

Document Identifier	Version	Reviewed By		Authorised By			
LCS-PP-COR216	4	Ruth Wearne, QM		Tarina Venturin, OM			
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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

3.1 State Government Legislation

Under current Victorian Government Regulations Organisations are to enact their COVID Safe Plan and communicate it to their workforce.

Under Government Regulations and Lifestyle Centred Services Policies and Procedures, the following is required:

- Have a COVID Safe Plan in place that is regularly updated.
- If there is guidance from the Government regarding working from home, ensure staff who can work from home do so in relation to that guidance.
- Collect records of all workers, subcontractors, customers, and clients attending a workplace for 15 minutes or longer.
- Provide the Government's preferred method of check in (QR Codes) at public spaces that Lifestyle Centred Services occupies (Head Office).
- Populate office environment/s with the current number of staff per square metreage (per



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Government Advice at any given time).

- Where possible, minimise work across multiple sites, or for multiple employers. Mitigate risk where this is not possible.
- Ensure that workers are in good health while they are working workers cannot work if they are unwell and Lifestyle Centred Services must not require them to work.
- If an employee is unwell, direct the employee to return home and be tested. They must stay at home until they have satisfied any government directives for isolation or quarantine.
- Report any positive cases of COVID-19 to Management, Worksafe, Health and Safety Representatives, and the NDIS Commission.
- Conduct contact tracing when an employee has been on shift unwell, or a client or their support network has been identified as positive while an employee is on shift.
- Ensure workspaces are regularly cleaned.
- Undertake risk assessments for cleaning and the potential closure of the workplace in certain situations.

Under this policy, employees must:

- Know Lifestyle Centred Services' COVID Safe Plan and understand what is required.
- If required by any restrictions as directed by the government, work from home if they can work from home.
- If required by the government, have a permit if they need to travel to restricted areas for work.
- Advise if they are not feeling well before starting a shift, even if they have even mild symptoms, and not attend Head Office or a client's place of residence if unwell.
- Use Lifestyle Centred Services shift clocking in systems when they start a shift, and clock out if the system used requires it.
- Return home and seek a test if they are feeling unwell (even with mild symptoms).
- Tell Lifestyle Centred Services as soon as possible if they test positive for COVID-19.





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- Regularly clean equipment and shared spaces.
- Respond to any memorandum that is communicated due to updated Government Directives.
- Complete any training that is requested to minimise the risk of virus spread.

3.2 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 the homes of people with a disability, and in the community throughout Victoria (both Metropolitan and Regional) and on the Sunshine Coast in Queensland. No other facilities other than the Seaford-based Head Office are owned or operated by Lifestyle Centred Services.

4.0 Policy Statement

The safety of our clients and employees are top priority as we face the COVID-19 global pandemic. LCS Management responded decisively in early 2020, when it was first confirmed to have been transmitted in the Victorian community. Firm and fast decisions regarding procedural issues to keep our workforce and Client base safe have been made frequently, in line with Government Advice but also in response to risks to business continuity and the health and wellbeing of stakeholders.

Head Office Based staff have successfully worked from home and have been supported to do this through a variety of resources, ensuring that psychological wellbeing and support is at front of mind. Lifestyle Centred Services has maintained efficient service coordination and delivery during



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the pandemic as a result of this support.

Any attendance at Head Office is regulated until further notice, as directed by the Management Team.

The increased workload as a result of risk minimisation activities and responses to events has been shared among the team and a culture of support for fellow colleagues is well-established.

The Management Team have ensured that remote workers (Direct Support Workers), our clients and their families and support networks have been regularly communicated with – via email, phone, social media and on the website.

Where a suspected or confirmed case of the virus is reported, a response plan is quickly established and enacted (*LCS Guide for the Safe Delivery of Supports*). This plan is regularly reviewed by the Management Team – including the Director, Operations Manager, Quality Manager, and Service Coordination Team. Feedback is sought from all affected stakeholders.

4.1 Personal Protective Equipment (PPE)

Lifestyle Centred Services ensures:

- Employees are aware of the current conditions that apply for the use of PPE during the course of their work.
- suitable PPE and protective clothing are supplied
- PPE and protective clothing meet relevant legislative, Australian Standard and/or industry requirements or guidelines
- information and training are provided in the correct use, wear and maintenance of PPE and protective clothing supplied





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- tasks are assessed to determine correct level of PPE required
- PPE and protective clothing being used are in an appropriate condition for the works being performed
- damaged or worn PPE and protective clothing is discarded safely and replaced, and
- workers wear and use such items supplied to them.

If a support worker attends a home and later tests positive to COVID-19, clients can pay for a one-off professional deep clean of their house using NDIS funds. If this happens, LCS may contact the client to organise a one-off professional deep clean of the house using NDIS funds.

4.1.1 Notes about Disabilities and the use of PPE General

Clients are advised that they should wear a face mask during the delivery of services in their home, 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.





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- 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 <u>a toolkit</u> with images that you can save on a device to help people with a disability communicate with people wearing a mask.

Autism Spectrum Disorder (ASD) and PPE

Many people with Autism Spectrum Disorder 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.





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- Introduce a mask in a quiet and calm environment, so that the individual can experience success wearing the face mask.
- 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.

4.2 Client COVID Safe Plans

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

<u>Collaboriating4Inclusion</u> has partnered with the Australian Government Department of Health to make a <u>Planning Resource for People with a Disability</u>. 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

4.3 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.





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- 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:

	Office Environment (Head Office)	Community Environment (Support Workers)
HAND SANTIZER	Approval must be sought from the Operations Manager before attending the office outside of pre- scheduled times (as rostered). The office has four (4) hand sanitizer stations set up with signs pointing to their location. One is set up upon entry.	Some Clients have hand sanitizer and supplies on hand. 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. 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.
AIRFLOW	Approval must be sought from the Operations Manager before attending the office outside of pre- scheduled times (as rostered). Each area within the office has a reverse cycle unit to assist with air flow. There are no window openings. Doors can be opened to promote airflow in downstairs areas.	Where working in proximity, we recommend that windows are left slightly ajar to promote air flow



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	Office Environment (Head Office)	Community Environment (Support Workers)
FACE COVERINGS/SURGICAL MASKS	Approval must be sought from the Operations Manager before attending the office outside of pre- scheduled times (as rostered). At present, masks are not required within the office, however you can choose to wear a mask at your own discretion.	Staff must wear a mask while providing support in home —except where: a) The worker has a physical or mental health condition or disability which makes wearing the face covering unsuitable b) The visibility of the workers mouth is essential for communicating with the Client; or c) The nature of the work means that wearing a face covering creates a risk to their health and safety; or d) the worker is asked to remove the face covering to ascertain identity; or e) for emergency purposes. Surgical masks must be discarded in line with infection control procedures and changed every 4 hours. Cloth masks are to be washed at the end of each day. Face masks are to be worn on community outings if businesses require them, or per Government Directives.
EYE PROTECTION	Not Applicable	Eye protection must be worn if providing support to a person suspected or confirmed positive with COVID-19 or when health supports require eye protection in line with LCS Infection Control Policy.
TRAINING	All Staff must complete Infection Control Training for COVID-19 specific issues (either Health Department provided course, or course provided by DSC).	All Staff must complete infection control training for COVID-19 specific issues (either Health Department provided course, or course provided by DSC).



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	Office Environment (Head Office)	Community Environment (Support Workers)
	CLEANING	
CLEANING	Approval must be sought from the Operations Manager before attending the office outside of pre-scheduled times (per roster). Any Staff member attending must ensure surfaces are thoroughly cleaned after they have been used. Staff must clean personal property brought into the office upon attendance and at the end of the shift. Staff must use hand sanitizer provided upon entry to the office and check in by either using the QR code or signing in manually.	Shared spaces must be cleaned at regular intervals, including surfaces and high traffic areas – such as kitchen, bathroom and loungeroom areas. If support is being provided in a client's bedroom, surfaces in this area must also be cleaned after caregiving. Staff are provided with the COVID-19 Guide for Safe Delivery of Supports in the event that a person who is involved with the client's is suspected positive or confirmed infectious with the virus.
SUPPLIES	Cleaners have instruction on suitable products and supplies being used. 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. PHYSICAL DISTANCING AND LIMIT	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. NG WORKPLACE ATTENDANCE
	THOOAL DISTANSING AND LIMIT	WORKI LAGE ATTENDANGE
HOME OFFICES	Approval must be sought from the Operations Manager before attending the office outside of pre-scheduled times (per roster). All office Staff are to work from home during scheduled times.	Not applicable.



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	Office Environment (Head Office)	Community Environment (Support Workers)
MULTIPLE WORK SITES	All office Staff must work from home during allocated times.	Where possible, LCS will limit Staff to working in one home during this period. There will be instances where this is not possible. 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. All Staff are to advise LCS if they are working for multiple organisations, who their other employer is, and contact details for that employer.
WORKER SCREENING	Staff are to advise management if they fall ill.	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. 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. Where Support Workers are requested to submit to temperature testing prior to entering a Client's house, they must do so.
ENCLOSED WORKSPACES	Density limits apply to each room in the Head Office environment. If possible, teams should work downstairs where air ventilation is better due to open windows/doors. While risk from exposure to COVID-19 while working at home is minimal, 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.	Density limits apply to a person's home in each room, as the client's home is considered a worksite. 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. Never move furniture to a place that prevents safe evacuation from a room or house in the event of an emergency



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	Office Environment (Head Office)	Community Environment (Support Workers)
WORKSTATIONS	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. Office workstations are required to be wiped down at the beginning and end of the employee's shift with the supplied cleaning wipes. Staff are to understand the supplied Data Safety Sheets for any cleaning supplies in the office which are supplied in the Office COVID-19 Safety Guide.	Not applicable.

RECORD KEEPING

ATTENDANCE

VACCINATIONS

Attendance at the office will be recorded via the QR Code Check in system.

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.

suspected case, all Staff members will be notified via phone call.

All staff are required to provide their valid COVID-19

Vaccination Certificate or valid exemption – in line with

any current Government mandates in order to work.

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

All staff are required to provide their valid COVID-19 Vaccination Certificate or valid exemption – in line with any current Government mandates in order to work in the office environment, or undertake visits to client homes.

Vaccination Certificates are filed securely in line with LCS Privacy Policy in a personnel's file, and recorded on the Brevity Management System.

Staff who fail to provide this evidence in line with any current Government mandates have their employment placed on hold until such time as they produce

evidence of their vaccination status.

Vaccination Certificates are filed securely in line with LCS Privacy Policy in a personnel's file, and recorded on the Brevity Management System.



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Incidents reported that could indicate the transmission of or exposure to COVID-19 are to be recorded as "Extreme Impact" (see LCS-PP-COR221 Risk Management Policy and Procedure) and reported immediately to The Director, delegated persons, or the Operations Manager.

Risks or hazards that may lead to increased likelihood of being exposed to COVID-19 must be reported as soon as possible to The Director or delegated persons, or by calling the 24/7 pager service (03) 9483 4755.

Incidents 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 (LCS-PP-COR261).

The Incident Reporting System is also available on the Employee Hub and Brevity for personnel with records on this system.



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Business Continuity Plan

General risks identified to services at this time are:

- The organisation may not be able to provide support services.
- Clients, families, and employees may either unable or unwilling to follow organisational advice in place to help keep them safe.
- Government directives may 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.
- Many staff being unwell at any given time may pose a risk to service continuity for a client.

Strategies to mitigate these general risks are as follows:

- Complete individual risk assessments to identify clients who require supports during a period of testing and isolation, or illness, and whether supports can be modified to continue supports during a period of isolation or quarantine.
- Where possible and per a person's individual risk assessment, service provision is to be modified (eg. 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 any care plans, health care plans and contact details are up to date. Contact Behaviour Support Practitioners for updated BSPs where those are in place.
- Encourage clients to consult with health professionals to gain a plan in case they need to go to hospital in the event they contract the virus.



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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:

- Lifestyle Centred Services Policies and Procedures related to high risk activities are up to date and well communicated on a regular basis.
- Lifestyle Centred Services will continue regular communication to Staff and Clients about updated directives and expectations regarding those directives.
- Service Coordinators and Administrators will 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 should they be in place under any government directives.

Communication risks identified at this time are:

- Information may be unavailable in the clients' preferred language or method of choice.
- There could be a lack of communication about updated directives from Government departments
- There could be a lack of easy-read documentation available about updated directives.

Strategies to mitigate communication risks identified at this time are:

- Collection of information about COVID-19 from government departments or other reputable resources
- Distribution of information about COVID-19 in a client's preferred language
- Regular updates from LCS Management/Director or delegated persons regarding information about COVID-19 on various channels – email, website, and social media.
- Collection of easy-read documentation and distribution of that information to Clients who require this.



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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.

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. The Service Coordinator and/or the Management Team will take steps to communicate with contacts and advise to get tested and isolate.

Employees must be tested and self-isolate until they have satisfied the directives of current Government Guidelines for testing and isolation.

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.

Where there has been a confirmed case of COVID-19 within a Client's home, cleaning will take place to disinfect the environment regularly.

If a support worker attends a home and later tests positive to COVID-19, clients can pay for a one-off professional deep clean of their house using NDIS funds. If this happens, LCS may contact the client to organise a one-off professional deep clean of the house using NDIS funds.

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 (karl@lifestylecentred.com.au) or delegated persons.

An OH&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.



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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 (or advised by Government directives).

If an employee fails to inform LCS of their test in attempt to continue working active shifts, 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.



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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.

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 contact tracing efforts.



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LCS are required to <u>notify the NDIS Commission</u> 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 Clients 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, delegated persons 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





Document Identifier	Version	Reviewed By		Authorised By	
LCS-PP-COR216	4	Ruth Wearne, QM		Tarina Venturin, OM	
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NDIS Standard:	Core Module 2.1 Governance and Operational Management				

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 <u>13 23 60</u> and provide formal written notification within 48 hours via the <u>Confirmed COVID-19 diagnosis reporting form</u>.

¹ Thom, R and Turner, K, "Helping people with autism spectrum disorder manage masks and COVID-19 tests" June 10, 2020: Harvard Medical Publishing,