



Review of Safeguarding at Yooralla

A high-level assessment of safeguarding related systems, policies and processes at Yooralla

December 2017

Updated March 2018

Inherent Limitations

This report has been prepared as outlined in the Scope Section of KPMG's engagement letter with Yooralla dated 13 October 2017. The services provided in connection with this engagement comprise an advisory engagement, which is not subject to assurance or other standards issued by the Australian Auditing and Assurance Standards Board and, consequently no opinions or conclusions intended to convey assurance have been expressed.

The findings in this report are primarily based on a review of policy and procedure documents provided by Yooralla, and are not informed by consultation with relevant stakeholders, including staff, customers and families.

No warranty of completeness, accuracy or reliability is given in relation to the statements and representations made by, and the information and documentation provided by Yooralla as part of the process.

KPMG have indicated within this report the sources of the information provided. We have not sought to independently verify those sources unless otherwise noted within the report.

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The findings in this report have been formed on the above basis.

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Executive Summary

This report presents the findings from a review of the systems, policies and processes that contribute to Yooralla's safeguarding approach for ensuring the wellbeing of its customers, and compliance to its regulatory and oversight obligations. The primary method of analysis was a high-level review of Yooralla's policy and procedural documentation. This was supported by a comparison of the limited incident and reporting data made available by the Victorian Government against data provided by Yooralla, a demonstration of the Riskman system, and discussions with Senior Management and Executive level staff who hold accountability in relation to safeguarding within the organisation.

The review found that Yooralla's significant investment over recent years into safeguarding its customers from abuse and neglect has resulted in the successful development of a comprehensive suite of high-quality policy and procedural documentation, an industry-leading risk management technology platform, and strong reporting functionality that contributes to the organisation's proactive and highly innovative approach to safeguarding. Collectively, these reflect the organisation's strong commitment to establishing Yooralla as a leader in empowering customers to exercise their rights, and to safeguard them from abuse or neglect.

The review concluded that Yooralla's safeguarding systems, policies and processes meet all expectations of contemporary practice, satisfy current Victorian and National Standards, and that the controls and reporting mechanisms in place are clear and robust. As a result of these findings, KPMG also suggests that the Yooralla is in a strong position to successfully meet its obligations under the pending National Quality and Safeguarding Standards. Recommendations for Yooralla to build upon its current position discussed in the report include:

- the development of a new Policy Framework to enhance the logic of its policy and procedure suite and to ensure continued alignment to the current operating model and the NDIS context, and
- a review of its current policy and procedure suite to further enhance its efficiency and effectiveness against its new Policy Framework.

Due to the desktop nature of the analysis, the above findings are limited by KPMG's inability to verify the implementation of the policy and procedural documentation at a practice level, or to consult with Yooralla's staff or customers to determine the perceived effectiveness of Yooralla's safeguarding systems from their perspective.

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Introduction

Introduction – Review purpose, scope and limitations

Purpose

The purpose of this review is to assess Yooralla’s safeguarding systems, policies and processes that contribute to the organisation’s ability to meet its current compliance and oversight obligations.

Scope

Undertake a high-level, desk-based review of the key systems, policies, and processes that demonstrate Yooralla’s approach to safeguarding, across three key areas:

- Preventing abuse through Customer Empowerment and Safeguarding Human Rights
- Practices and controls that ensure safeguarding of customers and the prevention of abuse, and
- Responding to and learning from incidents of abuse.

The review will focus on determining:

- the consistency of relevant policies and processes with contemporary approaches to safeguarding of people with disability (see ‘Background’ section)
- the adequacy of the controls and reporting mechanisms that underpin Yooralla’s safeguarding systems and policies are clear, and
- the adequacy of Yooralla’s policies and processes in relation to its obligations under the current quality and safeguarding arrangements as a NDIS registered service provider in Victoria, including the Victorian Human Services Standards

Scope (cont.)

- a view on Yooralla’s preparedness against the NDIS Quality and Safeguarding Framework, and
- whether there are opportunities to further strengthen Yooralla’s approach to safeguarding.

Limitations

There are a number of limitations that must be noted when considering the findings documented in this report. These relate to out-of-scope activities for this desk-based, high-level review. KPMG therefore did not:

- consult with customers, families, or direct service staff regarding the perceived effectiveness and / or the extent to which the policies, systems or procedures are embedded within and inform the culture and practices within the organisation
- draw full conclusions on the actual effectiveness of the controls and reporting mechanisms in achieving the organisation’s objectives relating to safeguarding
- consider all relevant documentation available and / or presented as evidence as part of this review process in an in depth nature, and
- seek to independently verify data provided by Yooralla relating to reported rates of incidents at Yooralla.



Background

Contemporary approaches to quality and safeguarding

Contemporary safeguarding approaches

Safeguarding can be defined as actions designed to protect and promote the rights of people to be safe from the risk of harm, abuse and neglect, while maximising the choice and control they have over their lives. Many people with disability require no, or minimal, additional supports to ensure they can access general safeguards to an extent equal to other members of the community. Some people with disability with more complex needs may experience increased vulnerability and therefore face increased risk of harm, abuse or neglect.

Contemporary safeguarding approaches address an issue at multiple points of intervention – from preventing an event from occurring, through reducing likely severity of consequences should an event occur, to redressing an event once it has occurred. There are three types of safeguards – developmental, preventative and corrective.

1. *Developmental (individual and/or community)*

These aim to produce desirable social conditions for inclusion and protection of people with disability, supporting their valued status in the community and developing supports through family and intentional relationship building. Research shows that a person who has a network of family and community support, understands how the system works, and has a sound knowledge of their rights will always be better protected by these natural safeguards than they would be by any safety net built by governments.

2. *Preventive (service system and/or providers)*

These focus on service design and cultures to prevent abuse and neglect and actively address risks for individuals. Preventive

measures would also encourage providers to deliver safe, high quality supports, such as assisting providers to build their capacity, including selection and training of their frontline staff.

3. *Corrective (service system and/or government):*

These processes redress, support and aim to minimise trauma after an event has occurred.

See *Diagram 1* (overleaf) for an illustrative example of the three types of safeguarding mechanisms at the system, service, individual and community levels

Risk-based approach

A risk-based approach to quality and safeguarding involves identification of risks and safeguards through individual planning, and greater requirements for workers and providers of supports that are considered to pose a higher potential risk. Examples of high risk supports include those that involve more direct contact between staff and participants; unsupervised contact such as personal care in the home; and supports for people with complex needs such as intensive behaviour support and restrictive practices.

A risk-based approach also recognises the differing levels of individual vulnerability (associated with individual capacity and natural supports or the environment) when setting criteria to meet quality and safeguarding requirements.

By taking a risk-based approach, it is intended that the provider of supports becomes more proactive rather than reactive, preventing or reducing undesired risk and promoting a culture of continuous improvement.

Illustrative example of contemporary safeguarding mechanisms

Diagram 1: Illustrative example of the three types of safeguarding mechanisms at system, service, individual and community levels

	Developmental	Preventative	Corrective
System Legislation, regulation and policy that mandates the rights of people with a disability and establishes the parameters for the provision of disability support.	High quality credible information on the system and rights.	Quality standards and accreditation.	Health and Community Services Complaints Commission investigations.
Service level Processes to guide the provision of support at the disability support provider level, including mandated reporting.	Information about service quality. Training and education on understanding abuse and neglect.	Police checks. Professional development for staff.	Changes to policies and practice in response to critical incidents.
Individual level Practices and mechanisms focused on supporting, empowering and protecting individuals and families as part of providing support.	Self-advocacy and decision-making skills. Education / training.	Health planning and medication management. Ongoing information.	The right to have restrictive practices reviewed.
Community level External mechanisms to enable independent review and monitoring.	Community awareness programs. Peer support services.	Community visitor program.	Independent representation, including advocacy.

Source: Adapted from *Safeguarding People’s Right to be Free from Abuse: Learning from Complaints. Occasional Paper No. 1. Disability Services Commissioner, June, 2012.*

Transition arrangements for quality and safeguarding in Victoria

Legislative context

Under the *Bilateral Agreement for Transition to the NDIS* between the Commonwealth and Victorian Government, Schedule F, Commonwealth and Victorian Governments made a commitment that existing quality and safeguards would continue to operate during transition to the NDIS.

This commitment is given effect by *the Victorian Quality and Safeguards Working Arrangements for Transition (the Victorian Working Arrangements)* – an agreement between the Victorian Government, the Commonwealth Government and the National Disability Insurance Agency (NDIA). The Working Arrangements took effect on 1 July 2016 and will operate until 30 June 2019.

Victorian Government's role during transition

Under these arrangements, the Victorian Government will retain responsibility for operating and monitoring quality and safeguards for disability services transitioning to the NDIS until the national quality and safeguards framework is implemented. This includes a continuation of the statutory oversight role of the Community Visitors, the Senior Practitioner and the Disability Services Commissioner. The Victorian Government will undertake ongoing monitoring of providers' compliance with these requirements.

Yooralla's obligations under the Victorian Human Services Standards

As a Department of Health and Human Services (DHHS) funded service provider receiving funding in scope of the standards and registration under the *Disability Act 2006* and/or *Children, Youth and Families Act 2005*, Yooralla continues to be required to meet the Victorian Human Services Standards.

As a service provider that delivers services directly to clients in Victoria, Yooralla is required to undertake one full certification review against the standards in every 3 year period. Yooralla must also maintain certification through participating in mid-cycle audits (at least every 18 months, as per the process of the endorsed independent review body).

Diagram 2: Victorian Human Services Standards



Source: Adapted from the Victorian Human Services Standards.



Progress against Service Review recommendations

Progress against Service Review recommendations

The following recommendations were provided in the Funded Organisation Service Review of Yooralla, completed by KPMG in September 2015 on behalf of the Department of Health and Human Services (DHHS). The table below provides commentary on the progress Yooralla has made to date against key recommendations relating to safeguarding.

FOR CONSIDERATION (2015)	PROGRESS COMMENTARY (Dec. 2017)
<p>Create a formal process for customers and family members participating on interview panels during staff recruitment processes.</p>	<p>Customers are offered the opportunity to participate in recruitment panels for specific roles. This is stipulated in the <i>Recruitment and Selection Policy</i> (see Page 26) and is evidenced through recruitment panel interview notes provided as part of this Review. The organisation notes that involvement of customers is not possible for all interviews due to the frequency of recruitment across the organisation. However, it is recommended that Yooralla considers the involvement of customers in a more deliberate and consistent way when recruiting frontline staff through their video interviewing, group interviewing, and assessment centres.</p> <p>Customers are also encouraged to provide feedback on staff performance, particularly that of casual staff. This information is used by the organisation to support staffing and rostering decisions. In therapy settings, customers have the ability to choose preferred therapists, which includes the option to change where they are dissatisfied with the services provided.</p>
<p>Set clear policy guidelines regarding the completion of shadow shifts, while maintaining some flexibility at the local level.</p>	<p>Yooralla's <i>Orientation and Induction Policy</i> and supporting <i>Procedure</i> considers in the induction needs of a range of employee types including contractors, students and volunteers. The induction requirements of each position are clearly articulated and appear to be inline with expectations and responsibilities associated with each role.</p> <p>It is suggested that Yooralla updates its <i>Orientation and Induction Procedure</i> to include reference to its <i>Student Placement Framework</i> (see Page 26).</p>
<p>Examine how the quality and outcomes of the supervision processes can be improved.</p>	<p>Yooralla has reviewed and updated its <i>Reflection and Development Policy and Procedure</i> to optimise its supervision structures to focus on the acknowledgement of good practice, positive role modeling, and the recognition and challenging of poor practice. Note, this high-level review is unable to determine the effectiveness of these policy and procedure changes in practice.</p>

Progress against Service Review recommendations (cont.)

FOR CONSIDERATION (2015)	PROGRESS COMMENTARY (Dec. 2017)
<p>Undertake policy development and practice improvement with respect to information provision and addressing feedback and complaints, with a focus on the language, content, and purpose of all forms of communication.</p>	<p>Yooralla has made enhancements to its customer complaints and feedback mechanism. This includes the use of RiskMan to record and report on feedback and complaints, as well as the inclusion of community visitor report to its regular reporting schedule. Yooralla also publishes a <i>Customer Feedback and Complaints Annual Report</i> and provides a <i>Feedback and Complaints Overview</i> to the Service Delivery and Quality Committee on a monthly basis. See Page 24 for further information about Yooralla’s current approach to the management of customer feedback and complaints.</p>
<p>Pursue the adoption of a “one-customer, one-plan policy” while concurrently ensuring information is available in an easily accessible summary format.</p>	<p>Yooralla has adopted the <i>My Yooralla Plan (MYP)</i> as its central document for customer outcome tracking. This document has a goal focused section and is supported by quality checking mechanisms located on the organisation’s CMS. <i>MYPs</i> include all services delivered by Yooralla to ensure the customer has a single plan. Yooralla is willing and able to share this plan with other providers with appropriate consent from the customer. Yooralla views plan as property of the customer rather than the organisation. Staff are supported to support customers to implement their <i>MYPs</i> through an <i>MYP</i> work instruction.</p>
<p>Ensure families receive information regarding participants outcomes as a result of participant in Yooralla programs and these interactions are recorded on customer files.</p>	<p>Yooralla’s Residential Services utilise file notes from which individual monthly updates are produced. There is also an annual action plan review where a Keyworker sits down with the customer and their family, as appropriate. For Early Children Services a <i>Family Service Support Plan</i> is one document used for this purpose. At Community Hubs customer’s goals as per their Individual Support Plan/lifestyle plan are tracked by staff via file/progress notes using the organisation’s CRM. Yooralla’s ADEs report against the <i>Individual Employment Plans (IEPs)</i>. For NDIS customers, the <i>My Yooralla Plan (MYP)</i> is used (see above and Page 22 for further information on <i>MYPs</i>).</p> <p>Yooralla recognises the importance of adults having choice in this process and may not wish to share all information with their family, such wishes are respected by the organisation.</p>

Progress against Service Review recommendations (cont.)

FOR CONSIDERATION (2015)	PROGRESS COMMENTARY (Dec. 2017)
<p>Continue to develop and rollout simple summaries and easy English version of key policies to improve accessibility.</p>	<p>Yooralla has made a number of enhancements to its simple summary and Easy English documentation across its policy, operational and customer feedback material. Examples of such material introduced since the 2015 review includes:</p> <ul style="list-style-type: none"> • Customer Charter of Rights and Responsibilities Poster • Your Yooralla Experience Poster and Form (Easy English) • Accommodation Factsheet (Easy English) • Respite Factsheet (Easy English) • Recreation Factsheet (Easy English) <p>It is suggested that Yooralla consider expanding simplified or Easy English versions of key external facing policy documentation (e.g.. Customer Feedback and Complaints Policy) as well as continuing to develop Easy English factsheets for each of its service offerings, see Page 32 for more detail.</p>
<p>Create a robust process for documenting sign-off of new information, including revised policies and procedures, for employees.</p>	<p>Every Thursday, the staff e-news is distributed by Marcoms and features a policy of the week. New policies and changed policies are featured following their approval. New policies are presented at the quarterly Senior Management Team (SMT) forums, and polices are also included as a standing agenda item on team meetings. Further, a global email is sent to all service managers, group managers and the senior group manager alerting them to the change whenever a procedure or form is modified that relates to Residential and Respite Support Services. This is complemented with a communications folder at each service which contains a register of all forms and procedures etc. that have changed describing what it is about, who it is from and when it is to take effect. Staff are required to sign the register to indicate that they have read the change.</p> <p>Yooralla should consider automating the process for documenting individual sign-off of new and revised policies and procedures relevant to the staff member’s role within the organisation. For example, the implementation of a learning and development system that disperses the new document as it is approved by the organisation (and has relevant documents preset for new starters) that allows the reader to acknowledge individual documents by ticking a box (e.g.. “I have read and acknowledge the contents of this document”). This type of system creates a robust and automated process, and allows Yooralla to have clear oversight of compliance at a macro level.</p>

Progress against Service Review recommendations (cont.)

FOR CONSIDERATION (2015)	PROGRESS COMMENTARY (Dec. 2017)
<p>Create and distribute tailored and appropriately formatted safeguarding related brochures for customers with intellectual disability.</p>	<p>Yooralla’s Customer Rights and Empowerment (CRE) Team provide a number of resources for safeguards and feedback for people with intellectual disability (ID). This includes an Easy English version of the feedback form. All feedback forms reviewed by KPMG were updated in 2017. Yooralla also use a number of external resources such as the Office of the Public Advocate (OPA) ‘<i>ABUSE is not ok</i>’ and the Disability Services Commissioner (DSC) ‘<i>It’s ok to complain</i>’ to encourage its customers to report allegations of abuse and neglect.</p> <p>Yooralla also has a range of programs and resources dedicated to safeguarding customers with an intellectual disability, this includes a ‘life skills – speaking up’ program that can be tailored by the CRE Team to the specific needs of customer cohorts, as evidenced by program and materials adapted for Drouin Community Hub customers.</p> <p>Further, Yooralla management noted that it is working to eliminate from their common practice the idea that a person with an intellectual disability cannot respond to a standard document and always requires an easy English version. This is based on the understanding that some people with ID can be offended by the assumption that they require easy English resources and therefore the skill is to assess the suitability of a resource for the particular circumstance and provide a suitable explanation checking for comprehension.</p>
<p>Development of a policy and practice guideline that clearly articulates the types of information participants and families receive upon joining the service, including access to the full suite of organisational policies and procedures guiding the operation of the support environment.</p>	<p>Yooralla’s Residential and Respite Support Services, Community Hubs and Yooralla’s Australian Disability Enterprises (ADEs) all have a customer handbook in standard and easy English formats. The handbooks cover organisational values, what to expect from the service, how to make a complaint and human rights. The relevant handbook is provided to new customers (or the customer’s carer) / supported employees who sign their acknowledgement of receipt of the handbook. Additionally, all of Yooralla’s customer wellbeing and safeguards policies are publicly available on the internet.</p> <p>Yooralla would benefit from developing a policy document a (e.g. Provision of Information Policy) that explicitly sets out the information provided to customers when joining a service, as well as any ongoing requirements for the sharing of information between he organisation and the customer.</p>



Current review



Key findings

Key findings of the review

- 1 Policies and procedures are consistent with contemporary safeguarding approaches, and language used throughout is consistent with Yooralla's holistic approach to safeguarding, which has a clear emphasis on customer empowerment, rights-based practice, and the importance of continuous improvement at both a staff and organisation-level.
- 2 All policies reviewed are up-to-date, link to other relevant policies and supporting documents, and identify applicable legislation and standards.
- 3 Yooralla has invested significant effort in developing effective systems for recording incidents, monitoring responses, and identifying opportunities to mitigate risks.

Given the findings that Yooralla's policies and procedures are consistent with contemporary approaches to safeguarding, and with Victorian and National legislation and standards, Yooralla is now well positioned to undertake a range of activities that ensure that the documentation that supports its practice is further enhanced to make these more easily accessible and able to be understood by the intended audiences.

- 4 Yooralla has a number of policies relating to incidents and safeguarding of rights, although the Review noted that Yooralla presently lacks a standalone policy on prevention of abuse – given the centrality of this subject to Yooralla's work, a standalone policy capturing the breadth of responsibilities of support workers, management and the Executive in recognising, responding to and reporting abuse may be useful.
- 5 Accessibility of policies and procedures could be enhanced by:
 - developing a Policy Framework to enable policy users to orient themselves and clearly step through all policies relevant to a particular issue, event or subject area
 - rationalising the number of policies, with reference to the Policy Framework, and clearer delineation between policy and procedural information to enable a streamlined group of core policies, underpinned by more specialised and detailed procedural documents
 - developing easy English versions of policies that are directly relevant to customers and families
 - involving a cross-section of staff in the development and review of policies and procedures to ensure that they are written in a way that is easily understood by all target audiences
 - involving customers in the development and review of policies and procedures that are intended to be available to them.

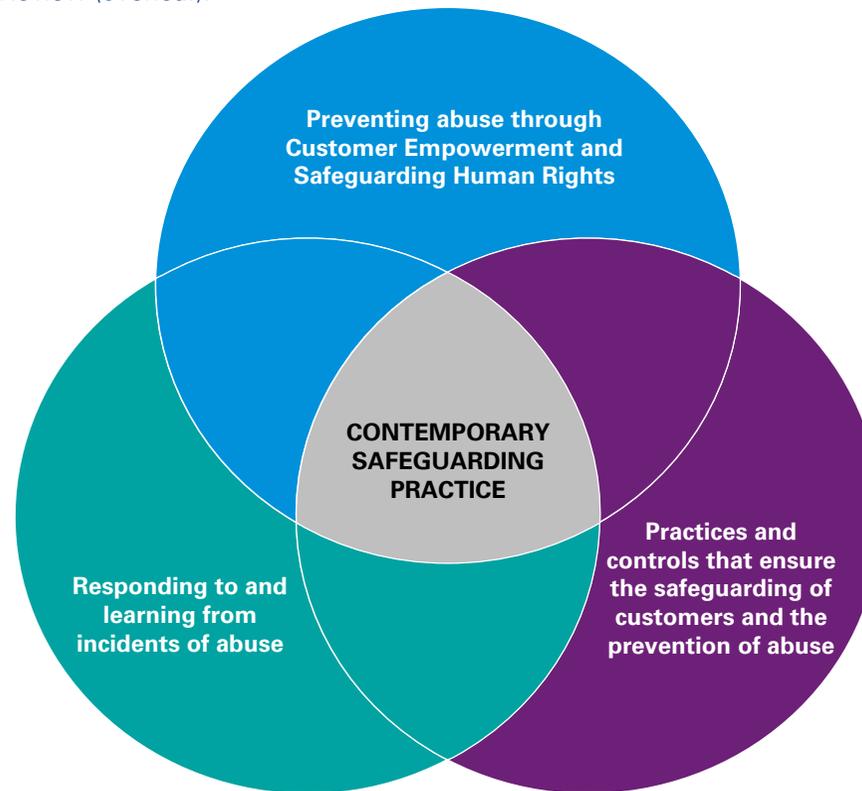


Assessment

Assessment domains

DRAFT

In line with contemporary practice, it is expected that organisations have systems, policies and processes relating to quality and safeguarding across three core areas. Broadly these encompass customer-focused and holistic approaches to preventing abuse through customer empowerment and the safeguarding of human rights; practices and controls that ensure the safeguarding of customers and the prevention of abuse through an appropriately skilled, monitored and supported workforce; and, robust systems and processes for responding to and learning from incidents of abuse. Key elements of each of these domains are outlined on Page 21 of this Review (overleaf).



Assessment domains (cont.)

For the purpose of providing a targeted high level assessment of Yooralla's safeguarding systems, policies and processes, the following key elements of each domain have been assessed.

Preventing abuse through Customer Empowerment and Safeguarding Human Rights

This domain focuses on the individual, and the ways in which Yooralla's policies and practices enable customers to be empowered and to exercise their rights.

Person-centred planning

Person-centred practice

Customer safety and wellbeing

Reducing the use of restrictive practices

Customer feedback and complaints

Practices and controls that ensure the safeguarding of customers and the prevention of abuse

This domain focuses on workforce, and Yooralla's use of appropriate systems, structures and guidance materials to support staff in the delivery of quality supports.

Recruitment and staff safety screening

Staff induction processes

Learning and development

Supervision and reflective practice

Responding to and learning from incidents of abuse

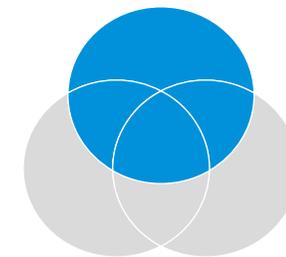
This domain focuses on organisation-level systems and processes Yooralla has in place to ensure clear and effective oversight of incidents and responses, and mitigation of future risks.

Recognising, responding to and reporting abuse

Management oversight of incidents

Prevention of further occurrences, including implementing learnings from incidents

Preventing abuse through Customer Empowerment and Safeguarding Human Rights



Person-centred planning

The key policy underpinning Yooralla's person-centred approach to customer planning is the *Customer Related Plans Policy*. It states that the rights of people with disabilities are to be reflected in Yooralla customers' plans, and acknowledges the need to enable Yooralla customers and key stakeholders to actively participate in the planning process and goal-setting. It is clear from this policy, and the broader suite of related policy and procedural documentation reviewed by KPMG, that Yooralla understands and is committed to implementing contemporary approaches to person-centred planning. Whilst the policy itself does not contain information on when a *Customer Support Plan (CSP)* must be in place, or how frequently *CSPs* are reviewed, the organisation's service-specific handbooks (e.g.. *Residential Services Procedure Manual*) do indicate that *CSPs* are reviewed annually and updated as frequently as required (based on changing support needs), which is in line with contemporary practice.

The organisation has recently introduced *My Yooralla Plan (MYP)* as its central document for customer goal planning and outcome tracking. The goal focused section of the *MYP* is supported by quality checking mechanisms located on the organisation's *Customer Relationship Management (CRM) system*. *MYPs* incorporate all services delivered by Yooralla to ensure the customer has a single plan, which aligns with Yooralla's 'one customer, one plan' approach identified during the 2015 KPMG review. Yooralla is willing and able to share this plan with other service providers with appropriate consent from the customer. In support of its person-centred and empowerment approach, Yooralla views each individual's *MYP* as the property of the customer rather than the organisation itself. Staff are supported to assist customers to utilise their *MYPs* through a *MYP Work Instruction*. Yooralla also provides customers with clear information, via service-specific handbooks, on their right to be involved in planning and decision making

This review identified that Yooralla's service-specific procedure manuals need to be updated to reflect the organisation's updated customer planning language and approach. The changes will ensure the organisation is able to drive consistency and common understanding for its staff and customers.

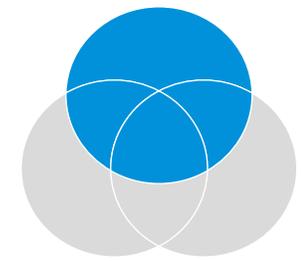
Person-centred practice

It is evident from Yooralla's policy and procedure documents, particularly sections relating to implementation and compliance, that the leadership of the organisation is committed to and cognisant of their role in driving an organisation that delivers person-centred practices. Across all policies relating to person-centred support, the roles and responsibilities of actors across different tiers of the organisation are articulated to ensure a whole-of-organisation approach. Information provided is generally clear, actionable, and appropriately pitched at each level. Furthermore, the language used throughout Yooralla's policies reflects contemporary person-centred approaches and terminology, such as 'customer', 'empowerment', 'choice' and 'participation'.

Service-specific handbooks provide customers and their carers and families with clear and accessible information relating to Yooralla's approach and commitment to person-centred active support practice. This includes respecting and promoting rights to choose and participate in decision making, supporting customers to build and maintain relationships with important people in their lives and communities, and encouraging customers to experience a broad range of opportunities. Indicators of good person-centred active support are included, demonstrating a focus not only on practice, but specific outcomes for customers. Yooralla would benefit from ensuring that, in addition to providing information via service-specific handbooks, key policies relating to customer rights and empowerment are also made available in customer friendly formats.

As noted at Page 27 of this Review, a number of strategies are used to support staff in person-centred practice. This includes tailored training, appropriate supervision and clinical support, the use of a Customer Rights and Empowerment Team to support person-centred approaches across the organisation, and the use of committees at organisation- level which enable customers and their families to inform and contribute to decision making, e.g. YCPAC. Yooralla are also engaged in advocacy and knowledge-sharing activities to advance the sector overall.

Preventing abuse through Customer Empowerment and Safeguarding Human Rights (cont.)



Customer safety and wellbeing

A clear and strong focus on customer safety and wellbeing is embedded throughout Yooralla's extensive suite of policy and procedural documentation. Yooralla's *Quality and Customer Empowerment Policy* is its core overarching policy document for ensuring the safety and wellbeing of its customers. The organisation's contemporary and innovative approach to safeguarding places emphasis on embedding a culture of quality, continuous improvement and safeguarding the rights of people with disabilities to ensure their wellbeing and safety. The policy recognises the role of culture; use of outcomes and indicators to monitor success; skills and competencies of leadership; use of qualitative, quantitative and anecdotal data; and the use of continuous improvement to drive policies, practices and service outcomes. It describes clear responsibilities for implementation, compliance monitoring, measuring and continual improvement, i.e. leadership, management, staff, customers. The policy is governed by the organisation's *Quality and Empowerment Framework* and is enacted through the *Customer Empowerment Team*.

Yooralla's '*How we're upholding safeguards*' document provides strong insight into the organisation's understanding, commitment, and approach to contemporary safeguarding practices, which focus on the prevention of abuse and neglect.

As noted above, there are a suite of other policies and supporting documents that drive the organisation's customer safety and wellbeing agenda. These include but are not limited to: *Safeguarding Rights Framework*; *Human Rights Policy*; *Health and wellbeing policy*; *Customer Charter of Rights and Responsibilities*; *Clinical Governance Policy*; *Child Safety Policy*; *Risk Management Policy*; and the *Community Visitors Program*.

Noting its demonstrated commitment and acknowledgement of the importance of prevention of abuse, the organisation may benefit from the development of a standalone '*Preventing Abuse and Neglect*' policy to ensure increased ease of understanding of Yooralla's position for its customers, staff, and the broader public. This would be an overarching policy that existing policies would sit under.

Reducing the use of restrictive practices

Yooralla has a number of policies and frameworks which reflect the organisation's commitment to the human rights of people with disability, including a *Human Rights Policy*, *Quality and Customer Empowerment Policy*, *Quality and Empowerment Framework*, and *Safeguarding Rights Framework*. Furthermore, the organisation's commitment to safeguarding human rights is expressed through a number of other issue-specific policies (e.g. *Customer Personal Relationships Sexuality and Sexual Health Policy*), underpinning Yooralla's overall approach to service delivery and design.

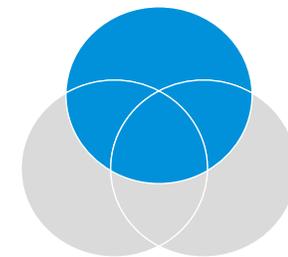
The key policy relating specifically to the use of restrictive practices is the *Positive Behaviour Support and Restrictive Interventions Policy*. This policy situates positive behavior support as the primary and preferred means of managing behaviours of concern, and notes that the organisation does not in principle support the use of restrictive practices.

A number of processes and systems support this commitment, including appropriate clinical governance through the *Clinical Governance Framework and Policy*, tailored training to support staff in managing behaviours of concern, supervision, and the use of *RiskMan* (its internal online Risk Management system) to record, monitor and analyse data relating to critical incidents.

The development of *Behaviour Support Plans (BSPs)* is supported by specific training programs for staff and guidance documents including a *Behaviour Support Plan Checklist*, *Behaviour Support Document Planner* and a *Behaviour Support Plan Approval* work instruction.

Yooralla's approach to the reduction of the use of restrictive practices is consistent with their requirements under relevant current legislation and standards. Further, Yooralla has an array of additional processes to monitor, scrutinise and act upon, where required, any concerns it has in regards to the use of restrictive practices within the organisation.

Preventing abuse through Customer Empowerment and Safeguarding Human Rights (cont.)



Customer feedback and complaints

Yooralla's *Customer Feedback and Complaints Policy* articulates the organisation's approach to receiving customer feedback, as well as managing and responding to complaints. Roles and responsibilities are clear and appropriate, and the supporting flowchart demonstrates to the reader the complaint management process. The organisation's *Customer Feedback and Complaints Procedure Manual* provides a detailed guide for employees handling complaints, compliments and other feedback. The manual is robust and appropriately refers to relevant legislation, standards and external bodies (e.g. Disability Services Commissioner). The manual provides clear guidance on the timeline requirements for responding to complaints and other feedback, the referral process to external parties (where required) and the review of, and learning from complaints.

At an operational level, key documentation utilised by service staff, including the *Residential Services Procedure Manual* and *Community Hubs Procedure Manual*, give practical high level guidance on the customer feedback and complaints process and provide linkage to key reference material including the policy, procedure manuals, and relevant forms and systems. For customers, information on feedback and complaints is included in service documentation material, for example the *Accommodation Services Handbook*, which is provided to customers upon entering a service agreement with Yooralla.

The organisation's customer feedback and complaints initiative 'Your Yooralla Experience' provides customers and their families with clear and accessible avenues to provide feedback and raise complaints. The program is well supported by a range of materials, including the *Your Yooralla Experience Brochure* and *Form*. As part of this initiative, Yooralla undertakes an annual Customer Survey Report. The *Customer Survey Report 2017* sought input from 574 customers who were randomly selected from the customer database, ensuring a set percentages of customers from all services provided by Yooralla. Yooralla advised that selection bias only occurred to remove customers or family members who had previously advised that they did not wish to be contacted; or, to remove customers from the list where it was felt that the timing of contact for a survey may be seen as insensitive and cause significant distress for the family (for example, serious illness at the time of the survey).

Customer feedback and complaints (cont.)

The survey found an overall satisfaction rate of 89%, a slight reduction on the previous year. Despite this outcome, it is a strong result in a period of significant change for both the organisation and its customers.

Relevant key findings reported in the survey include:

- 96% of customers report feeling safe and at ease using Yooralla services
- 95% of customers report staff support them to make their own choices
- 93% of customers report that staff understand their needs.

The *Survey* also found that 23% of customers gave a negative response when asked if they knew how to make complaint at Yooralla. Commentary in the *Report* indicated that Yooralla intends to address this challenge during the transition of customers to the NDIS as it is a natural opportunity to provide relevant material and for a discussion to be held between the customer and their key staff.

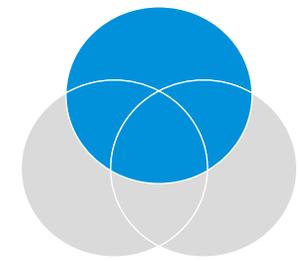
Yooralla records all feedback and complaints on its *RiskMan* database (described at Page 29 of this Review). Using this information, Yooralla's Senior Practitioner provides a *Feedback and Complaints Overview* to the *Service Delivery and Quality Committee* on a monthly basis and publishes a *Customer Feedback and Complaints Annual Report*.

The *Disability Services Commissioner Victoria Annual Complaints Report Individual Service Provider 2015-16 Report for Yooralla* shows that Yooralla received 16.7% of all complaints reported in the sector during 2015-16. Data indicates that the organisation finalises 94% of complaints within an average of 46.7 days, as compared to 93% and 48.6 days for service providers receiving 50 or more complaints during the same period.¹ This demonstrates that Yooralla acts upon complaints received in an effective way.

Note, this Review was unable to verify the culture of supporting feedback and complaints at the delivery level, the actioning of agreed outcomes arising from finalised complaints, or the experience of customers in relation to providing feedback or making a complaint to Yooralla.

1. Yooralla and <https://dhhs.vic.gov.au/disability-services-additional-service-delivery-data-2016-17>. This data has not been independently verified as part of this Review.

Findings summary – Preventing abuse through Customer Empowerment and Safeguarding Human Rights



This high level review of Yooralla's systems, policies and processes relating to the *Prevention of abuse through Customer Empowerment and Safeguarding of Human Rights* found the organisation has developed innovative and contemporary practices that are consistent with contemporary approaches to safeguarding, and current Victorian and National Standards. The review found that Yooralla's reporting mechanisms and follow up processes in relation to the areas assessed in this section exist, however there are some opportunities for enhancing the accessibility of key documentation for staff, customers and other stakeholders. See also, 'General commentary – Scope, structure and content of policies' section.

OUTCOME INDICATOR

Consistency with contemporary approaches to safeguarding

Consistency with current Victorian & National Standards

Clear controls and reporting mechanisms

Evidence reviewed

Policy / Framework documents

- Human Rights Policy
- Quality and Customer Empowerment Policy
- Clinical Governance Framework
- Child Safety Policy
- Quality and Empowerment Framework
- Choice and Advocacy Policy
- Customer Feedback and Complaints Policy
- Customer Related Plans Policy
- Service Delivery Policy
- Health and Wellbeing Policy
- Guardianship and Administration Policy
- Positive Behaviour Support and Restrictive Interventions Policy
- Customer Personal Relationships Sexuality and Sexual Health Policy

Procedural documentation

- Residential Services Procedure Manual
- Community Hubs Procedure Manual
- Customer Feedback and Complaints Procedure Manual

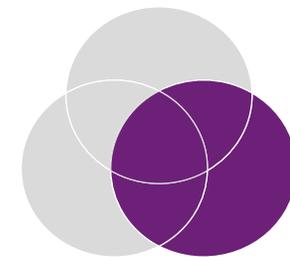
Systems

- QMS Policies and Procedures
- RiskMan

Other documentation

- Customer Charter of Rights and Responsibilities
- Customer Rights and Empowerment (CRE) Team description
- Customer Survey Report 2017
- Service Delivery and Quality Committee Meeting Papers
- Yooralla Community Partnership Advisory Committee Meeting Papers
- Your Enquiries Solved (YES) Group Minutes
- Disability Services Commissioner Victoria Annual Complaints Report Individual Service Provider 2015-16 Report for Yooralla

Practices and controls that ensure the safeguarding of customers and the prevention of abuse



Recruitment and staff safety screening

Yooralla's recruitment practices are guided by the *Recruitment and Selection Policy*, and are primarily enacted through the Recruitment and Employment Team, Workforce Planning and Resources Manager, and hiring managers, with the Recruitment and Employment Team involved in essentially all recruitment and selection activities to ensure consistency. The policy is complemented by the *Position Description Policy*, which ensures a consistent approach to the development of Position Descriptions (PDs). While a review of actual PDs to ensure their appropriateness is beyond the scope of this review, the template is comprehensive, including mandatory requirements, qualifications, professional experience, personal skills and attributes, and contains a section detailing the organisation's commitment to customer safeguards and wellbeing.

The *Recruitment and Selection Policy* sets out clear accountabilities for undertaking and documenting pre-employment checks, and refers to supporting policies including *Police Record Check Policy* and *Working with Children Check Policy*, which provide detailed processes for ensuring compliance with legislative requirements, both when commencing employment and on an ongoing basis. The People and Culture team within Yooralla have responsibility for monitoring of checks, and clear systems are in place to ensure current checks are maintained and documented, inline with the *Employee Records Management Policy*.

Yooralla uses a staged approach to recruit disability support workers, including application and assessment centres. A person with disability attends the introduction sessions. Yooralla is introducing an additional video interview step, and it is intended that a person with disability will be involved in assessment of applicants' videos. Other features of the selection process (outlined in the *Recruitment and Selection Policy*) include culture fit questions, behavioural based interviewing, use of gender mixed panels, and the inclusion of at least one customer representative on interview panels (although Yooralla reports that the use of customer representatives is not yet fully embedded, and is primarily used in the selection of Executive and Management staff). It is not clear whether panel participants are trained in the selection process.

Overall, Yooralla's approach to recruitment and selection demonstrates cognisance of the different factors, qualities and attributes relevant when recruiting to a disability services organisation, as well as the critical importance of clear processes, accountabilities and systems to support proper staff safety screening.

Staff induction processes

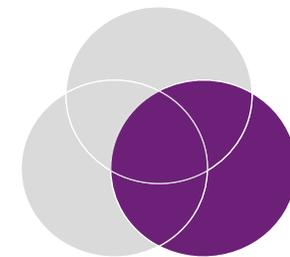
The *Orientation and Induction Policy* applies to permanent and casual staff, volunteers, contractors, Agency personnel, students, volunteers, Executive Directors and Board Members, to ensure that they are systematically provided with all they need to know to be successful in their role and to be an active and engaged member of the Yooralla community. The purpose and policy statement sections of this document could be further enhanced to include the organisation's intention to ensure its induction practices contribute to the safeguarding of its customers.

Induction processes are described in the *Orientation and Induction Procedure*, and differ according to each employment category. For example, Agency personnel (hired through a third party labour hire firm) are contractually required to complete mandatory training requirements, and undergo a local workplace induction, whereas Yooralla employees are subject to more rigorous induction processes (mandatory training requirements are discussed at Page 27). Induction is phased, with core activities to be completed in the first day/week, and other requirements completed in the first month/three months. The procedure sets out clear accountabilities for facilitating, documenting and monitoring completion of the Induction Process via the Recruitment and Employment team. People and Culture has responsibility for developing, maintaining and reviewing induction programs and resources, and Executive Directors are expected to provide periodic feedback to the Learning and Development team on the content and value of the induction program. The Procedure does not reference Yooralla's *Student Placement Framework*.

A review of the *Yooralla Staff Handbook* indicates that this is a valuable resource for orienting new staff, providing clear, accessible information on topics relevant to safeguarding customers such as: handling feedback and complaints; incident reporting; and Yooralla's Quality Management System. Yooralla also has a number of service-specific procedure manuals (described at Page 27 of this review).

Noting that a comprehensive review of induction materials is out of scope, it is apparent from documents reviewed that Yooralla recognises induction as an important part of ensuring safe, quality service delivery; has processes in place to monitor completion of induction requirements; and takes an holistic approach to induction that incorporates employees, agency staff, volunteers and others.

Practices and controls that ensure the safeguarding of customers and the prevention of abuse (cont.)



Supervision and reflective practice

Yooralla has a *Reflection and Development Policy* which requires staff to undertake reflective practice ('reflection and development'). The policy refers to reflection and development as a key element of the organisation's continuous improvement approach to service delivery and safeguarding, and supporting staff in keeping up to date with contemporary practice. The policy sets out the responsibilities of line managers in undertaking reflective practice with staff; recognising and rewarding good practice through increased responsibility; identifying opportunities for developing knowledge and skills of staff; and acting as positive role models.

The policy is supported by the *Reflection and Development Procedures Manual*, which sets out clear processes for undertaking reflection and development, including through one-on-one formal discussions, informal chats, emails and team discussions. It describes as a minimum that processes to support or facilitate reflection and development should occur once a month. Line managers are responsible for documenting reflection and development discussions, and these are drawn on during the Annual Performance Review process. Information on reflection and development is provided to staff in a clear, accessible format via the *Staff Handbook*.

Supervision is also embedded in a range of working documents. For example, *Service Manager Monthly Reporting Checklists* include formal supervision of individual reportees, with documented outcomes, and the maintenance of *Supervision, Support and Development Notes*. As per Yooralla's *Managing Underperformance Policy*, underperformance is managed through more active supervision, support and development, including performance improvement plans, monitoring and counselling, as guided by Yooralla's *Managing Underperformance Guidelines*. In circumstances where supervision and support is not available, Yooralla's *Working Alone Policy* takes a risk-based approach, e.g. risk assessment, appropriate induction and training, and monitoring systems.

Yooralla's Specialist Clinical Team also provides practice supervision across the organisation, focusing on both discipline and customer specific supervision, and supporting line management in relation to practice supervision of staff.

Learning and development

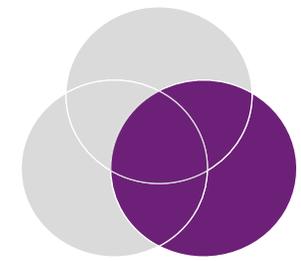
Yooralla's *Employee Learning and Development Policy* acknowledges the role that staff capabilities play in safeguarding the rights of people with disability. It describes clear accountabilities for facilitating employee learning and development, with the Learning and Development team (People and Culture) supporting and overseeing the organisation's learning and development activities. However, it does not describe how training completion is monitored. The policy is underpinned by the *Yooralla Workforce Capability Framework*, which sets out capabilities required for individual roles, as well as higher level capabilities that employees may aspire to. Learning and development opportunities are designed to align with this *Framework*, and are regularly evaluated by the Learning and Development team.

Yooralla takes a progressive view of mandatory training requirements for service delivery staff. In addition to compliance driven courses (e.g. Workplace Health and Safety, mandatory staff training is tailored to each individual service, with service understood broadly to include a service type (i.e. accommodation, respite), or a specific site or customer. This ensures that mandatory training requirements reflect the particular support needs of the customer/s that a staff member supports.

Yooralla's service-specific procedure manuals are also an important learning and development tool for staff. Each of the manuals from the sample reviewed contained a specific section on '*Safeguarding People*' with reference to the organisation's commitment to the prevention of abuse and neglect. The review of these manuals also found that they use clear, accessible language for staff. Content is appropriately pitched, using examples to support understanding, and defines key concepts and requirements of service delivery.

Broadly, Yooralla's policies and procedures reflect a continuous improvement approach. In particular, Yooralla's approach to setting mandatory training requirements demonstrates that learning and development at Yooralla is designed to be person-centred, risk-based, and reflective of contemporary practice, including its approach to positive behavior support.

Findings summary – Practices and controls that ensure the safeguarding of customers and the prevention of abuse



This high level review of Yooralla’s systems, policies and processes relating to its *practices and controls that ensure the safeguarding of customers and the prevention of abuse* found that the organisation employs a proactive and risk-based approach to employing, supervising and managing its workforce. Supported by a suite of contemporary policy documents, the organisation uses specialist teams and technology to act on the commitments made within key documentation. Whilst a primary limitation of this review was the inability to test the workings of Yooralla’s systems at an operational level, consultation with senior management demonstrated a deep commitment to having zero tolerance to any form of abuse and neglect of its customers with a strong emphasis on prevention as an enabler to that vision. See also, *General commentary – Scope, structure and content of policies’* section of this Review.

OUTCOME INDICATOR

Consistency with contemporary approaches to safeguarding

Consistency with current Victorian & National Standards

Clear controls and reporting mechanisms

Evidence reviewed

Policy / Frameworks

- Recruitment and Selection Policy
- Police Record Check Policy
- Disability Support Workers Exclusions Scheme Policy
- Code of Conduct Policy
- Orientation and Induction Policy
- Managing Underperformance Policy
- Yooralla Workforce Capability Framework
- Working Alone Policy

Procedures

- Health and Wellbeing Procedures Manual
- Orientation and Induction Procedure
- Residential Services Procedure Manual
- Community Hubs Procedure Manual
- Service Manager Monthly Reporting Checklists
- Yooralla’s Managing Underperformance Guidelines

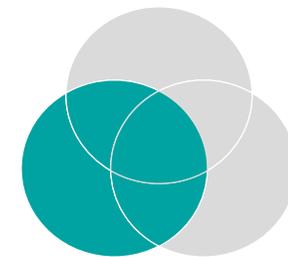
Systems

- QMS Policies and Procedures
- RiskMan

Other documentation

- Specialist Clinical Team Terms of Reference
- ‘Part 1’ (classroom) Induction Program overview
- “Human Rights in Practice” presentation (Induction program)
- “Human Rights Principles: What is required of you?” presentation (Induction program)

Responding to and learning from incidents of abuse



Recognising, responding to and reporting abuse

All employees at Yooralla have a duty to report all incidents that they observe or that are reported to them. Incident management, including recognising, responding to and reporting abuse, is governed by Yooralla's *Management of Incidents Policy*. The policy defines key concepts - including 'incident', 'failure to disclose offence', 'reasonable excuse', 'reasonable belief' and 'reportable conduct' – and states that, in the case of allegations relating to abuse or neglect, an internal or external investigation will occur. Yooralla's position is that, where allegations are disputed, responses will prioritise duty of care to the customer.

The policy is underpinned by the *Management of Incidents Procedures Manual*, which provides detailed guidance on when an incident report is required, incident categorisation, and the *Reporting an incident flowchart*. It also provides guidance on how to respond to specific incidents, such as the death of a customer, a head injury, or incidents involving children or young people under 18 years of age, where responses to these incidents have additional requirements.

The procedure is necessarily detailed, but easy to navigate, and clearly steps out requirements for staff to ensure appropriate incident responses. Line managers play a key role in responding to ongoing safety and wellbeing needs of those involved, ensuring the incident is properly documented and reported in compliance with legislative requirements, and working with the service team to undertake a root cause analysis. Taken together, these two documents provide clear guidance to Yooralla staff at all levels on their roles and responsibilities in the management of critical incidents, including reporting of, and responding to, abuse and neglect, and ensure that appropriately qualified and experienced staff have oversight at all phases of responding to and reporting abuse (further detail on management oversight is provided at Page 30).

Clear and accessible information relating to abuse is also provided to staff via service-specific procedure manuals, such as the *Residential Services Procedures Manual*, which outlines Yooralla's position in relation to responding to allegations of abuse, including listening, conducting an internal or external investigation, and prioritising duty of care and interests of the customer.

Recognising, responding to and reporting abuse (cont.)

As per Yooralla's *Human Rights Policy*, it is the responsibility of Yooralla managers to ensure staff attend and participate in training relating to safeguarding rights (it is assumed that this includes recognising, responding to and reporting abuse).

All incidents are reported via the *RiskMan* database, described at Page 30 of this Review. Legislative reporting requirements (e.g. Cat 1 incidents) are integrated into *RiskMan* to support compliance.

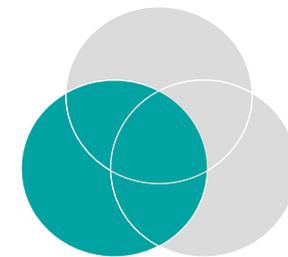
Recognising that allegations may not always be able to be substantiated, the *Safeguarding Customers Post Incidents Policy* outlines Yooralla's response to an allegation of abuse or poor quality of care where the report is not substantiated. This includes weekly coaching, identification and support of staff training needs, and restrictions on work arrangements to minimise the risk of future incidents. The policy is consistent with Yooralla's approach to supervision and staff capacity-building as key components of safeguarding against abuse.

Information from the Department of Health and Human Services' *Disability services additional service delivery data 2016-17* shows that a comparison of Category 1 incidents of alleged abuse figures for Yooralla versus other service of Yooralla's size demonstrates that Yooralla has a lower rate of incidence of alleged abuse than like providers. For example, in 2016/17 Yooralla had 51 Category 1 incidents reported under assaults or 7.8% of Victoria's cat 1 assaults (651). As a proportion of Yooralla's total Category 1 incidents in 2016/17, alleged assaults accounted for 15.8% whereas for Victoria, assaults accounted for 22.2% of cat 1 incidents.²

Note, this Review was unable to verify the culture or practices of recognising, responding to or reporting alleged abuse at the service delivery level, nor was it in the scope of this engagement for KPMG to verify incident data provided by Yooralla. It should also be noted that Yooralla does not have a standalone policy relating to the prevention of, and recognising, responding to and reporting abuse.

2. Yooralla and <https://dhhs.vic.gov.au/disability-services-additional-service-delivery-data-2016-17>. This data has not been independently verified as part of this Review.

Responding to and learning from incidents of abuse (cont.)



Management oversight of incidents

Yooralla has clear accountabilities for line management, and senior management, relating to incident management and reporting, as set out in the *Management of Incident Policy* and associated procedure manual.

Senior management are responsible for reviewing and managing incident data, including aggregate incident data to identify trends and opportunities for practice improvement. The Chief Practitioner has overall responsibility for leading Yooralla's critical customer incident management approach, and providing periodic analysis to relevant managers and committees. In addition, for Category 1 incidents, the Executive Director is responsible for holding monthly discussions with the CEO, and communicating these discussions to the Board.

Management oversight of incidents is supported in the *RiskMan* database. Specific incident types trigger an email alert to the Chief Practitioner, CEO and relevant specialist managers, or, in the event of emergency use of restrictive interventions, the Authorised Program Officer is notified. Built-in distribution lists can also be used where other Yooralla managers need to be informed of an incident. Incident report data is also provided to Yooralla's Service Delivery and Quality Committee to inform program and service monitoring and reviews. This illustrates Yooralla's overall approach to management oversight of incidents, which is not only focused on compliance and immediate incident management needs, but on identifying key trends and risks so as to inform service design and delivery.

In addition to incident reporting, *RiskMan* is used to document and monitor complaints and feedback, staff incidents, community visitor reports, and information relating to legislation with compliance. As such, the database supports comprehensive management oversight of risks and incidents by providing a centralised repository for a broad range of information relevant to customer safety and wellbeing and quality of care.

Customers' *My Yooralla Plan* includes a tracking mechanism, stored in the CMS, which also enables Yooralla to monitor and maintain oversight of the quality of supports delivered to customers, as expressed through customer outcomes.

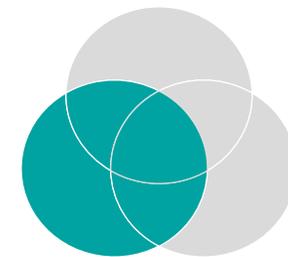
Prevention of further occurrences, including implementing learnings from incidents

Yooralla's *RiskMan* database is the organisation's central source of information relating to incidents. A demonstration of *RiskMan* as part of this Review indicated significant investment and thought has gone into the development of the *RiskMan* interface to optimise usability of incident reporting data. This includes the use of mandatory data fields to ensure key data is captured, and extensive pre-set options to describe incidents and responses. In addition, required actions following incidents are tracked, and prompts are used to ensure that any actions are resolved within the required timeframe. Yooralla also has dedicated staff resources responsible for reviewing and monitoring incident reporting via *RiskMan*. As noted previously, *RiskMan* is also used to store and track other types of data, including complaints and feedback, and staff incidents.

RiskMan's extensive reporting capabilities enables Yooralla to analyse data in different ways, i.e. by site, incident type, customer, etc. Yooralla reports that this supports the Senior Management team in identifying trends in incident data, and implementing preventative actions. Yooralla provided examples to the reviewers of how this information has been used at both the site-level and customer-level to prompt an assessment, and subsequent changes to the environment (to address an increase in falls) or the customer's support needs (to address underlying drivers of an increase in behaviours of concern) respectively. The overall design and use of *RiskMan* demonstrates Yooralla's commitment to capturing comprehensive and accurate incident data as a key mechanism for preventing future incidents and mitigating emerging risks. This is supported by key committees, such as Yooralla's Service Delivery and Quality Committee.

In addition to the *RiskMan* system, Yooralla has policies and systems in place to support reflective practice, and the use of training and development to enhance staff capabilities and minimise the occurrence of incidents (described previously in this Review).

Findings summary – Responding to and learning from incidents of abuse



This high level review of Yooralla’s systems, policies and processes relating to *responding to and learning from incidents of abuse* found that Yooralla has invested significant effort in developing effective systems for recording incidents, monitoring responses, and identifying opportunities to mitigate risks. Yooralla does not have a standalone policy on abuse, although it is addressed through other policies relating to incidents and safeguarding of rights – given the centrality of this subject to Yooralla’s work, a standalone policy capturing the breadth of responsibilities of support workers, management and the Executive in recognising, responding to and reporting abuse may be useful. See also, *General commentary – Scope, structure and content of policies’* section of this Review.

OUTCOME INDICATOR

Consistency with contemporary approaches to safeguarding

Consistency with current Victorian & National Standards

Clear controls and reporting mechanisms

Evidence reviewed

Policy / Frameworks

- Safeguarding Customers Post Incidents Policy
- Customer Feedback and Complaints Policy
- Management of Incidents Policy
- Open Disclosure Policy
- Whistleblower Policy
- Risk Management Policy

Procedures

- Risk Management Procedure
- Management of Incidents Procedures Manual

Systems

- RiskMan
- Management Reporting Framework

Other documentation

- Customer Feedback and Complains Annual Analysis Report 16/17
- Your Yooralla Experience (standard brochure and Easy English version)
- Yooralla Allied Health Services Review – Final Report
- Disability services additional service delivery data 2016-17

General commentary – Scope, structure and content of policies

General comments on Yooralla’s policies

Overall, Yooralla’s policies are consistently and clearly structured. All policies reviewed are up-to-date, link to other relevant policies and supporting documents, and identify applicable legislation and standards. It should also be noted that language used is consistent with Yooralla’s contemporary approach to safeguarding, with a clear emphasis throughout on customer empowerment, rights-based practice, and the importance of continuous improvement at both a staff and organisation-level.

General themes relating to the usability of Yooralla’s policies identified during the review are as follows:

- Navigating policies – Yooralla staff are fully inducted on a range of policies, and can use the intranet search function to navigate and locate policies as required. Usability of Yooralla’s policies would be strengthened by developing an overarching Policy Framework to enable policy users to orient themselves and clearly step through all policies relevant to a particular issue, event or subject area. There is also an absence of clear signposting within individual policies to direct the reader to the relevant related policy or document (e.g. “For guidance on Yooralla’s broader approach to empowering customers, please see the *Quality and Empowerment Framework*; “If the incident relates to a customer under the age of 18 years, please refer to the *Child Safety Policy*”).
- Separating policy and procedure – The Review found that policy documents frequently contained detailed procedural information. This appeared to contribute to a high volume of policy documents, as the specificity of information necessitates multiple policy documents where a single, overarching policy underpinned by a number of more specialised and detailed procedural documents would be more appropriate.

General comments on Yooralla’s policies (cont.)

- Suitability of content – The language and level of detail used in some policies was considered not suitable given the breadth of competencies of Yooralla’s workforce. While *Procedure Manuals* were noted as a valuable resource in communicating clear, actionable and easy to understand information to staff regarding their role and responsibilities, we would also expect policy and procedure documents to be appropriately pitched. This may be supported by the separation of policy and procedural information, as this would potentially enable role-specific procedures to sit beneath the broader policies. Suitability of content is considered particularly relevant in the context of the NDIS, and the potential for an increasingly casualised workforce.
- Customer-facing policies – The Review noted the absence of customer-facing policies in an appropriate format, including Easy English. While clear and suitably pitched information for customers was noted to be included in service-specific handbooks, we would expect to see key customer-facing policies also made available in suitable and accessible formats, particularly in the context of the NDIS where potential customers and their families/carers are likely to ‘shop’ for providers (including by reviewing key public-facing policy documents).
- Up-to-date references – Some minor referencing issues were detected, for example, policies which refer to documents which are no longer available on the intranet, or use non-current document names (e.g. ‘Staff Handbook’ referred to as ‘Employee Handbook’). It is expected that this would be easily rectified through an internal review of policies.

Opportunities for improvement are outlined at Page 36 of this Review.



Future Quality and Safeguarding Considerations

NDIS Quality and Safeguarding Framework

Overview

The primary objective of the national *Quality and Safeguarding Framework* (the *Framework*) is two-fold – to advance the rights of people with disability and minimise the risk of harm, while maximising the choice and control they have over their lives to achieve their goals. It is designed to offer national consistency across the country. This is also consistent with the overall approach of the NDIS.

The *Framework* has been shaped by the following principles:

- Choice and control: maximise opportunities for people with disability to make decisions about their supports.
- Risk-based and person-centred approach: safeguards should relate to the actual level of risk faced by a person.
- Presumption of capacity: presume that all people with disability have the capacity to make decisions and exercise choice and control.
- National consistency: the framework should provide the same protection to people, regardless of where they live in Australia.
- Reducing and minimising regulation: the framework should create the least burden possible on individuals and providers of supports while still achieving the agreed aims of the Framework.
- Administrative efficiency: a national system should be well organised.

The *Framework* takes a risk-based approach with consideration of two key types of risk – the risk that people with disability could receive poor quality supports that do not assist them to achieve their goals, and the risk that people with disability could be harmed in some way. The aim of the Framework is to target those areas where the likelihood of harm is greatest and the consequences of harm the most severe. This means that providers of support types where there is potentially a greater risk to participants will have to comply with a stronger regulatory framework than providers in low-risk areas (such as home handyperson services). It also incorporates the three types of safeguarding mechanisms described earlier – developmental, preventative and corrective.

Yooralla's preparedness against the NDIS Quality and Safeguarding Framework

This high level review of Yooralla's safeguarding policies, systems and processes indicates that the organisation is well placed in relation to the NDIS *Quality and Safeguarding Framework*. As noted within this report, Yooralla's documented approach to quality and safeguarding is based on contemporary safeguarding practices. This includes the adoption of multi-layered, risk-based and person-centred approaches to ensure the prevention of abuse and neglect of people with disability, of which the foundations of the *Framework* are also based on.

Examples of Yooralla's current practices alignment to core components of this *Framework* include:

- *Individual*: Yooralla's dedicated *Customer Rights and Empowerment Team* specialise in building participant capacity to drive a continuous improvement culture informed by the experience of their customers. Yooralla provides a range of material about both the NDIS and its services in accessible formats to support its customers to undertake informed decision making.
- *Workforce*: Yooralla has strict documented screening processes for new staff and undertakes tailored induction and ongoing learning and development activities to ensure its workforce has the appropriate skills to effectively meet the needs of its customers whilst keeping them safe from abuse and neglect.
- *Organisational*: Yooralla's *Clinical Governance Framework* has a strong emphasis on partnering with customers to promote safe and innovative services. Further, Yooralla's *Positive Behaviour Support and Restrictive Interventions Policy* advocates for the reduction of restrictive practices through evidence-based positive behaviour support practices. Yooralla also contributes to research both independently and in partnership with government departments to inform best practice within the sector (e.g. *Restrictive Interventions Data System Cohort follow-up study*).



Opportunities to improve Yooralla's safeguarding approach

Opportunities to further strengthen Yooralla's safeguarding approach

Recommendations

As documented throughout this report, the Review has found that Yooralla has a strong commitment to the safeguarding of its customers achieved through a contemporary and practice driven approach that includes a focus on the individual customer (through customer empowerment and rights-based practices), Yooralla's workforce (through appropriate induction, training and supervision of staff), and Yooralla's systems and processes relating to incident management (through a robust and effective system for responding to, reporting and monitoring incidents, including allegations of abuse and neglect).

In line with the organisation's well documented continuous improvement mind-set, there is opportunity for Yooralla to further strengthen its current practice to ensure it continues to strengthen its safeguarding practices. As such, in the order listed, KPMG recommends that Yooralla:

1. Develops a Policy Framework that is fit for purpose for Yooralla's current operations. The framework will enhance the logic of Yooralla's policy suite and subsequently increase the usability of all policy and related documentation for customers, staff and management.
2. Undertakes a review of its current policy suite (155 policies) to determine the relevance and positioning of each policy under the new Policy Framework.
3. Reviews each policy within the suite to ensure the contents of each document is policy related, and that each is easy to follow and key messages are prominent within the document.
4. Separates procedures from policies.

Recommendations (cont.)

5. Establishes a Policy Committee, or similar, with representation across the business including service delivery staff, to:
 - review new draft policies and existing policies identified for being up for review
 - provide feedback on new and existing policies, and
 - ensure integrity and efficiency of the Policy Framework and Index.
6. Restructures the Policy Index to reflect the new Policy Framework and outcomes of the policy review.
7. Adapts all related materials to reflect the new Policy Framework and updated Policy Index.
8. Drawing on Yooralla's existing governance structure, forms a Working Group or sub-committee within the existing Yooralla Community Partnership Advisory Group (YCPAC), in order to receive customer viewpoints and advice on appropriate format, style, content and scope of customer-facing policies.
9. In collaboration with the YCPAC Working Group or sub-committee, develop and release Easy English versions of relevant public facing policy documents (e.g. Choice and Advocacy Policy, Positive Behaviour Support and Restrictive Interventions Policy).



Appendices

Appendix A: Review Methodology

Overview

This high-level, desk-based review of Yooralla's key systems, policies, and processes relating to the safeguarding of its customers comprised of three phases:

1. Initial consultation with senior management

KPMG met with the Senior Practitioner and key staff to discuss the engagement and understand Yooralla's progress relating to safeguarding since the 2015 KPMG review.

2. Assessment of systems, policies and other documentation

KPMG undertook an assessment of information provided and documentation available on Yooralla's policies and procedures intranet site.

3. Reporting and recommendations

KPMG reported against the assessment domains within each section and identified opportunities to further strengthen Yooralla's current approach.

Outcome Indicators

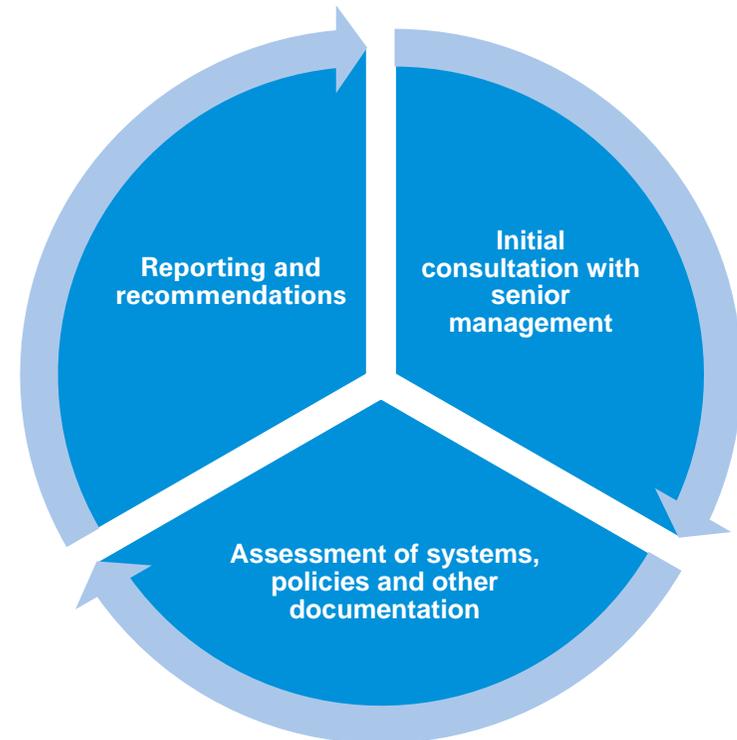
Following the review of each section, KPMG assessed three key focus areas within each domain:

- Consistency with contemporary approaches to safeguarding
- Consistency with current Victorian & National Standards, and
- Clear controls and reporting mechanisms.

The 'traffic light' colours provide a high level indication of Yooralla's progress against each area of assessment.

- *Green* – Evidence of good practice with a view to ensure a focus on continually improving
- *Yellow* – Some improvement required, and
- *Red* – Significant improvement required.

Diagram 3: Review methodology overview



Source: KPMG.



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