

Quality Management System Pandemic Checklist

Tool for Quality Managers of NDIS Services

April 2020



Using this Tool

The role of the Quality Manager is to ensure the Quality Management System (QMS) responds quickly to the pandemic and incorporates lessons learned in continuous improvement. This checklist has been developed to support Quality Managers (or staff that have 'quality' related functions) to apply QMS principles in a pandemic environment.

It is important to note that this checklist is not a one size fits all and may not contain everything you need to consider for business continuity. You are welcome to modify and amend the checklist to suit the structure and culture of your business. In times like these, we think it is important to work together and share information. The links and resources provided are for your consideration only but are not intended as endorsements or business advice.

It can be tempting to overlook our quality functions at this time, but in a time of crisis, a robust QMS has never been more important. NDIS Providers need to develop responsive, fit-for-purpose systems to ensure they can continue to provide quality service whilst safeguarding Participants and workers. Don't let the absence of answers or data stop you from doing this work now. During a crisis, some areas will just need to go unanswered until you can source the information you need later. Just make a start and keep on going. Your commitment will make a real difference in peoples' lives. Further, by capturing learnings throughout this time of crisis, you can refine your systems and improve your future planned response.

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This checklist has been developed to review the following key business areas. You may wish to expand on your organisation's specific business areas or remove what is not relevant.

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RISK

Action	Resources/links	Person responsible	✓ Further action required
Risk management register is updated for COVID-19 (risks to Participants, staff, financial, WH&S and service delivery, ICT, governance).			
Risks and mitigation strategies are linked to the Continuous Improvement Register (CIR).			
The incident management system is updated to respond to COVID-19 related incidents.	https://www.ndiscommission.gov.au/providers/incident-management-and-reportable-incidents		
Where incidents relating to COVID-19 are reported learnings are entered into the CIR.			
Disaster response and business continuity plans have been reviewed to ensure they are up-to-date, effective and communicated. Learnings are entered into CIR.			
Behaviour support policies and procedures have been reviewed to ensure they are up-to-date, provide clarity and strategies in an environment of increased behaviour risks.	https://www.ndiscommission.gov.au/sites/default/files/documents/2020-03/fact-sheet-COVID-19-behaviour-support-and-restrictive-practices.pdf		
Service agreements for alternate/emergency workers issued, collected and stored securely. (Service agreements to include relevant details: e.g. insurance, minimum training/qualifications, information-sharing and communication protocols around serious events).			

Action	Resources/links	Person responsible	✓ Further action required
Restrictive practice and reportable incident requirements reviewed and communicated.	https://www.ndiscommission.gov.au/sites/default/files/documents/2020-03/fact-sheet-COVID-19-behaviour-support-and-restrictive-practices.pdf https://www.ndiscommission.gov.au/providers/incident-management-and-reportable-incidents https://www.ndiscommission.gov.au/providers/behaviour-support#02		
Worker screening register and procedures reviewed for quick onboarding of new pandemic workers.	https://www.ndiscommission.gov.au/providers/worker-screening https://www.ndiscommission.gov.au/workers/training-course		
Urgent policy and procedure amendments ratified and disseminated.			
Notifiable changes and events resulting from COVID-19 identified and included in the risk management plan.	https://www.ndiscommission.gov.au/providers/notice-changes-events/notification-COVID-19		
Notifiable data breach events resulting from COVID-19 identified and included in risk management plan (e.g. potential privacy data breaches - information leak from use of paper-based forms, mobile apps, remote access of Participant information, sharing information with other services, insufficient consents for emergency activities).	https://www.oaic.gov.au/privacy/notifiable-data-breaches/report-a-data-breach/ https://www.ndiscommission.gov.au/providers/incident-management-and-reportable-incidents		
WHS/OHS notifiable incidents resulting from COVID-19 (serious illness) identified, recorded	https://www.safeworkaustralia.gov.au/corona-virus-COVID-19		

Action	Resources/links	Person responsible	✓ Further action required
and included in risk register (review per State/Territory).	https://www.safework.sa.gov.au/licensing/notifications/workplace-incidents# https://www.safework.nsw.gov.au/notify-safework https://www.worksafe.vic.gov.au/report-incident-criteria-reportable-incidents https://www.worksafe.qld.gov.au/claims-and-return-to-work/novel-coronavirus-COVID-19-faqs/employer-faqs https://worksafe.nt.gov.au/notify-nt-worksafe https://worksafe.tas.gov.au/topics/Health-and-Safety/notify-worksafe https://www.commerce.wa.gov.au/worksafe/how-report-injury-or-disease-0		
Accommodation services - Protocols for reporting an outbreak of COVID-19 to local Public Health Units are identified.	https://www.disabilityservicesconsulting.com.au/resources/COVID-19-in-disability-accommodation https://www.health.gov.au/resources/publications/coronavirus-COVID-19-guidelines-for-outbreaks-in-residential-care-facilities		
<p>Key decision points have been documented e.g.:</p> <ul style="list-style-type: none"> • Interruption of the supply of essential goods/services • Government directive • COVID-19 infection (Participants and workers) • Minimum staffing ratios • Data breaches out of necessity • Delegated authority if key-decision maker ill/unavailable. 	https://www.disabilityservicesconsulting.com.au/resources/suspending-group-services		

Action	Resources/links	Person responsible	✓ Further action required
<i>Additional Tasks</i>			

COMPLIANCE & REPORTING

Action	Resources/links	Person responsible	✓ Further action required
COVID-19 incident reporting requirements are communicated to staff.	https://www.ndiscommission.gov.au/providers/incident-management-and-reportable-incidents		
Restrictive practice and reportable incident requirements reviewed and communicated.	https://www.ndiscommission.gov.au/sites/default/files/documents/2020-03/fact-sheet-COVID-19-behaviour-support-and-restrictive-practices.pdf https://www.ndiscommission.gov.au/providers/incident-management-and-reportable-incidents https://www.ndiscommission.gov.au/providers/behaviour-support#02		
Subscribe to NDIS Quality and Safeguard Commission updates.	https://www.ndiscommission.gov.au/resources/coronavirus-COVID-19-information		
Notifiable changes and events resulting from COVID-19 are reported to the NDIS Commission.	https://www.ndiscommission.gov.au/providers/notice-changes-events/notification-COVID-19		

Action	Resources/links	Person responsible	✓ Further action required
Notifiable data breach events resulting from COVID-19 are reported to the OAIC.	https://www.oaic.gov.au/privacy/notifiable-data-breaches/report-a-data-breach/ https://www.ndiscommission.gov.au/providers/incident-management-and-reportable-incidents		
Accommodation services - Protocols for reporting an outbreak of COVID-19 to the local Public Health Unit is identified and adhered to.	https://www.disabilityservicesconsulting.com.au/resources/COVID-19-in-disability-accommodation https://www.health.gov.au/resources/publications/coronavirus-COVID-19-guidelines-for-outbreaks-in-residential-care-facilities		
WHS/OHS notifiable incidents resulting from COVID-19 (serious illness) reported as per State/Territory).	https://www.safeworkaustralia.gov.au/coronavirus-COVID-19 https://www.safework.sa.gov.au/licensing/notifications/workplace-incidents# https://www.safework.nsw.gov.au/notify-safework https://www.worksafe.vic.gov.au/report-incident-criteria-reportable-incidents https://www.worksafe.qld.gov.au/claims-and-return-to-work/novel-coronavirus-COVID-19-faqs/employer-faqs https://worksafe.nt.gov.au/notify-nt-worksafe https://worksafe.tas.gov.au/topics/Health-and-Safety/notify-worksafe https://www.commerce.wa.gov.au/worksafe/how-report-injury-or-disease-0		

Action	Resources/links	Person responsible	✓ Further action required
Real-time tracking, review and communication of regulatory directives (included in risk management register).			
<i>Additional Tasks</i>			

COMMUNICATIONS

Action	Resources/links	Person responsible	✓ Further action required
A system has been developed to document the preferred method of communication for each Participant.			
Resources have been allocated to develop COVID-19 documents in identified formats and methods.			
Resources to support communications in alternate formats have been documented and are located in a centralised area for easy retrieval.			
Organisation-wide updates and announcements are centralised and recorded (includes authorised representatives).			
<i>Additional Tasks</i>			

Action	Resources/links	Person responsible	✓ Further action required

IT / SYSTEMS

Action	Resources/links	Person responsible	✓ Further action required
Systems have been developed to document, record, retain, modify and provide access to business data relating to phone, internet, CRM, HR, accounts, portals (e.g. myGov, NDIS, NDIS Commission).			
Work practice guidelines have been developed to support quick changes in processes resulting from pandemic (e.g. accessing IT when working from home, use of PPE, Bring-your-own-device [BYOD]).			
BYOD policy and procedure developed (consider including authority to wipe data via factory default if privacy breach).			
Alternate internet provision sourced in case of IP congestion/ internet failure in essential service sites (e.g. supported independent living).			
<i>Additional tasks</i>			

FINANCE

Action	Resources/links	Person responsible	✓ Further action required
Procedures have been developed for the interruption of the supply of essential goods/services.			
Insurance policy reviewed – for currency, any clauses requiring serious event notifications.			
Fee and hardship policy reviewed, and any changes ratified.			
<i>Additional tasks</i>			

HUMAN RESOURCES / INDUSTRIAL RELATIONS

Action	Resources/links	Person responsible	✓ Further action required
System developed to record changes in staff arrangements (including name of staff and the functions they are performing at home, access requirements, support needs, emergency contact details, WHS e.g. work from home ergonomic checklist signed off).	https://www.safeworkaustralia.gov.au/COVID-19-information-workplaces/working-home		

Action	Resources/links	Person responsible	✓ Further action required
The minimum staff requirements have been documented to prepare for the event that new workers from outside the sector (or friends/family where allowable) are required to be engaged in an emergency. E.g. Worker screening, worker orientation e-learning module, hygiene training, specialist competencies (if applicable).	https://www.ndiscommission.gov.au/workers/training-course https://www.ndiscommission.gov.au/providers/worker-screening https://www.ndiscommission.gov.au/document/1026 https://www.ndiscommission.gov.au/workers/ndis-code-conduct		
HR procedures reviewed to include the above and enable fast and safe onboarding.			
Staff register updated to include passwords and access requirements resulting from alternate working arrangements, confirmed contact details and emergency contacts.			
Employment contracts reviewed, developed or updated for pandemic related conditions.			
System developed to record and respond to a potential increase in questions, feedback and concerns from staff (linking learnings to CIR).			
Updated training register/system to include pandemic related webinars, e-learning and training required for staff to complete.	https://training.disabilityservicesconsulting.com.au/products/infectionfree https://www.health.gov.au/resources/apps-and-tools/COVID-19-infection-control-training		
Online staff communication tools have been screened to ensure they are compliant with the Australian government. standards and conditions of use have been clearly communicated.			
<i>Additional Tasks</i>			

Action	Resources/links	Person responsible	✓ Further action required

SERVICE DELIVERY

Action	Resources/links	Person responsible	✓ Further action required
Systems developed to report changes in service delivery to enable: <ul style="list-style-type: none"> • HR response • Contingency response • NDIS Commission reporting requirements. 	https://www.ndiscommission.gov.au/providers/notice-changes-events/notification-COVID-19		
Handover templates have been developed for each work area and once completed are kept in a centralised and secure location.	https://www.disabilityservicesconsulting.com.au/resources/essential-personalised-information-tool-COVID-19		
A system has been developed to identify Participants with heightened risk to a pandemic (the system must be easily accessible).			
A document (simple) has been developed for staff or families to record Participant health needs, critical supports, cognitive or behavioural issues, mental health concerns, informal supports and alternate supports during and post-pandemic.	https://www.disabilityservicesconsulting.com.au/resources/essential-personalised-information-tool-COVID-19 https://www.disabilityservicesconsulting.com.au/resources/COVID-19-in-disability-accommodation https://www.thegrowingspace.com.au/covid19/		

Action	Resources/links	Person responsible	✓ Further action required
An internal audit of Participant consents, emergency details and plans (both paper and electronic) completed.			
Participant emergency plan developed or updated to include preferred responses and support, emergency contacts, risks/concerns and mitigation including hospitalisation admission/or discharge during the pandemic.	https://www.disabilityservicesconsulting.com.au/resources/essential-personalised-information-tool-COVID-19 https://www.disabilityservicesconsulting.com.au/resources/COVID-19-in-disability-accommodation https://www.thegrowingspace.com.au/covid19/		
<i>Additional Tasks</i>			

RECOVERY

Action	Resources/links	Person responsible	✓ Further action required
System developed to manage the post-pandemic re-engagement of staff (e.g. documented process of initial contact, safety check and record of outcomes).			
System developed to manage the post-pandemic re-engagement of Participants (e.g. documented process of initial contact, safety check and record of outcomes).			

Action	Resources/links	Person responsible	✓ Further action required
System developed to manage the post-pandemic re-deployment and reinstatement of facilities and amenities.			
System developed to manage the post-pandemic supply chain and credit terms (internal and external) by Finance Team.			
All pandemic actions have been entered into the CIR for post-pandemic review (e.g. additional training, HR/IR, Participant planning documents, incident and complaint processes, decision-makers, internal audit calendar by priority).			
Pandemic response analysis and continuous improvement identified. The opportunity is used to review the organisations' response to the pandemic, identify areas that could be improved and entered actions into the CIR for refinement of the response plan.			
<i>Additional Tasks</i>			

About DSC

NDIS is our world, not just a job. We care, or we wouldn't be here.

Not only are our consultants NDIS experts – armed with a plethora of PhDs, MBAs, ex-disability CEO and NDIA Director positions under their belts - most also have lived experience of disability. This makes us uniquely positioned to 'get' challenges and opportunities from every which way; leadership, workforce, Agency, sector, participant and family perspectives.

Across the hugely varied consulting and training work we do with organisations across Australia, all the challenges, the complexities, the opportunities, the sleepless nights, can be distilled down to one fundamental theme: We want better outcomes for people with disability.

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