High Risk & Vulnerable Customer Management Policy

Policy Purpose

Access4u has a comprehensive framework in place which has the primary objective of keeping our Customers as safe as possible, whilst ensuring we deliver quality services.

This commitment to Customer safeguarding is not just a matter of compliance with quality and safeguarding standards such as those set by the NDIS; we have an ethical duty to support customers balancing our duty of care with the individual's dignity of risk and opportunity for self-determination.

Access4u has an approach that addresses both the individual and their circumstances, as a provider of assistance with daily activities in the home we have adopted additional measures in relation to NDIS participants who may elect to receive services from one mentor only.

Responsibilities and delegations **This** *policy applies to all staff, volunteers, and contractors.*	
This policy applies to	Governing Body, CEO, Managers and Staff
Specific responsibilities	**The Board –** ensure effective governance mechanisms in place. **CEO / Managers–** To ensure customers are supported in choice.
Policy approval	CEO

Policy context – this policy relates to:	
Standards	• *NDIS Practice Standards* • *NDIS Quality and Safeguarding Framework*
Legislation	• *NDIS Act 2013* • *Consent to Medical Treatment and Palliative Care Act 1995* • *Guardianship and Administration Act 1993 (SA)*
Contractual obligations	*NDIS Provider Registration*
Organisation policies	*Human Rights Policy*
Forms, record keeping, other documents	Sole Support Worker Provider Risk Assessment Template letter to Customers choosing sole mentor support. Service Agreement

Definitions *relevant to this policy*

High Risk – for the purpose of this document is any customer for whom there is a likelihood of harm and neglect due to their personal circumstances if Access4u does not provide an appropriate (increased) level of oversight and support on a regular and systematic basis.

Vulnerable - a person who is unable to take care of themselves or protect themselves from harm or from being exploited; this may be because they have a mental health problem, a disability, a sensory impairment, are under 18 years of age, are old and frail, or have some form of illness.

Minimum Access4u Customer oversight – annual face to face visit with Customer, which includes all service planning and WHS assessment; annual team meeting with Mentors; ad hoc team meetings; ad hoc check-ins with the Customer; phone contact as necessary.

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Procedure

During the on boarding process for new customers the Customer has choice and control and part of the selection process for mentors / support staff including the Customer or their decision maker in selection of mentors / support staff. In the event the customer elects for services from one mentor the following steps will need to be undertaken:

1. The detail of this election is to be recorded on the Register of High Risk & Vulnerable Customers

2. The Risk Assessment of the Customer to include whether the following risk factors apply to the customer when:

    a. They are not receiving supports that involve regular face to face contact from another provider.
    b. The Customer has limited or no physical mobility unless assisted by another person.
    c. The Customer uses equipment for physical mobility.
    d. The Customer has limited or no ability to communicate without assistance.
    e. The Customer uses equipment to enable or facilitate communication with others.
    f. The Customer lives alone, has no formal or informal support network or other service provider involved in their daily care.

3. Document this risk assessment and provide a copy to the customer and place a copy in our customer records.

4. Update the risk assessment if circumstances change (and provide/maintain copies)

5. Document a plan in relation to any identified risk factor as to how the Mentor/ Support Worker will be supervised.

6. Regular ongoing review of the Register will occur on a monthly basis or as required. Meetings with all key personnel reviewing the details in relation to the care and skill with which personal care is being provided. Taking appropriate action without any unreasonable delay to address any concerns identified in these reports.

7. The Service Agreement with the customer, which includes details of how the lone worker will be selected (including the customer's role in this), the means by which we will supervise and monitor the performance of the Mentor (including in-home supervision), how we will communicate with the customer and the means by which we may engage with other providers who may become involved.

8. The Manager will have a process whereby someone other than the Mentor checks, at an appropriate frequency directly with the Customer as to the customer's satisfaction with the type, quality and frequency of support provided.

9. Existing Customers that have been identified as fitting the definition of High Risk / Vulnerable by NDIS will be risk assessed by the Manager or their delegate and relevant discussions occurring with the Customer including an addendum being added to their Service Agreement if they elect to continue with the sole mentor.

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Checklist to Record High Risk and Vulnerable Customers on Register

The following checklist will be applied to identify vulnerable customers who may be at high risk and who require additional safeguarding measures:

RISK ISSUE	INCLUSION ON REGISTER?
Customer has lone Support Worker	YES
Customer has no regular support network: - lives alone, and - irregular or no welfare checks by others	YES
Customer has decision making capacity but displays behaviours of concern: - e.g. consistent concern reports - possible decline in cognition	Discuss with Access4u Management Team and assess any other factors – document and monitor
Customer is considered remote: - lives alone, and - lives 30 minutes or more from support, or - has limited or no internet/phone coverage	Discuss with Access4u Management Team and assess any other factors – document and monitor
Customer has rapidly changing circumstances that may impact safeguarding, e.g. changes in domestic relationship or death of a parent, where there is reliance on informal care from that person	Discuss with Access4u Management Team and assess any other factors – document and monitor
Customer has Mentor team that does not change over a 12-month period	Discuss with Access4u Management Team and assess any other factors – document and monitor
Customer receives >35hr/pw support and lives alone	Yes
Access4u is sole provider for the customer (no other provider involved)	Yes
Any other identified high-risk concern	Yes

Customer oversight – those on high-risk register:

Minimum Access4u customer oversight, plus:

1. Quarterly review (in a manner agreed with the customer, but preferably face to face) by the Manager or their delegate.

2. Additional checks as agreed through opt-in process, conducted by member of staff not directly involved with service delivery.

3. Manager or their delegate will conduct a review with appropriate Guardians on a quarterly basis also.

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