



**Bilingual Care Worker
Cooperative of Australia
Limited**

**Aged Care Policy & Procedure Manual:
Part 1 - Governance and Management**

Last Updated: 12 February 2025

Table of Contents

Corporate Governance Policy.....	3
Code of Conduct for Aged Care Policy.....	10
Regulatory Compliance Policy	13
Business Continuity & Disaster Recovery Policy	20
Conflict of Interest Policy	22
Records and Information Management Policy	25
Privacy and Confidentiality Policy	32
Professional Ethics and Code of Conduct Policy	44
Complaints, Compliments and Feedback Policy	50
Risk Management Policy.....	57
Continuous Improvement Policy.....	73
Financial Management Policy	76
Workplace Health, Safety and Security Policy	88
Audit, Internal Assessment and Review Policy	109
Brokered Services and Sub-Contractor Management Policy.....	115
Personal Protective Clothing and Equipment Policy	120

Corporate Governance Policy

1. Policy and Procedure

Bilingual Care Worker Cooperative of Australia Limited manages its business using an organisational structure, reporting and decision-making processes, policies and procedures resulting in effective planning, reporting, financial management and compliance with contractual obligations, service/funding agreements and legislative requirements. This ensures that Bilingual Care Worker Cooperative of Australia Limited:

- complies with relevant legislation, regulations and contractual arrangements;
- supports and develops its staff; and
- delivers quality and safe services to its clients.

2. Definitions

Governance – is the process by which organisations are directed, controlled and held to account. It encompasses authority, accountability, stewardship, leadership, directions and control exercised in the organisation.

Key personnel – individuals who hold key executive, management or operational positions in an organisation, such as Directors, Board Members, Managers, the Managing Director and Quality Care Advisory Body members. Key Personnel members may also make up the Management Team.

3. Purpose

The purpose of effective corporate governance procedures within the organisation are to ensure that:

- roles and responsibilities are well documented and understood
- decision making can be undertaken by the most qualified members of the organisation
- planning and decision-making is based on accurate and timely information
- staff are aware of their obligations in relation to compliance and service performance
- staff have access to policies and procedures to confirm expectations and requirements and to inform practice
- the organisation is operating in accordance with the Code of Conduct for Aged Care, applicable to home care services from 1 December 2022 (see Code of Conduct for Aged Care Policy).

The Managing Director, Board Members, and Management (collectively, Key Personnel) and the governing body of Bilingual Care Worker Cooperative of Australia Limited are responsible for ensuring the highest standards of corporate governance are implemented and adhered to. Their responsibilities are as follows:

- Establish and maintain a framework that continuously promotes transparency and safeguards Bilingual Care Worker Cooperative of Australia Limited against any unlawful or unethical practice.

- Determine methods that promote internal and external actions of persons related to Bilingual Care Worker Cooperative of Australia Limited.
- Ensure operation is completed in accordance with all rules, regulation, legislation and organisational standards.
- Determine persons related to Bilingual Care Worker Cooperative of Australia Limited's ability and promotes to fulfill all responsible duties.
- Determine persons related to Bilingual Care Worker Cooperative of Australia Limited's ability to provide best and highest quality care to clients.
- Write to care recipients and their representatives every 12 months to seek interest in establishing one or more consumer advisory bodies.

4. Governing Body Membership

Where Bilingual Care Worker Cooperative of Australia Limited has more than five (5) governing body members and 40 care recipients, it must ensure the majority of the governing body members are independent, non-executive members, and appoint at least one member who has experience in providing clinical care. This requirement does not apply to Aboriginal Community-Controlled Organisations or state, territory, state or territory authority, or local government authorities.

5. Quality Care Advisory Body

Bilingual Care Worker Cooperative of Australia Limited must also establish a Quality Care Advisory Body which must provide the governing body a written report about the provider's quality of care for each of its services every six months.

The Quality Care Advisory Body must include:

- a member of our key personnel who has appropriate experience providing aged care;
- a staff member directly involved in the delivery of aged care, or a staff member directly involved in the delivery of clinical care (where we deliver clinical care); and
- a member who represents consumers' interests (for example, a consumer or representative).

6. Organisation Structure

Bilingual Care Worker Cooperative of Australia Limited utilises an organisational chart to detail staff positions, decision making, delegation and reporting paths and how these fit into the overall structure of the organisation.

An induction process is undertaken for all new staff.

Staff are provided with access to policies, procedures and instruction manuals to support them in their new roles. Staff will have the opportunity to attend meetings (e.g. weekly between management and operations teams and monthly/quarterly state staff meetings) and participate in training.

Staff have regular contact with their manager and other team members, fostering an environment of open communication where ideas, feedback and discussion is encouraged

and supported.

Program activities, service performance and issues needing attention are communicated, depending on the nature and urgency of the information, in person, via monthly reports or both to the Managing Director, the Executive and/or the Board of the organisation.

7. Key Personnel

Bilingual Care Worker Cooperative of Australia Limited conducts operation with the following key personnel:

- The Managing Director
- Care Manager
- Clinical Advisor
- Human Resources Manager
- IT Manager
- Finance Manager
- Accounts Advisor
- Sales/Marketing/BD Advisor

Bilingual Care Worker Cooperative of Australia Limited will review the suitability of its key personnel every 12 months and keep a record of this assessment. Where:

- an individual becomes a key personnel; or
- an individual stops being a key personnel; or
- Bilingual Care Worker Cooperative of Australia Limited becomes aware of a change of circumstances relating to a key personnel's suitability,

Bilingual Care Worker Cooperative of Australia Limited will advise the Commissioner within 14 days.

Key personnel must notify Bilingual Care Worker Cooperative of Australia Limited within 14 days of any changes that affect their suitability to perform their role. The notification must be in writing.

8. Roles and Responsibilities

Staff are provided with individual position descriptions detailing their role, their key performance areas, their expected qualifications and experience, the details of their immediate manager and reporting requirements.

Performance Reviews are undertaken to review performance, confirm key performance areas and undertake future planning.

All staff, but particularly senior staff, are encouraged to identify business opportunities, attend relevant network meetings, identify opportunities for increased productivity and monitor any threats or opportunities to the program/ organisation.

9. Management Team Qualifications, Training and Development

Bilingual Care Worker Cooperative of Australia Limited must be managed by suitably qualified and experienced people with clearly defined responsibilities, authority and accountability for the provision of supports to clients.

Collectively, the Management Team must have the qualifications and experience to meet Bilingual Care Worker Cooperative of Australia Limited's financial, legislative, regulatory and contractual responsibilities, and to monitor and respond to quality and safeguarding matters associated with delivering Home Care supports to clients.

As per Bilingual Care Worker Cooperative of Australia Limited's Human Resources Policies and Procedures, all Management Team members must successfully meet all Key Personnel mandatory requirements to obtain and retain their position with Bilingual Care Worker Cooperative of Australia Limited.

In addition to the above, all Management Team members must undergo induction, receive ongoing training and development opportunities and participate in annual performance reviews, to support continuous improvement in Bilingual Care Worker Cooperative of Australia Limited's management practices.

Responsibilities for each of the Key Personnel are outlined in position descriptions and summarised in Bilingual Care Worker Cooperative of Australia Limited's Business Plan and Organisation Chart.

10. Accountability and Reporting Processes

Home Care staff document client movements, including commencement and cessation of a package, leave periods and use of supplements into the Home Care CMS, Ezihealth.

This information is utilised to complete monthly funding claims and monitor client budgets by the Care Manager.

Care Workers are aware of their individual caseloads and their case mix (Level 1-4) and special needs groups (e.g. CALD, financially disadvantaged, retirement village linked).

Care Workers are aware of individual client budgets and need to seek approval from the Care Manager should there be a need to amend this budget due to extraordinary client circumstances.

Ezihealth provides detailed information about spending on specific service types.

The Care Manager provides information relating to the operation of the service to staff, the Financial Manager and the Managing Director of Bilingual Care Worker Cooperative of Australia Limited on a monthly basis for incorporation in the Executive report which is provided to the Board.

The Care Manager and Clinical Advisor attend Executive team meetings, clinical governance meetings and meets with the Managing Director on a regular basis to ensure effective and efficient communication and information sharing.

The Managing Director, and at various times the Care Manager and the Clinical Advisor, attends Board meetings to provide program updates, highlight threats and opportunities to the business, seek approval for projects and receive feedback and support from the Board.

The Finance department is responsible for the processing of income and expenses associated with the operation of the service and client related costs. The Financial Accountant and external auditors prepare annual financial returns to the Department of Health and Aged Care.

Quickbooks is used for financial recordkeeping and reporting.

11. Planning Processes

A strategic plan is created, which details the proposed growth and development of the Home Care business. This plan is used as a basis for decision making in relation to funding applications and program direction.

The strategic plan may be reviewed and amended in case of changes to contractual obligations/funding or reporting arrangements and in light of any developing threats/opportunities. The Board will be provided with information about these changes and their approval for changes sought.

12. Financial Management and Reporting Processes

Bilingual Care Worker Cooperative of Australia Limited utilises external auditors to check its financial operations and funding allocations received from a variety of income sources.

Bilingual Care Worker Cooperative of Australia Limited provides an annual financial statement and grant funding statement (if applicable) to the Department of Health and Aged Care in accordance with funding guidelines.

An annual financial target is set by the Board for the business, and operations and budgets are developed and managed accordingly.

Monthly financial reports are provided to the Board highlighting business income and expenditure and how this compares to budgets.

13. Monitoring and Managing Compliance and Service Performance

The Care Manager, Executive Managers and the Managing Director share responsibility for continuing to be aware of any changes to funding agreements, program guidelines and legislation. Any action required to meet these changes are managed by the Care Manager and are actioned in a timely manner.

Bilingual Care Worker Cooperative of Australia Limited utilises funding agreements, program guidelines, common standards and legislation to inform its policies and procedures, thereby ensuring service performance is compliant to set expectations.

The Quality Review Team undertakes biennial audits of all policies, procedures and forms to ensure they continue to meet changes to practice, service models, legislation, guidelines, funding agreements and the range of services provided.

Bilingual Care Worker Cooperative of Australia Limited enters into formal Home Care Agreements with service providers delivering services or consumables to clients. Home Care Agreements are renewed every 3 years and copies of insurance certificates and police check declarations collected annually.

14. Organisational overview

Bilingual Care Worker Cooperative of Australia Limited is a registered non-distributing co-operative located in Rockdale, NSW, that delivers support services to My Aged Care clients. Bilingual Care Worker Cooperative of Australia Limited's team share deep knowledge and passion for the healthcare industry and are committed to providing valuable and relevant services that improve client's independence.

We provide services that are funded by the Department of Health and Aged Care and through client fees. We continuously operate in accordance with the Aged Care Act and Standards as well as all other relevant rules, regulations, and legislation.

15. Target group

We provide services to seniors in Metropolitan Sydney and Melbourne as well as the Illawarra region. We provide services to any group and cultural background, in the comfort of their own home. We provide a friendly, high-quality service that is respectable, flexible, affordable, and accessible to all who require care.

Our services are tailored to suit client's needs, for as long as is required. Our clients include:

- Persons aged 65 and above, including those who require support to live at home or to function within their community.
- Persons from CALD backgrounds with specific language requirements.

16. Services we provide

Bilingual Care Worker Cooperative of Australia Limited provides a range of supports to assist seniors to remain living at home for as long as possible and to enable clients to have choice and flexibility in the way that care and support is provided at home. There are four levels of home care service that are provided:

Level 1 (Home Care)	A package to support people with basic care needs
Level 2 (Home Care)	A package to support people with low level care needs, equivalent to the former Community Aged Care Package (CACCP).
Level 3 (Home Care)	A package to support people with intermediate care needs.
Level 4 (Home Care)	A package to support people with high care needs, equivalent to the former Extended Aged Care at Home (EACH) package.

Bilingual Care Worker Cooperative of Australia Limited's specific Home Care supports include Personal Care services, such as:

1. Assessment
2. Domestic Assistance
3. Social Support
4. Personal Care
5. Clinical Services

6. Specialized Nursing Interventions
7. Respite Care
8. Meal Delivery
9. Client Care Coordination
10. General Nursing Services
11. Support and Information
12. Cleaning and Gardening

17. Supporting Documents

Relevant documents relating to this Policy and Procedure:

- Human Resource Policy and Procedure
- Organisation Chart
- Employee/Worker Contracts
- Client Information Handbook
- Strategic and Operational Plan
- Meeting Agenda
- Meeting Minutes
- Annual Report
- Charter of Aged Care Rights

18. Applicable Aged Care Quality Standards

Relevant documents relating to this Policy and Procedure:

- Standard 8 - Organisational Governance

Code of Conduct for Aged Care Policy

1. Policy statement

The Code of Conduct for Aged Care (the *Code*) commenced on 1 December 2022. It sets out eight behaviour statements that approved providers, aged care workers and governing persons are expected to comply with.

Bilingual Care Worker Cooperative of Australia Limited has responsibilities under the Aged Care Act 1997 (the *Act*) to comply with the Code and to take reasonable steps to ensure that aged care workers and governing persons comply with the Code.

2. Code of Conduct for Aged Care

The Code includes eight elements that describe behaviours expected of approved providers, aged care workers and governing persons. These elements are consistent with community expectations, consumer rights and existing standards and expectations for how providers should behave (described across a range of provider responsibilities) and reflect similar standards of behaviour to that of the NDIS Code of Conduct.

Bilingual Care Worker Cooperative of Australia Limited understands that the Code is not exhaustive and will follow this framework to ensure the conduct of our staff and governing persons is beyond reprove and upholds our responsibilities under the Act, so that all clients have confidence in the receipt of high quality care from our organisation.

When providing care, supports and services to people, Bilingual Care Worker Cooperative of Australia Limited, its staff and its governing persons must:

- a) act with respect for people's rights to freedom of expression, self-determination and decision-making in accordance with applicable laws and conventions
- b) act in a way that treats people with dignity and respect, and values their diversity
- c) act with respect for the privacy of people
- d) provide care, supports and services in a safe and competent manner, with care and skill
- e) act with integrity, honesty and transparency
- f) promptly take steps to raise and act on concerns about matters that may impact the quality and safety of care, supports and services
- g) provide care, supports and services free from:
 - i. all forms of violence, discrimination, exploitation, neglect and abuse
 - ii. sexual misconduct
- h) take all reasonable steps to prevent and respond to:
 - i. all forms of violence, discrimination, exploitation, neglect and abuse
 - ii. sexual misconduct

3. Implementation and Monitoring of the Code

In line with Bilingual Care Worker Cooperative of Australia Limited's Human Resources policies, we will ensure all workers and governing persons:

- read and understand the Code and the Code of Conduct - Guidance for Aged Care Workers and Governing Persons. The eight elements of expected behaviour are reinforced in Bilingual Care Worker Cooperative of Australia Limited's Employee Handbook
- receive regular training (beginning at induction) and professional development that helps them understand, apply and uphold the behaviours expected under the Code (see Orientation and Induction Policy, and Learning and Development Policy)
- understand the consequences of failing to act in accordance with the Code for the organisation and for them personally (as outlined in our Disciplinary Action Policy and Procedure)
- are supportive to resolve issues where concerns are identified with their compliance with the Code (e.g. through training, guidance and supervision to build skills and capability).

4. Expectations of Governing Persons

Bilingual Care Worker Cooperative of Australia Limited's Key Personnel and Board (governing persons) are responsible for ensuring the organisation acts in a way that is consistent with the Code and that the organisation remains compliant with this, the Aged Care Act, the Quality Standards and the Charter of Aged Care Rights.

Bilingual Care Worker Cooperative of Australia Limited's Key Personnel meet weekly, to ensure the organisation and its governing persons:

- understand the rights of consumers and ensure they are upheld by the organisation
- are fostering a culture of consumer empowerment and person-centred care
- know and act in accordance with the organisation's policies and procedures, which are developed and reviewed in line with applicable legislation and standards
- ensure information provided to clients, their representatives, families or carers is clear and informative
- foster a respectful workplace culture, including through modelling good behaviours in the management of aged care workers to demonstrate how all persons should be treated with dignity and respect
- understand the applicable privacy laws and obligations under the aged care legislation to manage information in a certain way and ensure the organisation's policies and procedures are consistent with these laws
- maintain and respect the personal privacy of consumers when using consumer information in performing their role, when meeting with consumers, representatives, families and carers, and attending the home or service of the consumer
- lead a positive culture of safety, inclusivity (for both consumers and aged care workers) and quality improvement that prioritises the rights, safety and well-being of consumers and aged care workers, and be able to demonstrate this culture exists within the organisation
- have the right mix of skills, experience and expertise to perform their role in the organisation

- maintain oversight of key aspects of the organisation's operations, including analysing data and identifying trends to continuously improve the quality of care, supports and services and ensure compliance with provider responsibilities, including the Code
- demonstrate the highest standards of integrity, honesty and transparency. This includes declining inducements or gifts that take advantage of consumers, representatives, families and carers, and avoiding conflicts of interest that might influence decisions to act against the best interests of consumers
- ensure the organisation has systems and practices in place to detect and respond to dishonest and/or inappropriate practices as they relate to consumers
- ensure there is regular review of the effectiveness of systems (both procedural and software-based) and make updates to improve systems and practices that support the delivery of high-quality and safe care, supports and services
- have update to date information on all staff so that the organisation can confirm the suitability of personnel to delivery aged care
- take steps to safeguard consumers from any form of violence, discrimination, exploitation, neglect, abuse or sexual misconduct
- foster and maintain a culture of zero tolerance of elder abuse and seek the reduction and elimination of restrictive practices
- manage incidents in accordance with the aged care legislation, consistent with Bilingual Care Worker Cooperative of Australia Limited's responsibilities, including where incidents are required to be notified to the Commission as a reportable incident and, in some circumstances, the police
- uphold the protections against victimisation afforded to certain aged care workers and others in certain circumstances relating to the disclosure of reportable incidents
- cooperate with the Commission regarding reportable incidents, complaints and other matters.

Each of the above items are covered under Bilingual Care Worker Cooperative of Australia Limited's policies and procedures.

Regulatory Compliance Policy

1. Policy

Bilingual Care Worker Cooperative of Australia Limited operates in accordance with funding agreements, funding guidelines and regulatory/ legislative requirements. Obligations and requirements are monitored on an ongoing basis. Changes and amendments in agreements, guidelines, regulatory or legislative requirements are implemented.

2. Definitions

Aged Care Act 1997	The overarching legislation that outlines the obligations and responsibilities that aged care providers must abide by to receive Australian Government subsidies.
Aged Care Quality Standards	Organisations providing Commonwealth subsidised aged care services are required to comply with the Aged Care Quality Standards (Quality Standards) 2018. The Quality Standards focus on outcomes for consumers and reflect the level of care and services the community can expect from organisations that provide Commonwealth subsidised aged care services.
Aged Care Quality and Safety Commission (Commission)	Australian Government agency in place to protect and enhance the safety, health, well-being and quality of life of people receiving aged care. The Commission independently accredits, assesses and monitors aged care services against the standards.
Non-Compliance	During the Quality Review assessment, should the Assessment Team identify that a provider of a service may not be complying with the Quality Standards the Commission may give notice of non-compliance. A provider who does not take actions within the agreed time period to rectify areas of non-compliance may have a sanction placed on them by the Department of Health and Aged Care.
Quality Review	An assessment undertaken by the Aged Care Quality and Safety commission against Home Care Package providers at least once every three years. It is the process of reviewing the quality of services delivered against the Quality Standards. The process includes a notification of a quality review, a site visit, an interim quality review report and a final quality review report.
Sanctions	A sanction may be placed on a service provider if there is an immediate and severe risk to the safety, health or wellbeing of someone receiving aged care services. A sanction can also be placed on a service provider who has not addressed areas of non-compliance as identified by the Commission.

3. Identification of Requirements

The Managing Director and Quality Care Advisory Body are responsible for the identification of and compliance with funding guidelines, funding agreements, relevant legislation and regulatory requirements.

4. Monitoring of Requirements

The Managing Director and Quality Care Advisory Body are responsible for keeping abreast of any changes in guidelines, legislative and regulatory requirements. We will utilise regulatory monitoring tools, government websites (e.g., Aged Care Quality and Safety Commission, Department of Health and Aged Care), and subscription-based compliance services.

Changes are monitored via:

- Notices from Medicare/ the Department of Health and Aged Care
- Aged Care Quality Bulletin
- Regulatory Bulletins provided by the ACQSC
- The internet
- Networking with other providers
- Attendance at Conferences/ Seminars
- Notifications from the HR/ Payroll Department
- Subscription to relevant newsletters provided by the Department of Health and Aged Care, such as the weekly "Your Aged Care Update, the Working in Aged Care Newsletter, and the EngAged monthly e-newsletter.

We aim to set up automated alerts to notify relevant staff when new regulations, standards, or legislative changes occur. When information advising of changes is received, the Managing Director will evaluate their impact and review policies and procedures for noncompliance/ change requirements.

The Managing Director will discuss and determine amendments, consult with Home Care Packages staff, the Quality Care Advisory Body and the Board as required and issue amendments or create new policies and procedures to ensure compliance.

The Managing Director will issue/ reissue updated Policies and Procedures, email all Home Care office staff and any other parties impacted by the changes with the details of the changes and ensure all updated policies are available to all staff. Where required (i.e. for urgent updates), staff will be asked to attend urgent training session regarding the changes.

Alerts and changes will then be distributed based on which area of the organisation has been affected. We will then assign specific team members to receive alerts based on expertise and influence, ensuring only relevant updates reach the right people:

- Clinical Advisor - changes to care standards, medication management, infection control.
- HR Manager - staffing ratios, training requirements, code of conduct updates.
- Managing Director - strategic policy changes, accreditation requirements.

- Finance Manager and Accounts Advisor - funding model changes, pricing regulations.
- IT Manager - changes to digital record-keeping, cybersecurity requirements.

5. Implementing Changes

The following steps are undertaken to implement guidelines/ regulatory/ legislative changes.

The Managing Director will be responsible for:

- Initial Review: Each assigned staff member reviews updates and assesses relevance.
- Impact Assessment: Staff determine if changes require new policies, procedures, training, or system adjustments.
- Collaboration: If an update requires broader action, personnel from multiple departments are brought together to find the best way forward.
- Implementation & Communication:
 - Update policies, procedures, and training materials.
 - Conduct staff training sessions where necessary.
 - Adjust workflows and IT systems to ensure compliance.

Stakeholders are informed via:

- Mail outs
- Updates to Handbooks
- Newsletters
- Meetings
- Training Sessions

6. Monitoring Compliance

The Managing Director and the Quality Care Advisory Body are responsible for monitoring the quality system, the financial operations and the human resources operation of the organisation to ensure compliance with guidelines, legislative and regulatory requirements is maintained.

The Managing Director will:

- Create a bi-annual timetable of Policies, Procedures and Forms to be reviewed.
- Timetable other Quality and Continuous improvement tasks to be undertaken.
- Undertake audits and reissue Policies, Procedures and Forms post review.

A compliance register will be maintained that logs:

- Each change received
- Assigned staff responsible
- Actions taken
- Deadlines and completion status

The compliance register records all relevant legislation, regulatory requirements, professional standards and guidelines that approved providers must comply with.

7. Staff Responsibilities

All staff are responsible for monitoring and managing compliance within their areas of influence.

Upon commencement, all staff undergo an Induction, which includes information and training on Bilingual Care Worker Cooperative of Australia Limited's compliance responsibilities.

Ongoing education is provided to staff (where applicable) on topics related to compliance including (but not limited to):

- changes to Aged Care legislation and how to understand them,
- changes to Aged Care standards and how to ensure compliance,
- changes to work health and safety and how best to implement to ensure the safety of all involved,
- any other relevant topics related to service provision and compliance activities.

The above education is provided in a variety of ways including in-house training utilising the knowledge of the Management Team, external representatives attending Bilingual Care Worker Cooperative of Australia Limited's premises and staff attending external educational opportunities.

8. Compliance Breaches

All staff must notify their immediate supervisor or the Managing Director as soon as they become aware that a compliance breach has occurred or is likely to occur. This includes when a compliance-related complaint is made.

The Managing Director must address the breach as soon as possible after becoming aware of it.

All compliance breaches must be reported to the Managing Director, who will track them in Bilingual Care Worker Cooperative of Australia Limited's Compliance Register and report them to the Quality Care Advisory Body.

Where a non-compliance has resulted in the Commissioner issuing an undertaking/non-compliance notice, our dedicated compliance team initiates an internal investigation. This team consists of our Managing Director and Quality Care Advisory Body.

The steps taken to formulate an appropriate undertaking, including deciding what actions Bilingual Care proposes to take to remedy the relevant non-compliance will include:

- Conducting a thorough review of the non-compliance issue to determine the accuracy of the notice;
- Consulting relevant stakeholders – staff, consumers, contractors and any other parties;
- Identification of the underlying causes and whether it was a one off or systemic issue to be addressed;
- Identification of remedial actions and inclusion of these actions in the Continuous Improvement Register;
- Assigning the remedial actions to specific team members, including setting a date for

completion.

A written undertaking including the steps we propose to take to rectify the non-compliance will be provided to the Commissioner within 14 days after receiving the notice; or if a shorter period is specified in the notice--that shorter period.

We understand this written undertaking must be in the form approved by the Commissioner, describe and acknowledge the non-compliance as identified through our investigation, set out the actions we propose to take and in what timeframe, and include a statement acknowledging that the Commissioner may decide to impose, under section 63N, one or more sanctions on Bilingual Care if we do not comply with the undertaking.

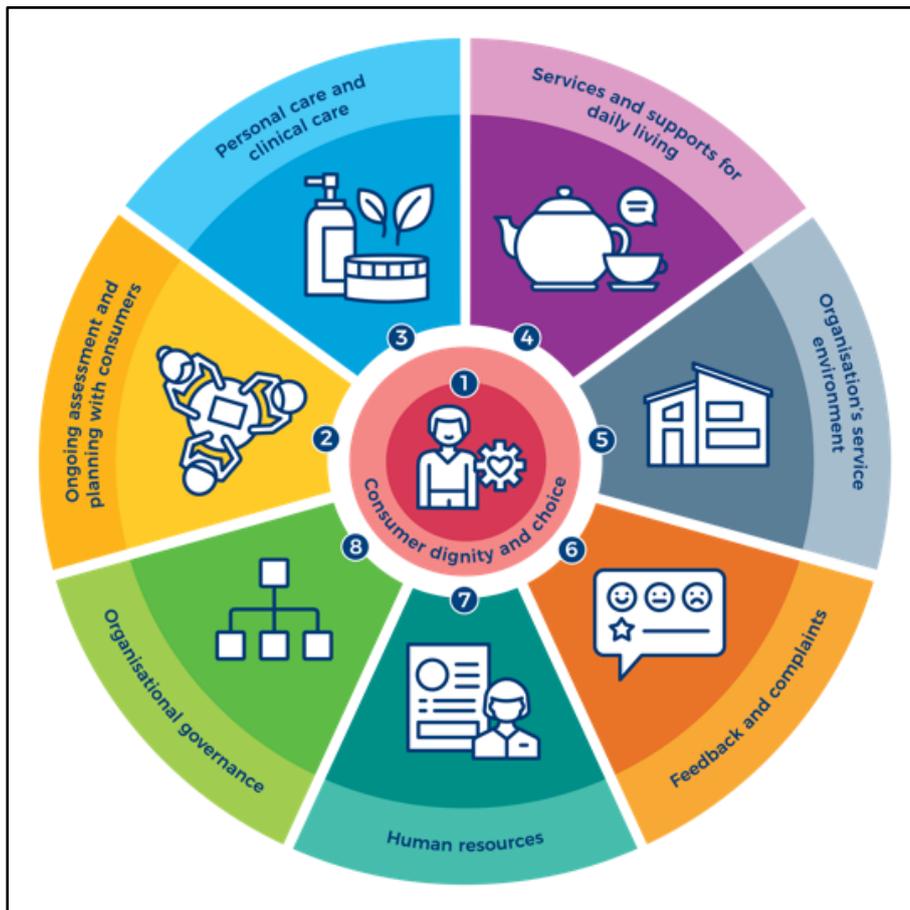
9. Specific Aged Care Compliance Requirements

Bilingual Care Worker Cooperative of Australia Limited will comply with all data collection, service delivery and financial reporting requirements of all relevant states of operation and Commonwealth government agencies.

10. Aged Care Approved Provider Compliance

As a Commonwealth Registered Home Care Provider, Bilingual Care Worker Cooperative of Australia Limited must comply with all of the relevant legislation and standards including but not limited to the Aged Care 1997 (Cth) and the Aged Care Quality Standards 2018.

Each of the Aged Care Quality Standards (8 in total) are depicted below.



Source: *Guidance and Resources for Providers to support the Aged Care Quality Standards 2018 (Cth)*

Bilingual Care Worker Cooperative of Australia Limited will assess its own compliance annually/bi-annually in addition to the formal triennial self-assessment (Quality Review) against the Aged Care Quality Standards conducted by the Commission.

Bilingual Care Worker Cooperative of Australia Limited understands and will comply with any requirements imposed by the Department should the above triennial Quality Review result in a non-compliance (and/or subsequent Sanctions).

11. Complying with Entry and Search Powers of Authorised Officers

Government agencies, including the Commission, have powers to ensure organisations comply with their legislative requirements and also to respond in instances of non-compliance.

Bilingual Care's Managing Director is responsible for overseeing our regulatory compliance, will be the primary point of contact for any compliance requests from the Secretary and will maintain detailed records of requests and corrective actions undertaken to be completed.

Bilingual Care understands its responsibilities to allow access to an authorised officer for the purpose of monitoring compliance and investigating complaints, and to cooperate with and assist the officer in exercising their powers under the Act.

We also understand that the authorised officer may only enter our premises with our voluntary consent and that this consent can be withdrawn at any time and/or restricted to a specified time period.

The authorised officer must show Bilingual Care's staff their identity card before entering the premises, or as soon as is reasonably practicable after entering the premises. Staff are to verify these credentials before allowing any officers access to the premises. While credentials are being verified, or the officer is waiting to be received by the Managing Director, the officer may be shown to a meeting room.

When conducting a search, the authorised officer has the power to:

- examine or observe any activity conducted on the premises;
- inspect, examine, take measurements of or conduct tests on anything on the premises;
- take any still or moving image or any recording of the premises or anything on the premises;
- inspect any document on the premises;
- take extracts from, or make copies of, any such document;
- take onto the premises such equipment and materials as the officer requires for the purpose of exercising powers in relation to the premises;
- operate electronic equipment on the premises;
- use a disk, tape or other storage device that is on the premises and can be used with the electronic equipment or is associated with it;

Where information relevant to the purpose of the search is found, the authorised officer has the power to:

- operate electronic equipment on the premises to put the information in documentary form and remove the documents so produced from the premises;
- operate electronic equipment on the premises to transfer the information to a disk, tape or other storage device that is brought to the premises for the exercise of the power; or is on the premises and the use of which for that purpose has been agreed in writing by the occupier of the premises;
- remove the disk, tape or other storage device from the premises.

The induction process for all staff will inform of Bilingual Care's compliance to the Aged Care Act 1997 and the Aged Care Quality and Safety Commission Act 2018, with a detailed overview of the provisions related to the rights of Authorised Officers.

Management will engage with, respect and comply with authorised officers' requests to enter and/or search our premises in relation to documents or applications and/or grants made by us, Quality Reviews and complaints.

We will accept authorised officers at our main office and the Managing Director will facilitate the prompt provision of information as requested, and requests for copies of documents as deemed necessary by the authorised officer.

If the Managing Director is not on site at the time, staff will be requested to notify him/her so that he/she may attend the office promptly and provide support to comply. In this case, the Clinical Advisor may also accept the authorised officers.

Management and staff will not be prevented from answering any questions put to them by authorised officers.

12. Applicable Aged Care Quality Standards

Standard 8 - Organisational Governance

Business Continuity & Disaster Recovery Policy

1. Policy statement

This policy allows for the Prevention, Preparedness, Response and Recovery from incidents that cause disruption to our services.

2. Workforce Planning

Bilingual Care Worker Cooperative of Australia Limited will employ sufficient staff with appropriate flexibility so that direct client services are able to be carried out in the event of support worker absence.

Rostering will be undertaken so as to balance the needs and preferences of clients with the need to avoid dependency and over-reliance on a particular staff member. This will promote an expectation, that while service delivery will be consistent, regular, and according to the Home Care Agreement, some staff changes may be necessary in the event of staff illness or absence.

By varying rosters and implementing shadow-shifting for new workers, the workforce will be resilient and flexible and able to step in when the need arises.

In all of our locations, we have more than one worker in place to address any absences at that level.

3. Case Notes

All staff are to use EziHealth to keep up to date case notes and tasks/action lists, to allow Care/Support Workers to continue to delivering services to clients.

4. Data Back-Ups

All data is electronically stored on our password protected, cloud-based servers, which are backed-up daily. Should our service be interrupted by adverse events such as natural disasters, technological outage, or data breach, this enables us to resume service delivery and key communications within 1 – 2 hours of any disaster impacting our primary facilities and systems.

5. Disaster recovery

Bilingual Care Worker Cooperative of Australia Limited maintains, at its own expense, insurance to replace all hardware and software in the event of destruction or theft.

The IT Department shall provide the backup for re-installation on new hardware in the event of a disaster. All electronic documentation is kept in a server offsite in Australia to ensure recovery is possible easily.

6. Continuity of Supports

Bilingual Care Worker Cooperative of Australia Limited is committed to providing support to clients without interruption throughout the period of their Home Care Agreement.

We conduct reviews of Care Plans and ensure continuity of care through identification of any change in the client's needs. In the event a client's needs are no longer best supported by Bilingual Care Worker Cooperative of Australia Limited, a Referral Database is maintained, and clients supported through transition, as required.

Our Exit and Transition policies outline how staff are to work collaboratively with all stakeholders involved in a client's service transition and how this will be documented in their Exit Plan.

Bilingual Care Worker Cooperative of Australia Limited also ensures continuity of care to clients by complying with its Risk Management Model and Practices, as outlined in the Risk Management Policy. Risk management plans are developed and reviewed annually, and any identified risks are followed up by the Care Manager.

We maintain an Incident Register (for both client incidents and the recording of organisational level incidents) that informs our continuous improvement processes, ensuring we are able to develop alternative plans and service delivery methods for clients.

Conflict of Interest Policy

1. What is a conflict of interest?

A conflict of interest occurs when the private interests of an officer or employee of Bilingual Care Worker Cooperative of Australia Limited interfere, or appear to interfere, with the performance of their official duties. Such a conflict can arise from avoiding personal losses as well as gaining personal advantage – whether financial or otherwise.

While conflicts of interest should be avoided wherever possible, conflicts often happen without anybody being at fault. Conflicts of interest can, if not identified, disclosed and managed effectively create a catalyst for misconduct. Conflicts of interest cannot always be avoided or prohibited and as such unavoidable conflicts of interest need to be disclosed, identified and effectively managed.

2. Types of conflict of interest

Private Interests

An interest in this context means anything that can have an impact on an individual or group. The term includes not only the personal, professional or business interests that each of us have but also personal, professional or business interests of the individuals or groups we associate with. This might include relatives, friends or even rivals and enemies.

Pecuniary Interests

Also known as material personal interest and involves an actual or potential financial gain or loss. Money does not need to change hands for an interest to be pecuniary. People have a pecuniary interest if they receive concessions, discounts, gifts or hospitality from a particular source.

Non-Pecuniary Interests

Do not have a financial component. They may arise from personal or family relationships, or involvement in sporting or social or cultural activities. They include any tendency towards favour or prejudice resulting from friendship, animosity, or other personal involvement with another group or person.

3. Managing conflicts of interest generally

Registered Aged Care Providers are required to have policies about potential conflicts of interest in service delivery.

Bilingual Care Worker Cooperative of Australia Limited and its team members will ensure that when providing supports to clients, any conflict of interest is declared and any risks to clients are mitigated.

All employees will act in the best interests of clients, ensuring they are informed, empowered and able to maximise choice and control. Staff members will not (by act or omission) constrain, influence or direct decision-making by a client and/or their family so as to limit that person's access to information, opportunities, and choice and control.

Employees will ensure that Bilingual Care Worker Cooperative of Australia Limited proactively manages perceived and actual conflicts of interest in service delivery. Employees will:

- Manage, document and report on individual conflicts as they arise, and
- Ensure that advice to a client about support options (including those not delivered directly by Bilingual Care Worker Cooperative of Australia Limited) is transparent and promotes choice and control.

4. Purpose

To protect Bilingual Care Worker Cooperative of Australia Limited interests in impartial and objective decision making and the reputation of Bilingual Care Worker Cooperative of Australia Limited by maintaining ethical standards of good judgement, fairness, and integrity in all its dealings. To ensure that in dealing with both internal and external persons, entities, company employees observe the highest standards of ethics and avoid any activity or interest that might reflect unfavourably on their own integrity and good name, or on the good name of Bilingual Care Worker Cooperative of Australia Limited.

5. Scope

All employees of Bilingual Care Worker Cooperative of Australia Limited.

6. Policy

It is Bilingual Care Worker Cooperative of Australia Limited policy that management and employees must:

- Avoid positions of conflict or potential conflict; therefore, all Bilingual Care Worker Cooperative of Australia Limited management and employees must avoid placing themselves in a situation that could be or may lead to a conflict of interest or duty, or a reasonable perception of an actual or potential conflict of interest or duty.
- Disclose any material personal interest.
- Any declared conflicts are to be reviewed at 6 monthly intervals to determine any ongoing concerns or further steps to be taken to prevent the conflict.

All Bilingual Care Worker Cooperative of Australia Limited management and employees must fully and frankly disclose any material personal interests related to the affairs of Bilingual Care Worker Cooperative of Australia Limited or external business interests that may lead to an actual or potential conflict of interest or duty, or a reasonable perception of an actual or potential conflict of interest or duty.

7. Procedure

All employees of Bilingual Care Worker Cooperative of Australia Limited are to be trained in the conflict of interest policy.

All employees of Bilingual Care Worker Cooperative of Australia Limited are to declare any actual, perceived or potential conflict/s of interest to the Managing Director or Human Resources Department.

If an employee of Bilingual Care Worker Cooperative of Australia Limited is aware or becomes aware of a potential conflict of interest of another employee a report is to be submitted outlining the potential conflict of interest.

If an employee has an actual, potential or perceived conflict of interest they are required to:

- Restrict the extent that the private interest could compromise or be seen to compromise their impartiality when carrying out their duties.
- Abstain from involvement in official decisions and actions which could be compromised by their private interests and affiliations.
- Not use their position or company resources for private gain.

8. Managing conflicts of interest

- Where possible, any conflicted team member will not be involved in the recommendation of or delivery of services.
- Bilingual Care Worker Cooperative of Australia Limited' risk register and/or conflict of interest register will note the ongoing actual or potential conflict of interest and a schedule for revisiting the conflict to determine any ongoing concerns or further steps to be taken to prevent the conflict.
- Clients will be presented with a range of choices about providers of supports and not only Bilingual Care Worker Cooperative of Australia Limited and staff will not seek to influence the client to select Bilingual Care Worker Cooperative of Australia Limited.
- Notes will be made Ezihealth confirming the advice given to the client.

9. Applicable Aged Care Quality Standards

- Standard 7 - Human Resources
- Standard 8 - Organisational Governance

Records and Information Management Policy

1. Policy

The policy outlines the how Care/Support Workers (and all staff) will treat the private and confidential information gathered during service provision. This policy will also ensure that:

- An accurate record is kept of the services provided by Bilingual Care Worker Cooperative of Australia Limited for each client.
- The integrity of information is maintained in clinical and billing records.
- We appropriate mechanisms in place, by which client information is documented, maintained, protected, utilised, and transferred.

Bilingual Care Worker Cooperative of Australia Limited is committed to collecting, keeping and disposing of client records in ways that protect privacy and ensure confidentiality is maintained. This policy will operate in conjunction with the organisation's *Privacy and Confidentiality Policy*.

Bilingual Care Worker Cooperative of Australia Limited conforms to the *Privacy Act (1988)*, (amended by the *Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cwlth)*), and the *Australian Privacy Principles* which govern the collection, use and storage of personal information.

Specifically, Bilingual Care Worker Cooperative of Australia Limited will:

- collect and keep information about clients only when it is relevant and necessary to the provision of the service
- ensure data about each client is up to date, accurate and secure, whether stored in hard copy or electronically, in accordance with privacy legislation
- take account of any relevant cultural or religious sensitivities of people using services in the way information about them is collected, stored and used
- store clients' records for the required length of time
- transfer or dispose of clients' records correctly
- give clients an option to remain anonymous or use a pseudonym unless an exemption under the *Privacy Act* applies
- provide information to clients about how their personal information is managed

When the organisation collects, keeps and uses identifiable data about a client, the following procedures will be implemented to guarantee the privacy of the client, and ensure that records are appropriate, accurate and secure.

2. Definitions

Information - knowledge that is communicated or received. It is the result of processing, gathering, manipulating and organising data in a way that adds to the knowledge of the receiver.

Information management – a system for creating, collecting, organising, storing, retrieving and distributing information. This information may be in any format and available from internal or external sources.

Record – information that is information in any form (including data in a computer system) and that is required to be kept as evidence of the activities or operations of a business.

Records management – a system for creating, receiving, maintaining, using and disposing of records. This includes processes for capturing and maintaining evidence of business activities and transactions.

3. Collecting Identifiable Data

The organisation collects and records information for the purpose of:

- service monitoring, evaluation and reporting
- meeting the reporting requirements of the aged care quality and safety standards
- monitoring and management of service to individuals
- meeting the legal requirements in accordance with the aged care quality and safety standards

When information is being sought from clients, the staff member seeking the information will request the person's consent via the *Client Consent Form* to provide the information and inform them of:

- the reason for requesting the information
- how the information will be recorded and stored
- what other information will be recorded during the provision of service
- how their privacy will be protected
- their rights to view or access information about them

The staff member will ask the client if they have any concerns or specific requests about the way their personal information will be recorded or managed. If identifiable information about a client will be shared with another agency, the staff member will obtain the client's consent for this and record the date of the verbal consent/obtain the client's signature on the *Client Consent Form*.

4. Retaining Client Information

We will only store personal information for as long as the information is required to support the reason it was collected, or to ensure compliance with legislative requirements (e.g. minimum retention requirements under Industrial Relations and Taxation legislation).

Consumer records are required to be held for a minimum of 3 years after the 30 June of the year in which the record was made (as per Part 6.3 of the Aged Care Act), and medical records held for 7 years.

When information is no longer required, it will be destroyed in a safe and confidential manner (whether in digital, paper or another format).

5. Outsourcing

Bilingual Care Worker Cooperative of Australia Limited may use external contracting agencies to provide services such as recruitment, health and medical, training, superannuation, human resource management services and IT support. All external contracting agencies are required to fully comply with Bilingual Care Worker Cooperative of Australia Limited's privacy policies in relation to use, access, disclosure, copying, retention, ownership and disposal of records and files.

6. Storage and Use of Identifiable Data

Information collected about individual clients is stored in the following ways:

- All client information is stored securely in Ezihealth and only staff delivering services to each client will have access to those files.
- Clients may request access to their files by contacting the Bilingual Care Worker Cooperative of Australia Limited office. Access by a client to their file requires the authorisation of the Managing Director and will be arranged by the client's Care Manager once approved. A request for access by a client must be considered and dealt with within 10 business days.

7. Electronic Records

Bilingual Care Worker Cooperative of Australia Limited's electronic records are stored securely in the following information management systems:

- Intuit Quickbooks for financial management;
- Microsoft Excel and Ezihealth for client record keeping; and
- Microsoft Office and Dropbox for business-related records, including emails.

Staff must use individual usernames, passwords and two-factor authentication to access these systems. The systems have back up and disaster management arrangements in place that are managed by the respective system suppliers.

All Bilingual Care Worker Cooperative of Australia Limited computers have password protection.

Business records must not be stored in email folders, shared folders, personal drives or external storage devices such as USBs, as they are not secure.

Where an email is considered a Bilingual Care Worker Cooperative of Australia Limited record, it must be captured in the relevant information management system as soon as possible.

Records created when using social media applications or mobile devices may also need to be captured in the relevant information management system.

Backups

Electronic forms, templates, documents and emails will be backed up by the Managing Director before leaving Bilingual Care Worker Cooperative of Australia Limited's office in order to ensure safety and security. Bilingual Care Worker Cooperative of Australia Limited

will then implement frequent testing to this server to ensure no data has been lost.

Anti-Virus Protection

Bilingual Care Worker Cooperative of Australia Limited will implement and install an anti-virus protection program. This is to ensure that all electronic data is secured and to eliminate the risk of things such as, data loss and hacking or theft.

8. Hard Copy Records

All hard copy records that contain private and confidential information about clients, staff or Bilingual Care Worker Cooperative of Australia Limited must be stored in a locked filing cabinet. Filing cabinet keys are stored in a lockable box and are available to authorised staff when they need to access files. Access to these keys is managed by the Managing Director or Care Manager using a Key Register.

Filing cabinets should be kept in secure, lockable areas with access limited to authorised staff only. The cabinets should be regularly maintained and cleaned and protected from pests, water, damp and mould. They should be stored away from direct sunlight, heat and risk of fire.

Where it is necessary to remove private and confidential records from Bilingual Care Worker Cooperative of Australia Limited's premises, they must be stored securely in a non-transparent container (for example, a locked briefcase).

9. Maintaining and Verifying Client Records

Clinical Records

- A confidential clinical record containing pertinent past and current findings in accordance with accepted professional standards is maintained for every client receiving care services.
- An accurate and complete client record shall be maintained for each client receiving services and shall include, but not be limited to:
 - Client identifying information
 - Identification of any client representative
 - Identification of client's medical practitioner
 - Medical orders, if appropriate
 - Rehabilitation plans, if appropriate
 - Advance care directives - if any
 - Admitting information, including client history
 - Information on the composition of the client's household, including individuals to be instructed in assisting the client and client's representative
 - An initial assessment of client's needs to develop a *Care Plan* for services
 - The Care Plan
 - Medications administered or taken
 - History of sensitivities or allergic reactions

- Nutritional requirements including specific dietary plans
- Medically necessary supplies and equipment
- Documentation of client rights review
- Clear, consistent and systematic reports of care provided
- A discharge or termination of service summary, when appropriate
- Signed and dated care notes provided by everyone delivering service shall be written on the day service is delivered and incorporated in the client record within seven (7) working days.
- Clinical records shall be organised and filed in a uniform fashion.

The client's Care Manager is responsible for reviewing and updating client records on a 6-monthly basis.

A file will be created for each client or client's family by the Care Manager and used to record:

- Personal care needs
- Who is responsible for undertaking duties
- Review timelines
- Client goals and how to assist the client to achieve their chosen goals.

10. Home Care Services Procedures

All client information forward to Care/Support Workers for the purposes of service delivery is sent via Ezihealth or secure email. All email addresses are stored on the Bilingual Care Worker Cooperative of Australia Limited secure server and are password protected. The email addresses are issued to staff during the Orientation process.

All field staff (Care/Support Workers & Nurses) are required to securely destroy any client information, including, but not limited to, emails, task lists and rosters obtained from Bilingual Care Worker Cooperative of Australia Limited.

Destruction of documents containing this information can occur in one of two ways:

- a. By paper shredder in the staff member's home; or
- b. By returning the documents to the Services team who will dispose of in a secure bin.

All field staff are advised of this procedure during their induction process and sign an *Induction Acknowledgment* stating that they will use one of the two methods mentioned above to dispose of any documentation containing client information.

11. File Management

The client's Care Manager is responsible for managing the filing of client records, maintaining the register of client records and managing the archiving and disposal of client records.

A register of client records will be kept on the electronic software archive. The register will cover all electronic files and computer data systems where information about client is stored. For each type of record, the register will document:

- the type of information recorded

- where the records or data are stored
- who is responsible for entering and maintaining the record
- what security measures are in place
- when and how the information is updated
- how this particular set of records are disposed of (frequency or time period and method)

Any non-authorised personnel must not action any of the following, unless they have been granted access to do so:

- Produce any photocopies of client's confidential documents.
- Transfer any financial or classified electronic statistics to another computer via disk, USB or any other device that allows transformation between different electronic devices.
- Communicate any confidential information between any unauthorized personnel within Bilingual Care Worker Cooperative of Australia Limited.

12. Record of Disposal

Client records are kept and archived electronically from the last point of service provision and records of clients who have left the service are archived immediately.

Following permanent departure from our service, all hard copy client information is kept for a period of 3 years after 30 June of the year in which they left our service, with any medical records kept for 7 years. Any archived files will be placed in a separate location. A lockable filing cabinet will be utilised by Bilingual Care Worker Cooperative of Australia Limited, and only the Managing Director and nominated key personnel will be the key holders.

Where there have been any incidents, disputes or litigation related to a client, and therefore a need to retain a file beyond 3 years, this information is retained on the off-site server and only accessible by the Managing Director or Clinical Advisor until such time as the Board/Governing Body confirms the case is fully closed and the files will no longer be required for future reference. Archiving and destruction is then carried out under the 'do we still need it' principle or is it 'reasonably necessary' to keep these records test.

The *Client File Archive Register* records instances of archiving and destruction date.

13. Supporting Documents

Relevant documents relating to this Policy and Procedure:

- Privacy and Confidentiality Policy and Procedure
- Archive Register
- Audit, Internal Assessment and Review Policy and Procedure
- Audit, Internal Assessment and Review Schedule
- Corporate Governance Policy and Procedure
- Human Resources Policy and Procedure
- Key Register
- Client Consent Form

14. Applicable Aged Care Quality Standards

- Standard 1 - Consumer Dignity and Choice
- Standard 2 - Ongoing Assessment and Planning with Consumers
- Standard 6 - Feedback and Complaints
- Standard 7 - Human Resources
- Standard 8 - Organisational Governance

Privacy and Confidentiality Policy

1. Policy and Procedure

Bilingual Care Worker Cooperative of Australia Limited is committed to protecting and upholding the right to privacy of clients, staff, volunteers, Governing body members and representative of agencies we deal with. In particular Bilingual Care Worker Cooperative of Australia Limited is committed to protecting and upholding the rights of our clients to privacy in the way we collect, store and use information about them, their needs and the services we provide to them.

Bilingual Care Worker Cooperative of Australia Limited requires staff and Governing body members to be consistent and careful in the way they manage what is written and said about individuals and how they decide who can see or hear this information.

Bilingual Care Worker Cooperative of Australia Limited is subject to the *Aged Care Act 1997 (Cth)*, *Schedule 2 User Rights Principles 2014* and will follow the guidelines of the *Australian Privacy Principles* in its information management practices. This policy will operate in conjunction with the organisation's *Records and Information Management Policy*.

Bilingual Care Worker Cooperative of Australia Limited will ensure that:

- it meets legal and ethical obligations as an employer and service provider in relation to protecting the privacy of clients and organisational personnel
- clients are provided with information about their rights regarding privacy
- clients and organisational personnel are provided with privacy when they are being interviewed or discussing matters of a personal or sensitive nature
- all staff and Governing body members understand what is required in meeting these obligations.

This policy conforms to the *Privacy Act (1988)* (amended by the *Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cwlth)*), and the *Australian Privacy Principles* which govern the collection, use and storage of personal information.

This policy will apply to all records, whether hard copy or electronic, containing personal information about individuals, and to interviews or discussions of a sensitive, personal nature.

2. Definitions

Privacy Act 1988 (Cth) - regulates how personal information about individuals is handled. The Act includes thirteen Australian Privacy Principles (APPs). The APPs set out standards, rights and obligations for the handling, holding, use, accessing and correction of personal information. The Act protects the privacy of an individual's information where it relates to Commonwealth agencies and private businesses (including not-for-profit organisations) with a turnover of more than \$3 million. All organisations that provide a health service and hold health information (other than in a staff record) are covered by the Act.

Health Information – personal information or an opinion about:

- the health, including an illness, disability or injury, (at any time) of an individual;
- an individual's expressed wishes about the future provision of health services to the

individual; or

- a health service provided, or to be provided, to an individual;

that is also:

- Personal Information;
- Other Personal Information collected to provide, or in providing, a health service to an individual;
- Other Personal Information collected in connection with the donation, or intended donation, by an individual of his or her body parts, organs or body substances; or
- genetic information about an individual in a form that is, or could be, predictive of the health of the individual or a genetic relative of the individual.

Personal Information – information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

Sensitive Information – personal information or an opinion about an individual's:

- racial or ethnic origin;
- political opinions;
- membership of a political association;
- religious beliefs or affiliations;
- philosophical beliefs;
- membership of a professional or trade association;
- membership of a trade union;
- sexual orientation or practices;
- criminal record;

that is also:

- Personal Information;
- Health Information about an individual;
- genetic information about an individual that is not otherwise health information;
- biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
- biometric templates.

Protected Information – information:

- about a person that is or was held in the records of the Agency; or
- to the effect that there is no information about a person held in the records of the Agency.

Privacy and Personal Information Protection Act 1998 (NSW) – regulates how personal information is handled by NSW public sector agencies including government agencies, local councils, State Owned Corporations and universities.

Personal Information - information or an opinion (including information or an opinion forming part of a database and whether or not recorded in a material form) about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion. It includes such things as an individual's fingerprints, retina prints, body samples or genetic characteristics. It does not include any of the following:

- information about an individual who has been dead for more than 30 years;
- information about an individual that is contained in a publicly available publication;
- information about a witness who is included in a witness protection program under the Witness Protection Act 1995 or who is subject to other witness protection arrangements made under an Act;
- information about an individual arising out of a warrant issued under the Telecommunications (Interception) Act 1979 of the Commonwealth;
- information about an individual that is contained in a public interest disclosure within the meaning of the Public Interest Disclosures Act 1994, or that has been collected in the course of an investigation arising out of a public interest disclosure;
- information about an individual arising out of, or in connection with, an authorised operation within the meaning of the Law Enforcement (Controlled Operations) Act 1997;
- information about an individual arising out of a Royal Commission or Special Commission of Inquiry;
- information about an individual arising out of a complaint made under Part 8A of the Police Act 1990;
- information about an individual that is contained in Cabinet information or Executive Council information under the Government Information (Public Access) Act 2009;
- information or an opinion about an individual's suitability for appointment or employment as a public sector official;
- information about an individual that is obtained about an individual under Chapter 8 (Adoption information) of the Adoption Act 2000;
- information about an individual that is of a class, or is contained in a document of a class, prescribed by the regulations.

Health Records and Information Privacy Act 2002 (NSW) – regulates how health information is handled by NSW public sector agencies, public sector health organisations, private sector organisations, health service providers and businesses with a turnover of more than \$3 million which hold health information.

Health information –

- personal information that is information or an opinion about:
- the physical or mental health or a disability (at any time) of an individual;
- an individual's express wishes about the future provision of health services to him or her;
- a health service provided, or to be provided, to an individual; or
- other personal information collected to provide, or in providing, a health service;
- other personal information about an individual collected in connection with the donation,

- or intended donation, of an individual's body parts, organs or body substances;
- other personal information that is genetic information about an individual arising from a health service provided to the individual in a form that is or could be predictive of the health (at any time) of the individual or of a genetic relative of the individual; or
- healthcare identifiers.

Private sector service providers in NSW must comply with the **Privacy Act 1988 (Cth)** and **Health Records and Information Privacy Act 2002 (NSW)** or **Health Records Act 2001(VIC)** when handling health information.

The **NSW Information and Privacy Commission** administers the HRIP Act and accepts complaints about health information.

3. Dealing with Personal Information

Information collected from a client may fit within two categories:

- a. Personal, safety, health and medical information; and
- b. Income information to determine if the client is experiencing personal financial hardship or will be subject to income testing (Home Care Packages only).

Personal information may include:

- name
- date of birth
- gender
- current and previous addresses
- residency status
- telephone numbers and e-mail addresses
- financial information
- bank account details
- tax file number
- driver's licence number
- Centrelink and My Aged Care information
- Photographs or videos
- race or ethnicity
- religion
- Care plan or progress notes
- medical history or information provided by a health service.

Personal, safety, health and medical information is collected directly from the client, his/her relatives, other authorised people or services (e.g. Power of Attorney, General Practitioner, Aged Care Assessment Service, Hospitals) and through observations and assessments. This information is used to:

- assess and provide services
- administer and manage those services

- evaluate and improve those services
- ensure client safety
- contact family, carers, or other third parties if required
- meet our obligations under relevant legislation and aged care funding arrangements.

Information about the client's representatives and other contact persons is collected to:

- enable sharing of information, as authorised by the client
- register the person as a contact in case of emergency
- enable regular/ongoing communications (if requested by the client).

In dealing with personal information, Bilingual Care Worker Cooperative of Australia Limited staff will:

- inform the client of what information is being collected, the purpose for collection, who will have access to the information, their rights to seek access to, and/or correct the information, and the right to make a complaint or appeal decisions about the handling of their information
- ensure privacy for clients, staff and governing body members when they are being interviewed or discussing matters of a personal or sensitive nature
- only collect and store personal information that is necessary for the functioning of the organisation and its activities
- use fair and lawful ways to collect personal information
- ensure that people know what sort of personal information is held, what purpose it is held for and how it is collected, used, disclosed and who will have access
- ensure that personal information collected or disclosed is accurate, complete and up-to-date, and provide access to any individual to review information or correct wrong information about themselves
- take responsible steps to protect all personal information from misuse and loss and from unauthorised access, modification or disclosure
- destroy or permanently de-identify personal information no longer needed and/or after legal requirements for retaining documents have expired

4. Responsibilities for Managing Privacy

- All staff are responsible for the management of personal information to which they have access, and in the conduct of research, consultation or advocacy work.
- The Managing Director is responsible for content in Bilingual Care Worker Cooperative of Australia Limited publications, communications and web site and must ensure the following:
 - appropriate consent is obtained for the inclusion of any personal information about any individual, including Bilingual Care Worker Cooperative of Australia Limited personnel
 - information being provided by other agencies or external individuals conforms to privacy principles

- that the website contains a Privacy statement that makes clear the conditions of any collection of personal information from the public through their visit to the website
- The HR Manager/Privacy Officer is responsible for safeguarding personal information relating to Bilingual Care Worker Cooperative of Australia Limited staff and Governing body members, volunteers, contractors, and Bilingual Care Worker Cooperative of Australia Limited members
- The HR Manager/Privacy Officer will be responsible for:
 - ensuring that all staff are familiar with the Privacy Policy and administrative procedures for handling personal information
 - ensuring that clients and other relevant individuals are provided with information about their rights regarding privacy
 - handling any queries or complaints about a privacy issue

5. Privacy Information for Clients

At the initial assessment clients will be told what information is being collected, how their privacy will be protected and their rights in relation to this information. The information will be outlined in their Home Care Agreement and also in the Client Information Handbook.

The *Privacy and Confidentiality Brochure* and *Client Consent Form* is to be provided to clients at the time of commencing services with Bilingual Care Worker Cooperative of Australia Limited. This form is to be:

- signed and placed in the client's file; and
- held securely with access limited to staff members in the performance of their role.

Clients, their families and carers will be encouraged to provide feedback on Bilingual Care Worker Cooperative of Australia Limited's privacy practices in our quarterly Client Satisfaction Survey.

6. Updating Participant Information

To ensure that client information is accurate, complete, current, relevant and not misleading, Bilingual Care Worker Cooperative of Australia Limited checks personal details and updates participant files accordingly:

- whenever reviewing a client's service; and / or
- upon being informed of changes or inaccuracies by clients or other stakeholders

There will be no charge for any correction of personal information.

Where Bilingual Care Worker Cooperative of Australia Limited has previously disclosed client personal information to other parties, should the client request us to notify these parties of any change to their details, we must take reasonable steps to do so.

7. Collection and Storage of Personal Information

Bilingual Care Worker Cooperative of Australia Limited collects information:

- directly from clients orally or in writing
- from third parties, such as medical practitioners, government agencies, client

representatives, carer/s, and other health service providers

- from client referrals; and
- from publicly available sources of information.

Bilingual Care Worker Cooperative of Australia Limited will collect sensitive information:

- only with client consent, unless an exemption applies (e.g. the collection is required by law, court/tribunal order or is necessary to prevent or lessen a serious and imminent threat to life or health)
- fairly, lawfully, and non-intrusively
- directly from the client, if doing so is reasonable and practicable
- only where deemed necessary to support

Bilingual Care Worker Cooperative of Australia Limited takes all reasonable steps to protect personal information against loss, interference, misuse, unauthorised access, modification, or disclosure. Bilingual Care Worker Cooperative of Australia Limited will destroy, or permanently de-identify personal information that is:

- no longer needed
- unsolicited and could not have been obtained directly
- not required to be retained by, or under, an Australian law or a court/tribunal order.

Bilingual Care Worker Cooperative of Australia Limited has appropriate security measures in place to protect stored electronic and hard-copy materials, including secure filing systems in locked cabinets, with access restricted to appropriate staff and password protected electronic records systems.

Bilingual Care Worker Cooperative of Australia Limited has an archiving process for client files which ensures files are securely and confidentially stored and destroyed in due course (see *Records and Information Management Policy*).

Should a breach in privacy occur, potentially exposing client information (e.g. computer system hacked, laptop stolen etc.) the Managing Director will immediately act to rectify the breach in accordance with organisational policy and processes (see *Breaches of Privacy and Response Plan*, below).

8. Photos and Videos

Photos, videos and other recordings are a form of personal information. Staff must respect people's choices about being photographed or videoed and ensure images of people are used appropriately. This includes being aware of cultural sensitivities and the need for some images to be treated with special care.

9. Disclosing Information

Bilingual Care Worker Cooperative of Australia Limited respects the right to privacy and confidentiality, and will not disclose personal information except:

- where disclosure would protect the client and / or others
- where necessary for best service practice

- where obligated by law.

For these purposes, Bilingual Care Worker Cooperative of Australia Limited may disclose clients' personal information to other people, organisations or service providers, including:

- medical and allied health service providers who assist with the services we provide to clients
- a 'person responsible' if the client is unable to give or communicate consent (e.g. next of kin, carer, or guardian)
- the client's authorised representative/s (e.g. legal adviser)
- our professional advisers (e.g. lawyers, accountants, auditors)
- government and regulatory authorities (e.g. Centrelink, My Aged Care, government departments, and the Australian Taxation Office)
- organisations undertaking research where information is relevant to public health or public safety
- when required or authorised by law.

10. International Disclosure

Under the Privacy Act 1988, before Bilingual Care Worker Cooperative of Australia Limited discloses personal information to an overseas recipient, it must take reasonable steps to ensure the overseas recipient does not breach the Principle 8 of the Australian Privacy Principles (APPs).

The Managing Director is responsible for undertaking these investigations.

This requirement does not apply if:

- the overseas recipient is subject to a law or binding scheme that has the effect of protecting the information in a way that is substantially similar to protection given under the APPs, and
- there are mechanisms available to enforce that protection.

11. Accessing Personal Information

Clients can request and be granted access to their personal information, subject to exceptions allowed by law. Access to health information can be arranged and are guided by the relevant Health Privacy Principles and Acts in each state.

Requests to access personal information must state:

- the information to be accessed
- the preferred means of accessing the information,
- and should be forwarded to the Managing Director either verbally, or in writing.

The Managing Director will assess the request to access information, taking into consideration current issues that may exist with the client, and whether these issues relate to any lawful exceptions to granting access to personal information.

Should the Managing Director decide that access to personal information will be denied, they must, within 20 business days of receipt of the request, inform the client in writing of:

- the reasons for denying access and
- the mechanisms available to complain or appeal.

Should access be granted, the Managing Director will contact the client within 20 business days of receipt of the request to arrange access to their personal information.

Should Bilingual Care Worker Cooperative of Australia Limited be unable to provide the information in the means requested, the Managing Director will discuss with the client alternative means of accessing their personal information.

Reasonable charges and fees, incurred by Bilingual Care Worker Cooperative of Australia Limited in providing the data as requested, may be passed on to the client.

12. Complaints

Questions or concerns about Bilingual Care Worker Cooperative of Australia Limited's privacy practices should be brought, in the first instance, to the Managing Director's attention.

In investigating the complaint, Bilingual Care Worker Cooperative of Australia Limited may, where necessary, contact the client making the complaint to obtain more information.

The client will be advised either in writing, or in a face-to-face meeting, of the outcomes and actions arising from the investigation.

If concerns cannot be resolved and a client wishes to formally complain about how their personal information is managed, or if they believe Bilingual Care Worker Cooperative of Australia Limited has breached an APP and/or IPP, they may send their concerns in writing to:

Information and Privacy Commission NSW

Level 15, McKell Building,

2-24 Rawson Pl,

Haymarket NSW 2000

Telephone: 1800 472 679

Email: ipcinfo@ipc.nsw.gov.au

13. Breaches of Privacy and Response Plan

A data breach occurs when personal information about others is lost or subject to unauthorised access. A data breach may be caused by malicious action, human error or a failure in information management or security systems.

To prevent or address a data breach or breach of privacy, the following process are in place:

Establish the Data Breach Response Team

The Data Breach Response Team will include:

Privacy Officer: The Privacy Officer, designated as the Human Resources Manager, is responsible for overseeing the breach response, ensuring compliance with data protection regulations, coordinating with legal counsel, and assessing the potential impact on personal data.

Incident Response Coordinator (IRC): The Incident Response Coordinator, designated as the Clinical Advisor, is tasked with overall coordination of the data breach response process, acting as a liaison with senior management and legal counsel, and ensuring adherence to the response plan.

IT Security Adviser: The IT Security Adviser may be the internal IT Manager, external IT Consultant or the lead security personnel of the system which has experienced the breach. They take the lead in the technical aspects of data breach detection and response, coordinate with the team to isolate and contain breaches, and assist with investigations.

Public Relations/Communications: The Public Relations/Communications officer, designated as the Marketing Advisor, manages internal and external communications during data breaches, prepares public statements and communications with clients, and handles media inquiries.

Legal Counsel: The Legal Counsel (which may be internal or an external advisor), provides legal guidance throughout the data breach response process and ensures compliance with relevant laws and regulations.

Implement the Incident Response Plan

Bilingual Care Worker Cooperative of Australia Limited is responsible for creating a comprehensive data breach response plan, outlining roles, and responsibilities, as well as defining severity levels of data breaches and corresponding responses.

The plan will include the identification of all sensitive data handled by Bilingual Care Worker Cooperative of Australia Limited, such as personal health information, financial data, and personal identifiers. This plan will be followed in the event of a breach.

Implement Security Measures

Bilingual Care Worker Cooperative of Australia Limited ensures the implementation of robust security measures, including encryption, access controls, and regular security audits.

Data Breach Detection

Bilingual Care Worker Cooperative of Australia Limited implements intrusion detection systems and real-time monitoring to promptly identify potential breaches. Staff members are educated about recognising and reporting unusual activities or suspicious behaviour.

Any staff who identify a potential breach must immediately inform their line manager, who must report to the Managing Director for further action.

If a staff member is suspected to have breached privacy, a thorough investigation will be undertaken to determine the exact nature of the breach and a response made appropriate to the situation (e.g. serious disciplinary actions or termination or employment).

Further detail about the Notifiable Data Breaches (NDB) Scheme is contained in the [Data Breach Preparation and Response – A Guide to Managing Data Breaches in Accordance with the Privacy Act 1988 \(Cth\)](#), published by the Office of the Australian Information Commissioner (OAIC).

Data Breach Classification

The Incident Response Plan defines a classification system to assess the severity of data breaches based on the type and amount of compromised data.

Containment and Mitigation

In case of a detected breach, Bilingual Care Worker Cooperative of Australia Limited will isolate affected systems and networks to prevent further damage and address the vulnerability that led to the breach.

Notification Requirements

The Incident Response Plan ensures understanding and compliance with obligations under the Notifiable Data Breaches (NDB) scheme. It mandates the preparation of templates for breach notification letters and public statements.

Legal and Regulatory Compliance

Legal counsel is consulted to ensure compliance with Australian data protection laws, and potential legal and financial consequences of data breaches are understood.

Public Relations and Communication

A communication plan is created to address internal and external stakeholders, and coordination with public relations experts is outlined to manage the organisation's public image during and after a breach.

Data Breach Documentation

The Incident Response Plan mandates the maintenance of comprehensive records of data breaches, including timing, scope, containment efforts, and notifications sent.

Remediation and Prevention

A plan for remediating the effects of a breach and preventing future breaches is developed. Employee training programs on data security best practices are also implemented.

Reviews and Updates

Regular reviews and updates of the data breach response plan are conducted to incorporate lessons learned from previous incidents and changes in regulations.

Testing and Training

Regular tabletop exercises are conducted to test the effectiveness of the response plan. Employees are trained on their roles and responsibilities in case of a breach.

Reporting to Authorities

Bilingual Care Worker Cooperative of Australia Limited is required to disclose a data breach to the Office of Australian Information Commissioner if the data contains personal information that is likely to result in "serious harm", which includes any of the following: physical, psychological, financial or reputational harm. Personal information is information about an identified individual, or an individual who is reasonably identifiable.

Third-Party Relationships

The plan emphasises the importance of third-party service providers having robust data security measures and a breach response plan.

Insurance

Consideration of cyber insurance to mitigate the financial impact of a data breach is encouraged.

14. Supporting Documents

Relevant documents relating to this Policy and Procedure:

- Records and Information Management Policy
- Client Consent Form
- Continuous Improvement Register

Professional Ethics and Code of Conduct Policy

1. Policy

The purpose of this policy is to apply a code of professional ethics to the workplace which is consistent with the mission, values, and objectives of Bilingual Care Worker Cooperative of Australia Limited and with best practice in the industry. This policy is also created to clearly establish professional boundaries and identify client/Caregiver relationship parameters and is to be used in conjunction with the Code of Ethics and Conduct.

2. Risk

Two main forms of risks are associated with staff conduct: risks associated with staff as representatives of the organisation and the particular risks associated with working with people with disabilities.

As representatives of Bilingual Care Worker Cooperative of Australia Limited, staff conduct can influence public perception, the standing of the organisation within the community and the success of the organisation. Risk treatment begins with clear guidelines for staff conduct (this policy). This must be reinforced with a culture of procedural fairness in informal and formal discussions about conduct; a culture of no retribution for responsibly reporting suspected infringements of the code of conduct, and a culture that promotes a sense of mutual responsibility between the organisation and its staff.

As workers in the aged care sector, staff must be able to distinguish between appropriate and inappropriate care between themselves and clients and be able to express the client/Caregiver relationship appropriately. The guidance this policy provides should be reinforced with a culture of openness and support to assist workers discuss and manage relationships with clients.

3. Dealing with People

When dealing with one another, Governing body/Management Committee members, consumers and service users, external stakeholders and other agency representatives, staff members will be respectful, honest and courteous. Staff members will give accurate information and prompt attention and observe fairness and equity in their dealings with others.

Bilingual Care Worker Cooperative of Australia Limited will strive to create an environment where all persons are treated equitably and with respect and where people's rights are upheld. This involves individual and collective responsibilities to:

- respect the rights, privacy and confidentiality of clients, staff, office bearers, volunteers, students and agents;
- promote a positive public image of clients, and their families and carers;
- make decisions which are procedurally fair;
- have respect for the opinions of others and approach any differences in opinion in an open and non-judgmental manner.

Staff, volunteers and students should recognise that their obligation to respect the rights and privacy of all persons associated with Bilingual Care Worker Cooperative of Australia Limited continues after they cease employment with the organisation.

Respect for persons emphasises the obligation of office bearers, staff, volunteers and students to refrain from behaviour which is or may be construed as sexual-, racial- or gender-based harassment. They should never behave towards other persons in a manner which may reasonably be perceived as intimidating, overbearing or bullying.

All staff, volunteers and students must ensure that co-worker relationships are dignified and respectful at all times.

4. Personal relationships

A conflict of interest may occur when a staff member or volunteer participates in decisions affecting another person with whom they have a close or personal relationship. Situations where such a conflict may occur include, but are not limited to:

- the appointment, supervision or promotion of staff,
- decisions being made that are of a nature to directly benefit the other person the awarding of tenders, or
- other forms of financial assistance.

Bilingual Care Worker Cooperative of Australia Limited recognises the right of staff and volunteers to engage in personal or intimate relationships with people of their own choosing. However, relationships between office bearers, staff and volunteers should be professional at all times. Personal or intimate relationships should not intrude, or be seen to intrude, on the Bilingual Care Worker Cooperative of Australia Limited work environment or the workplace in general.

When a personal or intimate relationship creates a clear conflict, the staff member should withdraw from the situation. Where there is any possibility of a perceived conflict, the staff member should discuss the matter with a senior staff member or the Managing Director.

5. Alcohol and illicit drug consumption

During the usual day-to-day conduct of their duties, staff and volunteers *must never* consume alcohol or illicit substances and must be free from the influence of any substance prior to commencement of a shift. Any deviation from this practice will be viewed as a serious breach of conduct and will be addressed in accordance with our Human Resources policies and procedures.

Whilst alcohol consumption may be permissible, or may be available, at certain business functions, staff and volunteers should refrain from excessive consumption of alcohol whilst representing Bilingual Care Worker Cooperative of Australia Limited. Staff and volunteers are encouraged to use common sense to maintain Bilingual Care Worker Cooperative of Australia Limited' interests and professional image, as well as their own welfare.

6. Working with Clients

All Care/Support Workers must devote their time, attention, skills and effort exclusively to the performance of their duties and responsibilities while at work. Care/Support Workers must behave in a manner that does not adversely affect the security, the personal safety, welfare, or interests of our clients, fellow employees or members of the public. Care/Support Workers should also support the business goals and image of Bilingual Care Worker Cooperative of Australia Limited.

The following list of practices is provided to assist in this goal:

- You cannot visit a client's premises on your rostered time off
- You must not call or meet clients during days off
- If rostered for 24hr Live-In Care, you must only reside at the client's premises on your rostered shifts and must not ask a client or a client's family, friends or acquaintances for any living situation other than the scheduled Twenty-Four-Hour Live-In Periods
- You must not leave the client's premises without prior authorisation from Bilingual Care Worker Cooperative of Australia Limited, except where your safety is at imminent risk. In the event that you need to leave the client, the Bilingual Care Worker Cooperative of Australia Limited office must be notified immediately, and you must obtain approval from Bilingual Care Worker Cooperative of Australia Limited prior to leaving the client's premises - except in cases of emergency. In an emergency situation where you have to leave the premises urgently, you must contact the Bilingual Care Worker Cooperative of Australia Limited office to notify them as soon as possible after the event.
- You must not use the client's telephone for any personal purposes.
- You may accept food and drink items available at the client's premises as long as the client has offered and agreed to the same. Additionally, upon agreement with the client, you may purchase reasonable items to be consumed by both parties, but such items must be ones that are suited to the client's health condition and tastes. Likewise, when preparing a meal for the client, you may prepare a portion for yourself with the consent of the client. Any special dietary requirements or diet preferences you may have are your own responsibility and you should provide for them yourself, by bringing appropriate supplies with you.
- The client's safety is your priority at all times. If a health and safety incident occurs while you are on duty, you must report it to Bilingual Care Worker Cooperative of Australia Limited as soon as is safe to do so. You are also responsible for completing the official *Incident Report Form* and submitting it to Bilingual Care Worker Cooperative of Australia Limited within 24 hours.
- You must not accept any money from any client, family member or representative. No payments or gifts shall be accepted while representing Bilingual Care Worker Cooperative of Australia Limited or upon the conclusion of services rendered to any client. If the client would like to offer some form of gift, please refer them to the Bilingual Care Worker Cooperative of Australia Limited office.
- It is essential to maintain client confidentiality.

- Due to the confidentiality agreement between the client and Bilingual Care Worker Cooperative of Australia Limited, and due to the requirements of national Privacy legislation, you are not allowed to disclose information relating to the client to any third party without the written consent of the client. This includes, but is not limited to, the client's address, telephone number and any other private information that is provided to you, including health related information.
- Part of our confidentiality precautions require that, in the event that you receive transportation to and/or from work for a shift, the name(s) of the person providing your transportation should be documented and reported to Bilingual Care Worker Cooperative of Australia Limited office staff.
- Personal visitors of a Caregiver are not permitted at the Consumers premises.
- You understand and acknowledge that by accepting employment, you agree to exercise reasonable caution to protect the client's property and agree that anything you bring onto Bilingual Care Worker Cooperative of Australia Limited' or the client's property is subject to inspection without notification (e.g. purse, backpack, packages, briefcase, automobile, etc.)
- By accepting employment with Bilingual Care Worker Cooperative of Australia Limited, you expressly agree that you will do nothing to harm or injure a client. Care/Support Workers will avoid any actions that could be construed as unethical or "taking advantage" of the client or the client's circumstances.
- Each Caregiver is expressly prohibited from wearing, using or removing the client's personal property (i.e. automobile, telephone, desk, clothes, computer, laundry detergent) beyond what is necessary to render companionship services.
- If you become aware that another party is posing a risk to the client's welfare, you must report the information to the Bilingual Care Worker Cooperative of Australia Limited office.
- Care/Support Workers will follow all the practices and procedures of Bilingual Care Worker Cooperative of Australia Limited, and if any questions arise, you will make efforts to seek clarification by contacting the Bilingual Care Worker Cooperative of Australia Limited office.
- If you notice any suspicious activity or activity regarding violation of any of these client welfare provisions, you must report your concerns to Bilingual Care Worker Cooperative of Australia Limited management immediately, using the Bilingual Care Worker Cooperative of Australia Limited *Incident Report Form*.

When interacting or working with people using the services of Bilingual Care Worker Cooperative of Australia Limited, staff will:

- always treat consumers with respect, and be mindful of their rights to privacy and confidentiality
- always show respect for people's cultural or religious sensitivities or requirements, and ensure the responsiveness of the service to their particular needs and circumstances
- ensure that service users are provided with, and understand, all information relevant to

their situation, options available to them and conditions of use for the service

- ensure they have access to independent advocacy or support, if they require, in making any decisions (refer to *Advocacy Policy*).
- be aware of personal boundaries and never enter into a sexual relationship with a client

7. Standards in the Workplace

All staff members are required to:

- attend work in the times agreed with management, notify managers or supervisors and other stakeholders of their absences, report and account for all leave taken, record attendance and obtain approval before changing their work times
- comply with the requirements of their duty statements and agreed work plans, paying appropriate attention to quality and detail in their work
- provide accurate and honest information to managers or supervisors about work completed and challenges experienced in completing work
- follow instructions that are reasonable and lawful and within their capability and training
- report any suspected corrupt or fraudulent practices of others. Any staff member making a report will be protected from reprisal in line with the State and Territory Workplace Health and safety legislation.
- observe the requirements for conditions of employment and safety as described in Bilingual Care Worker Cooperative of Australia Limited *Workplace Health and Safety Policy*
- perform their duties unaffected by alcohol or the use of drugs other than those prescribed for them by a medical practitioner
- maintain a harmonious, co-operative and productive workplace, respectful of diversity
- ensure they do not use their position to exert inappropriate influence over others

8. Work Participation

Staff members will:

- share a commitment to the values and objectives of Bilingual Care Worker Cooperative of Australia Limited
- work within priorities identified by the Governing body and senior staff
- actively participate in planning and consultative processes where appropriate and contribute to the development of the organisation
- use the specified communication channels for reporting and direction
- provide and receive constructive feedback and criticism

9. Teamwork

Staff members will:

- work together towards agreed work objectives and goals, and communicate regularly with one another about progress

- work together to look for ways to improve work methods and to solve workplace and service-related problems
- give support and guidance to each other, ensure appropriate training and development, and recognise each other's results and achievements

10. Use of Resources

Staff members will:

- ensure they have the necessary delegation to authorise expenditure or make use of organisational resources
- only use organisational materials, facilities, funds, people and equipment for authorised purposes and take responsible steps to prevent misuse by others
- conserve and efficiently use resources through recycling, energy saving and waste minimisation

11. Information

Staff members will:

- observe the organisation's policies regarding privacy and confidentiality when disclosing sensitive or confidential information, and provide access to information when required by law or to assist other staff in their duties
- not misuse information obtained at work either for financial reward or gain, or for taking advantage of another person
- observe the organisation's policies regarding information management and follow specified practices in the collection, storage and disposal of files and other records.

12. References

- National Code of Conduct for Health Care Workers

Complaints, Compliments and Feedback Policy

1. Policy and Procedure

Bilingual Care Worker Cooperative of Australia Limited is committed to providing quality care and welcome feedback from clients, carers, and their families to ensure we are continuously improving our service standards.

In accordance with Aged Care Quality Standards, Bilingual Care Worker Cooperative of Australia Limited engage with people who want to live independently in their own home for longer. We work with people rebuilding their nutrition, improving personal care, reconnecting with social activity, maintaining a clean, safe home living space, reinstalling a sense of life purpose, and more.

We take our work seriously and encourage feedback about every aspect of our service. All forms of feedback are encouraged and all people - carers, clients, families, Government and other service providers - can make contact at any time to voice feedback. Options for people include:

- Phone discussion
- Written (using website web form or Feedback Form)
- Face to face discussion

Anyone experiencing stress, harassment or bullying or any grievance can be assured that Bilingual Care Worker Cooperative of Australia Limited owners and managers will pay close attention to the issue and take immediate action to find a suitable remedy as quickly as possible. You will receive updates on our progress to remedy and our genuine offer of listening and support while we work to rectify a problem. We will keep your feedback confidential. We will use the feedback we gain from compliments, complaints, and suggestions to continuously improve our services and how we run our business.

This policy aims to:

- Treat all complaints fairly
- Resolve complaints in a timely manner
- Maintain positive relationships with stakeholders
- Encourage positive change and continuous reflection on current practice
- Maintain confidentiality
- Provide feedback on action taken

2. Definitions

Compliment	An expression of praise, encouragement or gratitude about an individual workers member, a team or a service.
Feedback	A person's thoughts, reactions or feelings in relation to a service or product received that is often used as a basis for improvement.

Complaint	<p>An expression of dissatisfaction made to or about an organisation, related to its products, services, workers or the handling of a complaint, where a response or resolution is explicitly or implicitly expected.</p> <p>For the purpose of this policy and procedure, a complaint is defined as an issue of a minor nature that can be resolved promptly or within 24 hours and does not require a detailed investigation.</p> <p>Complaints include an expression of displeasure, such as poor service, and any verbal or written complaint directly related to the service (including general and notifiable complaints).</p>
General complaint	Addresses any aspect of the service (e.g. a lost clothing item or the service's fees). The complaint must be dealt with as soon as is practicable to avoid escalation of the issue.
Grievance	A formal statement of complaint that cannot be addressed immediately and involves matters of a more serious nature (e.g. the service is in breach of a policy or the service did not meet the care expectations of a family).
Procedural fairness	A principal that requires a fair and proper procedure be used when making a decision.

3. Feedback

Provision of feedback to Bilingual Care Worker Cooperative of Australia Limited is voluntary, but will be sought regularly, including:

- after each major interaction with the service (e.g. initial assessment and planning; reviews; exit)
- during client service delivery
- at client forums
- through satisfaction surveys.

Stakeholders can provide feedback at any time through a *Compliments, Complaints and Feedback Form*, phone, email, website or post.

Where feedback is provided verbally, the receiving workers member will transcribe the feedback onto a Bilingual Care Worker Cooperative of Australia Limited *Compliments, Complaints and Feedback Form*.

4. Complaints

- Where a grievance is initiated by a Bilingual Care Worker Cooperative of Australia Limited client/representative - in the first instance the client is encouraged to speak with their Bilingual Care Worker Cooperative of Australia Limited Representative (e.g. Care Worker). The client may choose to have an advocate present.
- The Bilingual Care Worker Cooperative of Australia Limited representative will advocate on behalf of the client to investigate the grievance, regardless of the parties involved (e.g. internal or external support staff/providers of care).
- Where the grievance cannot be resolved, the Bilingual Care Worker Cooperative of

Australia Limited client is supported by their Representative to speak to the Care Manager to seek resolution.

- Where a grievance is against their Bilingual Care Worker Cooperative of Australia Limited, the client/representative should take the grievance to the Care Manager as per the *Client Information Handbook*, and/or involve the services of an advocate or representative.
- The role of the Care Manager is to be an objective mediator who responds within 21 days.
- The Matter can be escalated to the Managing Director at any point should this be required.
- All clients are made aware of their right to appeal in cases where they feel they have not been treated fairly in regard to aspects of Bilingual Care Worker Cooperative of Australia Limited's Home Care Packages.
- Clients can escalate their complaint to the Aged Care Quality and Safety Commission can be lodged:
 - by phone on 1800 951 822
 - by email: info@agedcarequality.gov.au
 - online at www.agedcarequality.gov.au
 - by post to:
Aged Care Quality and Safety Commission
GPO Box 9819
In your Capital City
- The Compliments, Complaints and Feedback Form is used to document the Complaint.
- The Home Care Staff member receiving/documenting the complaint will complete the *Complaints Register* with proposed actions to be reviewed by their Direct Manager.
- Complaints, Compliments and Feedback to be recorded and addressed at team meetings for future improvement plans.

5. The 5 Step Complaint Management Process

More specifically, the complaints management procedure follows these 5 steps:

1. Receive
2. Record
3. Acknowledge
4. Resolve
5. Communicate resolution

Receive

- To lodge a complaint, individuals are encouraged to speak directly to a worker first, in an attempt to resolve the matter without recourse to the complaints and grievances procedures.

- Workers will:
 - Listen – openly to the concerns being raised by the complainant.
 - Ask – the complainant what outcome they are seeking.
 - Inform – the complainant clearly of the complaint process, the time the process takes and set realistic expectations.
 - Be accountable – and empathetic towards the affected person and action all commitments made.
 - Assess – situations that pose an immediate threat or danger or require a specialised response.
- All complaints and grievances will be referred to the relevant supervisor (or Managing Director) for resolution.
- The relevant supervisor will discuss minor complaints directly with the party involved as a first step towards resolution.
- If the complaint cannot be resolved promptly or within 24 hours, the Managing Director will treat it as a grievance (advising the individual of their right to lodge a grievance if they have not already done so, with the assistance of a support person or advocate if they wish).
- A *Compliments, Complaints and Feedback Form* will be made available to the individual to lodge their grievance; however, it is not mandatory that they use the form. The *Compliments, Complaints and Feedback Form* can be used to make anonymous complaints.
- Grievances can be lodged directly with a worker, either verbally or by providing a completed *Compliments, Complaints and Feedback Form*, by email, phone or in writing.
- All clients making a complaint will be encouraged to use an advocate of their choice to act on their behalf if they wish. The advocate may be a family member or friend, or sourced (with the assistance of a Bilingual Care Worker Cooperative of Australia Limited worker if required) through the National Aged Care Advocacy Program.
- If a complaint alleges actual or possible criminal activity or abuse or neglect, it will be referred to the Managing Director immediately. The Managing Director will follow the *Client Incident Management Policy*, reporting the complaint and working with the relevant authority to investigate the allegation.
- Workers will take all reasonable steps to ensure a complainant is not adversely affected because a complaint has been made by them or on their behalf.

Record

- The Managing Director will:
 - Record – all information that is relevant to the compliment or complaint, in its original and simplest form, in the *Complaints Register*.
 - Store and protect – the *Complaints Register* in a secure file, accessible only to the Management Team.

Acknowledge

- The Managing Director will:

- Acknowledge – receipt of the grievance within 2 working days to build a relationship of trust and confidence with the person who raised the complaint.
- Provide anonymity – a person may request to remain anonymous in their lodgement and therefore contact may not be possible or expected.
- Seek desired outcomes – provide realistic expectations and refer the matter to other organisations, where identified as being more suitable to handle.
- Avoid conflict of interest – by appointing a person unrelated to the matter as an investigator if necessary.
- Provide timeframes and expectations – to the complainant where possible.

Resolve

- In resolving a complaint or grievance, the Managing Director will:
 - Involve the complainant – keep them informed of the progress of the complaint and discuss any disparities identified in the information held.
 - Request additional information – when required but apply a timeframe that limits when it is to be provided by.
 - Consider extensions – only where necessary and always communicate any additional time requirements to the complainant with an explanation of the need.
 - Record all decisions or actions of the complaint investigation in Bilingual Care Worker Cooperative of Australia Limited's *Complaints Register*.
 - Focus on the identified complaint matters only. A complaint is not an opportunity to review a whole case.
- Investigation of complaints will not be conducted by a person about whom a complaint has been made. If required, the Management Team will determine the appropriate person to undertake the investigation.

Communicate resolution

- Bilingual Care Worker Cooperative of Australia Limited will respond to all complaints and grievances as soon as possible and within 28 days from acknowledgement.
- If a complaint or grievance cannot be responded to in full within 28 days of acknowledgement, an update will be issued to the complainant. The update will provide the date by which a full response can be expected. The update should be provided verbally in the first instance then confirmed in writing.
- The Managing Director (or delegate) will:
 - Discuss the outcome – where possible, verbally with the complainant before providing written advice and allowing them the opportunity to make further contact following receipt of the written advice.
 - Include information on recourse – further action available to the complainant at the conclusion of the complaint investigation. An action of recourse may be to escalate the matter further with an external agency or for a further review within the organisation.
 - Provide a further review – to enable the first investigation to be reviewed for

soundness and allow additional information not available in the first complaint to be included.

- Identify opportunities – relay complaint outcomes to the appropriate area within the organisation for action to improve service delivery.
- Seek Feedback – from the complainant regarding their experience of the complaints process.
- Support will be provided to assist complainants understand correspondence regarding complaints and grievances where required (e.g. interpreters, referral to advocates, etc.).
- Options for actions responding to a complaint include but are not limited to:
 - explaining processes
 - rectifying an issue
 - providing an apology
 - ongoing monitoring of issues
 - training or education of workers.
- Bilingual Care Worker Cooperative of Australia Limited' *Complaints Register* will be used by Bilingual Care Worker Cooperative of Australia Limited's Managing Director (or delegate) to record every complaint, track investigation progress and outcomes and how the outcomes have been communicated to stakeholders.

6. Procedural Fairness

- Procedural fairness:
 - is impartial
 - requires a response proportionate to the complaint, accusation and likely remedial action
 - ensures that a complainant or client is not disadvantaged by the complaint or the process of resolving a complaint
 - ensures that persons who are likely to be adversely affected by a complaint process are given the opportunity to present their views and have them heard.
- Procedural fairness must be afforded to a person if their rights or interests may be adversely or detrimentally affected in a direct and specific way. In those circumstances:
 - the person must be given notice of each prejudicial matter that may be considered against them
 - the person must be given a reasonable opportunity to be heard on those matters before adverse action is taken, and to put forward information and submissions in support of an outcome that is favourable to their interests
 - the decision to take adverse action should be soundly based on the facts and issues that were raised during that process, and this should be apparent in the record of the decision
 - the decision maker should be unbiased and maintain an unbiased appearance.
- The precise requirements of procedural fairness can vary from one situation to another.

The required steps can vary according to:

- the nature of the matter being dealt with
- the options for resolving it
- the timeframe for resolution
- whether facts in issue are in dispute
- the gravity of possible findings that may be reached
- the sanctions that could be imposed based on those findings.

7. Supporting Documents

Relevant documents relating to this Policy and Procedure:

- Compliments, Complaints and Feedback Form
- Complaints Register

8. Applicable Aged Care Standards

- Standard 1 - Consumer Dignity and Choice
- Standard 6 - Feedback and Complaints
- Standard 7 - Human Resources
- Standard 8 - Organisational Governance

Risk Management Policy

1. Policy and Procedure

Bilingual Care Worker Cooperative of Australia Limited is committed to the responsible identification and management of risks which may arise during the delivery of services and the general management of the organisation, including risks relating to compliance, finance, safety and health, environmental risk and operational risk.

This Policy and Procedure enforces the dedication of Bilingual Care Worker Cooperative of Australia Limited to performance, advanced and secure provision of care/service provision.

Bilingual Care Worker Cooperative of Australia Limited aims to assist all persons and are committed to delivering care and services in a safe environment to protect clients, families, guardians, advocates, friends, visitors, workers, staff, employees, contractors and suppliers.

The Workplace Health and Safety Officer is ultimately responsible for identifying and managing risks that impact the organisation. Responsibilities include:

- Reviewing, Monitoring and Implementing the Risk Management Policy and Procedure.
- Receiving any Risk Assessment Forms.
- Reviewing any Risk Assessment Forms or noticed hazards.
- Forming a strategic plan to manage any risks or hazards escalated.
- Managing any risks that affect multiple services across a division and liaising with other appropriate personnel if required.
- Liaising with other workers, staff, employees, and management in order to effectively manage risks or hazards.

Nonetheless, Bilingual Care Worker Cooperative of Australia Limited:

- expects all workers to responsibly minimise risks to themselves and others, and report hazards and other risks as soon as they are noticed; and
- values the risk assessments, evaluations and recommendations gathered from internal and external audits and from stakeholder feedback.

Bilingual Care Worker Cooperative of Australia Limited's approach to risk management, including its Risk Management Model and Principles, is aligned with *ISO 31000:2018 (Risk Management Guidelines)*.

2. Definitions

Worker	Employees, Managing Director, Contractors, Subcontractors, Outworkers, Apprentices and Trainees, Work experience students, volunteers and PCBU's who are individuals if they perform work for the business.
Risk	"A possible effect on an expected outcome." More specifically, 'risk' indicates a potential danger to the organisation, to the success of its services, strategies, projects and processes, its financial viability, its reputation, or the health and safety of its clients and workers.
Risk Analysis	The process to understand the nature, sources and causes of risks to determine the degree of risk. The degree and consequences of risk together inform risk evaluation and decisions about risk treatment.

Risk Assessment	The process in which risk is identified, analysed and evaluated. Risk assessments assist in determining: <ul style="list-style-type: none"> • what levels of harm can occur; • how harm can occur; and • the likelihood that harm will occur.
Risk Management	Coordinated activities to direct and control an organisation with regard to risk.
Risk Treatment	A measure, process or system that eliminates a risk where possible or, if not possible, reduces the risk so far as is reasonably practicable.
Dignity of Risk	Respecting each individual's autonomy and self-determination (or “dignity”) to make choices for themselves.
Managed Risk	The level of risk remaining after risk treatment plans have been put in place and are being followed.
Unmanaged Risk	The level of risk before any action has been taken to manage it.
Risk Evaluation	The process of determining whether a risk is tolerable or whether it requires ‘risk treatment’.

3. Procedure



Overview

The Risk Management Process involves five steps:

- **Identify:** Identify the risk events that may prevent or delay the achievement of strategic goals and objectives.
- **Analyse:** Outline the causes, impacts and existing treatments in order to assess the consequence and likelihood of the risk and determine the risk rating.
- **Treat:** Implement existing and future treatments to prevent or mitigate the risk.
- **Monitor:** Continually monitor and evaluate the risks and treatments to maintain the effectiveness and appropriateness of the organisation’s risk management.
- **Report:** Provide regular reports and updates in order to assure the organisation and its stakeholders that risks are being appropriately managed and treated.

4. Identifying and Analysing Risk

Bilingual Care Worker Cooperative of Australia Limited utilises a number of ways to identify risks. Identifying risk means considering:

- Factors that impact positively or negatively; and
- Factors that make Bilingual Care Worker Cooperative of Australia Limited' strategic priorities and goals susceptible to risk.

Risks can be identified through the set-out mechanisms (not limited to):

- Conducting regular Risk Assessments including environmental and equipment assessments
- Incident forms or templates
- Reviewing incident reports
- Hazard data
- Monitoring changes in the care recipient's condition or environment that may introduce new risks.
- Worker, client and visitor feedback
- Worker, client and visitor complaints
- Statistical data or reports
- Maintenance log
- Input from workers or management at board meetings
- Review of policies and procedures
- Strategic and operational planning
- Information obtained from education, development or training sessions.
- Internal and external audits, internal assessments etc.

Workers are encouraged to identify hazards and to report them to supervisors and the Managing Director.

Bilingual Care Worker Cooperative of Australia Limited has established and continuously maintains a Risk Management Plan. This is done in order to minimise the incidence of any risks occurring and causing harm to clients or workers. Bilingual Care Worker Cooperative of Australia Limited observes risks to the organisation. This could include, however is not limited to:

- Loss of funding
- Death of a client
- Management inconsistency or dysfunction
- Psychological effects such as bullying, stress resulting from workloads, fatigue and violence
- Theft or fraud of funds
- Lack of suitable, experienced, and qualified workers

- Worker/staff/employee prolonged sickness or illness resulting in leave
- Destruction or loss of data due to natural disasters.

Bilingual Care Worker Cooperative of Australia Limited observes risks which workers may face. This could include, however is not limited to:

- Lack of suitable, experienced, and qualified workers
- Worker/staff/employee prolonged sickness or illness resulting in leave
- Worker/staff/employee injury or illness due to WHS risks
- Manual procedures such as musculoskeletal injuries, soft tissue injuries, repetitive stress syndrome (RSS) causing muscular strains and pains
- Biological hazards such as bacteria, legionnaires disease, fungi causing hepatitis, viruses, HIV/AIDS, allergies etc.
- Electrical hazards such as burns or death resulting from electrocution, irregular heart rhythms or shock when exposed to live wires and potential ignition sources
- Noise exposure such as prolonged exposure to high decibel noises can result in loss or permanent loss of hearing.
- Impact of global pandemics, natural disasters, or infection
- Conducting work in the client's home which may be unsafe.

Bilingual Care Worker Cooperative of Australia Limited observes risks which clients may face. This could include, however is not limited to:

- Environmental risks such as fires, cold temperatures, slippery footpaths.
- Falls risk
- Home/household risks such as electrical cords, appliances, stairs etc.
- Transport or delivery risks
- Utilizing equipment such as wheelchairs and hoists
- Abuse, violence, aggression and self-harm
- Bullying, discrimination and harassment
- Medication risks
- Communication misunderstandings
- Workers providing service in the client's home
- Interruptions to service or care provision delivery such as a client exiting services and seeking service from another provider.

Bilingual Care Worker Cooperative of Australia Limited uses the following 3 Step risk assessment:

- Step 1: Identify the degree of risk in a particular sector of operations.
- Step 2: Estimate the likelihood of an event occurring.
- Step 3: Calculate a Risk Rating.

See Risk Assessment Matrix below.

Step 1 - Qualitative Measure of Consequence or Impact

Use the example table below to estimate the consequence of risks in a particular sector of operation.

Exposure Category: indicates the severity of a negative event.

Consequence Category: indicates the sector in which risk occurs.

Exposure Category		1.	2.	3.	4.	5.
Category		Insignificant	Minor	Moderate	Major	Catastrophic
Consequence Category	A: HR & Safety	<p>Workforce injury – no lost time.</p> <p>No health effects.</p> <p>No workers turnover</p> <p>No IR issues, strikes, bans.</p>	<p>Workforce treatment required.</p> <p>Lost time (1-3 days).</p> <p>Minimal health effect.</p> <p>Workers disgruntlement / absent for 1 – 2 days</p> <p>Minimal IR issues, strikes, bans</p> <p>Workers turnover >10% < 15% due to IR issues</p>	<p>Workforce injury. Lost time (4 – 30 days).</p> <p>Short-term health effect</p> <p>Poor workers performance</p> <p>Minor IR issues</p> <p>>15 % < 20% workers turnover due to IR issues</p> <p>No strikes and bans</p>	<p>Serious workforce injuries</p> <p>Lost time > 1 month.</p> <p>Permanent disability</p> <p>IR issues stopping work.</p> <p>>20% < 30% workers turnover due to IR issues</p> <p>>5 < 10 days strikes and/or bans</p>	<p>Fatality; significant permanent disablement or permanent deleterious health effect.</p> <p>>30% workers turnover</p> <p>IR legal disputes</p> <p>>10 days strikes and bans</p>
	B: Finance & Assets	<p>Reduced income or increased costs <0.5%</p> <p>Almost negligible damage to assets.</p> <p>No interruption to operations</p>	<p>Reduced income or increased costs 0.5%> <2.5%</p> <p>Minor asset damage.</p> <p><5 days interruption to parts of the operations</p>	<p>Reduced income or increased costs 2.5%> <5%</p> <p>Severe asset damage.</p> <p>< 30 days interruption to parts of the operations</p>	<p>Reduced income or increased costs 5%> <10%</p> <p>Major system damage.</p> <p>30> <60 days interruption to parts of the operations</p>	<p>Reduced income or increased costs >10%.</p> <p>Loss of system or Plant</p> <p>>60 days interruption to operations,</p>

Exposure Category	1. Insignificant	2. Minor	3. Moderate	4. Major	5. Catastrophic
C: Governance	No measurable operational impact. Do not initiate Business Continuity (BC) / Emergency & Disaster Management Plan (E&DMP) No impact on new business/projects. No impact on Board oversight.	Minor service interruption localised disruption. May need to initiate Business Continuity (BC) / Emergency & Disaster Management Plan (E&DMP) No impact on new business/projects. No impact on Board oversight.	Significant degradation of operations, multiple business areas affecting sustainable operations. Need to initiate Business Continuity (BC) / Emergency & Disaster Management Plan (E&DMP) Some impact on new business/projects. Board to be notified <2 days.	Significant degradation of operations, multiple business areas affecting sustainable operations. Immediate actioning of Business Continuity (BC) / Emergency & Disaster Management Plan (E&DMP) Delayed Impact on new business/projects. Board to be notified immediately.	Widespread or total degradation of operations, cross functional impact. Operational performance Immediate actioning of Business Continuity (BC) / Emergency & Disaster Management Plan (E&DMP) New business / projects lost. Board and SMT to action immediately
	No impact, no profile or no negative publicity item. No/minimal health impact to clients Identified areas of need for internal quality Community / Stakeholders / Client adverse impact on trust & credibility of clinical care service delivery is nil.	Substantiated, low impact, low negative publicity. Some Community/ Stakeholders / Clients impact on trust and credibility of clinical care service delivery. Assets, business or services are not available for > 2 < 7 hours. Minor injuries managed internally	Substantiated, impact to reputation, moderate impact, moderate negative publicity. Community / Stakeholder / Client impact on trust and credibility of clinical care service delivery is in doubt as a result as evidenced by a formal complaint from a stakeholder.	Substantiated, public embarrassment. High impact, high negative news profile. Third party actions. Client injury resulting in hospitalisation. Result of internal audits – below 70% of compliance in the designated categories. Unmet outcomes in more than 1 standard.	Substantiated negative public media involvement. High impact, high negative news profile. Third party actions. Resident injury resulting in death. Result of internal audits – below 60% of compliance in the designated categories. Sanctions applied.

Exposure Category	1. Insignificant	2. Minor	3. Moderate	4. Major	5. Catastrophic
	Assets, business or services are temporarily unavailable i.e. < 2 hours.	Minor incident/recommendation for improvement as a result of an external review.	Client injury requiring medical treatment / interventions. Result of internal audits – 80% of compliance in designated areas. Unmet outcomes in 1 standard. Assets, business or services, including some critical are not available for > 24 < 48 hours	Community / Stakeholder / Client impact on trust and credibility of clinical care service is no longer there Critical assets or services are not available for >48 hours < 1 week.	Community / Stakeholder / client impact on trust and credibility of clinical care service is no longer there Critical assets or services are not available for >48 hours < 1 week
E: Strategic	No damage to reputation & image externally No impact on achievement of strategic objectives / KPIs. No changes in political/client/stakeholders' expectations Minimal changes in government funding/policy resulting in reduced funding of > .05%	Minimal damage to reputation & image externally Little impact on achievement of strategic objectives / KPIs. Slight changes in political/client/stakeholders' expectations Minimal changes in government funding/policy resulting in reduced funding 0.5% > < 2.5%	Noticeable damage to reputation & image externally Non achievement of few strategic objectives / KPIs. Changes in political/client/stakeholders expectations influencing some elements of Strategic Plan Changes in government funding/policy resulting in reduced funding 2.5% > < 5%	Clear & repeated damage to reputation & image externally Non achievement of core strategic objectives / KPIs. Changes in political/client/stakeholders expectations influencing core elements of Strategic Plan Changes in government funding/policy resulting in significant reduced funding 5% > < 10%	High level and repeated damage to reputation & image externally Non achievement of significant strategic objectives / KPIs. Changes in political/client/stakeholders expectations influencing all elements of Strategic Plan Changes in government funding/policy resulting in significant reduced funding >10%

Exposure Category	1. Insignificant	2. Minor	3. Moderate	4. Major	5. Catastrophic
F: Compliance & Legal	<p>Non-compliance or non-conformance with current policies/procedures are insignificant in nature with no disruption to performance of operations.</p> <p>Changes in Local, State, Federal government regulations/legislation have no impact.</p> <p>Full compliance with Federal & State health & environmental legislation</p> <p>Full compliance with Industry standards.</p> <p>No Litigation, public and professional liability costs. No impact on Contractual and Commercial risks.</p>	<p>Non-compliance or regulatory breach with current policies / procedures – requires attention or corrective actions.</p> <p>Changes in Local, State, Federal government regulations/legislation have minimal impact.</p> <p>Minor non-compliance with Federal & State health & environmental legislation but non-reportable.</p> <p>Minor non-compliance with Federal & State health & environmental legislation but non-reportable</p> <p>Ability to measure non-conformance to best practice or standards and take corrective actions</p>	<p>Non-compliance or regulatory breach with current policies / procedures requires significant attention or corrective actions.</p> <p>Changes in Local, State, Federal government regulations/legislation have some impact on operations</p> <p>Moderate non-compliance with Federal & State health & environmental legislation and/or</p> <p>Moderate non-compliance with Federal & State health & environmental legislation hence Reporting required to third parties / external regulators.</p> <p>Non-conformance to best practice or standards will attract attention if subject to third party review (including internal audit)</p>	<p>Non-compliance or regulatory breach with current policies / procedures requires immediate / significant attention or corrective actions.</p> <p>Changes in Local, State, Federal government regulations/legislation immediately impact on business operations</p> <p>Major non-compliance with Federal & State health & environmental legislation and/or</p> <p>Major non-compliance with Federal & State health & environmental legislation hence Non-compliance, regulatory breach or non-conformance to best practice or standards results in restriction on business and/or notice of prosecution and fines.</p>	<p>Changes in Local, State, Federal government regulations/legislation immediately restricts/ceases business operations</p> <p>Serious non-compliance with Federal & State health & environmental legislation and/or</p> <p>Serious non-compliance with Federal & State health & environmental legislation hence</p> <p>Non-compliance results in cancellation or loss of business operations.</p> <p>Non-compliance, regulatory breach or non-conformance results in class actions, prosecution and fines.</p>

Exposure Category	1. Insignificant	2. Minor	3. Moderate	4. Major	5. Catastrophic
		No Litigation, public and professional liability costs. No impact on Contractual and Commercial risks.	Possible Litigation, public and professional liability costs. Moderate impact on Contractual and Commercial risks.	Lengthy Litigation, public and professional liability costs. Contractual and Commercial risks are not contained.	Action being undertaken against Managing Director and/or Officers with possibility of severe penalties.

Step 2

Use the table below to estimate the *likelihood* that an event will occur.

Probability	Descriptor	Example of Description	Frequency
A	Almost Certain	The event is expected to occur in most circumstances	Once per week
B	Likely	The event will probably occur in most circumstances	Monthly
C	Moderate	The event should occur at some time	6 monthly
D	Unlikely	The event could occur at some time	Within a year
E	Rare	The event may occur only in exceptional circumstances	Once a year

Step 3

Use the table below to determine the Risk Rating using indicators from Tables 1 & 2

Likelihood Rating	Consequence Rating				
	1 Insignificant	2 Minor	3 Moderate	4 Major	5 Extreme
A - Certain	High	High	Extreme	Extreme	Extreme
B - Likely	Medium	High	High	Extreme	Extreme
C - Possible	Medium	Medium	High	High	Extreme

D - Unlikely	Low	Medium	Medium	High	High
E - Rare	Low	Low	Medium	Medium	High

Bilingual Care Worker Cooperative of Australia Limited will not accept a residual risk rating above the bold line.

5. Implementing Controls and Treatments:

- With the risk rating determined, it is necessary to consider the effectiveness of the controls that are already in place to manage the risk, and whether additional controls may be required.
 - Bilingual Care Worker Cooperative of Australia Limited will accept and monitor lower priority risks.
 - For those risks identified as moderate or higher, we need to consider the appropriate risk treatment options that will reduce the risk rating to an acceptable level, prioritising risks that are high impact and high prevalence in in-home care, such as falls, medication errors, infections, and social isolation.
- Controls are strategies to manage risk balanced against the cost and inconvenience of the control. Common controls include:
 - worker training
 - provision of information
 - the use of safe or safer equipment
 - maintaining adequate insurance
 - changes in procedures or practices
 - personal checks including referee checks, driver’s licences, motor vehicle registrations, professional registrations, criminal history checks etc.
- All identified risks and appropriate controls must be recorded on the Risk Register.

Managing High Impact and High Prevalence Risks

We will Implement proactive strategies to manage risks commonly associated with in-home care:

- Falls Prevention: conduct home safety assessments, encourage mobility aids, and exercise programs.
- Medication Management: conduct regular medication reviews, staff training sessions, and adherence monitoring.
- Infection Control: employ hygiene protocols, vaccination programs, and early detection measures.
- Mental Health & Wellbeing: establish social engagement programs and promote mental health screenings, and referrals.

6. Monitoring and Reporting Risk

- Regular monitoring and review of the performance of the risk management system is conducted, and includes changes to business initiatives and other internal processes:
- Risk register – the organisational risk register is a living document that is updated regularly by the Workplace Health & Safety Officer (currently the Care Manager).
- Risk assessments should be completed quarterly. Controls are monitored for effectiveness against the impact and likelihood ratings. Risk assessments are also required to be completed for each client on the commencement of service. These risk assessments should be reviewed, at a minimum, quarterly.
- All workers are responsible for managing risk within their areas of influence.
- Upon commencement, all workers, students and contractors will undergo Induction, which will include risk management training.
- Where workers are employed, regular Performance Reviews will assess workers' awareness of this policy and procedure and their roles and responsibilities in respect to risk management. Additional on-the-job and formal training will be provided where required.
- The Managing Director will ensure that all necessary insurance policies are in place to protect Bilingual Care Worker Cooperative of Australia Limited as an organisation, as well as its directors, workers, volunteers, clients, contractors and visitors.
- The Workplace Safety Officer will foster a risk aware service culture by including risk awareness and identification on agendas for workers meetings (where applicable).

Record Keeping and Documentation

Bilingual Care Worker Cooperative of Australia Limited will always:

- Maintain accurate and up-to-date risk assessments for each care recipient.
- Document all identified risks, mitigation strategies, and intervention outcomes.
- Keep detailed records of all incidents, near misses, and corrective actions taken.
- Store records securely and ensuring compliance with privacy and confidentiality requirements.
- Conduct regular audits of documentation to ensure completeness and accuracy.
- Ensure that records are accessible to relevant personnel for ongoing monitoring and improvement.

Currently, the Managing Director is responsible for record keeping, however this task will eventually be given to a dedicated WHS officer (currently the Care Manager).

Open Disclosure with Consumers and Stakeholders

Bilingual Care Worker Cooperative of Australia Limited is committed to:

- Transparency and open communication with care recipients and their families regarding risks and incidents.
- Informing care recipients and families promptly about incidents that affect their safety and wellbeing.

- Engaging in collaborative discussions to address concerns and implement appropriate resolutions.
- Providing clear explanations of risk management strategies and corrective actions.
- Encouraging feedback from care recipients and stakeholders to enhance risk management practices.

7. Incident and Near Miss Management

The WHS officer has the responsibilities of:

- Establishing a system to report, investigate, and respond to incidents and near misses (via Eziplan).
- Documenting all incidents in a centralised incident management system (Eziplan).
- Conducting root cause analyses for clinical incidents and incidents occurring during care delivery.
- Implementing corrective actions and learning strategies to prevent recurrence.
- Providing training and support to staff to enhance incident awareness and response capabilities.

8. Organisational Risk

Each Manager is responsible for identifying and managing organisational risks in their area of influence. They must conduct regular Risk Assessments in consultation with staff, clients, and relevant stakeholders, covering at least the following areas:

- Incident Management;
- Complaints Management;
- Workplace Health and Safety;
- Human Resource Management;
- Financial Management;
- Information Management;
- Governance; and
- Business Continuity.

The Finance Manager is responsible for ensuring all people and equipment associated with Bilingual Care Worker Cooperative of Australia Limited's operations are covered by appropriate insurances.

9. Risks to staff

All staff are responsible for managing risk within their work environment. Upon commencement, all staff will undergo an induction, which will include training and education

on risk management (related to organisational risks), as well as Duty of Care and client Dignity of Risk. Additional on-the-job and formal training will be provided, where required.

Team meetings and supervision sessions are ideal opportunities for managers and staff to reflect on person-centred risk management practice. Bilingual Care Worker Cooperative of Australia Limited includes Risk Management as part of its Agenda for any staff meetings, to increase risk awareness and to discuss any potential risks that have been identified (being mindful not to breach client privacy and confidentiality).

Operational risks and risks to staff must be reported to the Managing Director or Care Manager as soon as practicable after they are identified. Identified risks will be tracked by the Care Manager using Bilingual Care Worker Cooperative of Australia Limited's Risk Register.

Staff must also be aware of their Workplace Health and Safety obligations and comply with Bilingual Care Worker Cooperative of Australia Limited's Workplace Health and Safety policies and procedures.

10. Risks to clients

Bilingual Care Worker Cooperative of Australia Limited plays an important role in supporting clients to manage risks on a daily basis. Staff must understand and abide by the following concepts when supporting clients.

Foreseeable injury

When helping clients access activities or situations, keep in mind:

- the client's right to an assumption of competence first and foremost;
- what is already known about the person's capacity to carry out similar activities safely;
- what is known about a person's awareness of what risks might be involved and of how to avoid them;
- what is known about the dangers involved in the activity and whether the person can deal with them; and
- what can be learnt from relevant assessments or reports about the person's abilities and skills.

Seriousness of the injury

When considering the likelihood of an injury, keep in mind the potential seriousness of an injury, even where the likelihood of it occurring seems remote.

Doing what is reasonable to avoid injury

Consider courses of action that involve the least possible restriction on client's rights. It is never reasonable, in protecting clients from injury or harm, to restrict them or violate their rights and freedoms.

When a client's rights are compromised to avoid injury, ensure the least important and fewest rights of the client are affected.

Also ensure that compromises are being made to the rights of as few people as possible. Placing restrictions on people who are not affected by the issue is not reasonable.

Supporting clients to face risks safely with dignity and choice

Risks are part of life and an important means by which clients can express self-determination, their inherent human rights and valued status within the community.

Bilingual Care Worker Cooperative of Australia Limited encourages its staff to consider ways of empowering clients to take more control over, and responsibility for, situations including risks in their lives.

This can be achieved by providing opportunities and supports that assist the client to manage their own risks while avoiding harm.

We support client independence and dignity of risk by:

- Respecting the right of care recipients to make informed decisions about their care and lifestyle choices.
- Using a problem-solving approach to balance safety with independence.
- Conducting risk-benefit assessments collaboratively with care recipients and their families.
- Implementing risk reduction strategies that allow for autonomy while ensuring safety.
- Providing education and resources to empower care recipients in managing their own risks.

Safeguarding others from injury

In addition to protecting clients, Bilingual Care Worker Cooperative of Australia Limited owes a duty of care to others, including members of the public, who might be injured by the actions of a client that Bilingual Care Worker Cooperative of Australia Limited is supporting.

It is important to consider the wider effects of a client's choices, not just how those choices may affect the client.

Duty of care will take precedence over the right of informed clients to take calculated risks where that risk may pose a threat to the health and/or safety of staff or others.

Client Risk Assessments

A Client Risk Assessment must be undertaken for all clients at their initial assessment and reviewed during formal Care Plan reviews where this is deemed necessary by the Care Manager, based on relevant historical background information or current information provided to Bilingual Care Worker Cooperative of Australia Limited. The information gathered by Bilingual Care Worker Cooperative of Australia Limited to warrant a Client Risk Assessment must demonstrate a history of or current behaviours and any other conditions that may pose potential risks to staff or others.

Client Risk Assessments must also be reviewed six-monthly, or more frequently depending on the complexity of the clients' needs.

Earlier reviews may be needed if there are changes to the person's environment or existing risks, or if new risks emerge.

Where supports are to be provided in a client's home, a Home Risk Assessment must be completed at initial assessment. Reviews are to be conducted along with the Client Risk Assessment, and at any other time needed if there are changes to the client's home environment.

The purpose of a Home Risk Assessment is to identify potential hazards in the client's home and put appropriate controls in place to reduce the risk of injury or illness for staff, the client and others.

Risk assessments and risk reviews must be done in collaboration with clients, their supporters and any other stakeholders involved in managing a specific risk. Enabling clients to achieve their goals, retain choice, control and dignity (via the management of risks) must be considered during all assessments.

The risk assessment process must identify appropriate Risk Treatments, which should also be reflected in the client's Care Plan. If either assessment shows that staff would be exposed to significant risks, the Care Manager must determine if supports should be modified or suspended until the risk has been adequately controlled.

Staff should raise any issues or concerns regarding Client Risk Assessments or Home Risk Assessments with the Care Manager and significant risks should be escalated to the Managing Director or Management Team for further advice. Risk Assessments and reviews must be kept on client files.

In the case of a client making a decision to participate in an activity that could have negative consequences, even though adequate information has been provided concerning the associated risk(s), staff will ensure such instances are documented and recorded in shift notes in Ezihealth.

Supervision between staff and managers is an opportunity to discuss clients' safety needs, concerns and actions the staff member is responsible for. Clients' safety and wellbeing can also be discussed without disclosing the person's identity at team meetings, so all team members have the opportunity to learn from and contribute to different risk assessments.

11. Supporting Documents

Relevant documents relating to this Policy and Procedure:

- Risk Register
- Risk Assessment Form
- Client Risk Assessment
- Home Risk Assessment
- Corrective Action Request
- Client Care Plan
- Audit, Internal Assessment and Review Policy and Procedure

12. Applicable Aged Care Quality Standards

- Standard 1 - Consumer Dignity and Choice
- Standard 8 - Organisational Governance

Continuous Improvement Policy

1. Policy and Procedure

Bilingual Care Worker Cooperative of Australia Limited utilises and implements a Continuous Improvement Policy and procedure in order to ensure the organisation continuously operates in accordance with all relevant rules, regulations, laws and standards appropriate within Home Care.

Bilingual Care Worker Cooperative of Australia Limited always aims to provide excellent services via an integrated quality management system based on the continuous process of evaluation, review, and implementation.

This Policy and Procedure has been created in order to ensure that workers are trained and taught in Continuous Improvement, provide first-class service and care provision in accordance with appropriate standards and legislative criteria. Bilingual Care Worker Cooperative of Australia Limited aims for Quality Improvement by regular strategy, process and implementation analysis and audits.

Continuous Improvement presents a straightforward direction throughout all areas of Bilingual Care Worker Cooperative of Australia Limited and its operations.

This extends to all employees and meets relevant laws and regulations and standards.

2. Definitions

<p>Continuous Improvement</p>	<p>The ongoing effort of a business to improve services, systems, processes or products to maximise benefits for its clients. The process relies on using evidence-based information to support the business' achievement of its goals and outcomes. This also means adapting to the changing needs of its community or clients.</p>
-------------------------------	--

3. Policy

Bilingual Care Worker Cooperative of Australia Limited continuously abides by the Continuous Improvement Policy in order to further support professional growth as well as assist all stakeholders in promoting and implementing sustainable solutions that meet client needs and maintain quality in best practice regimes.

Bilingual Care Worker Cooperative of Australia Limited is always committed to delivering quality service, and to promoting innovation culture and continuous improvement, through best practice in service, management and strategic planning.

It allows for Bilingual Care Worker Cooperative of Australia Limited to operate in accordance with all relevant rules, regulations, laws, standards and legislation. Therefore, it promotes prompt alteration or adjustment within Bilingual Care Worker Cooperative of Australia Limited where necessary.

All Management and workers within Bilingual Care Worker Cooperative of Australia Limited are responsible for following all Policies and Procedures within Bilingual Care Worker Cooperative of Australia Limited and identifying areas for Continuous Improvement. All persons are encouraged to provide their personal feedback in order to promote change, as Bilingual Care Worker Cooperative of Australia Limited highly values personal opinion and input.

4. Procedure

Bilingual Care Worker Cooperative of Australia Limited constantly refers to the Continuous Improvement Procedure as it creates the foundation in which Bilingual Care Worker Cooperative of Australia Limited is required to operate by as well as make improvements or adjustments where these are deemed necessary and appropriate.

It affiliates with the Aged Care Act and Aged Care Quality Standards 2018 (Cth) as well as all applicable Commonwealth and State legislation and regulations.

All policies and procedures shall be formally reviewed at least annually. Reviews incorporate feedback from workers, clients, stakeholders and all other relevant personal corresponding in any way with Bilingual Care Worker Cooperative of Australia Limited.

All workers, management, employees, staff and volunteers will receive required training regarding their responsibilities through formal induction and annual training, combined with regular formal Continuous Improvement agenda items at Board or Worker Meetings.

Management of Bilingual Care Worker Cooperative of Australia Limited will record all matters of Continuous Improvement in the Continuous Improvement Register. This document will be continuously updated as required with the following items documented:

- Goal or improvement required
- Date identified
- Current performance within Bilingual Care Worker Cooperative of Australia Limited
- Proposed 6-month objective
- Proposed 12-month objective
- Any additional comments
- Status review
- Date rectified

If necessary, it may also include the name of the person nominated to take responsibility and implement action.

Should any changes in legislation or regulation arise, Bilingual Care Worker Cooperative of Australia Limited' management is responsible for keeping track and identifying this information. This can be completed within a number of ways such as observing or liaising with the government, other industries, consulting companies and associated information check points. This information may also be brought to light via industry conferences, networking events and further education.

5. Supporting Documents

Relevant documents relating to this Policy and Procedure:

- Quality Improvement Plan
- Quality Improvement Register
- Staff Performance Improvement Plan
- Staff Performance Review Feedback Form
- Staff Training Needs Self-Assessment
- Audit Schedule
- Compliments, Complaints and Feedback Form
- Complaint Register
- Incident Report Form
- Incident Register
- Internal and External Audits

6. Applicable Aged Care Quality Standards

- Standard 6 - Feedback and Complaints
- Standard 8 - Organisational Governance

Financial Management Policy

1. Introduction

The Financial Management Policy and Procedure ensures Bilingual Care Worker Cooperative of Australia Limited operates in accordance with the Aged Care Act and Principles and utilises correct and accepted Australian accounting practice.

The Financial Management Policy and Procedure will ensure Bilingual Care Worker Cooperative of Australia Limited charges care fees in accordance with all relevant rules, regulations, standards and legislation, including (but not limited to):

- Sections 19AC, 19AE, 19AF, 19B, 19C and 19D of the User Rights Principles;
- Chapter 3A, Divisions 52B and 52D of the Aged Care Act; and
- Part 4.2, Division 56-2(a) and 56-(aa) of the Aged Care Act.

Financial Management is the correct and appropriate use of management systems within Bilingual Care Worker Cooperative of Australia Limited in order to ensure all financials are managed under the correct protocols.

This policy and procedure are designed to assist Bilingual Care Worker Cooperative of Australia Limited in meeting financial requirements. The aim is to ensure that Bilingual Care Worker Cooperative of Australia Limited funds and services are only used for Bilingual Care Worker Cooperative of Australia Limited’s purposes, and that adequate financial measures are created, recorded, and implemented to avoid Bilingual Care Worker Cooperative of Australia Limited’s funds and other resources being exploited or misused.

Bilingual Care Worker Cooperative of Australia Limited aims to support clients to manage their personal financials independently. Bilingual Care Worker Cooperative of Australia Limited also aims to avoid intervention in client’s financial affairs where possible. This seeks to minimise potential risks and non-conformities for clients, workers and Bilingual Care Worker Cooperative of Australia Limited.

This policy and procedure ensure Bilingual Care Worker Cooperative of Australia Limited abides by strict regulations when managing or assisting clients to manage their financial affairs. This protects clients and Bilingual Care Worker Cooperative of Australia Limited to safeguard their financials in a private and confidential manner.

This extends to all employees and meets relevant laws and regulations and standards.

2. Definitions

Assets	<p>Non-consumable items of tangible property (including fixtures) that have a service life greater than one year. Assets can include, but are not limited to:</p> <ul style="list-style-type: none"> • equipment or aids to support clients; • electronic equipment (such as computers); • furniture; and • motor vehicles.
--------	---

Corruption	Dishonest activity where a person engaged by a business acts in a way that is contrary to the interests of the business and abuses their position to achieve a personal gain or advantage for themselves or others.
Fraud	Dishonest activity causing actual or potential financial loss to any person or business, including theft. Fraud also includes the deliberate falsification, concealment, destruction or use of falsified documentation or the improper use of information or position for financial benefit.

3. Policy

The Financial Management Policy indicates the responsibilities of Bilingual Care Worker Cooperative of Australia Limited and Bilingual Care Worker Cooperative of Australia Limited's personnel when receiving and managing a client's financial affairs and aims to only assist them where possible. It also highlights the correct Financial Management protocols when utilising and charging care fees.

Bilingual Care Worker Cooperative of Australia Limited maintains financial management and accounting systems that:

- are transparent and accountable;
- allow for full and accurate recordkeeping;
- allow budgeting and reporting;
- meet applicable Australian Accounting Standards; and
- support all relevant financial compliance and reporting requirements.

All financial transactions, including receipts and payments related to Aged Care service delivery, are clearly identifiable and easily tracked within Bilingual Care Worker Cooperative of Australia Limited's financial system.

4. Organisational Financial Management

Bilingual Care Worker Cooperative of Australia Limited's Finance Manager:

- uses Quickbooks to support Bilingual Care Worker Cooperative of Australia Limited's financial management;
- maintains accurate and up-to-date records of the business' Bank Accounts; and
- monitors Bilingual Care Worker Cooperative of Australia Limited's financial position to minimise the risk of fraud and ensure expenditure complies with the budget, is accounted for correctly, and is properly authorised prior to expenditure being incurred.

Business Debit and Credit cards are held by the Managing Director.

The signatories for Bilingual Care Worker Cooperative of Australia Limited's bank account are Bilingual Care Worker Cooperative of Australia Limited's Managing Director (Savva Petridis) and Director (Neb Hamoo). The Managing Director and Finance Manager also have online access to Bilingual Care Worker Cooperative of Australia Limited's bank accounts. Access is controlled by unique user IDs and passwords, which must remain confidential, and under no circumstances be divulged to anyone else.

The bank accounts are reconciled weekly.

Business-related expenses under \$500 may be paid for by the Managing Director using their Credit or Debit cards or online banking without the approval of the Management Team.

Purchases over \$500 must be agreed by the Management Team.

All purchases must be reconciled in Quickbooks. Receipts for all expenditure must be provided to the Accounts Advisor.

The Accounts Advisor is responsible for authorising and reimbursing payments for work-related expenses incurred by staff, where appropriate.

The Finance Manager is responsible for ensuring that processes are in place and there are funds available to pay for:

- staff wages and salaries;
- long service leave, sick leave and accumulated annual leave entitlements;
- equipment and other assets;
- training and development;
- maintenance; and
- unexpected expenses.

The Managing Director is also responsible for ensuring all debts incurred by Bilingual Care Worker Cooperative of Australia Limited are settled by their due date or arranging extensions for payment where this is necessary.

Clients, their supporters and other stakeholders have access to Bilingual Care Worker Cooperative of Australia Limited's feedback and complaints processes and can raise issues about the business' financial management processes without fear of retribution.

Assets

Details of all assets owned by Bilingual Care Worker Cooperative of Australia Limited are recorded in an Asset Register. When an asset is sold or otherwise disposed of, the details of the disposal (such as sale proceeds) are recorded in both Quickbooks and the Asset Register.

Where an asset is lost, damaged, or destroyed, Bilingual Care Worker Cooperative of Australia Limited will repair or replace the asset if it is still required. Asset depreciation will be recorded in accordance with the Australian Accounting Standards.

Insurance

The Finance Manager is responsible for ensuring all people and equipment associated with Bilingual Care Worker Cooperative of Australia Limited's operations are covered by all necessary insurances. Insurances are recorded in an Insurances Register, which includes the type of insurance, policy name and number, annual premium and expiry date of each policy.

Insurance policies must be renewed no less than 14 days before their expiry and reflect the business' requirements as well as market conditions.

Organisational Budget Processes

The Finance Manager prepares annual itemised budgets for Bilingual Care Worker Cooperative of Australia Limited for each financial year in consultation with Bilingual Care Worker Cooperative of Australia Limited's independent accountant. Budget development

takes into account the current and previous year's income and expenditure, any known changes to funding arrangements and expected cost changes.

The Finance Manager will set annual budgets, according to the available funding, to be endorsed by the Management Team.

All monies received by the organisation must be recorded.

The Finance Manager (or delegate) will prepare a quarterly report of expenditure against the budget.

The Finance Manager (or delegate) will conduct a financial reconciliation annually in consultation with the Management Team and independent accountant and prepare a Financial Report.

The Financial Report will include:

- Profit & Loss year to date;
- Balance Sheet for the year to date;
- General Ledger for the year to date; and
- Budget vs. Actual for the year to date.

Annual budgets for each financial year must be endorsed by the Management Team by no later than the July of that financial year.

Payroll

Payroll is processed fortnightly by the Payroll Officer. Employees receiving wages based on the number of hours they work must submit a timesheet to the Payroll Officer by the Sunday before payroll is processed.

Internal Reporting

The Finance Manager prepares monthly financial reports for review by the Management Team.

Financial statements for submission to funding bodies are prepared by the Finance Manager at the intervals specified in funding contracts. These are also endorsed by the Management Team prior to submission.

Bilingual Care Worker Cooperative of Australia Limited will complete the annual Aged Care Financial Report (ACFR) by the 31st of October each year to report the submission of this to the Board Members of Bilingual Care Worker Cooperative of Australia Limited. This will be the responsibility of the Managing Director and Finance Manager.

Steps for completing the ACFR:

1. Gather Required Financial Data:

- Income and expenditure reports
- Balance sheets
- Cash flow statements
- Home Care Package (HCP) subsidy and client contribution records
- Employee wages and benefits data

2. Review Compliance Requirements:
 - Ensure financial statements adhere to the Aged Care Act 1997 and relevant accounting standards.
 - Verify expenditure allocations comply with funding guidelines.
3. Prepare Financial Statements:
 - Consolidate financial records for the reporting period.
 - Ensure accuracy in revenue recognition and expense categorization.
4. Internal Review and Approval:
 - Submit the draft report to the Finance Manager for initial review.
 - Conduct an internal audit check to validate the accuracy of financial data.
 - Obtain approval from senior management or the board before submission.
5. Lodgement of ACFR:
 - Submit the ACFR via the My Aged Care Provider Portal before the specified deadline.
 - Ensure all supporting documents are attached as required.
 - Keep a copy of the submitted report for compliance records.
6. Post-Lodgement Actions:
 - Address any feedback or compliance inquiries from regulatory bodies.
 - Implement corrective actions if discrepancies are identified.
 - Maintain a record of the ACFR submission and review outcomes.

Each financial year, the Finance Manager appoints a qualified auditor to audit Bilingual Care Worker Cooperative of Australia Limited's accounts. Bilingual Care Worker Cooperative of Australia Limited's independent accountant and Finance Manager ensure all necessary documents and records required by the auditor are made available to them in a timely manner and are accurate and complete when presented.

In each new financial year, the Finance Manager will ensure that the previous year's financials are documented, archived and labelled.

External Reporting

The Finance Manager is responsible for reconciling Bilingual Care Worker Cooperative of Australia Limited's accounts at the end of each financial quarter/year and submitting Business Activity Statements to the Australian Tax Office (ATO) within the required timeframe.

The Finance Manager is also required to provide information to the Secretary of the Department of Health and Aged Care under sections 53E and 56G of the *Accountability Principles 2014*.

The Finance Manager is also responsible for reporting Superannuation and Pay As You Go (PAYG) tax withholding amounts to the ATO.

All Superannuation must be paid to the correct super funds within the timeframe required. BAS and PAYG amounts must be paid to the ATO by their due date. The Finance Manager must contact the ATO should Bilingual Care Worker Cooperative of Australia Limited be unable to make any of these payments on time.

Fraud and Corruption

Bilingual Care Worker Cooperative of Australia Limited's Managing Director is responsible for ensuring staff are trained in and understand what fraudulent practices are, how to identify potential fraud and how to report fraud.

Where a staff member, client or other stakeholder identifies suspected fraud or corruption, they must make an initial report to:

- Managing Director (unless that person may be implicated); or
- the Police.

All reports of fraud or corruption must be treated confidentially and referred to the Management Team. The Managing Director will record all reports of actual and suspected fraud or corruption, noting the nature of the report, the time received, and remedial actions planned and taken. A copy of these records must be made available to relevant authorities upon request.

Any internal discipline or misconduct investigations relating to staff as a result of a fraud or corruption allegation must be conducted in accordance with Bilingual Care Worker Cooperative of Australia Limited's Human Resources Policies and Procedures.

If, during the course of a disciplinary investigation, it is determined that a criminal offence such as fraud or corruption may have been committed, a report must be made to the police. To ensure that a criminal investigation is not compromised, clearance may need to be sought from the police for Bilingual Care Worker Cooperative of Australia Limited to:

- continue the disciplinary investigation;
- notify the staff member of misconduct allegations;
- interview witnesses to inform a disciplinary investigation; and
- release information to the staff member or their representative.

5. Provision of Aged Care Home Care Services - Pricing/Fee Structure

Bilingual Care Worker Cooperative of Australia Limited's Accounts Advisor will ensure that all

of Bilingual Care Worker Cooperative of Australia Limited's financial arrangements regarding Aged Care service delivery comply with all relevant Commonwealth or State law or other requirements.

The Managing Director will develop pricing structures for Bilingual Care Worker Cooperative of Australia Limited services that remain up to date and aligned with the most recent Commonwealth Department of Health and Aged Care's Schedule of Fees and Charges for Home Care.

Bilingual Care Worker Cooperative of Australia Limited's pricing structures will also meet the requirements of the Aged Care (Transition Provisions) Act 1997, User Rights Principles 2014 and the Home Care Pricing Schedule.

The Managing Director is responsible for ensuring Bilingual Care Worker Cooperative of Australia Limited's pricing information is published in a standardised home care pricing schedule (the Schedule) on the My Aged Care website. The Schedule must contain:

- the common services Bilingual Care Worker Cooperative of Australia Limited provides;
- the costs under a home care package for the common services; and
- up to date pricing information (reviewed annually).

Bilingual Care Worker Cooperative of Australia Limited must also attach a full price list on the My Aged Care website via either a PDF document (or similar) or a website URL linked directly to Bilingual Care Worker Cooperative of Australia Limited's full price list.

The Finance Manager (or delegate) will maintain full and accurate accounts and financial records of the supports delivered to Home Care clients, along with records of all Home Care Agreements.

Bilingual Care Worker Cooperative of Australia Limited accounts and financial records will be maintained on a regular basis and in such detail that the Commonwealth Department of Health and Aged Care and other relevant government bodies are able to accurately ascertain the quantity, type and duration of support delivered.

Financial records and accounts relating to Aged Care service provision will be retained for a period of no less than 5 years from the date of issue.

The retention of all records will also comply with all relevant statutes, regulations, by-laws and requirements of any Commonwealth, State or Local Authority.

Home Care Agreements

Clients are ultimate decision makers in relation to the management of their finances (including their care package) and this is reflected in their Home Care Agreement with Bilingual Care Worker Cooperative of Australia Limited.

A Home Care Agreement will be used to formalise the supports that Bilingual Care Worker Cooperative of Australia Limited will provide clients.

When beginning care and service provision with clients, the Care Manager will be responsible for developing a budget in partnership with the client, their family, their advocate or representative. This will be directly based on the client's Home Care Agreement, Package Level, Funds Available and the Care Plan.

Each client's individualised budget will be comprised of the basic daily fee, government

subsidy, administration fees, case management fees, contingency fees, income tested fee and any eligible supplements.

Fees charged will not exceed the price controls set by the Commonwealth Department of Health and Aged Care. These pricing caps relate to administration and management charges for the home care package program as listed in Division 3B of the User Rights Principles 2014.

Bilingual Care Worker Cooperative of Australia Limited will ensure all prices, budgets and financials are clear and transparent. Clients will be required to notify Bilingual Care Worker Cooperative of Australia Limited of any changes in the budget or fees.

Bilingual Care Worker Cooperative of Australia Limited Home Care Agreements will clearly set out the costs to be paid for supports, when delivery of supports is to be performed and the method of payment required. See Bilingual Care Worker Cooperative of Australia Limited's Assessment and Review Policy and Procedure and Care Planning Policy and Procedure for more information on what the Home Care Agreement will contain.

The client should sign the Home Care Agreement before service delivery can commence. See Bilingual Care Worker Cooperative of Australia Limited's Assessment and Review Policy and Procedure and Care Planning Policy and Procedure for more information.

Home Care Agreements will be consistent with the requirements of the *A New Tax System (Goods and Service Tax) Act 1999* regarding the application of the GST.

Clients, their supporters and other stakeholders have access to Bilingual Care Worker Cooperative of Australia Limited's feedback, compliments and complaints processes to raise issues about financial management of their supports without fear of retribution.

Unspent Funds

In terms of Unspent Funds, the client's unspent funds are included within the accounting systems as a liability to ensure funds are available when required. If the client continues to receive a package at a different package level, the unspent funds will continue to be available under the client's new package.

Should the situation arise where a client ceases Home Care services with Bilingual Care Worker Cooperative of Australia Limited, unspent Home Care Package funds will be transferred to the client's new Home Care Provider.

In the event that a client leaves home care or passes away, Bilingual Care Worker Cooperative of Australia Limited must:

- notify the Commonwealth of the Commonwealth portion (including nil amounts) within 70 calendar days through the claims process managed by Services Australia;
- transfer the client portion to the client or their estate; and
- note that the Commonwealth portion will be recovered through dedications in future home care subsidy payments made to Bilingual Care Worker Cooperative of Australia Limited.

Other Payment Arrangements

Where there is no funding requirement for fees to be charged for services rendered, Bilingual

Care Worker Cooperative of Australia Limited will charge the client on a fee for service basis (for example – for the provision of Private Aged Care services).

Aged Care Fee Payments

Fees are calculated daily and are acquitted against clients' Home Care Packages account monthly.

Fees are to be paid by Direct Debit or direct deposit however Bilingual Care Worker Cooperative of Australia Limited will work with each client to ensure they are not disadvantaged to receive their Home Care Package based on Bilingual Care Worker Cooperative of Australia Limited's fee payment preferences.

Cash will not be kept on Bilingual Care Worker Cooperative of Australia Limited's premises for safety reasons and Bilingual Care Worker Cooperative of Australia Limited will not accept cash payments unless by exceptional circumstance or where it has been previously approved by a member of the Management Team.

Fees are managed via Bilingual Care Worker Cooperative of Australia Limited's financial administration of clients' Home Care Packages.

Where a client has difficulty paying their fees due to reasons beyond their control, Bilingual Care Worker Cooperative of Australia Limited's Managing Director will offer them the option of applying for financial hardship assistance with Services Australia (via a financial hardship assistance for home care and residential respite care SA462 application form).

Until such a time that the client's financial hardship is resolved, Bilingual Care Worker Cooperative of Australia Limited will work with the client so that a mutually acceptable payment arrangement can be put in place (or similar).

Subsidy Claiming

Bilingual Care Worker Cooperative of Australia Limited's Accounts Advisor and Care Manager are responsible for the following in relation to Home Care Package client subsidy claiming:

- ensuring all clients entering into a Home Care Agreement with Bilingual Care Worker Cooperative of Australia Limited have been assigned a Home Care Package and agreed to receive care and services;
- accessing the My Aged Care Provider Portal to accept new clients within Bilingual Care Worker Cooperative of Australia Limited prior to initial claiming;
- completing the client entry information for Services Australia via the Aged Care Online System (ACOS) or submission of an Aged Care Entry Record (ACER) for each new client; and
- any ongoing administrative requirements within the Services Australia Aged Care Online Services including regular claiming, monitoring of payment statements and required reporting.

The Accounts Advisor is responsible for reconciling the Subsidy Payment Form and the Subsidy Claim Form. This is required to be completed within the first week of the next month. Should there be discrepancies, Bilingual Care Worker Cooperative of Australia Limited will provide a detailed written explanation where required.

Monthly Statements

Bilingual Care Worker Cooperative of Australia Limited will ensure that clients/their nominated representatives are provided with monthly statements (as required under section 21 B of the User Rights Principles 2014) that contain the following information:

- details of services received,
- fees charged,
- any additional primary supplements,
- subsidy/funds available, and
- the expenditure in respect of the care and services.

Monthly statements will be in a format that suits each client's needs and information detailed in the statement is easy to understand. Statements will be generated on the Eziplan platform by the Accounts Advisor.

Consumer Funds

To properly quarantine consumer funds and subsidies from the main expenditure account in in-home aged care, follow these steps:

1. Establish Separate Bank Accounts
 - Open a dedicated consumer funds account to receive all subsidies and consumer contributions.
 - Maintain a separate operating expenses account for general business expenses.
2. Automate Fund Transfers & Allocations
 - Configure automated transfers to allocate funds to designated accounts as soon as they are received.
 - Ensure that only approved expenses (such as care services and related costs) are deducted from consumer funds.
3. Implement Fund Access Controls
 - Restrict access to the consumer funds account to authorized personnel only.
 - Set dual authorization requirements for fund withdrawals or transfers.
4. Monthly Reconciliation & Audits
 - Conduct monthly reconciliations to ensure consumer funds match recorded obligations.
 - Perform quarterly internal audits to verify compliance with aged care financial regulations.
5. Financial Reporting & Transparency
 - Generate individual client statements detailing fund usage and balances.
 - Ensure compliance with Aged Care Quality Standards and Aged Care Act 1997 financial management requirements.

Leave Arrangements

Clients are able to receive leave from the Home Care Package when required. This could include clients taking a holiday. If the client wishes to take this leave, Bilingual Care Worker

Cooperative of Australia Limited must approve, however the income-tested fee (if applicable) may be asked to pay whilst undertaking said leave. The full fee must be paid for up to 28 days followed by a reduced fee after the 28-day time frame.

Leave arrangements remain the same across all Home Care Package Levels. Should the client require hospital leave, this may be unlimited for a client. All financials and budgets will be adhered to in accordance with the client's signed Home Care Agreement. Clients or their family, advocate or representative are required to inform Bilingual Care Worker Cooperative of Australia Limited of any leave in writing, 7 days prior to the services being superseded.

If a client is taking leave due to transition care, a subsidy is payable (at the full basic subsidy rate) for up to 28 consecutive days in a year, for each episode of transition care.

After 28 consecutive days, the subsidy is payable at 25% of the basic subsidy rate.

If a client is taking leave due to hospitalization, a subsidy is payable (at the full basic subsidy rate) for up to 28 consecutive days in a year, for each episode of hospitalization. After 28 consecutive days, the subsidy is payable at 25% of the basic subsidy rate.

If a client is taking respite care leave, a subsidy is payable (at the full basic subsidy rate) for up to 28 cumulative days in a year. After 28 cumulative days, the subsidy is payable at 25% of the basic subsidy rate.

If a client is taking a form of social leave, a subsidy is payable (at the full basic subsidy rate) for up to 28 cumulative days in a year. After 28 cumulative days, the subsidy is payable at 25% of the basic subsidy rate.

Should the situation arise where a client has been transferred to a different Package Level, their full leave entitlements will be available under the new Package Level. If required, a client may be required to pay an ongoing care provision fee while on leave from their package which will not exceed the usual fee agreed upon by the client and Bilingual Care Worker Cooperative of Australia Limited. Under no circumstances will care provision fees be charged if the client is undertaking leave due to Residential Respite Care Leave or Transition Care Leave.

Exit Fees

In line with new legislation from 1 January 2023, Bilingual Care will not charge an exit fee if a consumer exits a service or transfers to a new provider. This includes existing consumers, regardless of whether the consumer has agreed to exit charges in a previous agreement.

Use of Client Funds

If any worker in Bilingual Care Worker Cooperative of Australia Limited completed shopping on behalf of clients, workers are required to retain receipts and provide all change. Failure to abide by this and the action of theft will result in serious consequences and disciplinary action in accordance with the Disciplinary Action Policy and Procedure.

6. Supporting Documents

Relevant documents relating to this Policy and Procedure:

- Disciplinary Action Policy and Procedure
- Care Planning Policy and Procedure

- Assessment and Review Policy and Procedure
 - Home Care Agreement
 - Care Plan
 - Subsidy Claim Form
 - Subsidy Payment Form
 - Audit, Internal Assessment and Schedule Policy and Procedure
 - Internal and External Review/Audit Schedule
 - Asset Register
 - Insurance Register
 - Budget
- 7. Applicable Aged Care Quality Standards**
- Standard 8 - Organisational Governance

Workplace Health, Safety and Security Policy

1. Policy and Procedure

The objective of the Workplace Health, Safety and Security Policy and Procedure is to ensure the safety obligations that Bilingual Care Worker Cooperative of Australia Limited must deliver for all workers and interested parties, whilst providing safe and protected support developmental structure. All aspects of upkeep regarding equipment, machinery and property are to have constantly evolving standards.

Workplace Health, Safety and Security refers to ensuring the safe delivery of care to clients and also for workers. Bilingual Care Worker Cooperative of Australia Limited’s aim is to promote reliable, safe and comfortable wellbeing for all workers, clients, Management, stakeholders, families, advocates, friends, visitors and all other interested parties.

This Policy and Procedure will abide by all standards, applicable laws, and legislations, it will also be developed in conjunction with Workplace Health and Safety Rules, Regulations and Standards.

This extends to all employees and meets relevant laws and regulations and standards.

2. Definitions

Worker	Includes employees, contractors, subcontractors, apprentices and trainees, work experience students, volunteers and any other individuals if they perform work for the business.
Workplace	Any place where work is carried out on behalf of Bilingual Care Worker Cooperative of Australia Limited. This can include a client’s private residence, or public areas in the local community.
Trespassing	Commit an offence against (a person or a set of rules) by entering someone’s land or property without permission.
Liability	A person or thing whose presence or behaviour is likely to put one at a disadvantage, leading to the state of being legally responsible for something.
Stakeholders	Denoting a type of organisation or system in which all the members or clients are seen as having an interest in its success.
Defibrillator	An apparatus used to control heart fibrillation by application of an electric current to the chest wall or heart.
Noise emission	Noise emission refers to the noise emitted by the source, in essence the sound power of the source.
Duty of care	A legal obligation to avoid causing harm or to prevent harm occurring to another person through any act that is careless or negligent and arises from a relationship

	<p>between parties. Health and aged support workers have a duty of care to the older people they are assisting. In the context of this policy, duty of care refers to the responsibility of Bilingual Care Worker Cooperative of Australia Limited to provide staff with an adequate level of care and protection against reasonable, foreseeable harm and injury. Similarly, Bilingual Care Worker Cooperative of Australia Limited staff are expected to provide clients and anyone else using the service with the same level of care and protection to prevent reasonable, foreseeable harm and injury.</p>
Electrical Equipment	<p>Any apparatus, appliance, cable, conductor, fitting, insulator, material, meter or wire that:</p> <ul style="list-style-type: none"> • is used for controlling, generating, supplying, transforming or transmitting electricity at a voltage greater than extra-low voltage; • is operated by electricity at a voltage greater than extra-low voltage; • is part of an electrical installation located in an area in which the atmosphere presents a risk to health and safety from fire or explosion; or • is, or is part of, an active impressed current cathodic protection system.
Hazard	<p>The chance of something happening that may have a negative (or positive) effect on the intended outcome. In relation to health and safety, this is generally a source or situation that could cause harm or damage to a person, property or the environment.</p>
Person Conducting a Business or Undertaking (PCBU)	<p>Abroad term used in Workplace Health and safety legislation to describe all forms of modern working arrangements, commonly referred to as businesses. This includes an individual who is conducting a business in their own right (e.g. Sole Trader/Self-employed).</p>
Personal Protective Equipment (PPE)	<p>Clothing or equipment worn by workers to protect them from possible harm or injury. PPE can include items such as eye and face protection (e.g. glasses, goggles or face shields), gloves, masks, clothing (e.g. coveralls, aprons), and safety footwear.</p>
Reasonably Practicable	<p>What could be reasonably able to be done at a particular time to ensure health and safety, with regard for:</p> <ul style="list-style-type: none"> • the likelihood of the hazard or risk occurring; • the degree of potential harm; • how much information is known, or ought to have been known, about the hazard or risk; • the ways of eliminating or minimizing the risk; • the availability/suitability of eliminating or minimising the risk; and • the cost of eliminating or minimising the risk (is the cost grossly disproportionate to the potential risk).

<p>Safe Work Procedure (SWP)</p>	<p>A documented procedure for performing specific workplace tasks. SWPs reduce risks to health and safety by ensuring staff know how to work safely when carrying out specific tasks by providing step-by-step instructions on how to perform a task/job, and the necessary safety precautions. SWPs may also be called Standard Operating Procedures (SOPs).</p>
----------------------------------	---

3. Policy

The Workplace Health, Safety and Security Policy expects workers to actively uphold all standards set out in this policy to guarantee all appropriate precautions are then regarding the protection of guests, relevant personnel, workers and their personal belongings. Bilingual Care Worker Cooperative of Australia Limited retains the protection and security of workers and visitors through a wide range of security measures connected to the premises and also for workers attending client’s home to provide care or travel. The safety and security for all workers and guests is accomplished in combination with existing legislations along with Workplace Health and safety standards depicted throughout this Policy and Procedure.

In order to prevent trespassing, the office premise will be secured constantly. Workers and other interested parties will be able to access all systems within Bilingual Care Worker Cooperative of Australia Limited in a reliable and protected manner at any given time, these areas are always to be maintained.

This Policy is applicable to Bilingual Care Worker Cooperative of Australia Limited in all its operations and functions, including where personnel work off site, for example at a client’s home. Bilingual Care Worker Cooperative of Australia Limited understands its moral and legal responsibility under all health and safety legislation to provide a practical, safe and healthy environment for workers delivering care and for clients receiving services.

Bilingual Care Worker Cooperative of Australia Limited’s Managing Director and the WHS Officer is responsible for the management and oversight of the Workplace Health, Safety and Security for all persons related to Bilingual Care Worker Cooperative of Australia Limited. This facilitates co-operation between Bilingual Care Worker Cooperative of Australia Limited, its workers and clients to develop and implement measures specifically designed to ensure a safe and healthy working environment.

4. Obligations of Bilingual Care Worker Cooperative of Australia Limited Management

Management of Bilingual Care Worker Cooperative of Australia Limited have an obligation under the *Work Health and Safety Act 2011 (NSW)* to ensure the health and safety of each employee and client of Bilingual Care Worker Cooperative of Australia Limited and to ensure the health and safety of others is not affected by Bilingual Care Worker Cooperative of Australia Limited activities.

Bilingual Care Worker Cooperative of Australia Limited’s Management Team is responsible for:

- implementing an effective WHS program for Bilingual Care Worker Cooperative of Australia Limited, taking into account the size and nature of the services it provides;

- showing leadership and commitment to having a positive safety culture;
- consulting and involving staff and other stakeholders about health, safety and well-being matters that may affect them;
- developing and documenting WHS policies and procedures, including Safe Work Procedures and Emergency Procedures;
- providing health and safety training and information for all staff to safely perform their role;
- reporting and investigating accidents and incidents;
- following an open disclosure framework by providing an apology and acknowledgement when any accident or incident had the risk of harm or caused harm to a client;
- managing risks by eliminating or reducing them as far as is reasonably practicable;
- providing appropriate safety equipment and personal protective equipment (PPE); and
- regularly monitoring and reviewing Bilingual Care Worker Cooperative of Australia Limited's health and safety performance to identify improvements

Management will delegate responsibility of management of Workplace Health and Safety but retains ultimate accountability.

5. Obligation of Delegates

Delegates must ensure that the functional areas under their control comply with the *Workplace Health and Safety Act 2011* and all applicable standards.

In carrying out these obligations, delegates are expected to:

- Ensure that the Health and Safety Policy is available to all employees and displayed in each work site
- Issue instructions for the Health and Safety of employees and others
- Establish a process for regular risk assessments and self-audits in workplaces
- Monitor all aspects of Health and Safety processes
- Ensure adequate training and supervision of standard work practices
- Ensure all work-related incidents are investigated and appropriate action implemented to prevent a recurrence
- Ensure health and safety issues are resolved
- Include Workplace Health and Safety as an agenda item at all meetings
- Budget for training, safety equipment and other health and safety resources

6. Obligations of Supervisors

All Managers and those in management positions at the corporate office have an obligation to ensure the Workplace Health and safety of all employees and clients receiving support from Bilingual Care Worker Cooperative of Australia Limited by preventing and minimising exposure to risk.

To meet these obligations, Managers are expected to:

- Be the first point of contact for employees regarding health and safety concerns

- Be familiar with relevant health and safety legislation and standards
- Undertake risk assessments and self-audits within work sites
- Include health and safety in all induction programs
- Carry out equipment safety checks
- Ensure the correct use of all safety equipment and PPE
- Record all injuries, incidents, illnesses and hazards
- Investigate the circumstances surrounding all incidents and take corrective action
- Seek assistance in the resolution of Workplace Health and safety issues from Management team.
- Ensure all Support Workers have current First Aid Certificates, and up to date police/NDIS Worker Screening in place (specific to the jurisdiction in which they operate).

7. Obligation of employees and Clients and visitors

All employees and Clients have an obligation to comply with Bilingual Care Worker Cooperative of Australia Limited Workplace Health and Safety policies, procedures, and instructions to ensure a safe workplace.

Bilingual Care Worker Cooperative of Australia Limited staff are responsible for:

- taking responsibility for their own health and safety, and not compromising the safety of others;
- following all reasonable instructions, safe work procedures and rules;
- reporting any health and safety hazards or concerns;
- reporting all injuries, incidents or near misses as soon as possible;
- participating in health and safety training as required by Bilingual Care Worker Cooperative of Australia Limited; and
- promoting a positive health and safety culture to help continuously improve.

If a staff member does experience an injury or illness, Bilingual Care Worker Cooperative of Australia Limited is committed to the safe and durable return of the injured worker and will:

- participate in the development of a return to work/suitable duties plan and ensure that injury management commences as soon as possible after the staff member is injured;
- support the injured staff member and ensure that early return to work is a normal expectation;
- provide meaningful suitable duties that are based on medical advice as soon as possible;
- ensure that injured staff (and anyone representing them) are aware of their rights and responsibilities – including the right to choose their own doctor, and the responsibility to provide accurate information about the injury and its cause;
- comply with requests for updates of their licences including drivers' licence, first aid certificates, and police checks/NDIS Worker Screening;
- consult with staff to ensure that the return-to-work program operates as smoothly as possible; and

- maintain the confidentiality of injured staff members and their records.

Clients and visitors, volunteers and contractors are required to:

- Comply with Workplace Health and safety instructions
- Take corrective actions to eliminate hazards in the workplace
- Report all hazards which cannot be immediately corrected
- Use all PPE provided
- Not misuse any safety equipment provided
- Not wilfully place at risk the safety of themselves or others in the workplace
- Not wilfully injure themselves
- Be familiar with all emergency and evacuation procedures

8. Risk Assessments

The following approach should be taken when conducting a risk assessment in relation to a possible workplace health and safety hazard:

- conduct the risk assessment objectively - gather all available, relevant information, data and research about the hazard;
- include staff and/or clients who work with, or may be directly impacted by the hazard, in the risk assessment process – risk assessments should be a team effort;
- consider all possible control options, based on the Hierarchy of Control, as outlined in Bilingual Care Worker Cooperative of Australia Limited's Risk Management Policy and Procedure.
- document the risk assessment, including who was involved in the risk assessment, the nature of the hazard/s, the current controls and any proposed treatments in the Risk Assessment Form
- assign any proposed/future treatments to a responsible Manager and agree on a date that the action can be reasonably completed;
- regularly review the progress of treatment actions to ensure they are completed, or if they cannot be completed to determine an alternate strategy to reduce the risk; and
- provide the Risk Assessment to the Director/Managing Director so that it can be entered and tracked in Bilingual Care Worker Cooperative of Australia Limited's Risk Register.

For additional guidance in conducting risk assessments and some practical advice for managing risks for staff working in client's homes, the Guidance Material "[A guide to working safely in people's homes](#)" (2018) from Workplace Health and Safety Queensland may be helpful (noting it can be applied across all States and Territories).

9. Working in a Client's Home

Where supports are to be provided in a client's home, the Home Risk Assessment must be completed (and Client Risk Assessment if assessed as required), monitored and reviewed (see Bilingual Care Worker Cooperative of Australia Limited's Risk Management Policy and Procedure).

A client's home can change between visits. Changes may include:

- positioning of furniture;
- inoperable electrical equipment;
- people or animals are now present;
- altered storage patterns;
- spills or leaks;
- new equipment or furniture; and
- obstructed access.

Staff must determine at each visit the safety of the client's home as a workplace before commencing their duties. This includes undertaking a visual scan of the home immediately on arrival, and of any equipment to be used, before use.

Clients and/or their supporters are responsible for:

- maintaining a safe work environment for staff (for example, repair broken steps, mow long grass, restrain animals, provide adequate lighting);
- looking after their own in-home safety (for example, maintaining electrical equipment and installing smoke alarms and safety switches to switchboards);
- cooperating with staff to ensure they can work in a safe way (for example, moving furniture to allow adequate workspace);
- keeping their equipment safe, well maintained and in good order; and
- informing staff of any known hazards.

10. Remote or Isolated Work

Remote or isolated work is when a staff member may be isolated from help from other people because of where or when they are working, or the nature of the work they are doing. For example, they may be working in locations or at times where it would be difficult for them to be rescued, get medical assistance or be reached by emergency services.

Workers also face additional risks if nobody else is around to help with difficult tasks, alert them to hazards, give a second opinion about how to safely do a task, or notice if they are fatigued.

A worker may be isolated even if other people are close by, for example a community nurse carrying out clinical visits at night.

Bilingual Care Worker Cooperative of Australia Limited must manage the risks associated with remote or isolated work. This is particularly important should a staff member require medical assistance, rescue or emergency services. Exposure to violence and poor access to emergency assistance are the main hazards that increase the risk of remote or isolated work.

Bilingual Care Worker Cooperative of Australia Limited will ensure that it has effective means of communication with workers at all times while on duty. To support staff working alone or remotely, specific communications processes, electronic logging in and out, GPS tracking, duress alarms will be provided.

11. Injury and emergency management

Injury and emergency management is necessary to ensure prompt, effective action to reduce the severity of injury to personnel and minimise the damage to property and equipment.

Should an injury or emergency occur:

- Shut down any equipment.
- Render First Aid if required (remember the DRABC Action Plan).
- Minimise further personal injury and / or equipment damage.
- Move the casualty only if there is an immediate danger.
- The injured worker or nearest colleague should contact 000 for an ambulance followed by notification to the nearest Manager.
- Any employee who is injured on the job, experiences a safety incident or a near miss, must report the incident to the nearest manager, Care Manager or Managing Director.
- The manager or Managing Director must write a report in the Register of Injuries, Incidents and Near Misses. This standard report must include:
 - employee's name and job details
 - time and date of injury
 - exact location the injury/incident occurred
 - how the injury/incident happened
 - details of the injury/illness and the part/s of the body injured
 - names of any witnesses
 - name of the person entering details in the Register
 - date the employer was notified
- Bilingual Care Worker Cooperative of Australia Limited will let the injured worker know in writing that we have received notification of any injury or illness reported and it is recorded in the Register.
- See section 9, below, for information on the type of injuries and emergencies should be notified to Workplace Health and Safety immediately.

12. Incident Reporting

In the event of a notifiable incident, the person responsible for making the notification is the staff member (volunteer or paid) involved or closest to the incident. The Directors and management of Bilingual Care Worker Cooperative of Australia Limited must be notified at the earliest convenience.

Bilingual Care Worker Cooperative of Australia Limited must notify Workplace Health and Safety as soon as they become aware of a death, or a serious injury that results in:

- Immediate hospital treatment as an in-patient;
- Immediate medical treatment for injuries (e.g. amputation, scalping, a spinal injury, loss of a bodily function or a serious laceration, burn, head or eye injury, fracture of any bone in

the arm (other than in the wrists or hand) or in the leg (other than the bone in the ankle or foot));

- Medical treatment within 48 hours of exposure to a substance; or
- Any injury other than those referred to above which, in the opinion of a medical practitioner, is likely to prevent the employee from being able to work within 10 days of the day on which the injury occurred.

Workplace Health and Safety must also be immediately notified of any dangerous incident that exposes a person to a serious health or safety risk from immediate or imminent exposure to:

- An electric shock.
- The fall or release from height of any equipment, substance or thing.
- Other incidents as stated in the WHS Regulation.

Notice of an incident must be given by the fastest possible means. A written notice may be required by Workplace Health and Safety. A record of this notice or notes of the telephone conversation must be kept for 7 years. The site of the incident must not be disturbed until an inspector arrives at the site or directs otherwise. This does not prevent any action required to protect a person's health or safety.

Following the incident, Bilingual Care Worker Cooperative of Australia Limited's Directors and management will investigate to ascertain why the incident occurred and implement strategies to ensure that the incident does not occur again. This investigation process involves the collection of evidence, identification of immediate causes and corrective actions.

13. Entry to Premises

Bilingual Care Worker Cooperative of Australia Limited is situated at Suite 17, 8-12 King Street, Rockdale, NSW 2216

The office/front door will be locked when unattended. All documents are locked in the filing cabinet. Alarms will be in operation when unattended. Only the Managing Director and nominated key personnel will be given the code for the alarm system.

14. Departure from Premises

Any time the office is left unattended it will be fully locked and alarm systems will be in operation. All doors and filing cabinets will be locked by the Managing Director or nominated key personnel. The Managing Director will be responsible for backing up all electronic files before exiting the premises, in accordance with the Information and Record Keeping Policy and Procedure.

15. Damages/Theft of Facilities or Personal Belongings

In the situation that personal belongings (including workers, guests and any other affected parties) or Bilingual Care Worker Cooperative of Australia Limited's facilities are to be stolen or damages have occurred, workers or Management must report to the Managing Director immediately who will take the appropriate steps including notifying authorities such as Police on 000, or communicating with applicable insurance companies. Workers must have means

of ensuring their belongings are safe and secured. Bilingual Care Worker Cooperative of Australia Limited takes no responsibility or liability for the damage or theft of personal items of workers.

16. Worker Education, Training and Orientation

Every new worker, staff member or employee of Bilingual Care Worker Cooperative of Australia Limited shall be provided training or instruction on the following (however is not limited to):

- Location and correct procedure when operating of all fire equipment.
- Correct identification and minimization of fire hazards.
- Correct procedure to abide by in any and all emergencies.
- All Emergency Training – this could include First Aid, Asthma, CPR etc.
- Bilingual Care Worker Cooperative of Australia Limited's evacuation drill.
- Thorough orientation of all correct procedures (e.g. Managing Risks, Incident Reporting etc.)
- Appropriate Risk identification and management in accordance with the Risk Management Policy and Procedure.
- Appropriate Incident Report Form completion and management in accordance with the Incident and Abuse Management Policy and Procedure.
- Correct Manual Handling procedures.
- Competency Approval for all Medical and Care competency guides.

This will be provided within (7) days of commencing employment with Bilingual Care Worker Cooperative of Australia Limited.

17. Lighting and Ventilation

There must be plenty of light to allow workers to execute duties without straining eyes or developing unpleasant postures. Additional lighting in poor lighting fields should be used. When workers are attending a client's home and providing care, the worker is urged to ensure appropriate lighting is demonstrated in work areas.

In terms of windows and doors, fans or air conditioning, internal workplaces must be correctly ventilated.

During extreme temperatures, an average temperature between 20 °C and 26 ° C should be retained throughout the working and service delivery environment.

18. Electrical Safety

Electrical work is not to be undertaken on Bilingual Care Worker Cooperative of Australia Limited premises except by an appropriately licensed Electrical Installation worker engaged by the Managing Director. The changing of light globes and lamps have been known to result in electric shock and falls from heights. This work must be completed by a licenced electrician or an appropriately trained staff member or contractor.

19. Testing, Tagging and Repairing Electrical Equipment

The inspection, testing and tagging of electrical equipment used at Bilingual Care Worker Cooperative of Australia Limited must be conducted for all equipment that is in use.

Equipment not in use and/or beyond its testing date should be removed from service, and an isolation tag applied noting that tagging is required and must be completed prior to use.

Testing and tagging of equipment must be done either by a qualified electrician or by someone who has successfully completed an approved course at a Vocational Education and Training provider.

There are also a number of electrical contractors who specialise in the checking and tagging of electrical equipment. Electrical appliances must be inspected and tested:

- at intervals not exceeding those set out by AS3760:2010 (a tolerance of two weeks is acceptable); and
- before being returned to service or after any repair or servicing that could have affected the electrical safety of the appliance.

Manufacturer's instructions may specify intervals appropriate to specific types of equipment.

20. New Equipment

Brand new electrical equipment that is 'out of the box' and unused (i.e. new equipment that is not second-hand) does not have to be tested before first use but should still be visually inspected to ensure that no damage occurred during transport, delivery, installation or commissioning.

The date when the new electrical item was placed into service should be recorded, including:

- that the equipment is 'new to service';
- the date of entry into service; and
- the date when the first electrical safety test is due.

Any equipment purchased second-hand must be tested and tagged before first use.

21. Appliances Brought in from Home

Electrical appliances brought in from home by staff, or by contractors, clients or volunteers, for use on Bilingual Care Worker Cooperative of Australia Limited premises are subject to the same testing and tagging procedures as for appliances owned or leased by Bilingual Care Worker Cooperative of Australia Limited. Appliances should be tested and tagged prior to their use on Bilingual Care Worker Cooperative of Australia Limited property.

While there is no requirement to test and tag personal computers/laptops, staff, clients and volunteers are encouraged to have their laptops tested and tagged using an approved person or company.

In both situations above the testing and tagging is the responsibility and at the expense of the appliance owner.

22. Hire Equipment

While it is the responsibility of the person hiring equipment to ensure that the equipment is

inspected and tested at the commencement of each hire, the person or company who hires out the equipment to Bilingual Care Worker Cooperative of Australia Limited must ensure that the equipment - for the period of the hire - meets all relevant inspection and testing requirements.

23. Electrical Equipment and Appliances in Client's Homes

While electrical equipment in a private residence does not have to be tested and tagged, Bilingual Care Worker Cooperative of Australia Limited staff must still visually inspect any electrical equipment or appliance prior to use to ensure that it is not damaged, cords are not frayed and the item is in good working order.

As a precautionary measure, all direct support workers/staff performing duties within a client's home using the clients electrical equipment and appliances must use a Residual Current Device (RCD) supplied by Bilingual Care Worker Cooperative of Australia Limited.

Portable RCD's (or Safety Switches) (see image right) provide added protection for direct care staff when using electrical equipment. RCD's cut the power supply to the electrical appliance if a current leakage fault is recognised and are designed to help prevent electrocution.

Any electrical item that is broken or damaged must not be used, and the client or their supporters/family informed so it can be repaired or replaced. If appropriate, it is recommended that the item is removed from use.

24. Use of Electrical Portable Outlet Devices on Bilingual Care Worker Cooperative of Australia Limited Premises

The use of double adaptors is not permitted within Bilingual Care Worker Cooperative of Australia Limited and should be removed and replaced with Electrical Portable Outlet Devices (EPODs), also known as power boards, fitted with overload protection devices.

Power boards are to be used only if they have overload protection. Home-made EPODs are illegal throughout Australia and must not be used at Bilingual Care Worker Cooperative of Australia Limited.

Ensure that any power boards are installed securely and in a location that is not susceptible to damage or exposure to water and have adequate ventilation. Where possible, power boards should be placed on their side to prevent dust build up in unused points. Each power board must be plugged into a general purpose outlet (GPO). GPOs share power circuits. Be aware too many EPODs plugged into GPOs on the same circuit may overload the circuit and cause a power failure.

Staff must regularly check that all plugs are firmly fixed into the power board and look for any signs of damage/fraying. Any power boards that are broken or not working must be removed from use and replaced.

25. Examples of EPODs / Power boards in Use

Extension leads are only suitable for temporary applications. For longer term applications a new GPO should be installed or an EPOD with overload protection used. Ensure the extension lead is placed appropriately and shielded with an appropriate extension lead cover

to reduce tripping hazards. Be wary of heavy equipment rolling over or impacting the lead as it may damage the insulation and wires causing shorting.



26. Unsafe Electrical Equipment at the Workplace

The Managing Director will ensure that any unsafe electrical equipment is disconnected (or isolated) from its electricity supply and, once disconnected, is not reconnected until it is repaired or tested and found to be safe or is replaced or permanently removed from use.

To ensure that unsafe electrical equipment is not used inadvertently before it can be tested, repaired or replaced, it should immediately be tagged to indicate that it has been taken out of service for safety reasons pending testing and possible repair and to warn against further use.

An Incident Report should be lodged when the hazard is discovered and include all details of the incident to enable accurate investigation.

27. Noise

The workplace must not exceed the maximum noise levels enforced by the Standards Association of Australia. Noise is considered excessive when:

- total (continuous) noise exceeds 85 dB when averaged over an 8-hour period (known as 85dB(A)); or
- noise that exceeds a peak noise level of 140 dB(C) at any time during the day.

Bilingual Care Worker Cooperative of Australia Limited will actively aim to keep noise below 50 dB(A) if the work requires high concentration or effortless conversation or 70 dB (A) if the work is routine, fast-paced and demands attentiveness, or if it is important to carry on conversations.

If noise creates distress, the Managing Director should be reported to by workers, attendees and other stakeholders, and alternatives for reducing noise / where providing PPE can be identified. Equipment also must not produce noise that exceeds the maximum noise level recommended by the Standards Association of Australia.

28. Visitors

Visitors wishing to enter Bilingual Care Worker Cooperative of Australia Limited's premises can enter through the front door. Should a worker be providing services at a client's home, only visitors approved by the client or their advocate may enter under Bilingual Care Worker Cooperative of Australia Limited's workers supervision.

All visitors who enter the office will require to sign a visitor book.

29. Manual Handling

All workers of Bilingual Care Worker Cooperative of Australia Limited will undoubtedly be required to partake in manual handling activities. Usually this will occur in a client's home.

Bilingual Care Worker Cooperative of Australia Limited utilises and implements a minimal lift policy and all workers are instructed in this protocol in their orientation and induction training. Upon receiving the correct manual handling protocols from Bilingual Care Worker Cooperative of Australia Limited's Management, workers will be assessed on their techniques.



Reviews will be conducted monthly during the workers probation period. Post probation period, reviews and monitoring will be conducted annually.

All manual handling injuries and accidents will be documented and reviewed in lieu of the Incident and Abuse Management Policies and Procedures.

Should equipment be required in order to safely execute manual handling activities, Bilingual Care Worker Cooperative of Australia Limited will provide adjuncts or equipment as necessary.

Personal manual handling equipment and adjuncts such as 'slide sheets' are preserved in accordance with the Infection Control Policy and Procedure.

Work Practices for Patient Manual Handling	
Unacceptable Work Practice	Alternative Work Practice
Shoulder lift (to move a patient up the bed)	<ul style="list-style-type: none"> • Slide sheets • Sling/hoist lifter • Hovermat
"Top and tail" lift	<ul style="list-style-type: none"> • Sling/hoist lifter
Cradle lift (to move or transfer a patient)	<ul style="list-style-type: none"> • Sling/hoist lifter • Slide sheets • Hovermat • Client self-help with assistive device eg. bed rope, bed stick
Lifting a patient from the floor (without the appropriate equipment)	<ul style="list-style-type: none"> • Sling/hoist lifter • Jordan frame <p><i>Emergency Situation:</i></p> <ul style="list-style-type: none"> • Controlled lift with adequate staff numbers

Neck holding of staff by patient to assist a patient from sitting to standing	<ul style="list-style-type: none"> • Stand-up lifter • Bed mechanics +/- sacral prompt
Pivot standing transfer of a patient by staff member with a neck hold	<ul style="list-style-type: none"> • Stand-up lifter • Bed mechanics +/- sacral prompt
Under-arm lift to assist patient from sitting to standing	<ul style="list-style-type: none"> • Stand-up lifter • Bed mechanics +/- sacral prompt
Blue handling straps	<ul style="list-style-type: none"> • Sling/hoist lifter • Stand-up lifter • Slide sheets
Under arm lift to lift a patient from supine to sitting	<ul style="list-style-type: none"> • Bed mechanics • Assistive devices e.g. bed rope, leg lifter
Use of kylie as a lifting and turning device	<ul style="list-style-type: none"> • Slide sheets • Sling/hoist lifter

30. Workplace Health and Safety Officer (WHS Officer)

Bilingual Care Worker Cooperative of Australia Limited's WHS Officer is responsible for implementing and upholding Workplace Health, Safety and Security for all person. They hold a primary duty of care in order to promote health and wellbeing. They are required to continuously uphold care of the highest quality and this responsibility ensures the WHS Officer:

- Provides and maintains a safe working environment for all persons related to Bilingual Care Worker Cooperative of Australia Limited.
- Provides, maintains, and provides correct and up to date procedures and protocols to maintain safety.
- Where required, provide instruction, training, orientation, information, induction and supervision for workers.
- Continuous monitor and aim to improve the health and wellbeing of all workers and conditions of all work areas.

Should any risks or hazards be identified, the WHS Officer is responsible for identifying, monitoring, implementing, and reviewing actions in order to manage the risk. This will be completed in accordance with the Risk Management Policy and Procedure.

The WHS Officer may employ Health and Safety Representatives (HSR) in order to effectively operate within Bilingual Care Worker Cooperative of Australia Limited. Should the HSR worker request further incentive and development, the WHS Officer will allow the HSR to attend a course that is approved by SafeWork NSW. Training is required to be completed

within 3 months of the initial required.

The Managing Director is currently the WHS Officer.

31. First Aid

As a requirement, all workers, employees, Management and staff of Bilingual Care Worker Cooperative of Australia Limited must hold a valid First Aid Certificate before undertaking any works within Bilingual Care Worker Cooperative of Australia Limited. This ensures correct and adequate management of illness or injuries to clients or co-workers.

All workers of Bilingual Care Worker Cooperative of Australia Limited will be provided a full first aid kit when attending client's households, and one will be retained at Bilingual Care Worker Cooperative of Australia Limited's head office. It is the responsibility of each and every worker to replenish their first aid kit when supplies are low. These items can be found at Bilingual Care Worker Cooperative of Australia Limited's office.

The Managing Director, WHS Officer and the Care Manager are responsible for ensuring stock at, Bilingual Care Worker Cooperative of Australia Limited's head office is replenished, as necessary.

All workers, Management, staff, employees and volunteers of Bilingual Care Worker Cooperative of Australia Limited are required to hold an obtain one of the following first aid certificates upon course completion.

- Provide First Aid Course (HLTAID003). [COMPULSORY]
- First Aid Refresher Course and Recertification (HLTAID003) [COMPLETED ANUALLY]
- First Aid Course for Teachers and Carers (HLTAID004)
- Remote First Aid (HLTAID005)
- Advanced First Aid Care (HLTAID006)
- First Aid in the Workplace Course (HLTSS00027)
- Asthma First Aid
- Anaphylaxis Training
- Epilepsy and Seizure First Aid.

32. Cardiopulmonary Resuscitation (CPR)

As a requirement, all workers, employees, Management, and staff of Bilingual Care Worker Cooperative of Australia Limited must hold a valid CPR Certificate before undertaking any works within Bilingual Care Worker Cooperative of Australia Limited. This ensures correct and adequate management of cardiopulmonary resuscitation to clients or co-workers.

As a recommendation, Bilingual Care Worker Cooperative of Australia Limited may buy and store a Defibrillator at Bilingual Care Worker Cooperative of Australia Limited's office if the Managing Director wishes. It is their responsibility to ensure its efficiency and effectiveness.

Any worker of Bilingual Care Worker Cooperative of Australia Limited is required to obey a 'Do Not Resuscitate' order provided by any client. Failure to abide by this may result upon legal actions and repercussions.

All recruited workers of Bilingual Care Worker Cooperative of Australia Limited are required

to be competent to provide CPR when required.

All workers, Management, staff, employees and volunteers of Bilingual Care Worker Cooperative of Australia Limited are required to hold an obtain one of the following CPR certificates upon course completion.

- CPR Course (HLTAID001) [COMPULSORY]
- CPR Refresher Course (HLTAID003) [COMPLETED ANUALLY]
- Provide Advanced Resuscitation (HLTAID007).

33. Occupational Stress

Bilingual Care Worker Cooperative of Australia Limited understands that Occupational or Work Stress can highly affect the functioning of Bilingual Care Worker Cooperative of Australia Limited and the care provided to clients. Bilingual Care Worker Cooperative of Australia Limited and its personnel will actively work to identify sources of workplace stressors. Once sources are identified, Bilingual Care Worker Cooperative of Australia Limited will implement appropriate measures in order to minimise risks associated with workplace/occupational stress. Where required, Bilingual Care Worker Cooperative of Australia Limited will recommend additional services such as counsellors or provide stress management techniques. Training and development will be provided to all Management personnel of Bilingual Care Worker Cooperative of Australia Limited to pass onto workers when attempting to manage work related stress.

Bilingual Care Worker Cooperative of Australia Limited actively works to establish reporting, issue and conflict resolution guidelines that can be implemented and utilised by all persons of Bilingual Care Worker Cooperative of Australia Limited. Management will always aim to recognize and support workers who are experiencing work related stress or other forms of stress. Management will utilise a calm and sensitive approach when discussing matters with workers who are experiencing any forms of stress. Management is required to employ duty of care to all workers and undertake appropriate means to assist workers to manage the struggles or issues they are facing.

Bilingual Care Worker Cooperative of Australia Limited develops rosters and work allocations in line with workers competence, availability and preferences (when appropriate). This is done in order to minimise work related stress.

34. Client Aggressive Behaviours

Bilingual Care Worker Cooperative of Australia Limited utilises and implements management strategies directed towards the prevention and control of aggressive behaviours in accordance with the Challenging Behaviour Management Policy and Procedure.

35. Emergency Management (fire drills)

In the event of an emergency or fire drill, workers will assist all individuals to evacuation locations via safe and secure methods. Any emergency procedures and exercised will be supervised by the Bilingual Care Worker Cooperative of Australia Limited's allocated key personnel. All individuals and workers must comply with all instructions throughout this process. Bilingual Care Worker Cooperative of Australia Limited will develop their own

evacuation plan based on the layout of their office.

36. Hazardous Substances Management

Bilingual Care Worker Cooperative of Australia Limited continuously aims to manage hazardous substances and dangerous goods in the most appropriate and effective way possible. Prior to purchasing any hazardous substances (e.g. cleaning chemicals), Bilingual Care Worker Cooperative of Australia Limited's Risk Assessment/Workplace Health and Safety officer will complete a risk assessment on the substance in order to minimise risks and harm occurrence. Should a hazardous piece of equipment need to be utilised, only competent workers or Management of Bilingual Care Worker Cooperative of Australia Limited will be able to use/operate. When a worker is participating with the handling of hazardous substances of disposal, the worker must be educated to safely and effectively maintain disposal. This will require the worker to follow instructions and training on the disposal of hazardous substances on any safety gear and clothing necessary. The manufacturer's instructions will always be followed.

Bilingual Care Worker Cooperative of Australia Limited has created and implements an Emergency Management Plan and an Emergency Waste Management Plan. This will be completed and upheld by the WHS Officer. By this document, Bilingual Care Worker Cooperative of Australia Limited addresses the management issues and incidents of clinical waste and hazardous substances.

All workers and Management can utilise the Waste Management Policy and Procedure when required. Disposal of Hazardous Substances or Dangerous Goods will be completed in accordance with the Waste Management Policy and Procedure.

37. Client Incident and Accident Management

Bilingual Care Worker Cooperative of Australia Limited manages incident and accident in accordance with the Client Incident Management (incl. SIRS) Policy. It forms part of Bilingual Care Worker Cooperative of Australia Limited's operation management and is integrated into all aspects of Bilingual Care Worker Cooperative of Australia Limited's organisational and operational processes. All persons related to Bilingual Care Worker Cooperative of Australia Limited are continuously encouraged to raise any issues or concerns regarding safety, security, risks, accidents or incidents. Any mentioned or identified care/service provision delivery will be handled appropriately and effectively by Bilingual Care Worker Cooperative of Australia Limited's Managing Director or the WHS Officer. Bilingual Care Worker Cooperative of Australia Limited also operates in line with the Risk Management Policy and Procedure when ensuring mechanisms for risk management are conducted accordingly.

38. Appropriate Documentation

Bilingual Care Worker Cooperative of Australia Limited ensures all appropriate documentation is gathered and maintained safely in accordance with Bilingual Care Worker Cooperative of Australia Limited's Privacy and Confidentiality Policy and Procedure as well as the Information and Record Keeping Policy and Procedure. Therefore, all forms, templates and documents will be recorded comprehensively and stored in a manner that is safe and

secure from theft, loss, misuse or damage. Incident reports are specifically for the use of the Managing Director, Health Care Manager or the WHS Officer as these are the only personnel competent to manage risk and enforce alterations where required.

39. Smoke Free Environments

Bilingual Care Worker Cooperative of Australia Limited is a smoke free workplace and environment. There is no smoking for any persons including workers, Management, visitors, subcontractors or client on the premises of Suite 4, 8-12 King Street, Rockdale, NSW 2216. Bilingual Care Worker Cooperative of Australia Limited also prohibits smoking in the work vehicles and also when providing care to clients. Failure to abide by this procedure will result in strict disciplinary action in accordance with the Disciplinary Action Policy and Procedure.

Workers who wish to smoke during work hours must only do so during scheduled breaks and outside of Bilingual Care Worker Cooperative of Australia Limited's premises or a 10-meter distance of the client's home. Should a worker wish to smoke in between care or service provision, the client must be comfortable with the worker smoking 10 meters away from their home. Should the client refuse, the worker must obey the client's wishes.

All rubbish and litter relating to cigarette smoke must be disposed of suitably and safely.

40. Environmental Exposure and Management

Bilingual Care Worker Cooperative of Australia Limited's workers and Management personnel are educated on the possibility of environmental exposure such as UV radiation. Workers and Management will always aim to minimise the risk of UV exposure by taking appropriate measures such as aiming to avoid outdoor exposure during the highest risk time zone which is between 11:00am – 3:00 pm. Where outdoor travel is required in high heat temperatures, workers will ensure they utilise SPF 50 + sunscreen on themselves and on clients. Applying and reapplying sunscreen will be completed in accordance with the manufacturer's instructions. Workers will also aim to wear appropriate clothing to minimise sun burn in hot temperatures and utilise warmer clothing in cold temperatures.

Bilingual Care Worker Cooperative of Australia Limited aims to minimise environmental impact by utilising management techniques. Bilingual Care Worker Cooperative of Australia Limited will aim to manage organisational waste, prevent unnecessary energy consumption, minimise damage to flora and fauna, maintain noise emission, utilise storm water management. Bilingual Care Worker Cooperative of Australia Limited continuously takes part in various mechanisms to manage environmental risks.

This could be any of the following however is not limited to:

- Utilize appropriate options for waste management.
- Improve storage where possible in order to limit waste, spills, odors etc.
- Limit energy consumption where possible.
- Limit water usage where possible.
- Improve education and awareness for correct procedures and protocols.
- Improve and provide education and awareness to workers, staff and employees.

41. Security

Bilingual Care Worker Cooperative of Australia Limited always aims to maintain a secure and safe environment for workers, staff, employees, Management, visitors, clients, and all other personnel related to Bilingual Care Worker Cooperative of Australia Limited. Where required, all persons are required to be informed of security measures and strategies. This can be explained via handbooks, service agreements, training regimes, brochures, newsletters etc.

Clients and visitors are encouraged to provide feedback or suggestions regarding Bilingual Care Worker Cooperative of Australia Limited's security protocol. This can be completed through a *Compliments, Complaints and Feedback Form* and Continuous Improvement System, which Bilingual Care Worker Cooperative of Australia Limited will then respond to any concerns or suggestions mentioned.

Bilingual Care Worker Cooperative of Australia Limited utilises various mechanisms to promote safety and security. This is mechanisms such as:

- Workers, volunteers, Management, or staff are required to wear an identification badge at all times.
- Uniforms will be provided to workers, volunteers, Management and staff OR education on which items of clothing should be worn will be provided.
- PPE will be provided to all workers, volunteers, Management, and staff of Bilingual Care Worker Cooperative of Australia Limited.
- All visitors entering Bilingual Care Worker Cooperative of Australia Limited will be required to sign in to Bilingual Care Worker Cooperative of Australia Limited's logbook and required to wear a visitor' badge.
- Workers will be required to notify a Manager of Bilingual Care Worker Cooperative of Australia Limited when arriving and departing from a client's home.
- Bilingual Care Worker Cooperative of Australia Limited changes all passwords and combinations on phones, computers, locks and alarm codes every 6 months. Only the Managing Director and nominated key personnel will be provided with the passwords and codes.
- Any persons entering Bilingual Care Worker Cooperative of Australia Limited who are not known must be courteously asked to identify themselves via provided identification, for example a Driver's License.
- Bilingual Care Worker Cooperative of Australia Limited utilises lockers at Bilingual Care Worker Cooperative of Australia Limited's office for workers to secure their belongings in. Lockers and locker keys are the responsibility of individual and are not to be shared with anyone.
- Bilingual Care Worker Cooperative of Australia Limited utilises and maintains a Key Register, lost, stolen or misplaced keys will be immediately reported to the Managing Director. No duplicate keys will be cut by any persons except the Managing Director.
- Large amounts of cash will not be kept at Bilingual Care Worker Cooperative of Australia Limited's office overnight.

42. Supporting Documents

Relevant documents relating to this Policy and Procedure:

- Risk Management Policy and Procedure
- Information and Record Keeping Policy and Procedure
- Personal Protective Clothing and Equipment Policy
- Working in a Care Recipient's Home Policy
- Infection Control Policy and Procedure
- Bullying and Harassment Policy and Procedure
- Competency Forms
- Disciplinary Action Policy and Procedure
- Waste Management Policy and Procedure
- Emergency Management Plan
- Privacy and Confidentiality Policy and Procedure
- Incident Report Form
- Incident Register
- Risk Assessment Forms
- Key Register

43. Applicable Aged Care Quality Standards

- Standard 3 - Personal Care and Clinical Care
- Standard 4 - Services and Supports for Daily Living
- Standard 5 - Organisations Service Environment
- Standard 8 - Organisational Governance

Audit, Internal Assessment and Review Policy

1. Policy and Procedure

Bilingual Care Worker Cooperative of Australia Limited utilises and implements organisational documents in order to reflect practices, rules, regulations and legislation in accordance with high quality practice, as an ongoing commitment and goal.

The Audit, Internal Assessment and Review Policy and Procedure sets out Bilingual Care Worker Cooperative of Australia Limited’s responsibilities in operation. It ensures all appropriate practices and process regarding the organisation are assessed and reviewed.

Audits and internal reviews provide an opportunity for required change and improvement to be made within Bilingual Care Worker Cooperative of Australia Limited.

Conducting and undergoing regular auditing processes ensures all documentation is continuously reviewed and adjusted in accordance with all relevant rules, regulations and legislation as set out by the Aged Care Quality and Safety Commission.

This extends to all employees and meets relevant laws and regulations and standards.

2. Definitions

Governance	The action or manner of governing a state, organisation, etc.
Human Resources	The personnel of a business or organisation regarded as a significant asset in terms of skills and abilities.
Risk Management	(in business) the forecasting and evaluation of financial risks together with the identification of procedures to avoid or minimise their impact.
Non-conformity	Failure or refusal to conform to a prevailing rule or practice.

3. Policy

The Audit, Internal Assessment and Review Policy sets out Bilingual Care Worker Cooperative of Australia Limited’s responsibilities in the process of maintain and managing all aspects of the organisation. It covers all documents, registers and client forms used.

Worker Responsibilities:

As staff and workers are providing care provision to client’s, their evaluation and opinion is highly regarded, recognised and taken into account through feedback mechanisms, such as Staff Surveys.

Any worker of Bilingual Care Worker Cooperative of Australia Limited will be responsible for:

- Completing Staff Surveys thoroughly and honestly.
- Completing Staff Training Needs Self-Assessment to indicate improvement within themselves.
- Completing Risk Assessment for themselves and clients in order to minimise harm and also ensure best and safe practice is adhered to by all.

- Providing Feedback or Complaint forms to Bilingual Care Worker Cooperative of Australia Limited, whether it be anonymous or named.
- Notifying Bilingual Care Worker Cooperative of Australia Limited of any urgent requests for alterations.
- Ensuring all employee documentation is honest and up to date.
- Following all correct procedure and protocol indefinitely.

Management Responsibilities:

It is the responsibility of Bilingual Care Worker Cooperative of Australia Limited's management personnel to implement and review all documentation in order to create improvement within the organisation. Management is responsible for all oversight that is set forth by workers, staff, clients, families, guardians or advocates.

The monitoring and review will be the responsibility of Bilingual Care Worker Cooperative of Australia Limited's management as they will hold the appropriate training related to assessment and review.

Any manager of Bilingual Care Worker Cooperative of Australia Limited will be responsible for:

- Reviewing all documentation provided by clients, their families, guardians or advocates.
- Suggesting or implementing any corrective actions required.
- Liaising with the Managing Director regarding issues, complaints or feedback out of their jurisdiction.
- Ensuring all received documentation is received, reviewed, implemented and kept in a safe lockable format.
- Continuously upholding respect, confidentiality and privacy to those who provide feedback or submit a complaint.
- Reviewing all employee documentation and ensuring it is up to date.
- Maintaining an auditing schedule of upcoming reviews, audits etc.
- Providing staff/workers with required training and providing/maintaining relevant documentation throughout.

4. Procedure

The Audit, Internal Assessment and Review Procedure indicates how Bilingual Care Worker Cooperative of Australia Limited will manage, maintain, review, acknowledge and assess aspects within Bilingual Care Worker Cooperative of Australia Limited. This gives way for improvement mechanisms to take place or adjustments to be made.

Training Regimes

If staff/workers of Bilingual Care Worker Cooperative of Australia Limited assess and request the need for training resources to be delivered, management of Bilingual Care Worker Cooperative of Australia Limited will provide staff or workers with the appropriate resources. This ensures all staff or workers of Bilingual Care Worker Cooperative of Australia Limited are competent, trained and feel safe and confident when providing care to clients.

Any manager of Bilingual Care Worker Cooperative of Australia Limited (unless depicted otherwise) will be responsible for allocating audits to staff trained in the process or with specific directions for targeted audits. They will also be responsible for allocating resources for internal assessments and reviews where necessary.

Bilingual Care Worker Cooperative of Australia Limited will ensure all documentation is provided regarding any requested or required training regimes, whether it be by a worker/staff member or management themselves.

Management or Bilingual Care Worker Cooperative of Australia Limited's Care Manager will be responsible for providing a competency test for workers newly trained in specialist nursing skills. This is done in order to ensure safe and best practice is continuously adhered to.

Audit, Internal Assessment and Review Schedule

The Aged Care Governance Committee is responsible for determining the Audit, Internal Assessment and Review Schedule. Bilingual Care Worker Cooperative of Australia Limited recognises and understands that this is a fundamental process which benefits the operation of the organisation and in turn, the provision of care provided to clients.

It ensures the care provision is provided in a safe and caring manner and encompasses the highly sought use of documentation. The Schedule will be determined prospectively according to risk and data analysis provided by Bilingual Care Worker Cooperative of Australia Limited.

Any Manager of Bilingual Care Worker Cooperative of Australia Limited is responsible for internally assessing conducted procedures within the organisation against documented procedures. Should any non-conformities become prevalent, this will be taken to the Managing Director and the Board Members for further assessment and improvement. Bilingual Care Worker Cooperative of Australia Limited will conduct these reviews at least every 3 years.

However, should a major non-conformity arise, reviews and monitoring will be conducted more frequently as required.

- Minor Non-Conformity Improvement Review: At least every year.
- Moderate Non-Conformity Improvement Review: At least every 6 months.
- Major Non-Conformity Improvement Review: At least every 3 months.

This will then require a Targeted Audit.

When assessing practices against documented procedures, this will also be internally assessed against the Aged Care Quality Standards at least every 6 months in order to ensure and maintain best and safest care provision to clients.

If required, any changes or improvements will result in a training session, meeting or notification to nominated staff/workers to ensure conformity.

Targeted Audits

Targeted Audits are completed if a non-conformity or issue is identified. This is to ensure Bilingual Care Worker Cooperative of Australia Limited is adhering to any alterations or

resolutions for improvement. Targeted Audits can also become an indicator for new training requirements or quality activities if improvements are not successful within the designated time frame.

Should a training regime or quality activity become evident for implementation, Bilingual Care Worker Cooperative of Australia Limited will organise accordingly for the correct personnel. This could involve, staff, workers or management.

Bilingual Care Worker Cooperative of Australia Limited recognises the importance of client inclusion and will therefore provide notification of any alterations within the organisation. This transparency allows for collaboration within Bilingual Care Worker Cooperative of Australia Limited to continuously improve practice and procedure.

Worker Notification

Bilingual Care Worker Cooperative of Australia Limited will notify any worker of any upcoming training regimes or quality activities via the following methods:

- Email to workers nominated email.
- Phone call from a Manager/SMS message to their work or personal number.
- Face to face conformation.
- Written Notification.

This notification will include reasoning as to why the worker is required to partake, the learning objective, time, date and other relevant information.

Bilingual Care Worker Cooperative of Australia Limited will ensure the training or activity can be conducted on a variety of days to ensure participation options for all workers as Bilingual Care Worker Cooperative of Australia Limited recognises that workers may possibly have other commitments.

Should the training or activity be conducted within the workers specific work hours, workers will be assigned to a date and a time in advance and ensure conformation of attendance is provided from the worker.

All required training regimes or quality activities will be paid by Bilingual Care Worker Cooperative of Australia Limited to the worker under their hourly rate.

All workers will have the opportunity to complete the *Staff Training Needs Self-Assessment Form* to indicate requests for further development. Bilingual Care Worker Cooperative of Australia Limited will review this accordingly and provide an outcome to the worker indicating if their request was a success or whether alternative measures need to take place.

Aged Care Quality and Safety Commission Audit

After undergoing an Audit from the Aged Care Quality and Safety Commission, Bilingual Care Worker Cooperative of Australia Limited will take highly into account the diversified outcome. Bilingual Care Worker Cooperative of Australia Limited understands that should any alterations within the organisation be determined by the Commission, Bilingual Care Worker Cooperative of Australia Limited will take any appropriate measure and conduct the alteration in a safe and careful manner. Should a non-conformity between practice and documented procedures arise, Bilingual Care Worker Cooperative of Australia Limited will

utilise a Corrective Action Request Form which will be collected, collated and distributed to the correct personnel nominated in managing the issue. The nominated Manager will be responsible for reviewing the Corrective Action Request and documenting when the non-conformity has been dealt with.

Post Audit from the Aged Care Quality and Safety Commission, Bilingual Care Worker Cooperative of Australia Limited will hold a Board Meeting with all Board Members and Management to discuss the outcome of the audit. This is done in order to ensure all raised issues are discussed and an improvement method has been put into place.

Reviews

Bilingual Care Worker Cooperative of Australia Limited's Management personnel are responsible for the implementation, monitoring and review of any non-conformities or outcomes post internal assessment or audit. It is their responsibility to ensure all practices and documented procedures are conducted in accordance with all set out rules, regulations, legislation and Commission suggestions.

Management will review worker practices and provide training regimes or quality activities where necessary. Competency Forms will be utilised in order to ensure workers are competent when delivering care to clients with advanced medical requirements. Documents will be reviewed by Bilingual Care Worker Cooperative of Australia Limited's Management/Key Personnel to reflect Bilingual Care Worker Cooperative of Australia Limited's vision, mission, objectives, goals, aspirations, standards, regulations, procedures and guidelines to maintain accordance with the Aged Care Act and Standards and also to remain operating with efficiency, best and safe practice to clients. Corrective Action Requests will be utilised and reviewed to support this.

Management, Key Personnel, Board Members and the Managing Director are responsible for analysing data and statistics within Bilingual Care Worker Cooperative of Australia Limited to ensure successful operation. A major analysis will be conducted every 3 years. Plans and alterations in operation will be conducted and implemented to improve outcomes for clients, Bilingual Care Worker Cooperative of Australia Limited and all relevant personnel.

Documentation

Bilingual Care Worker Cooperative of Australia Limited will retain all Audit, Internal Assessment and Review documentation in accordance with the Information and Record Keeping Policy and Procedure. Any copies will be filed under the Audit and Review Folder in Bilingual Care Worker Cooperative of Australia Limited's achieves. Bilingual Care Worker Cooperative of Australia Limited will retain a copy in both hard copy and soft copy format in order to minimise the opportunity for theft, misuse, loss and error. Hard copy files will be retained at Bilingual Care Worker Cooperative of Australia Limited's main office in a lockable and safe filing cabinet. Soft copy files will be kept at Bilingual Care Worker Cooperative of Australia Limited's main office on the Managing Director's computer under a lockable and password protected online filing system with two factor authentication where username and password are required. Any required documentation can be accessible to Managers of Bilingual Care Worker Cooperative of Australia Limited under the authorisation of the

Managing Director in a written format.

5. Supporting Documents

Relevant documents relating to this Policy and Procedure:

- Internal/External Review/Audit Schedule
- Audit Report
- Corrective Action Request (CAR)
- Corrective Action Request Register
- Staff Performance Improvement Plan
- Staff Performance Review Feedback Form
- Staff Training Needs Self-Assessment
- Staff Survey Form
- Risk Assessment Form
- Competency Forms
- Information and Record Keeping Policy and Procedure

Brokered Services and Sub-Contractor Management Policy

1. Policy and Procedure

The Brokered Services and Sub-Contractor Management Policy and Procedure outlines how Bilingual Care Worker Cooperative of Australia Limited manages and maintains high quality care to clients when services are provided from an external agency.

Bilingual Care Worker Cooperative of Australia Limited recognises that external agencies may be required and therefore formulates professional relationships with organisations in order to ensure trust within care provision.

Brokered or Sub-Contractor services refers to seeking care or service provision for individual client requirements.

All Brokered or Sub-Contractor services are required to operate in accordance with Bilingual Care Worker Cooperative of Australia Limited’s mission, values, standards, policies and procedures. As well as the Aged Care Quality Standards and Aged Care Act.

This extends to all employees or workers and meets relevant laws and regulations and standards.

2. Definitions

Subcontract/Brokerage	A formal relationship (as per an agreement) between Bilingual Care Worker Cooperative of Australia Limited and any other party established to achieve specified objectives (for clients). Usually used when a provider requires another organisation to provide in-home services on their behalf. Can also be called a subcontracted arrangement or partnership.
Unison	Simultaneous performance or utterance of action or speech.
Self-managing	Having control or authority of or by oneself.

3. Policy

Bilingual Care Worker Cooperative of Australia Limited understands it is their responsibility to utilise a thorough system when requesting external services from external agencies. This includes choice of contractor, level of involvement and the provision of constructive feedback and evaluation. This is done to minimise risk and harm to clients and to ensure they are receiving the best possible care.

At all times, Bilingual Care Worker Cooperative of Australia Limited will avoid contracting service provision to informal carers such as friends or family. Bilingual Care Worker Cooperative of Australia Limited recognises that it is their responsibility as the Home Care Provider to ensure compliance with all rules, regulations, legislations, and standards whether service or care delivery is provided by Bilingual Care Worker Cooperative of Australia Limited themselves or a Brokered or Sub-Contractor Service.

4. Establishment

Prior to the establishment of a formal arrangement (and signing of a subsequent Service Provider Agreement), the Care Manager is responsible for providing information to the Management Team in relation to the proposal and will outline:

- details of the proposed entity, its Governance structure and business Vision, Mission and Values;
- the capacity of the proposed entity to meet Bilingual Care Worker Cooperative of Australia Limited and its clients' needs;
- at least 3-5 references or recommendations from other approved providers or clients currently accessing the proposed entity's services;
- the risks and benefits of the arrangement;
- a due diligence report on the proposed entity; and
- evidence that the proposed entity is able to meet the Aged Care legislation, regulations and Standards (for example copies of any relevant policies and procedures that meet The Aged Care Act 1997 and/or Aged Care Quality Standards 2018).

Once the Management Team have assessed the above information and agree the proposed entity aligns with Bilingual Care Worker Cooperative of Australia Limited's goals and objectives of providing high quality, safe care and services, a formal Service Provider Agreement will be entered in to.

Preferred Service Provider List & Recruitment

Bilingual Care Worker Cooperative of Australia Limited utilises and maintains a list of Preferred Service Providers. This incorporates a list of Sub-Contractors or Brokerage Service providers that have the ability to meet the criteria required by Bilingual Care Worker Cooperative of Australia Limited. This is done in order to ensure client needs, choices and preferences are met.

Bilingual Care Worker Cooperative of Australia Limited follows a step-by-step procedure when recruiting new sub-contractors or brokerage services. This procedure may take some time, therefore required service provision may be delayed which could lead to additional cost charges. This will be made clear to the client and rectified in their budget.

Step 1. Initial Meeting:

Any prospective contractors are required to attend a meeting with the Care Manager of Bilingual Care Worker Cooperative of Australia Limited to discuss the required services. This meeting will include Bilingual Care Worker Cooperative of Australia Limited orientation and assist to develop a therapeutic relationship with contractors. Bilingual Care Worker Cooperative of Australia Limited will describe all rules, regulation, standards and guidelines set out by Bilingual Care Worker Cooperative of Australia Limited.

In this meeting, if both parties wish to engage in a professional relationship, a Service Provider Authorisation will be provided to the Sub-Contractor or Brokerage Service. They will be provided with an appropriate time frame to sign the agreement. Should the contractor fail to sign the agreement, Bilingual Care Worker Cooperative of Australia Limited will assume

they do not wish to continue in the process and seek an alternative service provider.

Step 2. Gather Relevant Forms:

Before any contractor or external agency begins service or care provision, Bilingual Care Worker Cooperative of Australia Limited will gather the following forms:

Police Check	Any external agencies will be required to provide National Police Checks for any workers commencing service provision to clients with Bilingual Care Worker Cooperative of Australia Limited.
Insurance Checks	External Agencies must provide: A current Workers Compensation Insurance Current Public Liability Insurance (the minimum cover is \$10,000,000) Current Professional Indemnity Insurance (the minimum cover is \$10,000,000)
Qualifications	External Agencies must provide qualifications for any workers commencing service provision to clients with Bilingual Care Worker Cooperative of Australia Limited.
Registrations and Licenses	External Agencies must provide current and appropriate registrations and licenses to the service or care provision.
Service Provider Authorisation	The External Agency is required to sign this form before commencing service provision. This is completed by the Care Manager or a representative.

Step 3. Notification:

Bilingual Care Worker Cooperative of Australia Limited will be required to notify sub-contractors or broker organisations of clients they will be in contact with, along with their service requirements or personalised care plan. Throughout the relationship, Bilingual Care Worker Cooperative of Australia Limited will notify contractors or brokerage agencies of any alterations or cancellations should they arise.

5. The Agreement

The formal Service Provider Agreement contains:

- the date the agreement commenced;
- business details of each agreeing party;
- recitals in relation to the agreed service/s being provided in accordance with The Aged Care Act 1997;
- terms of appointment and clear outlines that the arrangement does not create a relationship of employer and employee, principal and agent, or partnership between Bilingual Care Worker Cooperative of Australia Limited and the service provider, or any of its personnel;
- details of who is responsible for the payment of any personnel wages, leave,

entitlements etc;

- fees agreed between both parties including to how and when they should be invoiced and paid (and any evidence required of the service/s that have been delivered);
- expectations and responsibilities of Bilingual Care Worker Cooperative of Australia Limited and the subcontracted/brokered service provider;
- qualifications, training and other personnel requirements the subcontracted/brokered service provider must meet;
- work health and safety obligations;
- reporting requirements in relation to incidents;
- termination conditions and dispute resolution information;
- insurance and indemnity responsibilities; and
- clear instruction in relation to confidentiality and privacy requirements.

For further details in relation to the above, please view Bilingual Care Worker Cooperative of Australia Limited's Service Provider Agreement document.

6. Care Planning (and Referral)

Prior to the connection of a client to a subcontracted/brokered service provider, where a client and/or their representative has requested a subcontracted/brokered service, the client and/or their representative must identify the specific need and be offered a variety of choices. First and foremost, the client and/or their representative is to be asked if they have a preferred subcontractor/brokerage service provider that Bilingual Care Worker Cooperative of Australia Limited will approach.

Where Bilingual Care Worker Cooperative of Australia Limited has assessed the need for outsourced services (with the client's consent) or a client is unable to identify a preferred subcontractor/brokerage service provider; the client and/or their representative must be given detailed information (in a format and language to meet their needs) about each already established service provider Bilingual Care Worker Cooperative of Australia Limited is in agreement with. This information is provided without bias or Bilingual Care Worker Cooperative of Australia Limited's staff preference.

Referrals for a clients subcontracted/brokered care and/or services are to be made as per Bilingual Care Worker Cooperative of Australia Limited's Providing Information, Advice and Referral Policy and Procedure.

Bilingual Care Worker Cooperative of Australia Limited is responsible for ensuring the agreed subcontractor/brokerage service provider has sufficient information about the client and their needs, preferences and goals (with the clients and/or their representatives' consent) prior to services commencing.

7. Ongoing Compliance/Monitoring and Review

Whilst all subcontractor/brokered service provider are required to meet all aged care compliance requirements (as outlined in Bilingual Care Worker Cooperative of Australia Limited's Service Provider Agreement, it remains Bilingual Care Worker Cooperative of Australia Limited's responsibility to ensure the ongoing compliance and high-quality care and services for clients.

The Care Manager is responsible for managing and monitoring all subcontracted/brokered arrangements including:

- monitoring the formal agreement and the subcontractor/brokerage providers compliance with its responsibilities;
- monitoring communication between the subcontractor/brokerage provider and Bilingual Care Worker Cooperative of Australia Limited (as a way of not only reviewing the care and services are being provided as required, as per clients' goals but also the staff/ are performing their roles and responsibilities appropriately);
- regularly reporting to the Management Team outcomes for clients accessing the subcontract/brokerage provider for support/services; and
- meeting with the subcontractor/brokerage provider every 3-6 months or more frequently as required to discuss any positive outcomes achieved for clients via the subcontract/brokerage arrangement or any areas for improvement.

8. Cessation of Subcontracted/Brokered Arrangements

As per Bilingual Care Worker Cooperative of Australia Limited's Service Provider Agreement, either party may terminate the agreement without cause by giving 30 days written notice to the other party. This includes instances whereby a client has expressed a complaint or request to not continue using the subcontractor/brokered provider's services.

Bilingual Care Worker Cooperative of Australia Limited will respect a client's rights to request an alternative subcontract/broker service provider without question and it will be Bilingual Care Worker Cooperative of Australia Limited's responsibility to ensure continuity of care and service delivery for the client in accordance with the provisions of the Aged Care Act 1997 and the principles regardless of which party has terminated the agreement.

9. Supporting Documents

Relevant documents relating to this Policy and Procedure:

- Preferred Service Provider List
- Service Provider Authorisation
- Contractor Monitoring and Review
- Contractor Agreement Register
- Contractor Agreement
- Service Provider Alternations or Cancellations

Personal Protective Clothing and Equipment Policy

1. Policy and Procedure

Bilingual Care Worker Cooperative of Australia Limited will implement and maintain the Personal Protective Clothing and Equipment Policy and Procedure. This is to ensure that all personnel involved within Bilingual Care Worker Cooperative of Australia Limited are kept safe and are at low risk of injury.

All required uniform and equipment will be provided to each person to ensure that it reflects correctly and in accordance with their job position. It is standard that all personnel are to wear their appropriate attire and equipment when undertaking specific tasks. All protective clothing and equipment must be in accordance with Bilingual Care Worker Cooperative of Australia Limited's guidelines and regulations.

2. Definitions

Bacteria	A member of a large group of unicellular microorganisms which have cell walls but lack organelles and an organised nucleus, including some which can cause disease.
Hazardous	Risky; dangerous.
Protective	Intended to protect someone or something.

3. Policy

The Personal Protective Clothing and Equipment Policy indicates that Bilingual Care Worker Cooperative of Australia Limited must provide and implement protective clothing and equipment to all personnel delivering services for Bilingual Care Worker Cooperative of Australia Limited. All individuals must ensure that they are abiding by this policy to minimise any risk of injury or mishaps that can occur if failure to follow this policy.

Management Responsibilities:

- Provide and purchase all appropriate personal protective clothing and equipment in accordance with an individual's job position.
- Maintain all equipment to ensure it is working correctly.
- Ensuring all clothing and equipment are being used and its use is enforced within Bilingual Care Worker Cooperative of Australia Limited.
- Instruct each worker on how to use their PPE provided by Bilingual Care Worker Cooperative of Australia Limited.
- Provided appropriate locations for each item of equipment.

Worker Responsibilities:

- Ensuring all personnel are wearing the correct and appropriate attire at all necessary

times.

- Using accurate equipment when completing an individual's specific task.
- Ensuring all uniforms and equipment are kept tidy, presentable and in a respectable manner.
- Requesting new clothing/PPE as required.
- Ensuring that if any equipment or clothing is lost or damaged, it is reported to the correct person in Bilingual Care Worker Cooperative of Australia Limited.
- Ensuring that all equipment that are no longer in use, are disposed correctly.
- Ensure that all PPE is stored in a sanitary environment.

4. Procedure

Bilingual Care Worker Cooperative of Australia Limited will implement the Personal Protective Clothing and Equipment Procedure to ensure the safety of all personnel while delivering services for Bilingual Care Worker Cooperative of Australia Limited.

Bilingual Care Worker Cooperative of Australia Limited will provide all appropriate clothing and equipment to each individual, to ensure that it is in accordance with their relevant position within Bilingual Care Worker Cooperative of Australia Limited. Each person provided with PPE is expected to constantly implement and follow this procedure.

Description and Implementation of PPE

Gloves

Common Utility Gloves (Household): general purpose gloves are solely worn to protect an individual's hands from any contact with chemicals and reduce the risk of transmission of germs and bacteria. Any individual completing housekeeping related duties are to ensure that they are wearing common utility gloves. Different tasks that a housekeeping duty may contain are:

- contact with body fluids including blood.
- cleaning of surrounding environments.
- changing and handling an individual's linen.



Surgical and Examination Gloves: surgical and examination gloves are used to help minimise and prevent the cross contamination amongst clients and workers. They must be worn under the following circumstances, however, are not limited to:

- while undergoing and performing any procedure that becomes in direct contact with a client.
- when rearranging a client's item that has been in direct contact with things such as clothing and/or equipment.
- when performing suction techniques on a client.

Any personnel handling items such as used tissues that are contaminated by bacteria must wear sterile surgical gloves.

For most client care procedures that are performed, non-sterile examination gloves may be used.

All surgical and examination gloves are only to be used once and then disposed. Surgical and examination gloves must be disposed into an appropriate waste location, that will be provided by Bilingual Care Worker Cooperative of Australia Limited.

Protective Eyewear

Protective eyewear is commonly used to eliminate any hazardous substances entering the eye area. Bilingual Care Worker Cooperative of Australia Limited will supply and provide the necessary protective eyewear in accordance with a worker's tasks. It is essential that protective eyewear is worn and available to anyone who is in an environment that may contain the splattering of blood or any other body substances or fluids.



Some protective eyewear may be designed to have singular use only. Bilingual Care Worker Cooperative of Australia Limited is expected to notify any individual wearing the eyewear if disposal is necessary after the first use. However, if the protective eyewear is able to be used multiple times, it is crucial that they are washed and cleaned with provided cleaning material, after every use.

Gowns and/or Aprons

Personnel are expected to wear a plastic gown or apron where exposure of body substances is present. The main objective of an apron or gown is to protect an individual's clothing where risk of contamination of blood or body fluid may be transferred. It is essential that both the neck and waste ties are firmly secure in place.



All gowns and aprons are for singular use only and are to be disposed once they have been utilised. Bilingual Care Worker Cooperative of Australia Limited will designate a specific location to dispose all apron or gowns. All personnel are to wash their hands after every use.

Changing of gown or apron must occur when a person:

- Changing environments between a client's care area or into their designated work area.
- Changes procedures and tasks between clients.

If any blood or body substance has stained a person's clothing, it is anticipated that they are to remove before attending any other duties.

Protective Mouth and Nose Wear (Masks)

Masks are made and designed to be fluid repellent to ensure no hazardous substances enters the mouth or nose area. The mask should correctly fit the individual's face, where the nose and mouth area are completely covered. It is a requirement that all personnel wearing a mask wash their hands both before and after every use.



It is essential that all masks:

- Are singular use only and are disposed.
- Remain untouched once in position on face.
- Are immediately disposed and are removed by handling tapes.

5. Supporting Documents

Relevant documents relating to this Policy and Procedure:

- Risk Management Policy and Procedure
- Risk Assessment
- Incident Form
- Incident Register
- Hazardous Substances Register
- Preferred Suppliers List
- Workplace Health, Safety and Security Policy and Procedure