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NDIS Standard:	Core Module 2.1 Governance and Operational Management		

## Contents

<b>1.0 Purpose and Scope</b>	<b>1</b>
<b>2.0 Responsibilities</b>	<b>1</b>
<b>3.0 Context</b>	<b>1</b>
State Government Legislation	1
Information about COVID-19 for people with Intellectual Disabilities	2
Lifestyle Centred Services Context	2
<b>4.0 Policy Statement</b>	<b>2</b>
Personal Protective Equipment (PPE)	2
Notes about Disabilities and the use of PPE	3
a) General	3
b) Autism Spectrum Disorder (ASD) and PPE	3
c) Intellectual Disabilities and PPE	4
d) Client COVID Safe Plans	4
<b>5.0 LCS COVID Safe Plan</b>	<b>5</b>
<b>Hygiene</b>	<b>5</b>
Hand Sanitiser	5
Airflow	5
Masks	6
Eye Protection	6
Training	6
<b>Cleaning</b>	<b>7</b>
Cleaning	7
Supplies	7
<b>Physical Distancing and Limiting Workplace Attendance</b>	<b>7</b>
Home Offices	7
Multiple Worksites	7
Health Screening	8
Enclosed Workspaces	8
Workstations	8
<b>Record Keeping</b>	<b>8</b>
Attendance	8
OH&S, Risk and Incident Reporting	9
<b>6.0 Business Continuity Plan</b>	<b>10</b>
Business Risks and Strategies	10
Service Level Risks and Strategies	10
Communication Risks	11
Contact Tracing	11
Workplace Disinfection	11
Employee Positive in Attendance	12
Notification of Confirmed or Suspected Cases	12
Notification to the NDIS Commission	13
Notification to Worksafe	13

Document Identifier	Version	Reviewed By	Authorised By
LCS-PP-COR277	3	Ruth Wearne, QM	Tarina Venturin, OM
Next Review:	01/06/2022	Date: 01/06/2021	Date: 01/06/2021
NDIS Standard:	Core Module 2.7 Human Resources Management		

## 1.0 Purpose and Scope

The purpose of this document is to guide practices and procedure for minimisation, mitigation and elimination of the risks associated with the COVID-19 virus and its transmission – both for internal stakeholders and the public.

## 2.0 Responsibilities

The Director has overall responsibility for this policy and procedure. All internal stakeholders, including managers, service coordination teams, support workers, clients and their families have a responsibility to ensure that the procedures and the organisations COVID Safe Plan are adhered to during this time.

## 3.0 Context

### State Government Legislation

Under “Circuit Breaker” restrictions, the Victorian Government requires (from 11:59pm Thursday 27<sup>th</sup> of May) that all permitted businesses still operating during this time (including essential services) to enact their COVID Safe Plan and communicate it to their workforce.

Under the restrictions, workplaces that remain open must:

- Have a COVID Safe Plan in place that is regularly updated.
- Ensure any workers that can work from home are able to do so.
- Collect records of all workers, subcontractors, customers, and clients attending a workplace for 15 minutes or longer. All attendees must have a face mask while attending the onsite work premises.
- One worker per four square metres of enclosed workspace or in shared areas.
- Minimise work across multiple sites, or for multiple employers. Mitigate risk where this is not possible.
- Ensure that workers are in good health – workers cannot work if they are unwell and employers must not require them to work.
- If an employee is unwell, direct the employee to go home and be tested. They must stay at home until they have their result.
- Report any positive cases of COVID-19 to DHHS, Worksafe, Health and Safety Representatives, and the NDIS Commission.
- Ensure workspaces are regularly cleaned.
- Undertake risk assessments for cleaning and the potential closure of the workplace in certain situations.

Under the restrictions, employees must:

- Know their workplace’s COVID Safe Plan and understand what is required.
- Work from home where they can work from home.
- Have a permit if they need to travel for work.
- Check that they are feeling well before starting a shift.
- Provide details to their employer when they start a shift for record keeping purposes.

Document Identifier	Version	Reviewed By	Authorised By
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Next Review:	01/06/2022	Date: 01/06/2021	Date: 01/06/2021
NDIS Standard:	Core Module 2.7 Human Resources Management		

- If they are feeling unwell, go home and be tested.
- Tell their employer if they are tested positive for COVID-19.
- Regularly clean equipment and shared spaces.

### Information about COVID-19 for people with Intellectual Disabilities

Lifestyle Centred Services has information about COVID-19 in Easy Read format for people who have intellectual disabilities.

### Lifestyle Centred Services Context

Lifestyle Centred Services Pty Ltd. is a provider of community-based disability services, funded by the NDIS, TAC and other private funding. Our clients include those with a variety of disabilities – physical, intellectual, psychosocial and with ABI's.

The administrative team works from our Head Office, based in Seaford Victoria, and Support Workers work remotely in client's homes and in the community throughout Victoria (both Metropolitan and Regional). No other facilities are owned or operated by Lifestyle Centred Services.

### 4.0 Policy Statement

The safety of our clients and employees are our top priority as we face the COVID-19 pandemic. LCS Management has responded decisively throughout the period where the risk of infection has been a risk. Since then, firm decisions regarding procedural issues to keep our workforce and client base safe have been made regularly.

Office based staff have worked from home in the 2020 year and have been supported to do this through a variety of resources, ensuring that psychological wellbeing is at front of mind. The increasing workload has been shared among the team and a culture of support for each other has been established and will continue in 2021.

Support Workers have been communicated to and briefed regularly through several channels – via email, phone, social media and on our website. This communication will continue as the situation changes.

Where a suspected or confirmed case of the virus is reported, a response plan was quickly established and enacted. This plan is regularly reviewed by the management team – including the Director, Operations Manager, Quality Manager, and Service Coordination Team.

### Personal Protective Equipment (PPE)

Lifestyle Centred Services ongoing policy is that all staff must wear a surgical mask while in a client's home. If clients are able to wear a mask during services, they should do so. Please see [Notes about Disabilities and the use of PPE](#) for further information.

LCS Management are regularly checking avenues for supplies to provide face coverings to all staff – this includes the National Medical Stockpile, DHHS, and other avenues.

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Next Review:	01/06/2022	Date: 01/06/2021	Date: 01/06/2021
NDIS Standard:	Core Module 2.7 Human Resources Management		

### *Notes about Disabilities and the use of PPE*

#### a) General

Clients are advised that they should wear a face mask during the delivery of services except where they are:

- An infant and child under the age of 12 years.
- A person who is affected by a **relevant medical condition** - including problems with their breathing, a serious skin condition on the face, a disability, or a mental health condition.
- **communicating with a person who is hearing impaired**, where the ability to see the mouth is essential for communication.
- Persons whose professions need clear enunciation or visibility of their mouth. This includes teaching or live broadcasting.
- Professional sportspeople when training or competing.
- An individual who is doing any exercise or physical activity where they are out of breath or puffing; examples include jogging or running but not walking. You must have a face covering on you and wear it when you finish exercising.
- directed by police to remove the face covering to check identity.
- travelling in a vehicle by themselves or with other members of their household.
- consuming food, drink, medication or when smoking/vaping.
- undergoing dental treatment or other medical care to the extent that the procedure requires that no face covering may be worn.
- entering or inside a financial institution, like a bank.
- Experiencing an emergency.

Expressions Australia has developed [a toolkit](#) with images that you can save on a device to help people with a disability communicate with people wearing a mask.

#### b) Autism Spectrum Disorder (ASD) and PPE

Many people with ASD are highly sensitive to touch, and the face can be especially so. Wearing a face mask involves many unpleasant sensations. On the surface, there is the scratchy texture of fabric, tight contact where the top of the mask meets the skin, and the tug of elastic on the ears. Sensations under the mask are no more pleasant and include the warm, damp smell of recycled air. In addition, the sensation of breathing in and exhaling air through the nose can feel restrictive, leading to concern and worry for many individuals with ASD. While wearing a mask is uncomfortable at best, these unpleasant sensory experiences can be intensely magnified in people with ASD.

- Demonstrate using the face mask on a preferred object or person, such as a stuffed animal, a doll, or a family member.
- Allow the person with ASD to choose among different types of fabric face masks to find one that is most comfortable.
- Start by practicing wearing the face mask for short durations of time, allowing for breaks when needed.
- Introduce a mask in a quiet and calm environment, so that the individual can experience success wearing the face mask.

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- Use a printed photo or digital photo of the individual wearing a face mask as a visual cue to wear the mask before outings. The photo can be stored close to the door or on a tablet that is easily accessible.<sup>1</sup>

c) **Intellectual Disabilities and PPE**

Lifestyle Centred Services has information on hand for use with people who require easy-read documents about the use of PPE.

d) **Client COVID Safe Plans**

Clients of Lifestyle Centred Services are highly recommended to have in place a plan of their own.

**Collaborating4Inclusion** has partnered with the Australian Government Department of Health to make a **Planning Resource for People with a Disability**. This guide helps people with a disability to get facts about the Coronavirus COVID-19 and make a plan for how they will manage the impact of this situation.

Clients are advised to visit the Australian Government Department of Health's website for the most up-to-date advice for people with disability during the COVID-19 pandemic. There are a range of accessible resources available for people with disability, including their families, carers and support workers available here: <https://www.health.gov.au/news/health-alerts/novel-coronavirus-2019-ncov-health-alert/advice-for-people-at-risk-of-coronavirus-covid-19/coronavirus-covid-19-advice-for-people-with-disability>

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NDIS Standard:	Core Module 2.7 Human Resources Management		

## 5.0 LCS COVID Safe Plan

All staff have an obligation and responsibility to:

1. read and understand this plan; and
2. keep accurate records of any relevant information relating to this plan; and
3. ensure their staff records are up to date with accurate information about how to contact them in the case LCS needs to advise about the transmission of COVID-19.
4. understand that any breach of this plan may lead to disciplinary action or dismissal.
5. enact this plan until advised otherwise.

Our ongoing COVID Safe Plan is as follows:

Hygiene		
	Office Environment (Head Office)	Community Environment (Support Workers)
Hand Sanitiser	<p>Approval must be sought from the Operations Manager before attending the office for any reason.</p> <p>The office has a COVID Safe Office Procedures Manual upon entry which will identify safe operation of the office environment.</p>	<p>Some clients have hand sanitizer and supplies on hand.</p> <p>Where possible, soap and water are recommended to be used as a primary source of Hand Hygiene, in line with World Health Organisation (WHO) Guidelines.</p> <p>Where staff do not have access to hand sanitiser, we will attempt to source and provide. It may take some time for supplies to be delivered - staff should continue to use soap and water until a source can be confirmed to be delivered. While waiting, if staff have the capacity to source their own sanitiser, it is much appreciated. They can claim this expense on their tax return.</p>
Airflow	<p>Approval must be sought from the Operations Manager before attending the office for any reason.</p> <p>Each area within the office has a reverse cycle unit to assist with air flow. There are no window openings.</p>	<p>Where working in proximity, it is highly recommended that windows are left slightly ajar to promote air flow. -</p>

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	Office Environment (Office Staff)	Community Environment (Support Workers)
Masks	<p>Approval must be sought from the Operations Manager before attending the office for any reason.</p> <p>Any staff member attending the office must wear a face mask to and from the office, and always while in attendance, even if no other staff are present.</p>	<p>Staff must always wear face coverings during their shift in accordance with restrictions –except where:</p> <p>The worker has a physical or mental health condition or disability which makes wearing the face covering unsuitable</p> <p>The visibility of the workers mouth is essential for communicating with the client; or</p> <p>The nature of the work means that wearing a face covering creates a risk to their health and safety; or</p> <p>the worker is asked to remove the face covering to ascertain identity; or</p> <p>for emergency purposes.</p> <p>Surgical masks must be discarded in line with infection control procedures.</p> <p>They must be changed every 4 hours.</p> <p>Cloth masks are to be washed at the end of each day.</p> <p>Please see further information</p>
Eye Protection	Not Applicable	<p>Support Workers must wear eye protection (goggles) when there is a risk of being in contact with bodily fluids, as a general rule, while completing:</p> <ul style="list-style-type: none"> <li>• Bowel and Continence Care</li> <li>• Tracheostomy Care</li> <li>• Wound Care</li> <li>• Diabetes BSL tests</li> <li>• Urinary Catheter Care</li> <li>• Stoma Care</li> <li>• Mealtime Preparation</li> </ul> <p>and Activities of Daily Living, such as:</p> <ul style="list-style-type: none"> <li>• Showering Assistance</li> <li>• Bathing Assistance</li> <li>• Grooming Assistance</li> </ul>
Training	All staff must complete and update as requested, infection control training for COVID-19 specific issues (either Health Department provided course, or course provided by DSC).	All staff must complete and update as requested, infection control training for COVID-19 specific issues (either Health Department provided course, or course provided by DSC).

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	Office Environment (Office Staff)	Community Environment (Support Workers)
<b>Cleaning</b>		
<b>Cleaning</b>	<p>Approval must be sought from the Operations Manager before attending the office for any reason.</p> <p>Any staff member attending must ensure surfaces are thoroughly cleaned after they have been used.</p>	<p>Shared spaces must be cleaned at regular intervals, including surfaces and high traffic areas – such as kitchen, bathroom and lounge room areas.</p> <p>If support is being provided in a client's bedroom, surfaces in this area must also be cleaned after caregiving.</p>
<b>Supplies</b>	<p>Staff attending the office must notify the Operations Manager immediately if any product used for wiping surfaces, soap, or hand sanitizer is low. If this is unable to be restocked for any reason, the Operations Manager will notify all office-based staff. Safety Data Sheets (SDS) are available for all cleaning products on premises: see the COVID Safe Office Procedures Manual.</p>	<p>Staff are recommended to ensure supplies for cleaning are in stock and notify the client, their primary carer or guardian if stocks are low. If stocks are unable to be restocked for any reason, staff must contact the Operations Manager for further advice.</p>
<b>Physical Distancing and Limiting Workplace Attendance</b>		
<b>Home Offices</b>	<p>All office staff are to work from home until further notice. Where access to the office is required, approval must be sought from the Operations Manager.</p>	<p>Not possible for this cohort of staff.</p>
<b>Multiple Worksites</b>	<p>All office staff must work from home at this time.</p>	<p>Where possible, LCS will limit staff to working in one home during this period. There will be instances where this is not possible.</p> <p>Staff who have shifts in multiple homes have a responsibility to practice thorough infection control between leaving one person's home and arriving at another.</p> <p>All staff are to advise LCS if they are working for multiple organisations, who their other employer is, and contact details for that employer.</p>



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	Office Environment (Office Staff)	Community Environment (Support Workers)
Health Screening	Staff are to advise management if they fall ill	<p>Support Workers must advise when they are unwell and must not attend their shift at any time under these circumstances. Breach of this may lead to disciplinary action or dismissal.</p> <p>Support Workers must advise LCS Management/Service Coordination Team as soon as symptoms are felt. Management and/or the Service Coordinator will complete the COVID-19 Exposure Contact Checklist.</p> <p>Where Support Workers are requested to submit to temperature testing prior to entering a client's house, they must do so.</p>
Enclosed Workspaces	While not at risk from exposure to COVID-19 while working at home, all staff working from home must complete an Occupational Health and Safety Workplace Assessment for their home office environment to ensure suitability and mitigate risk of workplace injury while working from home.	<p>Apart from the client, one other person is permitted within 4 square metres in any one room.</p> <p>Where furniture or home décor prevents safe social distancing within the room where support is being provided, move furniture and/or décor to allow for safe social distancing. Ensure clients and their family members know the reason for doing this, and always practice safe manual handling while moving heavy objects.</p> <p>Never move furniture to a place that prevents safe evacuation from a room or house in the event of an emergency</p>
Workstations	While not at risk from exposure to COVID-19 while working at home, all staff working from home must complete an Occupational Health and Safety Workplace Assessment for their home office environment to ensure suitability and mitigate risk of workplace injury while working from home.	Not applicable.
Record Keeping		
Attendance	Attendance at the office will be recorded by use of a QR code located at the front door. The Operations Manager must also be notified of office attendance at this time. If any Office Staff member is confirmed positive for COVID-19 and has attended the office, other staff that may have attended in the 72 hours prior will be notified.	Confirmed attendance at a client's residence will be recorded in the Brevity Software system. Where a staff member's roster is still being kept via manual record by head office and the Brevity System is not being used to record their attendance yet, in event of a confirmed or suspected case, all staff members will be notified via phone call.

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NDIS Standard:	Core Module 2.7 Human Resources Management		

	Office Environment (Office Staff)	Community Environment (Support Workers)
OH&S, Risk and Incident Reporting	<p>Incidents reported that could indicate the transmission of or exposure to COVID-19 are to be recorded as “<b>Extreme Impact</b>” (see <b>LCS-PP-COR221</b> Risk Management Policy and Procedure) and reported immediately to The Director or Operations Manager.</p>	<p><i>Risks or hazards</i> that may lead to increased likelihood of being exposed to COVID-19 must be reported as soon as possible to The Director, or by calling the 24/7 pager service (03) 9483 4755. <i>Incidents</i> where exposure to or transmission of COVID-19 have been confirmed must be immediately reported as per the LCS Incident Accident and Injury Reporting Policy and Procedure (<b>LCS-PP-COR261</b>).</p> <p>The Incident Reporting System is also available on the Employee Hub and Brevity for personnel with records on this system.</p>

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## 6.0 Business Continuity Plan

### Business Risks and Strategies

*General risks* identified to services at this time are:

- The organisation is not able to provide support services.
- Clients, families, and employees are either unable or unwilling to follow organisational advice in place to help keep them safe.
- Government directives do not meet the support needs of the client.
- Due to the person's disability, mental health, stressors and or changes in their routine, there may be more behaviours of concern.

*Strategies to mitigate* these general risks are as follows:

- Where possible, service provision to be provided by teleconference.
- Strengthening and making the recruitment process more efficient to mitigate the risk of staffing issues.
- Continued communication to staff and clients about updated directives and our expectations regarding those directives.

Ensure client care plans, health care plans and contact details are up to date. Contact Behaviour Support Practitioners for updated

### Service Level Risks and Strategies

*Service level risks* identified at this time are:

- **High Risk:** High Intensity Supports
- **Medium Risk:** Personal Care
- **Low Risk:** Domestic care and community participation.

*Strategies to mitigate* service level risks currently are:

- Ensuring Policies and Procedures related to High Risk activities are up to date and well communicated regularly.
- Continued communication to staff and clients about updated directives and our expectations regarding those directives.
- Ensure client care plans, health care plans and contact details are up to date.

Suspension of community-based activities that are not aligned with Restrictions.

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NDIS Standard:	Core Module 2.7 Human Resources Management		

Communication Risks	<p><i>Communication risks</i> identified at this time are:</p> <ul style="list-style-type: none"> <li>Information unavailable in the client's preferred language or method of choice.</li> <li>Lack of communication about updated directives from Government departments</li> <li>Lack of easy-read documentation available about updated directives.</li> </ul> <p><i>Strategies to mitigate</i> communication risks identified at this time are:</p> <ul style="list-style-type: none"> <li>Collection of information about COVID-19 from government departments or other reputable resources</li> <li>Distribution of information about COVID-19 in a client's preferred language</li> <li>Regular updates from LCS Management/Director regarding information about COVID-19 on various channels – email, website, and social media.</li> </ul> <p>Collection of easy-read documentation and distribution of that information to clients who require this.</p>
Contact Tracing	<p>Service Coordinators will, where there is a suspected case of COVID-19, complete an Exposure Checklist, which identifies whether it is an suspected or confirmed case of the virus, the date of the confirmation and who they have been in contact with during the period of exposure.</p> <p>Service Coordinators will then refer to rosters and/or Brevity records to identify contacts of the client, to ensure that even those that the person with a confirmed or suspected case wasn't able to identify during this survey are made aware of their potential exposure.</p> <p>Those at risk become symptomatic, they must be tested and self-isolate until the test results are confirmed as negative.</p> <p>If services can be delivered by teleconference (not possible with high-intensity or personal care supports) this can be arranged.</p> <p>External or third-party services may be arranged to support the affected client during the quarantine period. Those third-party services will be recorded on the client's file by the Service Coordinator.</p>
Workplace Disinfection	<p>Where there has been a confirmed case of COVID-19 within a client's home, services will only resume once the home has been disinfected.</p> <p>NDIS participants living in their own home who test positive for COVID-19 and are required to self-isolate or quarantine are now able to claim for related cleaning costs. The client and/or their primary caregiver is able to confirm the cleaning process has taken place in accordance with DHHS guidance via written notification to the Director, Karl Ellaway (<a href="mailto:karl@lifestylecentred.com.au">karl@lifestylecentred.com.au</a>)</p> <p>An OH&amp;S Workplace Safety Checklist will be completed by a Service Coordinator via teleconference or by a suitably trained staff member on site prior to regular service commencement.</p>

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Employee Positive in Attendance

Employees are to advise the Service Coordinator immediately in the case that they have undergone a test for COVID-19. If a test has been conducted the employee is to immediately self-isolate and will be taken off the roster until they have been confirmed negative.

If an employee fails to do this, they are liable for disciplinary action, or instant dismissal.

*In the unlikely case that the employee has failed to advise and self-isolate, and they receive notification of their positive result while on shift, the employee is to immediately leave the client's home, advise the client and their other residence within the home to practice infection control, and phone the clients Service Coordinator, or LCS Operations Manager, Tarina Venturin via the 24/7 pager service (03)9483 4755. They are to quarantine immediately.*

*If an employee becomes symptomatic on shift, they are to immediately leave the client's home, advise the client and their other residence within the home to practice infection control, and phone the client's Service Coordinator, or LCS Operations Manager, Tarina Venturin, via the 24/7 pager service (03) 9483 4755. The employee is to immediately arrange for a test and self-isolate in accordance with government directives. A suitable Support Worker will be found to replace the shift, if one can be found.*

Incidents and hazards will be reported in accordance with the COVID-19 Safe Plan.

Notification of Confirmed or Suspected Cases

Service Coordinators will make immediate contact with staff on a client's roster regarding a suspected or confirmed case via phone call. They will also contact the client or their primary supports.

Where no contact can be made via phone call, a Service Coordinator will continue to try for a period of 24 hours. If still no contact can be made, an email will be sent advising of the suspected or confirmed case.

DHHS will additionally be notified immediately after a confirmed case of the virus.

Records from the period of 48 hours prior to the last shift attended by the staff member will be collected – including the client's roster, contact details and contact details for the employees.

Where there is a confirmed case, these records will be sent to the Operations Manager/Director who will lead the engagement with DHHS to undertake employer-led contract tracing.

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Notification to the NDIS Commission

LCS are required to notify the NDIS Commission of changes to the organisation and its services under sections 13 and 13A of the NDIS (Provider Registration and Practice Standards) Rules 2018.

For the purposes of this plan the changes most likely to occur due to COVID-19 are:

- Events which extensively limit LCS’s ability to comply with the Practice Standards listed in the NDIS (Provider Registration and Practice Standards) Rules 2018.
- Events which seriously impair LCS’s ability to effectively conduct its operations and deliver services we are registered to provide, including:
  - A decision not to accept, on a temporary or permanent basis, new participants for supports or services that LCS is registered to provide
  - A significant or adverse change in wait times for the provision of supports or services.
  - A significant shortfall in the availability of workers.
  - The cessation, on a temporary or permanent basis, the provision of supports or services that LCS is registered to provide
  - A worker’s confirmed COVID-19 infection
  - A client’s confirmed COVID-19 infection
- Any changes to the scale of its operations, including:
  - A significant increase or decrease of clients being supported because of staff losses due to infection or participant cancellations due to infection
  - A decrease in staff that is unexpected and/or to the extent that LCS is unable to provide service continuity to clients.

**The Director or Operations Manager** has responsibility for reporting this to the Commission. They will provide details of:

- Suburbs impacted
- Number of staff impacted
- Number of clients impacted
- Any decisions made to minimize potential infection through the discontinuation of supports
- Class of supports impacted
- Actions taken to date

Any other relevant information

Notification to Worksafe

Where there is a confirmed case in an employee, the person (most likely the Service Coordinator) who has been notified will immediately advise the Operations Manager, and OHS Representative, Tarina Venturin. The Operations Manager will immediately notify Worksafe via the incident notification hotline **13 23 60** and provide formal written notification within 48 hours via the [Confirmed COVID-19 diagnosis reporting form](#).

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<sup>i</sup> Thom, R and Turner, K, “Helping people with autism spectrum disorder manage masks and COVID-19 tests” June 10, 2020: Harvard Medical Publishing,