1 POLICY TITLE: Adverse Events Policy and Procedures

1.1 Category:	Organisation
1.2 Approval by:	Management
1.3 Approval Date:	29/09/2022
1.4 Revision Due Date:	29/09/2024
1.5 Responsible Officer/Group:	Management

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2 Purpose

To ensure the safety of Leisure Networks' customers, staff and stakeholders in response to adverse events, risks and critical incidents.

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3 Scope/ Application

This policy applies to all areas and activities of Leisure Networks.

4 Definitions

'Business-as-usual incident' means:	an incident that is addressed in business-as-usual operations via team leaders and managers. They are guided by general policies and procedures, for example addressing a workplace hazard.
'A control' means:	a process, effected by an entity's board of directors, management and other personnel, designed to provide reasonable assurance regarding the achievement of objectives.
'Critical business function' means:	a business function identified as essential for survival of the organisation and its critical objectives.
'Critical incident management' means:	how critical incidents are effectively managed through prevention, immediate response, post incident reporting and post incident review.
'External context' means:	the external environment in which the organisation seeks to achieve its objectives.
'Emergency management' means:	the actions required to either evacuate (i.e. full or partial) or to undertake an emergency lockdown.
'Internal context' means:	the internal environment in which the organisation seeks to achieve its objectives.
'Resources' means:	the means that support delivery of an identifiable output and/ or result. Resources may be money, physical assets, or most importantly, people.
'Risk' means:	"The effect of uncertainty on objectives where an effect is a deviation from the expected – positive or negative." Source: ISO 31000, risk management.
'Risk management' means:	the identification, evaluation, and prioritisation of risks followed by coordinated and economical application of resources to minimise, monitor, and control the probability or impact of unfortunate events or to maximise the realisation of opportunities. This is achieved by the combination of culture, systems and processes undertaken by Leisure Networks to coordinate the identification and management of risk. Risk management activities inform decision making, support the achievement of objectives and the prevention of harm.

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'Risk management framework' means:	a set of components that provide the foundations and organisational arrangements for designing, implementing, monitoring, reviewing and continually improving risk management throughout the organisation.
'Service' means:	any planned disability support, service or program delivered by Leisure Networks.

5 Risk Management Planning

5.1 Outline

Risk management is an integral part of sound management practice and an essential element of effective corporate governance. Risk management offsets uncertainty, by judging the consequences against the likelihood of each positive and negative outcome and provides mitigation strategies to enable the desired result.

We need to **manage the risks to our business** by identifying and analysing the things that may have an adverse effect on our business and choosing the best method of dealing with each of these identified risks.

The **risk appetite** is set by the Board and defines the amount and type of risk that Leisure Networks is willing to accept or avoid in pursuing its objectives.

The level of risk accepted constitutes Leisure Networks' **risk tolerance** level and will be one that balances the level of risk against the drivers of value. The Leadership Team communicates expectations when overseeing risk management.

Risk management needs to be factored into corporate and business planning processes as well as project management activities and any proposal which may have political, economic, social, technological, legal or environmental consequences.

A positive **risk culture** is where staff take responsibility for thinking and managing risk as part of their roles, to ensure effective measures are undertaken, which reflect sound planning, to enable informed decision making.

The questions to ask yourself are:

- What could cause an impact?
- How serious would that impact be?
- What is the likelihood of this occurring?
- Can it be reduced or eliminated?

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6 Risk Management Procedures

6.1 Service Delivery Risks Procedure

6.1.1 Purpose

This procedure outlines how risk management activities will be performed, recorded and monitored when providing Leisure Networks services.

This procedure must be considered with Leisure Networks' Risk Management Framework.

6.1.2 Scope

This procedure outlines Leisure Networks' approach in responding to staff, customer and stakeholder safety during the delivery of all Leisure Networks services and programs.

All staff, customers and stakeholders are included in and responsible for the practices and scope included in this procedure.

6.1.3 Procedure

All Leisure Networks employees can identify risks at any time. When these risks are identified outside of formal risk review processes, escalation of the risk to the appropriate person needs to occur.

Staff members will ensure risks are actively identified, analysed, and managed via use of the:

- Screening questionnaire
- Getting To Know You form
- Customer Information and Risk Assessment
- In Home and Accommodation Risk Assessment
- Community Venue Risk Assessment

Information gathered on these forms will be recorded and shared by:

- Recording alerts and risks on individual customer files
- Recording risks on the Risk Register if the risk cannot be eliminated or satisfactorily managed
- Recording venue or community risks within files on SharePoint.

Staff are encouraged to identify risks as early as possible to minimise impact. The steps for accomplishing this are outlined in the following sections.

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6.1.3.1 Screening questionnaire (NDIS Services)

The screening questionnaire is a series of questions used to ascertain if there are any early issues or concerns that need to be considered before a customer is deemed suitable for services by establishing whether the customer's support needs are able to be met by Leisure Networks.

Intake staff are trained in identifying responses that may indicate Leisure Networks is an unsuitable provider for a customer. Any responses where the suitability is unclear are to be discussed with a Team Leader who will provide assistance with carrying out the assessment.

Any potential risks identified in the questionnaire, e.g. behaviours of concern or care needs, are to be discussed with a Team Leader who will identify and document steps taken to manage any risks.

6.1.3.2 'Getting To Know You' form (Community Inclusion Services)

The Getting to Know You form is a series of questions used to ascertain a deeper understanding of the customer, their goals and their needs. It will also further establish if the customer's support needs are able to be met by Leisure Networks.

Intake staff are trained in identifying responses that may indicate Leisure Networks is an unsuitable provider for a customer. Any responses where the suitability is unclear are to be discussed with a Team Leader who will provide assistance with carrying out the assessment.

Any potential risks identified in the form, e.g. behaviours of concern or care needs, are to be discussed with a Team Leader who will identify and document steps taken to manage any risks.

6.1.3.3 Customer Information and Risk Assessment (NDIS Services)

The Customer Information and Risk Assessment is completed at a minimum annually, at the time of the customer's onboarding and at service agreement renewal. If the customer has changes to their individual circumstances, such as an occupational therapist report that identifies new risks or additional medical needs, a new risk assessment must be carried out immediately.

The information provided should be assessed and any further information requirements should be sought if risks are identified.

Information regarding medical conditions and behaviours must be entered on the customer's file and displayed as an alert if the risk is considered moderate to severe.

6.1.3.4 In-Home and Accommodation Risk Assessment (All services)

The In-Home and Accommodation Risk Assessment is to be completed by Leisure Networks staff on any occasion where provision of services is in someone's home or accommodation, including short-term and temporary accommodation setting (e.g.

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weekends away) where the assessment has not been completed in the last 12 months. If the customer has changes to their individual circumstances, such as an occupational therapist report that identifies new risks or additional medical needs, a new risk assessment must be carried out immediately.

This risk assessment is completed by attending the home or accommodation in person and documenting responses to each of the sections. Any areas of concern should be noted on the customer's file.

External stakeholders may also be engaged on occasions when we are delivering services such as camps or outdoor activities. It is acceptable for a facility manager to gather and provide risk assessment information on behalf of Leisure Networks. Careful attention should be given to customer and staff safety. All risks identified will be assessed to ascertain the range of possible outcomes.

6.1.3.5 Community Venue Risk Assessment

The Community Venue Risk Assessment is to be completed by Leisure Networks staff on any occasion where provision of services is in a community venue at least once a month and/or is deemed a high-risk setting. Examples of high-risk settings include where large crowds gather, where risk of injury is high (such as a theme park), etc. These assessments are completed every 12 months or sooner if there is a change to the venue, e.g. renovations. If there is a change to a venue, a new risk assessment must be carried out immediately.

Careful attention should be given to customer and staff safety. All risks identified will be assessed to ascertain the range of possible outcomes.

6.1.3.6 For all assessments

If staff feel a risk cannot be satisfactorily managed or eliminated, the risk is presented to the respective service manager. Any newly identified risk should be reported to a manager as soon as it is known.

The manager will escalate consultation regarding management of the risk using the following hierarchy; only moving to the next option if a suitable management plan is not achieved by consulting the previous person or group.

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Service Manager  →  Manager, Compliance and Risk  →  Accountable Executive Director  →  CEO
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The accountable Executive Director will register the risk on the Risk Register and will determine the course of action to be taken.

If the risk is initially recognised during services, the Service Quality Committee will review the incident at its next meeting and follow any determined course of action. If the risk negatively impacts staff, the Workplace, Health and Safety Committee will review the incident at its next meeting and follow any determined course of action.

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6.1.3.7 Risk awareness

The staff member who completed, or first receives, the risk assessment will record the information:

- Risk alerts on the customer's file will be maintained and updated as necessary by the individual's Key Worker.

- Staff providing support services will be alerted to any risks at a program brief prior to a program beginning or prior to the next individual shift commencing.

- A Team Leader will be notified and consulted regarding any HIGH or MEDIUM rated risks or an increase of risk status. The Team Leader will escalate to a senior manager and/ or the Executive Leadership Team as required.

6.1.3.8 Tools and resources

Risk Register

The Risk Register will be maintained by the Manager, Compliance and Risk and regularly reviewed by the Executive Leadership Team and will be reviewed as a standing agenda item for relevant meetings.

Categorising risk

Risks and their level of action are categorised on the below scale:

- Low (L): need to monitor to ensure risk does not escalate.

- Medium (M): remove/ reduce/ isolate risk in 8-14 days.

- Serious (S): remove/ reduce/ isolate risk in 1-7 days.

- High (H): immediate action to remove/ reduce/ isolate risk.

In determining the category of risk, the likelihood of the risk occurring and the degree of impact of the consequences must be determined. A risk assessment guide is available in SupportAbility when registering an incident and on all risk assessment templates. The below table is a tool that should be used when determining the level of risk:

	Consequences				
Likelihood	Insignificant	Minor	Moderate	Major	Catastrophic
Almost certain	M	M	H	H	H
Likely	M	M	H	H	H
Possible	M	M	M	S	H
Unlikely	L	L	M	M	S
Rare	L	L	M	M	M

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Examples of consequences are:

- Insignificant: no injuries, low financial loss.

- Minor: first aid treatment, on-site release immediately contained, medium financial loss.

- Moderate: medical treatment required, on-site release contained with outside assistance, high financial loss.

- Major: extensive injuries, loss of production capability, off-site release with no detrimental effects, major financial loss.

- Catastrophic: death, toxic release off-site with detrimental effect, huge financial loss.

Controlling risk

There is a hierarchy of controls for controlling risk as shown below. The most effective control is elimination with the least effective control being the use of PPE.

Control	Description
Elimination	Physically remove the risk
Substitution/ Isolation	Replace or isolate the risk
Engineering	Physically reduce the risk, e.g. adding physical safeguards
Administration	Administratively reduce the risk, e.g. train staff
PPE	Use personal protective equipment, e.g. wear a mask
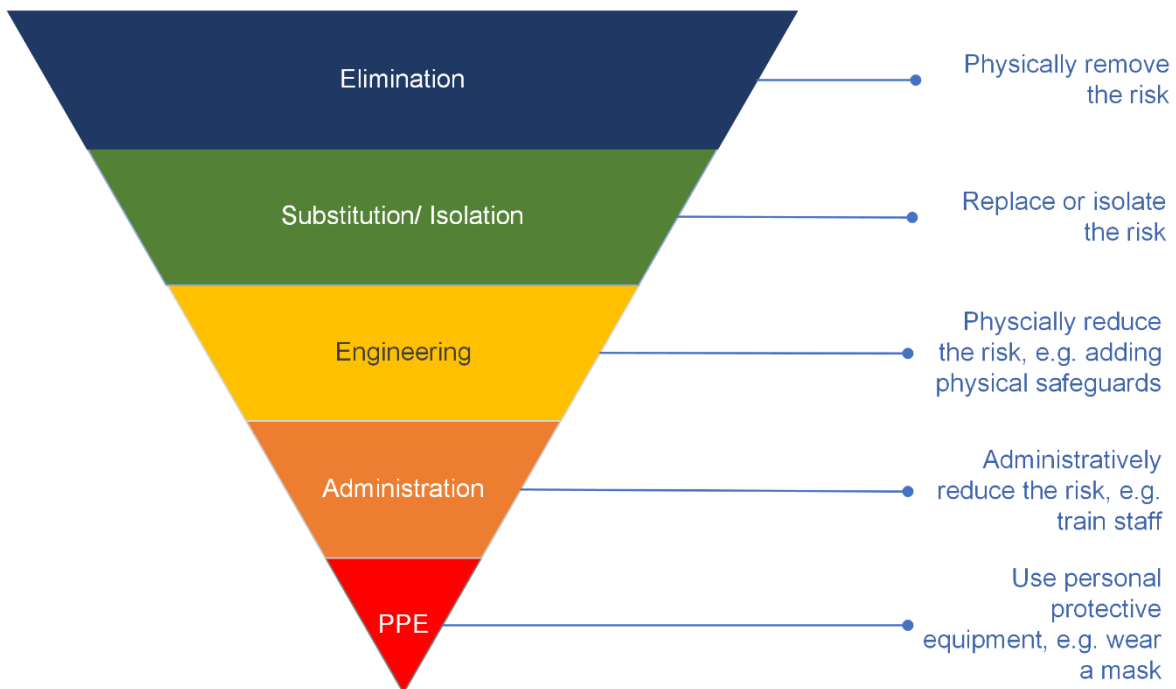
7 Business Continuity & Disaster Recovery Planning

7.1 Business Continuity Plan

Business continuity planning involves developing a practical plan for how Leisure Networks can prepare for and continue to operate after an incident or crisis. The image below shows a holistic, high-level approach to business continuity planning.

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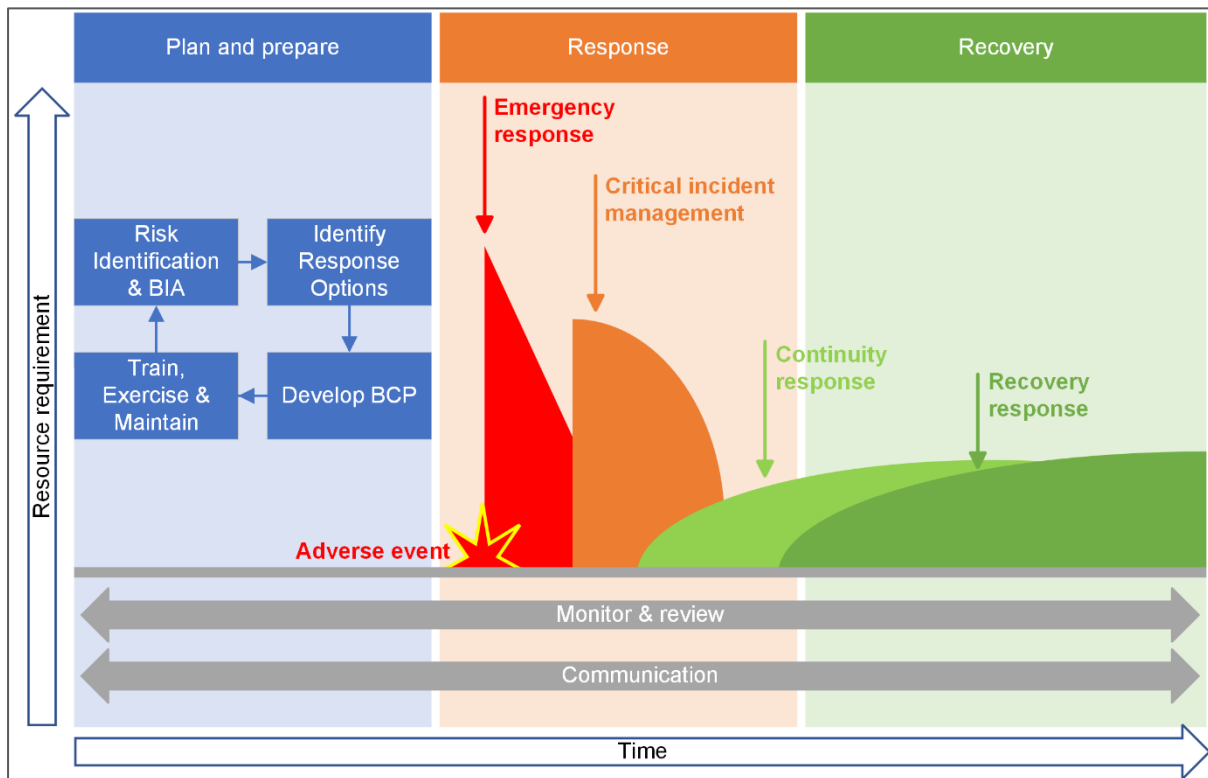
Leisure Networks' Business Continuity Plan is part of the broader Risk Management Framework. The critical incident management phase is outlined in the next section.

7.2 Disaster Recovery Plan

A disaster recovery plan is a documented, structured approach that describes how an organisation can quickly resume work after an unplanned incident.

Leisure Networks' Disaster Recovery Plan is part of the broader Risk Management Framework.

8 Critical Incident Management

8.1 Overview

A critical incident is "any event or series of events that is sudden, overwhelming, threatening or protracted" (Source: Better Health Channel). A critical incident demands an immediate, high-level response. In the context of operations at Leisure Networks, the Board note that a critical incident is any event that:

- Poses a serious risk to the life, health or safety of staff or an individual who is receiving supports, for example:
  - A missing customer (if there is risk of fatality or serious injury).
  - A significant injury or death.

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- o Actual or probable hospitalisation due to a serious event while receiving supports.
- o Actual or possible involvement by the police or other emergency services.
- o An actual or alleged sexual assault.
- o Recognising a customer who may be at risk of suicide or seriously injuring someone else.
- o A fire or other serious life-threatening emergency in the individual's home while receiving supports.
- o Actual or alleged serious fraud with reputational risk for Leisure Networks.

- Poses a serious risk to the ongoing operation of the organisation due to catastrophic environmental or other external incidents. For example, fire, flood, storm, hazardous substance accident, cyber-threat (such as widespread ongoing IT outage, data threat).

- Poses a serious reputational risk to the organisation.

- Other incidents of a similar nature and consequence to the above.

8.2 Types of incidents

There are two type of incident responses:

1. Critical incident response
1. Business-as-usual incident response

This policy addresses critical incident responses only.

A business-as-usual incident is one that is addressed in business-as-usual operations by team leaders and managers. They are guided by general policies and procedures; for example, addressing a workplace hazard or if a customer has a minor fall with no injury. Business-as-usual incidents must be reported in SupportAbility and are consistently monitored and reviewed by the Service Quality Committee.

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8.2.1 Determining whether an incident is critical

The answer to one or more of the below questions indicates the incident is critical.

Does the incident:
- Pose a serious risk to the life, health or safety of staff or an individual who is utilising our services? For example:
 > A missing customer (if there is risk of fatality or serious injury).
 > A significant injury or death.
 > Actual or probable hospitalisation due to a serious event while at work or utilising our services.
 > Actual or possible involvement by the police or other emergency services.
 > Actual or alleged sexual assault.
 > Recognising a client who may be at risk of suicide or seriously injuring someone else.
 > A fire or other serious life-threatening emergency in the individual's home while receiving supports.
 > Actual or alleged serious fraud with reputational risk for Leisure Networks.
- Pose a serious risk to the ongoing operation of the organisation due to catastrophic environmental or other external incidents? For example, fire, flood, storm, cyber-threat (such as widespread ongoing IT outage or data threat).
- Pose a serious reputational risk to the organisation?
- Other incidents of a similar nature and consequence to the above.

Yes ──────────── No

| Refer to Critical Incident Response Plan | Business-as-usual incident: Refer incident to People Leader |

8.2.2 NDIS reportable incidents

Some critical incidents are also reportable incidents in the NDIS. Leisure Networks has an obligation to notify the NDIS of reportable incidents, including alleged reportable incidents, within certain timeframes. Reportable incidents must be reported to the NDIS Commission even if they have been dealt with through Leisure Networks' incident procedures.

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Reportable incidents and the reporting timeframes are outlined in the table below.

Reportable incident	Required timeframe to report
Death of a person with disability	24 hours
Serious injury of a person with disability	24 hours
<u>Alleged or actual:</u>	
Abuse or neglect of a person with disability	24 hours
Unlawful sexual or physical contact with, or assault of, a person with disability	24 hours
Sexual misconduct committed against, or in the presence of, a person with disability, including grooming of the person for sexual activity	24 hours
The use of a restrictive practice in relation to a person with disability if the use is not in accordance with a required state or territory authorisation and/ or not in accordance with a behaviour support plan	Five business days

Due to the sensitive nature of reportable incidents, a brief incident report is logged on Leisure Networks' accident and incident register (AIR), with the full incident details and investigation notes stored on the secure People & Culture SharePoint site.

8.3 Critical Incident Response Team (CIRT) and roles

Core members are required for all incidents and are shaded in yellow in the table below. Primary members (not shaded) are to respond to incidents that impact their area of the business/ department only.

Secondary members are to respond to an incident only if required. A secondary member is required if:

- the relevant core or primary member is unavailable
- the nature of the incident requires additional staff resource, or
- the incident requires the secondary member to be engaged in the response.

All primary members accept and perform their roles and responsibilities as outlined in the Critical Incident Response Team (CIRT) plan.

All secondary members are to be taken through the CIRT plan and must demonstrate a clear understanding of their role and responsibilities in the case of being deputised for any of the above listed reasons.

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Core and primary members	Secondary (Deputy) members
CEO Role: Board liaison	Executive Director, Strategy, Performance & Customer
Executive Director, Strategy, Performance & Customer Role: Incident Lead – Communications (ILCOMM)	Head of Marketing & Communications
Executive Director, People, Culture & Capability Role: Incident Lead – Staff (ILPC)	Manager, People & Culture
Executive Director, Community Impact & Wellbeing Role: Incident Lead – Customer (ILC)	Relevant service manager: Manager, Inclusion, Independence & Impact Manager, Community Connections Manager, Financial Plan Management Manager, Sport, Rec & Health
Executive Director, Finance, Operations and Governance Role: Incident Lead – Business continuity (ILBC)	Manager, Risk & Compliance
Manager, Risk & Compliance Role: Incident Manager (IM)	Team Leader, Quality & Impact
Manager, Inclusion, Independence & Impact	Team Leader, Community Inclusion
Manager, Community Connections	Team Leader, Community Connections (West) *or* Team Leader, Community Connections (Barwon) *or* Team Leader, Community Connections (North)
Manager, Financial Plan Management	Team Leader, Financial Plan Management
Manager, Business Development	Manager, Sport, Rec & Health
Manager, Sport, Rec & Health	Manager, Business Development
Head of Marketing & Communications	CEO

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8.3.1 Procedure for primary and secondary member absence

Whilst it should be avoided where possible, in the event that both the primary and secondary members are unavailable during a critical incident, the following steps should be followed (in order):

1. If there are two secondary member options, the alternative secondary member should be engaged.

2. If there is only one secondary member and they are absent, the responsibility should be passed on to an alternative manager within the same area of the business.

3. If the alternative manager within the same area of the business is absent, a team leader within the same area of the business should be assigned responsibility.

4. If there is no alternative manager or team leader available within the same area of the business, the CEO or their alternative member will determine the most appropriate staff member to respond. This may be a manager or team leader from another department or someone who is already responding to the incident that will be assigned additional responsibility.

The table below provides a guide for alternative assignment of each responsibility after the secondary member options have been exhausted.

8.4 Critical Incident Response

A critical incident demands an immediate, high-level response. The Critical Incident Response Team (CIRT) manages the progressive phases of an incident. The progressive phases (which may overlap at times) are outlined in the table below and shown on the Critical Incident Response diagram below.

In the event of a critical incident, iteration of some steps may be required as the incident unfolds and recovery progresses.

Emergency contacts, evacuation plans and procedures are on display in prominent public areas and offices and should be referred to when an emergency evacuation is required.

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Incident phase	Action	Person/s responsible	Target outcome
Impact	Direct support of the injured or otherwise-affected party/ parties. Notification of on call manager.	Staff onsite, supported by a team leader or manager as soon as possible.	Impact minimised. Environmental safety secured and maintained. First aid, as appropriate. Emergency services called, as appropriate. Manager notified as soon as possible.
Decision-making	Triage the severity of the incident. Is it a critical incident?	Relevant service manager, supported by the relevant executive director *or* Manager, Risk & Compliance if unclear.	To ensure the incident is of sufficient severity and is not able to be managed as a business-as-usual incident. If the incident is deemed critical, CEO is notified.
CIRT convened	Core membership, plus relevant secondments selected.	Incident Manager	Selected membership notified immediately, and time of the first meeting arranged as soon as possible.
CIRT first meeting	Debrief all members, including current safety and impact to staff and customers. Allocate tasks. Distribute resources. Agree timelines.	Incident Manager	CIRT membership develops understanding of: • Immediate impact • Potential for longer-term impact • Individual roles and duties, both immediate and ongoing.
Coordination & stakeholder management	Establish communication lines within CIRT and logistics; for example, who operates from what location.	CIRT	Ensuring smooth flow of incident information. Team members are kept informed at appropriate times.

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Incident phase	Action	Person/s responsible	Target outcome
	Route incident enquiries and information to appropriate team member/s.	Incident Lead – Communications	Ensuring smooth flow of incident information. Team members are kept informed at appropriate times.
Communication	Establish communication arrangements with internal and external stakeholders.	Immediate: Staff on site. Ongoing: Incident Lead – Communications: *External stakeholders: Emergency services* *Internal stakeholders: Head of Marketing, CEO, Incident Manager*	Where personal injury or criminal activity has occurred, staff on site will call 000 to advise of need for appropriate emergency support and attendance.
		Incident Lead – Customer: *Customer and/ or families*	Customer and/ or families are kept informed at appropriate times with relevant information. Privacy of all parties is maintained.
		Incident Lead – Staff: *Employee/s on site and other employees*	Stakeholders are kept informed at appropriate times with relevant information appropriate to their needs. Supporting Leisure Networks employees. Notifying WorkSafe, as required.
		Incident Manager: *NDIS Quality & Safeguards Commission*	Ensure all statutory reporting requirements are met (excluding WorkSafe).
		Incident Lead – Communications: *Media*	Media enquiries are appropriately managed.

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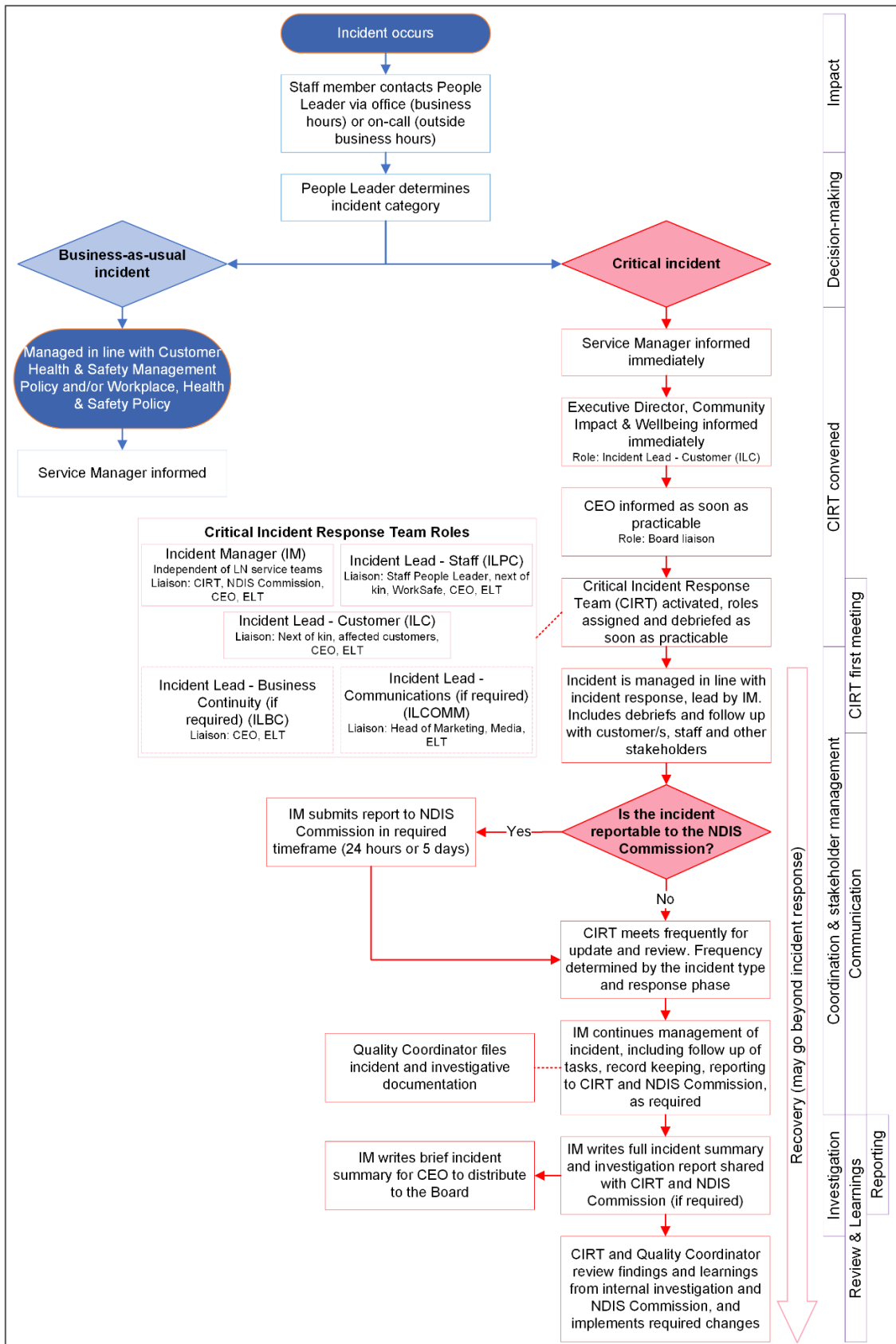| Incident phase	Action	Person/s responsible	Target outcome
Investigation	Preservation of evidence.	<u>Immediate</u>: Staff on site <u>Ongoing</u>: Team leader	Ensuring material evidence is secured as appropriate to support investigation.
		Police	Where personal injury or criminal activity has occurred, police to have access to undisturbed evidence.
	Gather evidence (eyewitness interviews from staff, customers or members of the public, photographs, file reviews, etc.). Collate and record investigation artefacts. Complete event logs, e.g. journals, notes, incident report.	Incident Manager	To ensure sufficient evidence is collected and collated to support a thorough investigation sufficient for a determination of a root cause, supporting continuous improvement and learning.
Reporting	Report to the Board.	<u>Preparation</u>: Incident Manager <u>Sign off</u>: CEO	The Board will be kept appraised of incident management progress by CEO at appropriate intervals. A formal final report provided at the next available Board meeting.
	Report to the NDIS Quality & Safeguards Commission, if required.	<u>Preparation</u>: Incident Manager <u>Sign off</u>: CEO	Where the incident is reportable to the NDIS Commission, an early notification must be made to the Commission within required timelines. A comprehensive report must follow within required timelines.

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Incident phase	Action	Person/s responsible	Target outcome
	Report to the Coroner, if required.	<u>Preparation</u>: CEO <u>Sign off</u>: Board Chair	Report supplied to Victoria Police which will draft report for the coroner. The coroner will prepare their own investigation, relying on Leisure Networks and police evidence in some part.
Recovery	Provide appropriate support to internal and external persons affected by the incident, especially for affected staff members: • Individual debriefing • Group debriefing	Executive Director, People, Culture & Capability, managers and team leaders, as relevant. CEO for affected families.	Supported healing and closure for all involved.
	Implement Business Continuity Plan and Disaster Recovery Plan, if required.	Incident Lead – Business Continuity	Continuity of critical business operations. Continuity of services for customers with the least disruption possible. Continuity of employment for staff. Understanding of required actions for successful business continuity and disaster recovery.

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Incident phase	Action	Person/s responsible	Target outcome
Review & Learnings	Review of the incident, how it was managed and the outcomes (organisation, staff and customer). Final report identifying: • Both superficial and root cause(s) of the incident • Potential improvements to the critical incident management process from organisation, staff and customer perspectives.	CIRT and Quality Coordinator (review and learnings)	Understanding why the incident occurred. Strategy developed to address the root cause. Minimised likelihood of incident recurring. Understanding of incident management process from the customer and staff point of view. Improved incident management process. Implementation of strategy to address the root cause.

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8.4.1 Critical Incident Response Diagram

This diagram is a high-level overview of the critical incident response based on the CIRT roles and responsibilities.

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8.4.2 Management of hazardous and infectious waste

8.4.2.1 Hazardous waste

Hazardous wastes are wastes or products that have the potential to harm humans or the environment, either now or in the future. There are many options to dispose of household hazardous wastes safely, protect the environment and keep the office/ home safe. Recycling programs are available for some hazardous wastes (Source: Better Health Channel).

Leisure Networks does not store or use hazardous substances other than household chemicals at any of its sites.

To handle hazardous waste at the office or home safely you should:

- Keep the goods in their original containers if possible. If containers are leaking, use new containers but never use food containers like soft drink bottles.

- Don't mix chemicals when decanting a substance into a new storage container.

- Make sure all labels, including warning labels and manufacturer's instructions, remain intact on the packaging.

- Store goods upright with lids secured tightly and out of the reach of young children.

- Keep all ignition sources, such as matches, well away from the storage area.

- Keep the storage area cool and dry.

- Buy the smallest amount for your needs.

Cleaning up household hazardous waste

Cleaning up minor hazardous waste must be completed safely to avoid contamination or injury. An example of household hazardous waste is a 1 litre bottle of bathroom bleach being spilled over the floor.

The Victorian Department of Health recommends the following steps to clean up household hazardous waste:

1. Ventilate the room.

2. Scoop up any glass fragments, powder or solids in a dustpan or equivalent. Use gloves to protect against cuts.

3. Put all the solid waste into a rigid, sealed container.

4. Use sticky tape to pick up any remaining small glass fragments or powder.

5. Wipe the area clean with damp paper towels or disposable wet wipes and place them in a glass jar or plastic bag.

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6. Continue to ventilate the room for 12–24 hours.

7. Dispose of any contaminated items in the rubbish. Don't put them in the recycling.

8.4.2.2 Infectious waste

At Leisure Networks, infectious and potentially infectious waste includes bodily fluids, such as urine and/ or faeces, vomit and blood, and any personal protective equipment (PPE) and/ or items used to clean the waste.

There is a trained first aider at Leisure Networks HQ and all support staff must hold a current first aid certificate. Staff are required to wear PPE when administering personal assistance where they may come into contact with bodily fluids or any form of first aid.

Workers involved in the management of actual or potentially infectious or hazardous waste are trained in the safe and appropriate handling of such waste, including the use of PPE and correct disposal.

There are two procedures for disposing of infectious waste at Leisure Networks:

1) Independent Living Supports

Houses where independent living supports are provided to more than one resident in the home have clinical waste bins for infectious and potentially infectious waste. These bins are separate from household waste and are provided and regularly emptied by an external contractor.

Staff and housemates are informed of the correct use and management of the clinical waste bins.

2) All other settings

In all other Leisure Networks settings infectious and potentially infectious waste must be:

- placed into a disposable bag and the bag sealed (e.g. by tying the opening in a knot)
- place that bag into a yellow disposable bag and seal it. The waste is then "double-bagged"
- place the double-bagged waste into an outside Leisure Networks general waste bin.

Yellow waste bags are available in all office sites and support worker back packs for this type of waste.

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8.4.2.3 Infectious waste – Coronavirus

How to dispose of coronavirus waste from a non-healthcare workplace and non-clinical care facilities

The following guidance is from the [Environmental Protection Agency (EPA) Victoria](#).

Rapid antigen tests (RATs)

Whether the test result is positive or negative:

- place the testing kit and its contents into the disposable bag provided and seal it (e.g. by tying the opening in a knot)

- place that bag into a yellow disposable bag and seal it. The waste is then "double-bagged"

- place the double-bagged rapid antigen test into your general waste bin.

Used rapid antigen tests may only be disposed of in general waste bins, they must not be placed in recycling bins.

Recycle the cardboard packaging and instructions.

Personal protective equipment (PPE)

Single use PPE includes items such as face masks, gloves and aprons or gowns. Waste PPE from a non-healthcare workplace can be placed into your general waste bin. EPA recommends you:

- place the waste PPE into a plastic bag such as a bin liner and seal the bag

- place that bag into a yellow bag and seal that bag too, i.e. the waste is "double-bagged"

- dispose of the double-bagged PPE in your general waste bin.

PPE waste must not be recycled or placed in the green waste bin.

8.5 Continuity of supports during and after a critical incident

During critical incidents and emergencies, some Leisure Networks customers will require continuation of supports that are critical to their safety, health and wellbeing. These are referred to as "daily living supports" in this procedure.

8.5.1 Determining critical supports for individual customers

Any daily living supports that an individual requires are identified on the Getting to Know You Form (onboarding) and the risk assessment (completed at least annually). After discussion with the customer and/ or their representative, daily living supports are included on the customer's service agreement and the tag "No informal supports, requires emergency and disaster support" added in the 'Client Details' section on SupportAbility.

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In the case of an emergency or disaster a list of customers that require daily living support can be obtained quickly from SupportAbility.

8.5.2 Business function and resource contingencies

The table below outlines Leisure Networks' practices and systems that ensure continuity of supports. Continuity of supports should be considered in conjunction with the Critical Incident Management Plan and Procedure.

Business function/ resource	Contingency
Access and communication	
Physical office locations	Utilise alternate office/ working location: • Barwon HQ • Sports House, South Geelong • Werribee office • Working from home • External meeting spaces Leisure Networks IT systems are cloud based and most staff have access to mobile IT equipment that allow them to work remotely in the event that an office is closed, such as laptops, accessories, a cloud-based phone system.
Landline phones	Utilise on call mobile phone and emails. Customers and stakeholders can be sent notifications by email in an emergency.
Mobile phones	Utilise landline phones and/ or emails.
Email systems	Utilise landline and/ or mobile phones for external contacts. Utilise landline, mobile phones and/ or Microsoft Teams for internal contacts.
Servers	Back-up servers are in place in the event of the main server being out of service. This is activated by Leisure Networks' IT provider.
Personnel	
Note: all Leisure Networks employees hold a valid NDIS Worker Screening Check and Working with Children Check as part of their employment. Compliance for these checks is carried out by People and Culture.	
Management, including the Executive Leadership Team, service managers and directors	See Critical Incident Response Team (CIRT) and table of secondary members.

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Business function/ resource	Contingency
Team leaders	Relevant service manager or executive director.
Support workers	1:1 supports: Experienced staff from other teams; for example, staff that are experienced support workers but working in other roles. Group supports: Staff from other teams can support experienced support workers as a second or third support worker.
Support coordinators	Community Connections team leaders or alternative support coordinators.
Financial plan management (FPM) customer engagement officers	FPM team leaders or alternative FPM customer engagement officers.
Team Impact administrative staff, including customer engagement and coordinators	Administration staff from other roles or teams.
Sport, Rec and Health (SRH) coordinators	SRH managers or alternative SRH coordinators.

8.5.3 Continuity of supports when a large portion of workforce is unavailable

In the case of a large-scale incident that results in a large percentage of the workforce being unavailable (equal to or greater than 15% of suitable staff), some supports may need to be placed on hold or rescheduled. If an emergency or critical incident is occurring, the critical incident response plan should be followed in the first instance.

This section will outline the process for continuation of customer supports only. A visual of these steps is provided below.

1. Run an active client report in SupportAbility filtered by tag: "No informal supports, requires emergency and disaster support" to identify what customers require daily living supports.

2. For customers identified in this report, check scheduled supports for the next 72 hours, ensuring every support shift has an appropriate staff member allocated. "Appropriate staff member" means a worker with the required skills and training to support the individual customer.

3. Once all daily living supports are confirmed and have staff allocated, rosters for all other supports or activities are reviewed to determine what supports must still go ahead in a face-to-face context.

   Considerations for the decision-making process:

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- Purpose of supports the customer typically requires, for example, assistance with independent living, social activities, employment support, sporting activities.

- Whether any supports would be effective if delivered virtually, therefore reducing travel time and freeing up staff to support other customers.

- Whether any shifts or activities could be shortened to free up staff to support other customers.

- Whether the customer has alternative providers that can assist with their supports during the emergency or critical incident.

4. Contact affected customers to advise them of the situation and provide support options, including the choice to cancel.

5. Transition face to face supports or activities that are identified as being suitable to carry out virtually.

6. Modify supports or activities that require postponement or change of time.

7. Cancellation of supports or activities that are unsafe to proceed due to staff shortages.

8. Executive Director, Community Impact & Wellbeing notifies the NDIS Commission of [reportable changes and events](#).

9. Review feedback from customers and the CIRT to ensure the plan is effective and adjust the response as needed.

10. Plan for return to business-as-usual, including notifying staff and customers of return to business-as-usual.

Note: If the disruption to services is expected to exceed 72 hours, the above steps will need to be carried out for a period of more than 72 hours or repeated every 48-72 hours.

Visual process for continuity of supports when a large portion of workforce is unavailable

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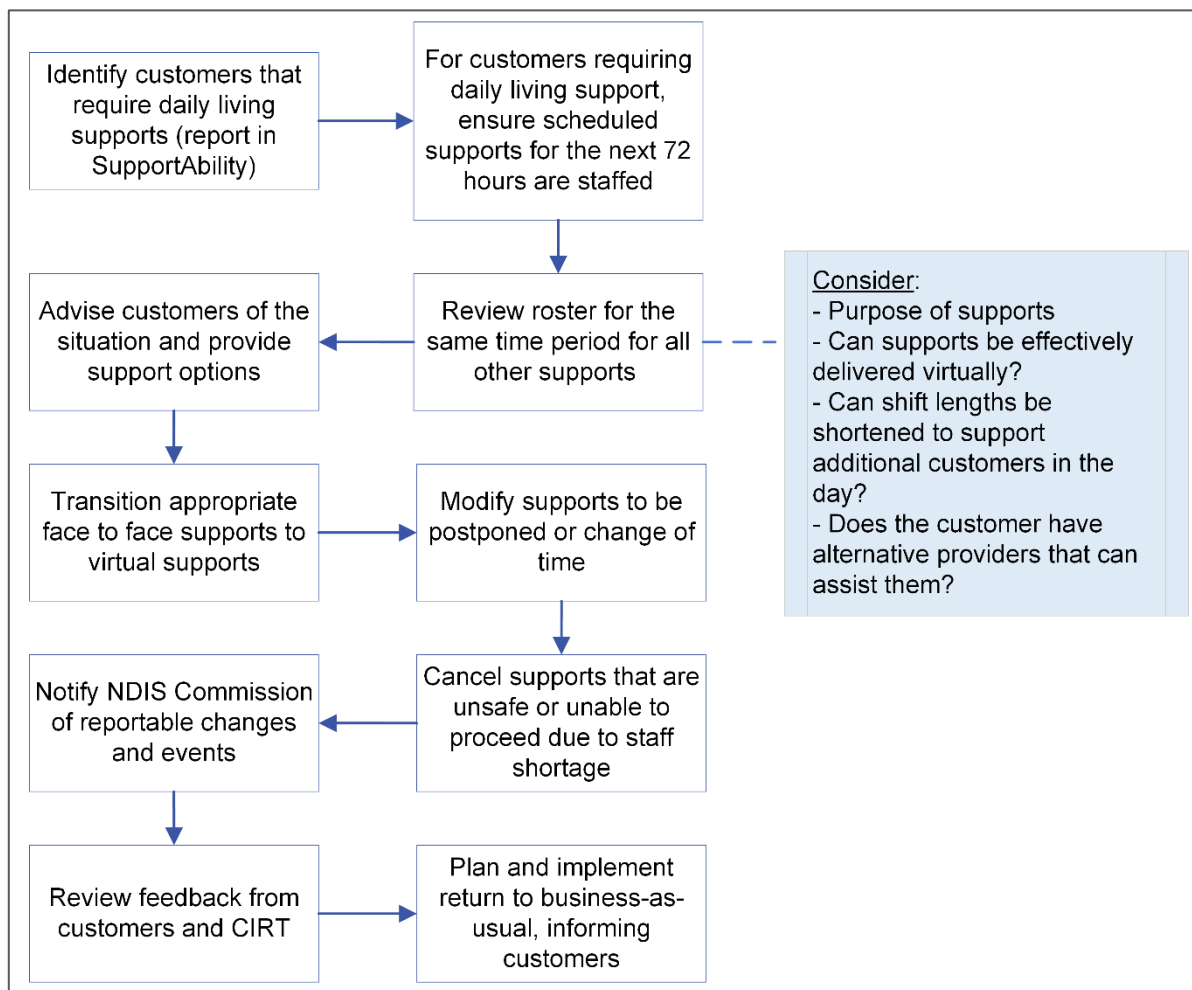
9 Record keeping of an incident (all staff)

The ongoing safety of staff and customers may be indirectly impacted by an incident at the time or later. Therefore, thorough and timely record keeping is an essential part of both business-as-usual and critical incident management. All staff have a responsibility to keep thorough records of any interactions they have with customers, including when the interaction is part of an incident. The following list highlights record keeping requirements of staff outside of the incident response team:

- Complete a journal at end of shift, conversation or interaction. The journal must include:

  - what happened during the shift, conversation or interaction prior to, and after, the incident if the incident is known to have occurred at the time (as opposed to a later allegation)

  - general conversations during the shift or interaction

  - note of anything out of the norm

  - note that an incident report has been completed and who it was provided to.

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- Staff must complete an incident report immediately following the shift, conversation or interaction regardless of whether the incident has been referred to a People Leader. The incident report must be provided to the People Leader as soon as completed.

- Journal all follow up conversations, check-ins, meetings, other interactions and completion of reports. Note if the journal entry is linked to the incident and/ or previous journal entries.

- When a People Leader adds the incident report to the accident and incident register, a journal must be added to the relevant files (customer and/ or staff) noting the incident number.

10 Emergency Response Plan (Evacuation/ Lockdown)

10.1 Scope

The Emergency Response Plan involves emergency procedures and addresses the actions required to either evacuate (in full or partially) or to undertake an emergency lockdown, in the case of the following situations:

- Fire and smoke

- Bomb threat or active shooter

- Internal emergency (e.g. gas leak, explosion, hazardous substance spill)

- Other event deemed necessary by a team leader or emergency services.

This plan and its related procedures apply to all staff, visitors, contractors, volunteers and customers at Leisure Networks.

10.2 Emergency evacuation and lockdown options and responsibilities

In conjunction with the Critical Incident Procedures, this plan outlines evacuation and lockdown options, roles, and responsibilities of staff at each Leisure Networks office. If a critical incident occurs at a venue or location outside of a Leisure Networks office, the emergency evacuation or lockdown procedures for the venue or location should be followed.

It is important to be mindful of, and prepared to support, people that need assistance with following directions and mobility, particularly in a stressful situation. Warnings will be provided in a customer's file in SupportAbility if they require assistance with communication, mobility or stressful situations.

Staff are aware of their responsibilities through their WH&S procedures and staff training.

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10.2.1   Emergency evacuation plans

In the case of an evacuation, the following steps should be taken to safely evacuate a premise:

- Stage 1: Removal of people from the immediate danger area if safe to do so.

- Stage 2: Removal to a safe area.

- Stage 3: Complete evacuation of the entire complex/ building.

- Stage 4: Roll call to ensure all people are accounted for.

Barwon HQ Evacuation Plan

There are two fire wardens for Leisure Networks HQ. Their names are displayed in the front area of the office.

As shown on the map below, the emergency evacuation assembly point is the carpark behind the dentist surgery at 415A Moorabool Street, Geelong.

Note: In the event of a fire or large-scale emergency, it may not be safe to walk to the emergency evacuation assembly point via the alley adjacent to the office.

Sports House Evacuation Plan

Emergency and evacuation procedures at Sports House are managed through the Kardinia Park Stadium Trust. The below procedures and maps are on display in

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Sports House and should be referred to in the event of an emergency. Staff should follow the instructions for Sports House Tenants.

There are multiple assembly areas for Kardinia Park, the closest safe assembly area should be used in the event of an emergency evacuation.

Due to the fluctuation in staff present at Sports House there is no designated fire warden for Leisure Networks.

Note: Sports House is part of a large stadium complex and some exits may not be safe to use.

Emergency Evacuation Procedure

IF THERE IS AN EMERGENCY, YOU WILL HEAR......

AN ALERT TONE....
- Alert tone = 'beep, beep, beep....'
- Means stop proceedings, gather together and prepare to evacuate the building.

AN EVACUATION TONE....
- Evacuation tone – 'whoop, whoop....'
- Means to leave the building immediately by the nearest safest exit and go to the Assembly Area
- Until given the all clear by the Fire Brigade please remain in the nearest safe area

ASSEMBLY AREAS FOR....

TENANTS AND SPORTS HOUSE –

Senior Citizens *(south of stadium – see map)*

- *Exit one:* if safe to do so, exit through front doors of Sports House, turn right and gather at the senior citizens;

Geelong Cricket Ground *(north of stadium – see map)*

- *Exit one:* if safe to do so, exit through front doors of Sports House, turn left and gather on cricket ground;
- *Exit two:* if safe to do so, proceed into the back corridor, turn right towards the umpire's rooms, exit via back race doors on left hand side out onto Simonds Stadium ground, go up the northern stairs behind the goal posts and gather on cricket ground.

St Mary's Oval *(west of stadium – see map)*

- *Exit one:* if safe to do so, proceed into the back corridor, turn left towards the umpire's race, exit via back race doors on left hand side out onto Simonds Stadium ground, go west across the oval and gather on St Mary's.
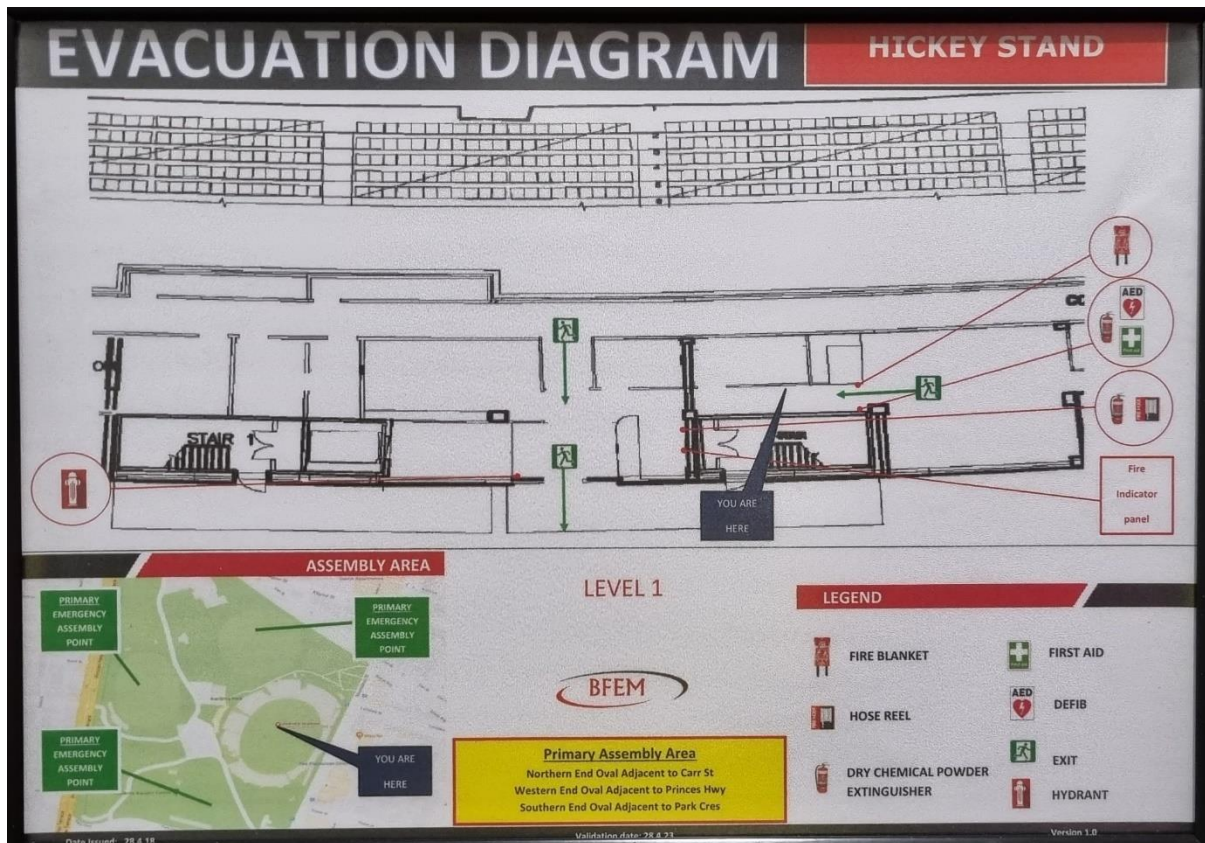
FIRST AID / MEDICAL MEMERGENCY......
- Sports House has trained First Aid Officers on-site during business hours.
- The First Aid Kit is located in the Break out area near the Kitchenette, which can only be access during business hours.
- For all medical emergencies, call 000

FOR YOUR SAFETY...
- Smoking is not permitted
- Do not enter other areas of the stadium
- Fire exits and escape routes are to be kept completely clear at all times
- Responsible and safe behaviour is expected at all times

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Werribee Office Evacuation Plan

Leisure Networks' Werribee office does not have any fire wardens as it is not regularly staffed.

There are two emergency evacuation exits within the office. The primary evacuation exit is via the reception area on to Watton Street. The secondary evacuation exit is via the kitchen into the car park.

The emergency evacuation assembly area for both exits is on the corner of Watton Street and Wedge Street South (roundabout intersection).

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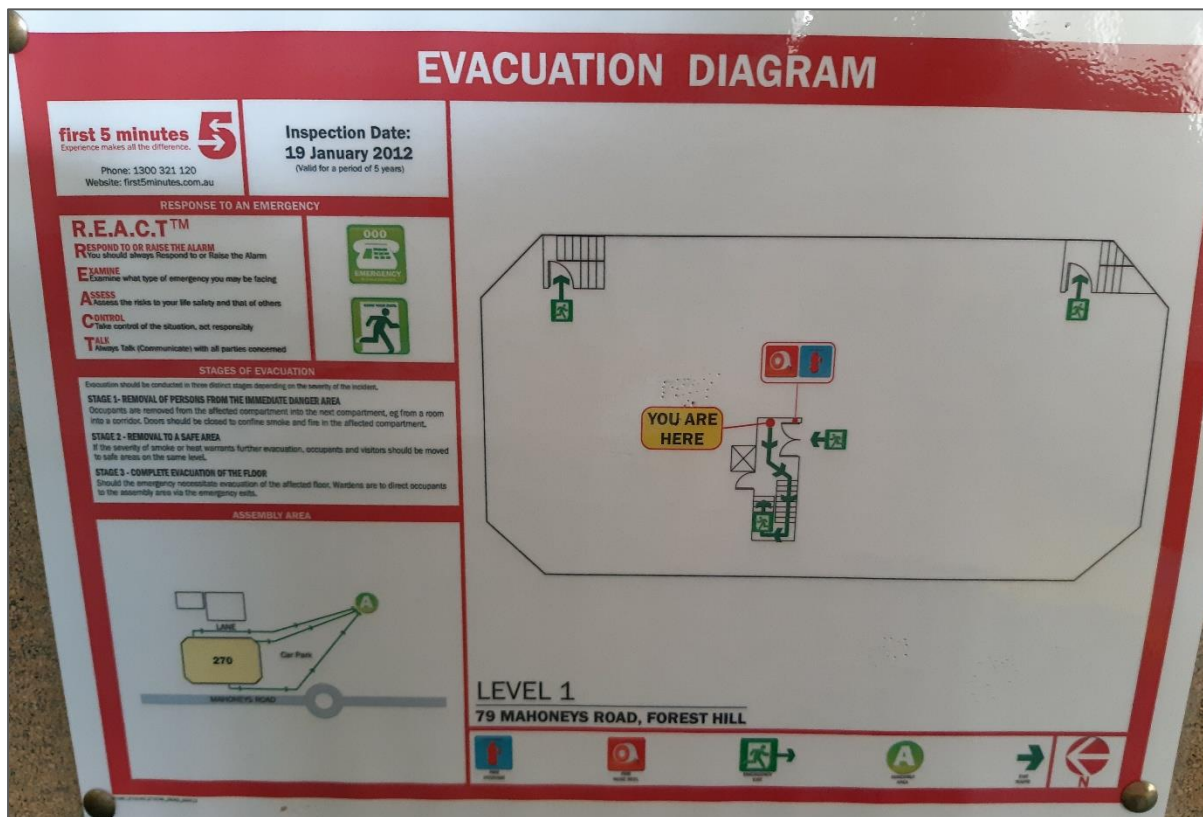

WERRIBEE OFFICE EVACUATION PLAN
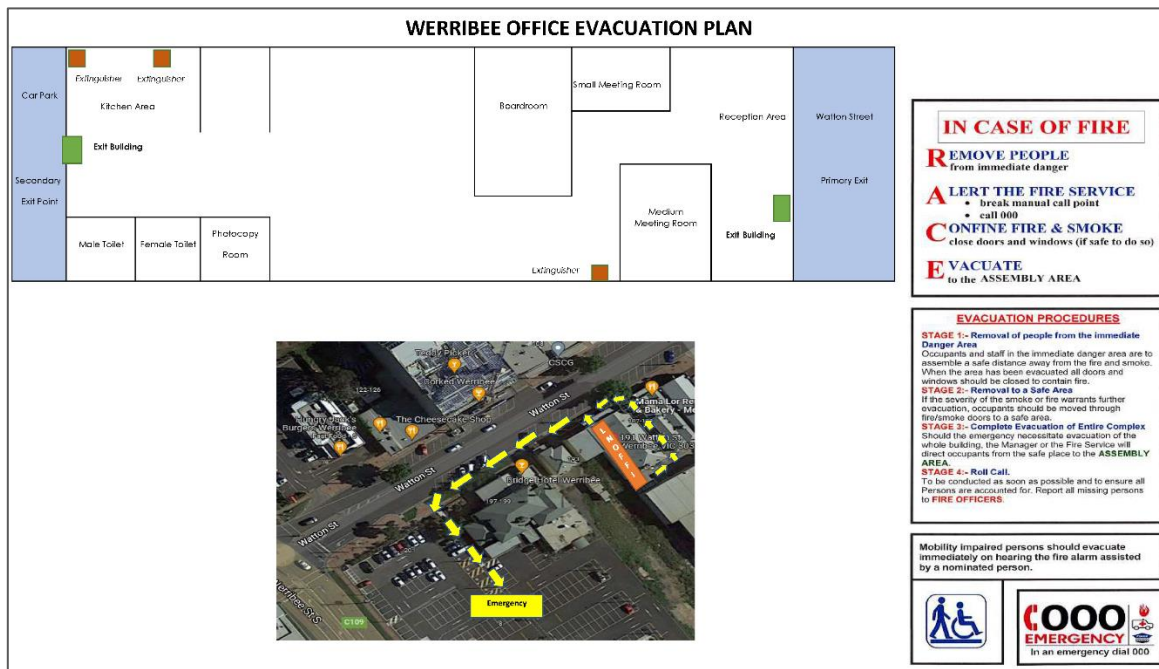
Forest Hill Evacuation Plan

Leisure Networks' Forest Hill office does not have any fire wardens as it is not regularly staffed.

There are three emergency evacuation exits within the office. The office is located on level one, so all fire exits are via stairs.

The emergency evacuation assembly area for all exits is behind the carpark adjacent to the office building.

Note: In the event of a fire or large-scale emergency, it may not be safe to walk to the emergency evacuation assembly point via the laneway behind the office.

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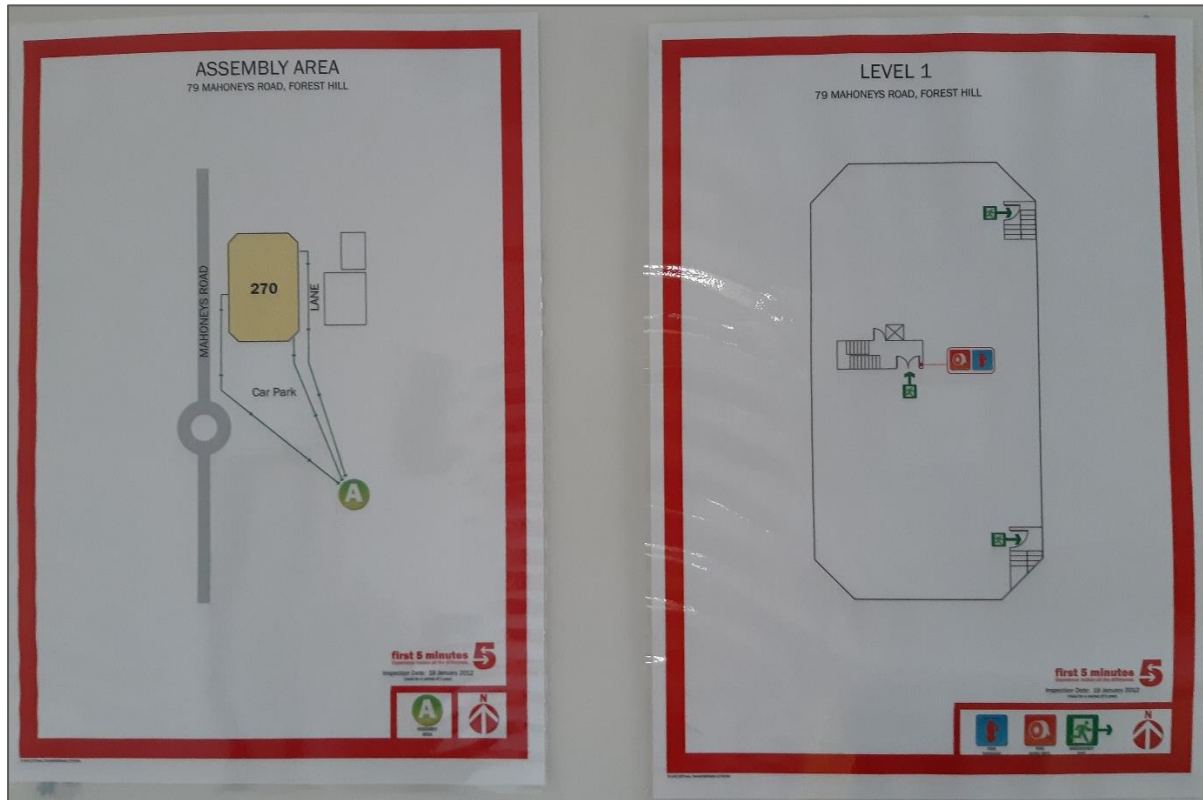
10.2.2   Emergency lockdown plan

In the event of a critical incident that requires an emergency lockdown at a Leisure Networks office, the following steps should be taken:

- Move quickly to a room with few windows and doors, that is easily lockable. Stay in that location until you are informed by emergency services that it is safe to exit.
- Lock all entrances to your location, including windows and doors.
- Close blinds on any windows.
- Turn off the lights.
- Turn mobile phones on silent.
- Stay low to the ground and hide until the situation has ended.
- Develop a plan with those in attendance in case the assailant gains access to the area.

10.3 Evacuation drill

An evacuation drill will be used to simulate an emergency that requires an evacuation to determine the effectiveness of the evacuation procedures.

An ongoing evacuation drill program will be scheduled to properly test and provide enough practice of procedures, to enable their effectiveness in the event of an actual emergency.

11 Insurance

11.1 Purpose

To ensure that all risks to board members, staff, volunteers and customers are appropriately covered by the appropriate type and level of insurance when engaged in activities associated with Leisure Networks.

To ensure that all risks to equipment or assets owned by Leisure Networks are covered by the appropriate type and level of insurance.

11.2 Scope

Insurance for all people and categories are listed in the procedure below.

11.3 Policy

Leisure Networks will comply with all legal requirements with respect to all insurance.

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Insurance cover shall be in place and remain current for the following insurance categories:

- public and products liability*

- professional indemnity*

- directors' and officers' liability* (including entity liability and employment practices violation)

- entity fidelity*

- personal accident*

- medical indemnity*

- WorkCover

- general insurance covering:

  - property – fire (for assets owned by Leisure Networks)

  - content – theft and burglary (replacement cost of Leisure Networks assets)

- Comprehensive vehicle insurance.

Insurance shall cover board members, customers, staff, volunteers, student placements and any person engaged in Leisure Networks activities where Leisure Networks has primary control of the activity.

*The level of insurance will be at the standard set by the Victorian Managed Insurance Authority for community service organisations.

12 Key Contacts

12.1 Contact list – Internal

The staff emergency contact list includes all staff with key responsibilities for:

- Critical Business Function Plan

- Critical Incident Response

Person	Contact number	Email	Title
Executive Leadership Team			
Libby Mears	0400 570 287	Libby.Mears@leisurenetworks.org	Chief ExecutiveOfficer

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Person	Contact number	Email	Title
Paul Davies	0400 959 921	Paul.Davies@leisurenetworks.org	Executive Director, Strategy, Performance & Customer
Simon van Hamond	0407 134 225	Simon.vanHamond@leisurenetworks.org	Executive Director, Finance, Operations & Governance
Managers			
Kelly MacGregor	0478 015719	Kelly.Macgregor@leisurenetworks.org	Manager, Community Connections
Trevor McFarlane	0488 224 414	Trevor.McFarlane@leisurenetworks.org	Manager, Financial Plan Management
Pru Farrer	0427 564 362	Pru.Farrer@leisurenetworks.org	Head of Marketing & Communications
Michael King	0431 463 127	Michael.King@leisurenetworks.org	Manager, Business Development
Brooke Connolly	0421 664 251	Brooke.Connolly@leisurenetworks.org	Manager, Sport, Rec & Health
Jacquie Sayers	0431 405 047	Jacquie.sayers@leisurenetworks.org	Manager, Impact, Inclusion & Independence

12.2 Contact list – External

Leisure Networks external contacts list is stored on the Business Operations SharePoint site.

13 Testing and Review

13.1 Outline

Testing and reviews are critical to ensure plans are relevant and practical.

13.2 Testing and review schedules

Review dates and logs of policies and procedures are recorded in the Governance – Policies folder in SharePoint and in the document library which is maintained by the Quality Coordinator.

Employee specific training and review dates and logs are maintained on the employee file by their direct manager and People and Culture.

Reviews of each incident are carried out and include, how it was managed and the outcomes for any customers and staff involved. A final report is written identifying both superficial and root cause(s) of the incident and potential improvements to operational processes and the critical incident management process. Incident

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reviews and investigative reports are stored on the secure People & Culture SharePoint site.

14 Documents, templates and forms

- Leisure Networks Risk Register
- Getting to Know You Form
- Leisure Networks Customer Information and Risk Assessment
- Leisure Networks In-Home & Accommodation Risk Assessment
- Leisure Networks Community Venue Risk Assessment
- Emergency and evacuation plans and maps

15 References

- Department of Treasury and Finance Victorian Risk Management Framework and Insurance Management Policy: http://www.dtf.vic.gov.au/Publications/Victoria-Economy-publications/Victorian-risk-management-framework-and-insurance-management-policy
- VMIA Risk Management Guide for Community Service Organisations: https://www.vmia.vic.gov.au/insurance/policies-and-cover/community-service-organisations-program
- Occupational Health and Safety Act 2004
- The Victorian Managed Insurance Authority (VMIA) is the State's insurer and provides a range of risk management services and advice to Government: https://www.vmia.vic.gov.au
- WorkCover Workers Insurance: http://www.worksafe.vic.gov.au/insurance-and-premiums/worksafe-insurance
- Better Health Channel, Hazardous waste: https://www.betterhealth.vic.gov.au/health/healthyliving/hazardous-waste#handling-and-storage-suggestions
- Department of Health, Environmental Health (waste management)
- Environment Protection Authority Victoria

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16 Applicable Quality Standards

Standard	Criteria
Victorian Child Safe Standards	All
Human Services Standards	3.5
NDIS Practice Standards	All

17 Quality records

Quality records shall be retained for at least the period shown below.

Record	Retention/ Disposal Responsibility	Retention Period	Location
Risk Register	Board/ CEO	5 years	Board Quality & Safeguarding Committee Reports CEO Files
Risk Management Reports	Board/ CEO	5 years	Board Reports CEO Files
Customer Information & Risk Assessment	Team Leaders of NDIS direct services	7 years after departure of the customer	Individual client files
In-Home & Accommodation Risk Assessment	Team Leaders of NDIS direct services Sport, Rec and Health	7 years after departure of the customer	Community group program files
Community Venue Risk Assessment	Team Leaders of NDIS direct services Sport, Rec and Health	7 years	SharePoint
Insurance Policy Documents	CEO	7 Years	LN Administration Office and/ or Electronic Filing System

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