Implementing Restrictive Practices Operating Procedure

Purpose and Scope
This procedure provides direction for the reduction, and where possible the elimination of the use of restrictive practices. Access4u is committed to The United Nations Convention on the Rights of Persons with Disabilities and Australian legislation to ensure the protection of the physical and mental integrity of people with disability on an equal basis with others to have choice and autonomy. Access4u wants to take a proactive approach and believes that restrictive practices in a disability service setting can be significantly reduced and, in many cases, eliminated. Restrictive practices are to be viewed as a last resort, time limited strategy, and need to be in line with the long-term improvement of quality of life for a person. Access4u will only use restraints within the defined legal and contractual obligations. Access4u services: • Focus on developing the Customer's capacity and on enhancing the opportunity to improve quality of life; • Are tailored to meet the individual needs and goals of Customers; • Promote the inclusion of Customers in the community and the development of natural networks and relationships; • Use person centred planning processes and encourage and support Customers to participate continually in the planning and operations of the services they receive; • Support the purpose of a Positive Behaviour Support Plan to reduce the occurrence and risk of behaviours of concern and improve quality of life.

Responsibilities and delegations	
This policy applies to	Governing Body. Staff and Volunteers
Specific responsibilities	**The Board –** Responsible for ensuring effective governance mechanisms are in place. **The CEO and Managers –** Responsible for monitoring and ensuring adherence to Policy and related procedures. Ensure due diligence and take reasonable steps to ensure Access4u are meeting their obligations. Ensure objectives of the policy are achieved. **Staff –** Responsible for adherence to this and related policies, procedures and forms that support this policy.
Policy approval	CEO

Policy context – this policy relates to:	
Standards	National Disability Insurance Scheme Quality and Safety Framework NDIS Quality and Safeguards Commission Consent and Restrictive Practices documents. United Nations Convention on the Rights of Persons with Disabilities 2006

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Legislation	National Disability Insurance Scheme (Provider Registration and Practice Standards) Rules 2018 National Disability Insurance Scheme Act 2013 Disability Discrimination Act (DDA) 1992 The Disability Services Act SA 1993 Australian Human Rights Commission Act 1986 SA Department of Human Services Restrictive Practices Authorisation Scheme
Contractual obligations	NDIS Code of Conduct
Organisation policies and procedures	Eliminating restrictive practices policy Implementing positive behaviour support policy and procedure
Forms, record keeping, other documents	Monthly Recording Chart of Authorised RP Restrictive Practice consent form Incident report form Restrictive Practices Register

Positive Behaviour Support Plans

PBS Practitioners develop Positive Behaviour Support plans (Interim or Comprehensive) that support reduction and elimination of restrictive practices. If restrictive practices are required, the behaviour support plan is lodged in PRODA. The Behaviour Support plan must include details of:

- any behaviours of concern and analysis of possible contributing environmental, social or health factors
- preventative strategies to reduce behaviours of concern and increase quality of life
- current and trialled interventions and their outcomes
- any restrictive practice including when and under what circumstances the restrictive practice may be used
- a fade-out plan towards reducing and eliminating any restrictive practices.

Access4u will discuss any restrictive practices with the customer, or their nominee, and obtain their consent to use the practices as necessary.

Access4u's Authorised Program Officer (APO) will lodge details of behaviour plans and restrictive practices in the SA DHS Restrictive Practices System and submit for authorisation.

Review and reporting

All specific behavioural incidents requiring intervention will be recorded and reported in line with the Incident Reporting Policy and Procedure. Restrictive Practices will be reviewed as part of the Incident Reporting. Access4u ensures that debriefing of both people with disability who are subject to restrictive practices and staff occurs as soon as practicably possible.

Restrictive Practices are recorded and reviewed on an individual level in the Customer file and on an organisational level to ensure best practice and continuous improvement in line with the objective to reduce and eliminate restrictive practices.

Authorised routine and PRN restrictive practices are recorded in the Restrictive Practices Register and reported monthly in PRODA by the 5th working day of the following month.

Authorised routine and PRN restrictive practice usage reports are sent to customers, or their nominees, quarterly.

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Responsibilities

Mentor; It is the responsibility of the Mentors:

- To participate in Restrictive Practice training and to understand the risks and processes required for the use of these practices.
- To only use restrictive practices as an emergency response or as directed/prescribed.
- To record the application of a restrictive practice as part of a regular activity (e.g. Application of a restraining belt or locking of doors) as instructed.
- To report all behavioural incidents that require the use of authorised restrictive practices in line with Customer incident reporting requirements.
- Completing ABC Chart as required.
- To ensure Customer documentation is complete and up to date.
- To ensure application/use of authorised restrictive practices are recorded in the Customer file.

Manager; It is the responsibility of the Manager:

- To monitor the ongoing needs of the Customers and report any problematic patterns of behaviour, incidents of concern and safety concerns.
- To ensure risk assessments and other comprehensive assessments are completed.
- To report and investigate incidents and safety concerns.
- To ensure all staff are familiar with their responsibilities in relation to restrictive practices
- To ensure positive behaviour support plans are implemented
- To ensure the availability of trained staff and ensure adequate supervision and assistance.
- To monitor the needs of Customers for support around safety, challenging behaviour and positive programming and seeking additional funding as required.
- To engage professional experts as required.
- To report to their CEO.

PBS Practitioner; It is the responsibility of the PBS Practitioner to train support workers in implementing practices in the behaviour support plan.

Chief Executive Officer: It is the responsibility of the CEO:

- To monitor progress and outcomes across the Customer group where restrictive practices have been approved.
- To track incident reports for trends that may indicate the need for further investigation, additional Customer assessment and strategy development.
- To ensure the policy and procedure on restrictive practices is in place that complies with legislation and Government policy, that it is being implemented and that any associated risks to other Customers, the staff and the public are minimised
- To report restrictive practices and the planned action to the Board
- To report to the NDIS Quality and Safeguarding Commission
- To ensure Access4u communicates with all relevant stakeholders around the implementation of Restrictive Practice legislation
- To liaise with the NDIS, the Office of the Public Advocate and other relevant organisations to keep informed of policy developments

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Restrictive Practice Committee: It is the responsibility of the RP Committee:

- To ensure the policy and procedure on restrictive practices are followed.
- To ensure that RP processes comply with legislation and Government policy.
- To keep the Restrictive Practices Register up to date.
- To provide monthly reports to the CEO.

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Restrictive Practice Procedure

Process Objective	Action	Who	Form & Resources
Identification of a Restrictive Practice	• Identification of 'pending' positive behaviour support plan (PBSP) in PRODA • Activate the plan • Download BPSP, FCA and relevant attachments from PRODA and save to customer file	• Senior Manager Specialist Services • Quality and Compliance officer	
Risk Assessment	• Review the plan • Assessment of the risks of the behaviours of concern and the risks of using a restrictive intervention. • Assess risk of self- harm, harm to staff or harm to others.	• Senior Manager Specialist Services • Quality and Compliance officer	
Obtaining consent	• Obtain approval to implement the Restrictive Practice/s from the customer or their nominee • Obtain consent to share information.	• Service coordinator	• Restrictive Practice consent form • Obtain and release information Form
Obtaining authorisation	• Enter customer's BSP and supporting documents on DHS portal with details of RPs, consultation and consent • Submit Level 1 only RPs to APO for endorsement • Submit Level 2 RPs for APO endorsement and SAO authorisation	• Senior Manager Specialist Services • Quality and Compliance officer	• SA DHS Restrictive Practices Guidelines
Documentation	• Update the Restrictive Practice Register • Update Customer information • Restrictive practice monthly recording chart to customer's support team	• Senior Manager Specialist Services • Quality and Compliance officer	• Restrictive Practice Register • Restrictive practice recording chart
Monitoring and Review	• Monthly review of RPs • Internal RP reporting to the board • External monthly reporting NDIS • External quarterly reporting to customer (or nominee) • Regular RP meetings	• CEO • Senior Manager Specialist Services • Quality and Compliance officer	• Restrictive Practice Register

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