person's understanding and permission



- occurs in an open environment
- is non –intrusive touch such as shaking hands, a hand to the upper arm or upper back, a pat on the back or upper arm or a hug to the side
- is to comfort a child who is upset/distressed
- is given when congratulating a child. Positive reinforcement with encouraging words should accompany this.

Physical contact is inappropriate if it:

- includes touching the groin, genital area, buttocks, breasts, or any part of the body that may cause distress or embarrassment
- frightens, distresses, harms, or embarrasses a child
- destroys their trust
- occurs in a private place
- results in the child being distressed or embarrassed
- restricts a child’s freedom of movement.

### **Mandatory Reporting**

By section 27 of the Children and Young Persons (Care and Protection) Act 1998, PlayAbility staff are Mandatory Reporters and are legally required to report when they have reasonable grounds to suspect that a child is at risk of significant harm from abuse or neglect. Refer to the [2.13 Incident Reporting and Management Policy](#) for further details.

### ***Document Review***

Version number 4	Last reviewed and approved: February 2022
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## ***2.12 Information Sharing Protocols under Chapter 16A***

### ***Policy***

Chapter 16A of the Children and Young Persons (Care and Protection) Act 1998 prioritises the safety, welfare, and wellbeing of a child or young person over an individual's right to privacy, allowing the exchange of information between prescribed bodies without any Community Services involvement.

PlayAbility will exchange information, following the procedures below, that relates to a child or young person's safety, welfare, or wellbeing. This is regardless of whether the child or young person is known to the Department of Community and Justice, and whether or not the person to whom the information relates give consents to the information exchange.

### ***Procedures***

Chapter 16A establishes a scheme for information exchange between prescribed bodies and requires organisations to take reasonable steps to co-ordinate the provision of services with other organisations without having to rely on Community Services as an intermediary.

Chapter 16A allows information to be exchanged between prescribed bodies despite other laws that prohibit or restrict the disclosure of personal information, such as the Privacy and Personal Information Protection Act 1998, the Health Records and Information Privacy Act 2002 and the Commonwealth Privacy Act 1988, provided it relates to the safety, welfare and wellbeing of a child or young person.

All information exchanges must first be approved by the CEO.

### **Prescribed Bodies**

A prescribed body is any organisation specified in section 248(6) of the Act or in clause 7 of the Children and Young Persons (Care and Protection) Regulation 2000. Prescribed bodies include:

- NSW Police Force
- State government department or a public authority
- a government school or a registered non-government school or a TAFE
- a public health organisation or a private health facility
- an accredited adoption service provider
- a designated agency
- a registered agency
- a children's service

- any other organisation the duties of which include direct responsibility for, or direct supervision of, the provision of health care, welfare, education, children's services, residential services, or law enforcement, wholly or partly to children.

And the following private health professionals

- Nurses (enrolled and registered)
- Registered medical practitioners
- Registered midwives
- Registered psychologists
- Occupational therapists (other than students)
- Speech pathologists (eligible for membership of Speech Pathology Australia)

### **Requesting Information under Chapter 16A**

Information can be requested and forwarded from a prescribed body if it concerns the safety, welfare or wellbeing of children, young people and/or their families within PlayAbility. The information collected is to be used to make a decision, assessment, or plan, initiate, or investigate, provide a service, or manage a risk that might arise to a child or young person.

You are not able to request information if the information does not concern the safety, welfare or wellbeing of a child or young person, or if the organisation you are requesting the information from is not a prescribed body.

Before requesting information assess if it is appropriate/practicable to seek consent and/or inform the family that information about them is being requested. If consent has been provided, the responding prescribed body should be advised that the family has consented or has been informed. If consent has not been obtained, or the family have not been advised as it may further jeopardise a child or young person's safety, welfare, or wellbeing, place yourself or another person at risk of harm or the parent/carer is not contactable and the matter is urgent, the responding body should be advised of this. Ensure you have provided sufficient information to enable the responding prescribed body to understand the purpose of the request and how the information will assist with that purpose.

Requesting information is to be made in writing, using the [Letter requesting information under Chapter 16A letter template](#) and forwarded to the prescribed body via email.

The information that has been received can be shared with other PlayAbility staff, to make a decision, assessment, or plan, initiate or investigate, provide a service, or manage a risk that might arise in the safety, welfare or wellbeing of a child or young person. The information should not be shared with staff members who are not involved with the child or family.

Information received under Chapter 16A may be requested and provided under Chapter 16A to a different organisation later.

### **Responding to a Chapter 16A request or providing information**

When responding to an information request, first ensure that the organisation requesting information are a prescribed body. Included your team member/CEO in this process. If they are not a prescribed body, the information is not to be shared. Secondly, ensure the information relates to the safety, welfare or wellbeing of a child or young person, and if you reasonably believe that the information would assist the prescribed body to make a decision, assessment, or plan, initiate or investigate, provide a service, or manage a risk that might arise in relation to the safety, welfare or wellbeing of a child or young person. If it does not, the information is not to be shared.

If there has not been an information request, but you believe you have information that could assist another prescribed body in relation to the safety, welfare or wellbeing of a child or young person, that information can be shared under Chapter 16A.

Information must not be shared, if you believe that sharing the information would:

- prejudice an investigation of any breach (or possible breach) or any law
- prejudice a coronial inquest or inquiry
- prejudice any care proceedings
- contravene any legal professional or client legal privilege
- enable the existence or identity of a confidential source of information in relation to the enforcement or administration of a law to be ascertained
- endanger a person's life or physical safety
- prejudice the effectiveness of a lawful method or procedure for preventing, detecting, investigating, or dealing with a breach (or possible breach) or a law
- not be in the public interest.

If you believe that the information requested should not be shared, the requesting agency must be notified in writing of the grounds for the refusal using the [Letter declining a Chapter 16A request template](#).

If providing the information request to a prescribed body, respond using the [Letter agreeing to a Chapter 16A request template](#) followed by a [Letter for providing information under Chapter 16A template](#). Ensure to identify through the information provided in the request letter to see if the family have consented or been informed that information will be released, alternatively, why the family has not provided consent or been informed.



All paperwork relevant to information requested and provided under Chapter 16A must be filled in the child's file and always kept secure, to ensure it can only be viewed by the concerned staff member/s.

In circumstances where a child, young person or their family members feel that there has been a misuse of Chapter 16A, or that there has been an unreasonable breach of privacy, PlayAbility should be advised of the concern or complaint (see policy [2.10 Feedback and Complaints](#)). If the matter is not satisfactorily resolved the complaint can be escalated to the NSW Ombudsman ([www.ombo.nsw.gov.au](http://www.ombo.nsw.gov.au) or phone: 02 9286 1000).

***Document Review***

Version number 3	Last reviewed and approved: February 2022
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## 2.13 Incident Reporting and Management

### Policy

PlayAbility is committed to providing a safe environment for staff, children, and their families. However, if an incident occurs PlayAbility aims to identify, report, assess, manage, and resolve and to identify where lessons can be learned, and appropriate controls can be implemented to reduce the risk of reoccurrence.

### Procedures

If a near miss or incident occurs staff will:

- Provide support and assistance to the affected person(s) if it is safe to do so. This may include the provision of first aid if the parent / carer has first given permission for the staff member to do so.
  - It is important for staff to consider that the child may have difficulty communicating pain and/ or anxiety.
- Communicate to the parent / carer that an 'Incident' has occurred and that the incident will be reported and followed up with them within 24 hours.
- Report the incident

Incident type	Report	Notes
Staff observe or are involved in a hazard, near miss and incident	Verbally report to management  Document in the <a href="#">Incident Report form</a> through the staff login within the PlayAbility website	Forms are to be completed within 24 hours, preferably straight away.
Child or their family/carer observe or are involved in a hazard, near miss and incident	Staff can either follow steps above or support them to raise the issue on the <a href="#">Feedback form</a> , whichever is the most appropriate for the child or their family	
Staff injured	<a href="#">Document in the Insurer Accident Report</a>	To be emailed to the insurer within 5 business days preferably straight away



On receiving the Incident or Feedback form the manager will then debrief the staff member to investigate and determine any corrective action needed to resolve the issue. They will then:

- Notify the CEO who will decide, based on the circumstances and the severity of the incident, corrective action and which of them will follow up the incident with the person or their family.
- Follow up the incident using the [Incident Follow Up Form](#). This form states all corrective action that is taken and gathers feedback from the parent on how the incident was handled.
- Where corrective action is not possible or difficult to determine the manager will discuss the issue further with the CEO.
- Complete an [Incident Closure Form](#) once the incident has been resolved including corrective action/s are implemented, corrective actions are evaluated to ascertain their effectiveness in managing/preventing incidents.
- Record risks that have the potential to be a further cause of harm but cannot be immediately remediated in the Risk Management plan.

The incident report and follow up will be tabled at the following Committee meeting with the report, investigation, follow up and how well the incident was managed and resolved with points raised recorded in the minutes of the meeting.

### **Supporting Children and/or family members/carers affected**

The CEO or Manager will contact the parent / carer, debrief the incident, and ascertain if there is any further resolution needed. This step will be carried out in a way that includes the family in the process of resolving the incident to their satisfaction.

The Manager will keep the parent / carer informed of any steps to remediate the situation or causes

The Manager or CEO will contact the family one month after the incident to ensure all steps have been followed and actions taken. With the agreement of the parent / carer the Incident will then be 'closed' and recorded using the [Incident Closed Form](#).

PlayAbility will deliver support that is 'trauma-informed'. This includes providing a safe environment; communicating openly and respectfully; helping participants to have maximum choice and control; and linking them to trauma services, such as counselling.

Participants will not be repeatedly questioned or told that the information they disclose will result in themselves or their worker getting in trouble. PlayAbility will provide participants support in the legal system and information about the use of

an advocate (including an independent advocate) and access to an advocate is facilitated where allegations of violence, abuse, neglect, exploitation, or discrimination have been made. For further information see [2.1 Rights and Advocacy](#).

### **Supporting Staff Affected**

If a staff member is unable to drive due to their injury or because they are shaken or upset, their emergency contact must be contacted to come or if a staff member is available, they can drive them home or to a medical facility. For serious injuries or when the seriousness is not clear an ambulance should be called.

Following an incident, even a low-level incident, staff may feel anxious. Time should be made for staff to debrief in a non-judgemental setting. The manager should also ensure their staff are aware of the Employee Assistance Program (EAP) including how to contact them.

If a staff member is involved in an investigation, they are entitled to leave with pay during the investigation and encouraged to access the [Employee Assistance Program, see policy 4.8](#). PlayAbility will ensure that workers are appropriately supported and afforded procedural fairness during the investigation process.

### **Reportable Incidents**

The following incidents (including allegations) arising in the context of providing NDIS supports or services must be reported:

- The death of a person with disability.
- Severe injury of a person with disability.
- Abuse or neglect of a person with disability.
- Unlawful sexual or physical contact with, or assault of, a person with disability.
- Sexual misconduct, committed against, or in the presence of, a person with disability, including grooming of the person with disability for sexual activity.
- Unlawful sexual or physical contact with, or assault of, an NDIS participant.

The notification must be made via the [NDIS Commission Portal](#).

If you suspect abuse or neglect of a participant, refer to Mandatory Reporting section below and [2.12 Information Sharing Protocols under Chapter 16A](#).

Depending on the circumstances of the reportable incident, relevant personnel may also be required to report to other bodies, including police or child welfare agencies. This responsibility is not discharged by notifying the reportable incident to the NDIS Commission.

The person making the report must provide the following information to the NDIS Commission where it can be collected:

- The name and contact details of:
  - The registered NDIS provider
  - The person making the notification
  - The person(s) involved in the incident (alleged victim and alleged offender)
- A description of the reportable incident – including the nature of any injuries sustained.
- Details such as time, date and place it allegedly occurred including:
  - a description of the impact on, or harm caused to, the person with disability (Note: where the reportable incident is a death this does not need to be provided)
  - the immediate actions taken by the provider in response to the reportable incident including any actions relating to the health, safety, and wellbeing of the participant, involved in the incident including medical treatment provided, or whether the incident has been reported to the police or any other body.

Registered providers are required to appropriately assess and/or investigate all incidents having regard to the views of any person with disability impacted by an incident and including the following:

- Whether the incident could have been prevented.
- How well the incident was managed and resolved.
- What, if any, remedial action needs to be undertaken to prevent further similar incidents from occurring, or to minimise their impact.
- Whether other persons or bodies need to be notified of the incident.

The nature and extent of this investigation will differ depending on the circumstances of the incident or allegation.

Strict Confidentiality and Privacy must be maintained at all times (see [policy 2.9 Confidentiality and Privacy](#)).

## Mandatory Reporting

PlayAbility staff are Mandatory Reporters and are legally required to report when they have reasonable grounds to suspect that a child is at risk of significant harm from abuse or neglect. The Mandatory Reporters Guide is to be used to determine when a report is required.

Steps staff must take if they suspect abuse or neglect:

Report internally	Verbally report and discuss next steps with Team Manager Team Manager will assist staff to follow procedures and complete reports
Report to police	In an emergency such as urgent concerns for the child's health or life, suspicions of abuse or neglect call emergency services on 000
Refer to Mandatory Reporters Guide (MRG)	MRG is to be used to determine when a report is required MRG is available on <a href="http://www://reporter.childstory.nsw.gov.au">www://reporter.childstory.nsw.gov.au</a>
Complete Decision Tree	
Print decision report	Once MRG is completed a decision report will be issued with an explanation of the outcome based on the completed decision tree. If the MRG indicates that the level of risk does not warrant a report, it will assist mandatory reporters in their appropriate response, such as a referral to an appropriate service or document and continue to monitor
Call Child Protection Helpline – as per Decision report	132 111 The MRG does not override professional judgement, thus if there are reasonable grounds to suspect or believe a child, a young person or an unborn child's safety, welfare or wellbeing is at risk of significant harm then staff must call
Document	Any concerns and reports, including MRG Decision report must be printed and stored in the child's file

Notes:

- If the report relates to an NDIS participant, a report to the NDIS Commission may also be required.



- If the circumstance does not fit into the Mandatory Reporters Guide using the decision-making process staff should speak with their Team Manager or CEO to determine if they should make a report to the Child Protection Helpline.

The detail and quality of the information provided to the Child Protection Helpline is critical in determining the response and outcome from the child protection unit. Therefore, it is important to be prepared by gathering all relevant information and details before making the call.

Once a report has been placed to the Child Protection Helpline, no further reports need to be made, unless new information is presented, or the current risk continues.

The Child Protection Helpline will provide written feedback to all mandatory reports which will detail whether a report met the statutory threshold (risk of significant harm), and any action or ongoing involvement Community Services may have with the child and his or her family. If staff have not heard back from the Child Protection Helpline in a reasonable timeframe, they are to follow up report using the hotline number 132 111.

If the report has not met the risk of significant harm threshold this will act as a prompt for staff to carry out other necessary tasks, such as consulting with another professional, referring directly to local services, offering alternate support services, seeking additional information (see policy [2.12 Information Sharing Protocols under Chapter 16A](#)), or continuing involvement with the family.

The report may still be forwarded within the Community Services if it relates to information already known (from multiple reports), or it is a family Community Services is working with under an existing open plan. If this is the case, written feedback advising that the report was forwarded within Community Services will be sent and relevant contact details provided.

If there is a suspicion a member of staff is/may be causing the risk of harm to a child or young person, the CEO must be advised immediately.

If a staff member is involved in an investigation, they are entitled to leave with pay during the investigation and encouraged to access the [Employee Assistance Program](#), see [policy 4.13](#).

Strict confidentiality must be maintained at all times (see [policy 2.9 Confidentiality and Privacy](#)), unless the information will affect a child or young person's safety, welfare or wellbeing, in this case you are then required to share the information to prevent the risk of serious harm (see [policy 2.12 Information Sharing Protocols under Chapter 16A](#)).

All PlayAbility [staff will be trained to identify and respond to children and young people at risk.](#)

### External Notifications

It may be necessary to report incidents to people or agencies outside of Playability, including external authorities.

Incident type	Report to	Time to report	Notes
Near misses and incidents which could/did result in a fatality, severe injury/illness (including COVID-19)	SafeWork NSW. 13 10 50 (24/7 line)	Immediately  Report to insurer within 48 hours	This includes incidents which relate to anyone at a workplace including a contractor or member of the public. Do not disturb the accident scene until investigation has been completed or all clear provided by SafeWork NSW
Changes and events, especially those which significantly affect our ability to provide the supports and services we are registered to provide (including events related to COVID-19)	NDIS Quality and Safeguards Commission	As soon as practicable	Refer to <a href="https://www.ndiscommission.gov.au/providers/notice-changes-events">https://www.ndiscommission.gov.au/providers/notice-changes-events</a> for more detail.
NDIS Reportable Incidents	NDIS Quality and Safeguards Commission	24 hours	Reported through the NDIS Commission Portal  Refer to further details below
Unauthorised use of a restrictive practice	NDIS Quality and Safeguards Commission	5 business days	Reported through the NDIS Commission Portal
Mandatory Reporting = incidents and suspicions that a	Department of Family and Community Services Child		

Incident type	Report to	Time to report	Notes
child is at risk of significant harm from abuse or neglect.	Protection Helpline 132 111 (24/7 line)		
Suspicion a member of staff is/may be causing the risk of harm to a child or young person	<p>The CEO must inform the NSW Ombudsman <a href="http://www.ombo.nsw.gov.au">www.ombo.nsw.gov.au</a> and investigate the suspicions</p> <p>Any findings of sexual or serious physical misconduct must also be reported to the office of The Children's Guardian <a href="mailto:kids@kidsguardian.nsw.gov.au">kids@kidsguardian.nsw.gov.au</a></p>	Report within 30 days	<p>The outcome of the investigation must be reported to the Ombudsman.</p> <p>The Children's Guardian will make the relevant amendments to the staff members Working with Children's Check</p>

### Incident review and monitoring

The CEO and or WHS Officer will regularly review the Incident register in Jotform so that hazards and control strategies and their effectiveness can be monitored.

The CEO will regularly discuss Incidents and potential risks to the organisation, staff, children, and families in relation to the PlayAbility Risk Management Plan template.

The CEO will review the Incident Reports received to ensure that adequate corrective action has been implemented. The CEO will present all incidents to the Management Committee at the monthly meeting until such a time the issue has been resolved. The Management Committee will continue to monitor for any incident trends to inform further preventative action and quality improvement activities.

### Contact details for relevant organisations:

#### NDIS Quality and Safeguards Commission

Telephone: 1800 035 544





Email: [feedback@ndiscommission.gov.au](mailto:feedback@ndiscommission.gov.au)

Website: [www.ndiscommission.gov.au](http://www.ndiscommission.gov.au)

### **NSW Ombudsman**

Telephone: 02 9286 1000, or 1800 451 524 (outside Sydney metro)

Email: [nswombo@ombo.nsw.gov.au](mailto:nswombo@ombo.nsw.gov.au)

Address: HSBC Centre 24/580 George St, Sydney NSW 2000

Website: [www.ombo.nsw.gov.au](http://www.ombo.nsw.gov.au)

### **Fair Trading NSW**

Telephone: 13 32 30

Address: 60 Station Street, Parramatta NSW 2150

Website: [www.fairtrading.nsw.gov.au](http://www.fairtrading.nsw.gov.au)

### **NSW Department of Community and Justice**

Telephone: 02 9377 600 (FACS Head Office)

Website: [www.facs.nsw.gov.au/about/contact](http://www.facs.nsw.gov.au/about/contact)

For your nearest Community Services Centre:  
[www.facs.nsw.gov.au/about/contact/csc](http://www.facs.nsw.gov.au/about/contact/csc)

### **Commonwealth Ombudsman**

Telephone: 1300 362 072

Address: Suite 2, level 16 580 George St, Sydney NSW 2000

Website: [www.ombudsman.gov.au/contact-us](http://www.ombudsman.gov.au/contact-us)

### **NSW Ageing and Disability Commission**

Telephone: 1800 628 221

Email: [nswadc@adc.nsw.gov.au](mailto:nswadc@adc.nsw.gov.au)

Website: [www.ageingdisabilitycommission.nsw.gov.au](http://www.ageingdisabilitycommission.nsw.gov.au)

### ***Document Review***

Version number 3	Last reviewed and approved: February 2022
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## ***2.14 Membership***

Membership is open to all individuals, who accept the objects and rules of the association. Employees may choose to become members of the association, however, are not permitted to vote.

### **Application of Membership**

To become a member of the association a person needs to fill out an [Application for Membership of Association Form](#)

PlayAbility clients have the option of becoming a member of the association when completing their [Registration/Intake for Early Intervention Form](#) or [PlayAbility Family Support Registration/Intake Form](#)

### **Membership Objectives and Rules**

Individuals must be nominated by a member of the association that personally knows them and approved by the Committee of membership.

The Committee may determine whether or not to accept an application for membership. The Committee will give reason for the rejection of an application, if requested by the applicant.

A register of PlayAbility members is kept in the registered office of the association and is updated regularly. The list of organisational members is published each year in the Annual Report. Membership information relating to individuals is subject to privacy legislation and is not made public.

Membership will cease upon resignation or expulsion.

### **Membership fees**

There are no fees associated with membership to the association.

### ***Document Review***

Version number 4	Last reviewed and approved: February 2022
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## **2.15 Transition**

### ***Policy***

One of the primary roles of PlayAbility's key workers, therapists and educators is to facilitate inclusion into the community of children with a disability or developmental delay, and their families. PlayAbility recognises 'inclusion' requires a commitment from the community and from the parents of the child; and is a process of acceptance, communication, and partnership.

Transition may include community family events, community playgroups, supported inclusive playgroups, long day care, family day care, pre-school, primary schools, and transition to other providers and / or agencies.

### ***Procedures***

PlayAbility has four roles in supporting transitions.

1. PlayAbility keyworkers, educators and therapists will assess and trial evidence-based strategies that support the child's development.
2. The strategies developed in clinical situations will be demonstrated and discussed with parents and educators across the different environments the child is part of. This is called 'capacity building' and is a core component of the Early Childhood Early Intervention (ECEI) approach under the NDIS.
3. Keyworkers have the role of facilitating contact and dialogue between the parents and the community organisation; be it school, preschool, day care or playgroup. Having often worked with the family we are in a position whereby we can provide information about the needs and abilities of the child and conversely, inform the parents on how the educators and the environment will support their child's development. Considerations will include not only the child's development and /or disability but also include the family's cultural and social background when appropriate.
4. Identifying and providing strategies to mitigate any risks to the child and their family during the transition. This may include documenting risks and sharing information to ensure the safety and wellbeing of the child and family are considered as a priority throughout the transition process.

### **PlayAbility Resources**

- The family's key worker will coordinate the early Intervention transition process as part of family goals as discussed verbally or recorded in the service agreement linked to the outcomes in the child's NDIS plan.
- PlayAbility key workers will organise and/ or attend meetings with community organisations and stakeholders to support the child's development and transition.



- Key workers will develop and produce individualised visual resources and/or programs to be implemented across the home, clinic, and community environments to facilitate a successful transition and mitigate any risks.

### **Assessment of client needs**

- During initial meetings with the family, PlayAbility staff will work towards identifying developmental goals and how the child's individual needs affect their ability to participate in social and community life. Details about the functional impact of developmental delays will be a central part of the interview before accessing services.
- Keyworkers will visit the child's day care, preschool or school and observe and discuss how the child's development is affecting their social and learning interactions; and discuss with the educators in relation to the family goals.
- Keyworkers will maintain an ongoing relationship of trust and open dialogue with the family and community organisations and will also arrange and/ participate in meetings with the family to review progress as required.
- Keyworkers will promote other local social supports; transition workshops, parent groups and mobilise family, friends, and community networks.
- Keyworkers to assess risks to the child and their family through the transition.

### **Goal setting**

- Specific transition points and goals will be discussed with the family well in advance and strategies identified and implemented to facilitate transition.

### **Planning**

- Parents will be asked about their priorities and concerns regarding their child's transition and any risks the transition may pose.
- After working with the child and family over time there will be a range of strategies and resources that will have been proven successful in supporting smaller transitions at home and in the sessions. These strategies and resources can then be demonstrated and handed over to the educators and carers in the new environment. These may include social stories, visual cards, key signs, I-Pad apps and other assistive technology and suggestions on changes to the environment and routines to support the individual child's needs.
- With children who are new to us we can conduct parent interviews to understand the child's needs and challenges.
- Define supplemental supports (financial assistance, in home and community supports) and their potential roles in the transition.
- Promote social supports: transition workshops, parent support groups and mobilise family, friends, and community networks.



- Maintain relationships and dialogue with the parents, carers, and people in the transitioning environment to ensure the child's needs are prioritised and that each stakeholder is feeling supported.

### **Implementation**

- Through the implementation of the [Individual Education Program \(IEP\)](#), in relation to the goals set out in the NDIS plan and the service agreement, we will work towards building the capacity of the family and stakeholders to implement the strategies and resources to facilitate successful transition for the child.
- PlayAbility will promote inclusion, support independence, and facilitate adjustment for the child across a range of environments both new and familiar.
- PlayAbility will observe and reflect on how each stakeholder is managing their part in the process; and provide feedback where appropriate.
- PlayAbility will create a collaborative environment that respects culturally and linguistically diverse backgrounds.
- PlayAbility will plan for and manage any risks to the child and their family through the transition.
- Playability will provide knowledge and support for families to make the best decisions about a range of educational settings and community supports, ideally within their own community.

### **Review**

- The effectiveness of the strategies used to support the transition will be evaluated.
- The effectiveness of risk management will be reviewed.
- The evaluation measures will be reviewed.
- Depending on the service agreement and the goals of the family the keyworkers and therapists will continue to work with the child in the new environment beyond the transition.

### **Associated documents**

- Completed intake forms
- Supporting Evidence for the child's delay including any developmental profile, letters from Paediatrician and assessments / reports from the Child and Infant Tertiary Service (CIFTS), Royal Far West (RFW) and the Early Years Assessment Service (EYAS) at Bega Community Health.
- The NDIS plan and listed goals
- The PlayAbility Service Agreement and listed goals
- Individual Education Plans (IEP's) developed by therapist or keyworker
- Meeting minutes and notes



***Document Review***

Version number 5	Last reviewed and approved: February 2022
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## ***2.16 NDIS Plan Management Policy***

### ***Policy***

PlayAbility provides NDIS Plan Management to clients with an NDIS Plan. Having a third party manage a NDIS Plan on behalf of the participant reduces the administrative tasks associated with self-managing such as directly paying providers etc. The participant, carer or Support Coordinator remains responsible for finding and organising supports, deciding when and how the supports are provided in accordance with the plan and developing written service agreements and working relationships with service providers.

All Plan Management fees charged by PlayAbility will be in accordance with the NDIS Pricing Arrangements and Price Limits. Plan management fees are included in the participants NDIS Plan.

### ***Procedures***

Participants choosing PlayAbility for Plan Management will be required to sign a Plan Management - Financial Administration Service Agreement. A Plan Management setup fee will be charged to the participant, PlayAbility will claim this fee directly from the NDIA upon signing of the Service Agreement.

During the term of the Service Agreement PlayAbility agrees to and will be responsible to:

- Provide financial administration services
- Reconcile participant balances
- Pay supplier invoices on behalf of the participant / participants representative
- Process participant / participants representative's reimbursement claims
- Track expenditure against the participant / participants representative's budget
- Provide monthly statements of expenditure and available funding upon request
- Assist with purchases where appropriate
- Provide troubleshooting for issues
- Engage in participant / participants representative liaison-emails, phone calls etc.
- Consult with the participant's representative on request, regarding decisions about how funds are spent
- Communicate openly and honestly in a timely manner
- Treat the participant and participants representative with courtesy and respect
- Listen to the participant / participants representative's feedback and resolve problems quickly (see policy 2.11 Feedback and Complaints)
- Protect the participant and participant's representative's privacy and confidentiality as per the PlayAbility, which can be viewed at [www.playability.com.au](http://www.playability.com.au). (see [policy 2.9 Confidentiality and Privacy](#)).



## Payments

The participant's representative will provide PlayAbility details of their support budgets as per the participant's current NDIS plan.

After supports have been delivered, the service provider or participant's representative will claim payment for those supports from PlayAbility by forwarding an invoice to [admin@playability.com.au](mailto:admin@playability.com.au). PlayAbility will claim from the NDIA portal for funding up to the amounts specified in the support category approved in the participant's current NDIS plan to pay the service providers.

PlayAbility will claim a monthly Plan Management Process Fee directly from the NDIA.

## Responsibilities of the participant's representative

Upon signing of the Service Agreement, the participant's representative agrees to:

- Provide information as requested by PlayAbility in a timely manner
- Treat PlayAbility staff with courtesy and respect
- Discuss any concerns about services provided with PlayAbility
- If the support categories or budget's change, to submit the changes immediately in writing to PlayAbility, signed, and dated
- Advise PlayAbility immediately if the participants NDIS plan is suspended or replaced by a new NDIS plan, or the participant stops being a participant of the NDIS

## Conflict of Interest

PlayAbility is committed to the NDIA's conflict of interest guidelines and will ensure that participants representatives have received all information needed to access the supports that best meet the participants needs. PlayAbility's governing policies and procedures promote the participants and their families right to choose and control the service they receive and the outcome.

## Ending the Service Agreement

Should either party wish to end the Service Agreement they must give 1 months' notice. If either party seriously breaches the Agreement the requirement of notice will be waived.

## *Document Review*

Version number 2	Last reviewed and approved: February 2022
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## 2.17 Telepractice

### Policy

Telepractice can be defined as an online (audio and visual) consultation with the family (parent / carer and child) and the PlayAbility staff member. Telepractice is regarded as at least equivalent to practice delivered in-person.

PlayAbility staff will always endeavour to deliver a quality Telepractice service. To achieve this the Telepractice is to be:

Founded on Person Centred Practice	The family are at the centre of decision making about services and supports
Relationship based	Telepractice is to enable and build strong collaborative relationships
The use of multiple modes of technology	This includes real time videoconferencing, telephone, email, apps, instant messaging, asynchronous video, photos, and audio clips
Enabled by skilled workers	Staff are to adapt their in-person professional skills to their delivery via Telepractice
Supporting parents / carers to understand the advantages of the Telepractice model	Staff are to work with parents / carers to trial how best Telepractice can be used to meet their needs given their individual situation and resources available
Enabled by careful planning before the session or making contact	This includes researching and looking for resources, seeking support from peers or other practitioners and maintaining contact with other stakeholders

### Procedure

Staff are expected to follow standards of practice in line with PlayAbility policies and procedures including but not limited to [4.11 Employee Standards](#) and [4.17 Working from Home](#).

Staff must ensure they identify risks and implement safeguards in their own environment and that of the family to maintain:

- Privacy: Can the session be overheard by others at either location?





- Safety, health, and wellbeing: Is the environment safe in both locations? This may include identifying physical, emotional, or psychological hazards from the environment, people present and from the content (games/books/video)
- Cultural beliefs. If there are any cultural factors that may cause distress to the parent / carer or child whilst receiving support via telepractice?
- Telecommunication equipment. Is it working properly and used appropriately?
- Alternative communication. Are alternatives available (mobile phone/iPad)?

Seek informed consent from the parent / carer before proceeding and to ensure:

- The session is private
- The technology is secure
- That no recording will be made without knowledge or consent
- The costs and billing for the services are transparent

It is the responsibility of the parent / carer to:

- Remain present in the room with their child while the session is in progress
- Have screened video content to ensure it is safe and appropriate before using

### **Guidelines**

To ensure professional standards PlayAbility staff should also:

- Provide information on how to connect to the telepractice app or platform
- Test run the app or platform with the family prior to the first session
- Email the parent / carer the day before with the link to the app or platform
- Email the parent to request they have on hand resources needed for the session
- Introduce yourself and any other staff member attending the session
- Ask the family to introduce any other unknown people present
- When closing the session provide a summary of the session, strategies to follow up, agree to the next step and schedule the following session
- Complete and email the progress notes to the parent / carer as soon as possible after the session
- Upload the session notes to the child's file

### ***Document Review***

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## ***2.18 Assistance with Social and Community Participation***

### ***Policy***

Children who are NDIS participants may receive Core Support funding to access Assistance with Social and Community Participation. This is to enable them, with the assistance of a support worker, to meet social goals and attain skills through engagement in community, social or recreational activities.

### ***Procedures***

Disability Support Workers who are to be employed to deliver Social and Community Participation support will have a minimum qualification of Certificate III; in Individual Support (Disability) Community Services or Early Childhood Education, and are to have received training in aspects of their roles including:

- Waste Management
- First aid training including the response to epilepsy and anaphylaxis
- Food Hygiene
- Manual Handling
- NDIS Worker Orientation Module

The provision of social and community participation services will follow PlayAbility processes, including:

- Staff performing the duties of a support worker will be identifiable by wearing the PlayAbility polo shirt or by wearing the PlayAbility name badge; or both.
- A Service Agreement will be established.
- The costs of providing the service will be explained and will be in line with the current NDIS Pricing Arrangements and Price Limits and Schedule.
- A support worker (or support workers) will be allocated after meeting with the parents / carers.
- A Social and Community Participation Plan outlining the roles and responsibilities of the support worker will be negotiated in collaboration with the parents / carers and provided to the support worker.
- The plan will state times, locations, contact details, spending money allocated and will be specific of any known risks to the child or to others.
- A Risk Assessment form is to be completed for each location support is to be delivered. The Risk Assessment form is on Jotform and available through the Staff portal on the PlayAbility website.
- Money provided by the parent / carer for the purchase of food or other items whilst the participant is in the care of the support worker is to be accounted for and safely managed. A record of money to be provided will be indicated in the Social and Community Participation Plan and a record made in the Service Report with receipts provided to the parent / carer at drop off.



- Children who are in nappies will at times need to be changed by their support worker. Nappies, wipes, disposable gloves, and a bag to dispose of wastes will be provided by the parent / carer.
- A record of the change will be made in the Service Report and include the time.
- Transport of children / participants without a parent / carer present may form part of the service a support worker provides under the plan. In the case of transport, the worker is to refer to policy **5.9 Transporting Children**. In addition, only the participants receiving the support under the plan are to be present in the car and transport will be conducted only to locations recorded in the plan unless previously arranged with the parent / carer.
- Following each support activity an NDIS Service Report (generated on Echidna online) will be written and sent to the parents / carers. The report will list and describe the activities undertaken and observations made including:
  - The time and place the child was picked up and their disposition or mood
  - Any communication or instructions from teacher, parent, or carer
  - Any risks to the child and others
  - Where the child was taken to such as the park, playground, shopping centre etc.
  - Activities engaged in (if they ate any food etc.)
  - Any money provided, purchases that were made and where the receipt has been placed
  - Any events, positive or negative, that occurred
  - Any observations about the child's development relative to the goals in the plan that were made
  - The time the child was dropped back to parent / carer
- PlayAbility staff will ensure, as far as practicable, that clients and staff are safe and not exposed to health and safety risks.

***Document Review***

Version number 2	Last reviewed and approved: February 2022
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## Appendix 1: Useful Links

[Advocacy - Early Childhood Intervention Australia Victoria/Tasmania \(eciavic.org.au\)](http://eciavic.org.au)

[Australian Human Rights Commission](#)

[Australian Human Rights Commission – Aboriginal and Torres Strait Islander Social Justice](#)

[Australian Human Rights Commission – Children’s Rights](#)

[Behaviour Management: Five Useful Phrases](#)

[Checklist for providing information or responding to a Chapter 16A information request](#)

[Checklist for receiving information under Chapter 16A](#)

[Checklist for requesting information under Chapter 16A](#)

[Child Wellbeing and Child Protection – NSW Interagency Guidelines](#)

[Code of Ethics](#)

[Disability Advocacy Finder](#)

[Disability and inclusion | Family & Community Services \(nsw.gov.au\)](http://nsw.gov.au)

[Early Childhood Education | Australian Human Rights Commission](#)

[Easy Read – NDIS Guide to Plan Management](#)

[ECIA - Advocacy](#)

[ECIA – Inclusion Tools](#)

[Family and Community Services ADHC – Ability Links](#)

[Family and Community Services Aging, Disability and Home Care \(ADHC\) – Advocacy and Information Services](#)

[Mandatory Reporter Guide NSW](#)

[National Guidelines for Best Practice in Early Childhood Intervention](#)

[NDIS Guide to Plan Management](#)

[NDIS Pricing Arrangements and Price Limits \(2020-2021 Version\)](#)

[NDIS Quality and Safeguards Commission Reportable Incidents Guidance – Version June 2019](#)

[NSW Ombudsman](#)

[Protection Children is Everybody’s Business – National Framework for Protecting Australia’s Children](#)

[Providing and requesting information under Chapter 16A](#)



[Report a Data Breach – Office of the Australian Information Commissioner](#)

[The Australian Privacy Principles](#)

[The NSW Office of the Children’s Guardian](#)

[United Nations Convention on the Rights of Persons with Disabilities \(UNCRPD\) |  
Australian Human Rights Commission](#)

[What is information exchange?](#)