

# NDIS Practice Standards Compliance Document

Module 1: Rights and Responsibilities

Module 2: Provider Governance and Operational Management

Module 3: Service Delivery

Registration Group: 0128 - Therapeutic Supports

Forge Clarity PTY LTD

Remote Telehealth Counselling Practice

ABN: 12 685 199 124

NDIS Support Service: 01\_741\_0128\_1\_3

## Important Notice

This document outlines Forge Clarity's compliance with NDIS Practice Standards for 0128 Therapeutic Supports registration, covering:

Module 1: Rights and Responsibilities

Module 2: Provider Governance and Operational Management

Module 3: Service Delivery

CRITICAL: This document should be read and applied in accordance with:

NDIS Act 2013 (Cth)

NDIS (Practice Standards—Therapeutic Supports) Rules

NDIS Practice Standards and Quality Indicators (Current Version)

NDIS Quality and Safeguards Commission Guidelines

To access current NDIS Practice Standards:

Visit:

<https://www.ndiscommission.gov.au/providers/registered-ndis-providers/practice-standards>

NDIS Commission: 1800 035 544

## 1. Purpose and Scope

### 1.1 Purpose

This document demonstrates Forge Clarity's commitment to and compliance with NDIS Practice Standards for 0128 Therapeutic Supports registration, specifically addressing:

- Rights-based approach to therapeutic service delivery
- Person-centred counselling and psychotherapy practices
- Provider governance and operational management
- Quality service delivery via remote telehealth
- Safeguarding participant rights and dignity

### 1.2 Scope

This policy applies to:

- All NDIS participants receiving therapeutic supports via telehealth
- All Forge Clarity practitioners providing therapeutic supports (currently sole practitioner: Tegan Elza Banks)
- All therapeutic counselling and psychotherapy interventions delivered remotely

Note on Volunteers: Volunteers facilitate the Thursday evening free grief support group for the general public only. Volunteers have no involvement with NDIS participants or their individual therapy sessions. All NDIS therapeutic supports are delivered exclusively by the Director/Lead Therapist, Tegan Elza Banks.

### 1.3 Service Delivery Model

Forge Clarity operates as a remote telehealth counselling practice, delivering therapeutic supports via:

- Zoom (password protected video conferencing)
- Telephone counselling
- Secure messaging (WhatsApp encrypted text)
- Hybrid models combining multiple platforms based on client preference

## 2. Legislative and Regulatory Framework

### 2.1 Compliance Standards

Forge Clarity complies with:

- NDIS Act 2013 (Cth)
- NDIS (Practice Standards—Therapeutic Supports) Rules
- NDIS Code of Conduct
- Disability Discrimination Act 1992 (Cth)
- Privacy Act 1988 (Cth) and Australian Privacy Principles
- Health Records and Information Privacy Act 2002 (NSW)
- Work Health and Safety Act 2011 (NSW)
- Australian Counselling Association (ACA) Code of Ethics
- Psychotherapy and Counselling Federation of Australia (PACFA) Code of Ethics

### 2.2 Registration Requirements

Registration Group: 0128 - Therapeutic Supports

Support Item: 01\_741\_0128\_1\_3

Provider Type: Remote Telehealth (Zoom, Phone, Secure Messaging)

Module Compliance: Modules 1, 2, and 3

## 3. MODULE 1: Rights and Responsibilities

### 3.1 Participant Rights

Forge Clarity upholds that every NDIS participant has the right to:

- Be treated with dignity and respect
- Exercise choice and control over their supports and therapeutic journey
- Participate meaningfully in decisions about their therapy and goals
- Privacy and confidentiality of personal and health information
- Freedom from abuse, violence, neglect, exploitation, and discrimination
- Access culturally safe, inclusive, and responsive services
- Access to advocacy services and complaints processes
- Be informed about their service agreement, fees, and how services will be delivered

### 3.2 Person-Centred Practice

Forge Clarity operates with a deeply person-centred ethos, ensuring:

### 3.2.1 Participant Voice and Choice

- Participants lead goal-setting processes
- Therapeutic approaches tailored to individual preferences and needs
- Flexibility in service delivery methods (Zoom, phone, messaging) based on participant preference
- Session frequency determined collaboratively based on participant needs and preferences

### 3.2.2 Informed Consent

Comprehensive informed consent is obtained for:

- Telehealth service delivery methods and platforms
- Therapeutic approaches and interventions
- Information sharing with support networks (when applicable)
- Limits of confidentiality and mandatory reporting obligations
- Emergency contact usage and safety procedures

Note: Participants have the right to withdraw consent at any time. All consent is documented in the Client Liability Waiver & Agreement and NDIS Service Agreement.

## 3.3 Cultural Safety and Responsiveness

Forge Clarity commits to providing culturally safe and inclusive therapeutic supports:

### 3.3.1 Cultural Competency

- Ongoing cultural competency training for practitioners
- Respect for Aboriginal and Torres Strait Islander cultural practices and healing approaches
- LGBTIQ+ affirming therapeutic practice
- Religious and spiritual sensitivity integrated into therapeutic approach
- Neurodiversity-affirming approaches
- Culturally and linguistically diverse (CALD) community awareness
- Collaboration with interpreters and cultural advisors when requested

### 3.3.2 Trauma-Informed Care

All therapeutic supports incorporate trauma-informed principles:

- Recognition of trauma impacts and prevalence
- Creation of safe, supportive therapeutic environments
- Emphasis on participant safety, choice, and empowerment
- Prevention of re-traumatisation through thoughtful practice

## 3.4 Complaints and Feedback

Participants have accessible pathways to provide feedback and raise complaints.

### 3.4.1 Internal Complaints Process

Multiple feedback channels: email, phone, written submission, anonymous online form

- Acknowledgment of complaints within 2 business days
- Investigation and response within 21 days
- No retribution or service withdrawal for making complaints

Complaints process outlined in NDIS Service Agreement and website  
 Full Policy Reference: Complaints & Disagreements Management Policy (available at <https://forgeclarity.com.au/documents>)

### 3.4.2 External Complaints Pathways

Participants are informed of their right to escalate complaints to:

- NDIS Quality and Safeguards Commission: 1800 035 544 | [www.ndiscommission.gov.au](http://www.ndiscommission.gov.au)
- Australian Counselling Association (ACA) complaints process
- Psychotherapy and Counselling Federation of Australia (PACFA) complaints process
- NSW Health Care Complaints Commission

### 3.5 Advocacy Support

Forge Clarity supports participants to access independent advocacy:

- Information about advocacy services provided at intake
- Support to connect with advocacy organisations
- Collaboration with advocates (with participant consent)
- Key Advocacy Organisations:
  - Disability Advocacy Network Australia (DANA)
  - National Disability Advocacy Program providers
  - State-based advocacy services

## 4. MODULE 2: Provider Governance and Operational Management

### 4.1 Organisational Structure

Forge Clarity operates as a sole practitioner telehealth counselling practice:

- Director and Lead Therapist: Tegan Elza Banks
- NDIS Service Delivery: All NDIS therapeutic supports provided exclusively by Lead Therapist
- Volunteers: Facilitate free Thursday evening grief support groups for general public only (no NDIS participant involvement)

### 4.2 Practitioner Qualifications and Registration

Lead Therapist: Tegan Elza Banks

Bachelor of Counselling

Master of Counselling and Psychotherapy

Australian Counselling Association Level 2 Counsellor (Registration: [24649](#))

NDIS Worker Screening Check (Current)

Working with Children Check (NSW - Current)

National Police Check (Current)

### 4.3 Therapeutic Approaches

Forge Clarity utilises evidence-based, integrative therapeutic approaches tailored to each participant's unique needs:

- Cognitive behavioural Therapy (CBT)
- Dialectical behaviour Therapy (DBT)
- Acceptance and Commitment Therapy (ACT)
- Motivational Interviewing (MI)

- Solution-Focused Therapy
- Narrative Therapy
- Trauma-Informed Care
- Integrative/Holistic Approaches
- Person-Centred Therapy

All approaches are applied with flexibility based on participant presenting concerns, goals, and preferences.

#### 4.4 Clinical Supervision

Clinical supervision is a professional requirement maintained by Forge Clarity:

Frequency: Minimum 10 hours per year (as required by ACA registration) plus additional supervision as needed for complex cases or critical incidents

Supervisor Requirements: ACA registered supervisors with appropriate experience and expertise

Documentation: Supervision attendance and clinical discussion notes retained securely and no client information or details are shared at any point

Critical Incident Debriefing: Mandatory supervision within 48 hours of any critical incident

#### 4.5 Continuing Professional Development

Forge Clarity maintains current knowledge and skills through ongoing professional development:

- NDIS Practice Standards updates (minimum 4 hours annually)
- Evidence-based therapeutic approaches and contemporary practices
- Trauma-informed care updates
- Cultural safety and responsiveness training
- Telehealth best practices and technology security
- First aid and emergency response training
- Mandatory reporting obligations and safeguarding
- ACA Requirements: Ongoing CPD maintained as per professional association requirements for registration renewal.

#### 4.6 Insurance and Risk Management

##### 4.6.1 Professional Indemnity Insurance

Insurer: Berkley Insurance Company trading as Berkley Re Australia (ABN 53 126 559 706)

Policy Number: ACA421789

Coverage: \$20,000,000 per claim | \$60,000,000 aggregate

Scope: Telehealth, interstate practice, cyber liability, contractual liability (NDIS)

##### 4.6.2 Public Liability Insurance

Insurer: Berkley Insurance Company trading as Berkley Re Australia

Coverage: \$20,000,000 per claim | \$60,000,000 aggregate

#### 4.7 Safeguarding and Incident Management

Forge Clarity maintains comprehensive incident management systems to ensure participant safety and NDIS compliance.

##### 4.7.1 Reportable Incidents

As per NDIS (Incident Management and Reportable Incidents) Rules 2018, reportable incidents include:

- Death of a participant
- Serious injury requiring medical treatment or hospitalisation
- Abuse or neglect of a participant
- Unlawful sexual or physical contact with a participant
- Sexual misconduct committed against or in presence of a participant

#### 4.7.2 Reporting Timeframes

24 Hours: Most reportable incidents must be reported to NDIS Commission within 24 hours of key personnel becoming aware

Reporting Method: NDIS Commission Portal or phone: 1800 035 544

Follow-up: Investigation outcomes reported to NDIS Commission within 60 days

Full Policy Reference: Incident Management Policy and Procedure | Incident Report Form | Emergency and Disaster Management Plan (available at <https://forgeclarity.com.au/documents>)

#### 4.7.3 Mandatory Reporting

As a registered counsellor and NDIS provider, Forge Clarity has mandatory reporting obligations:

Child Protection (NSW): Report within 24 hours to DCJ: 132 111 and or the Relevant Police Station.

Adult Safeguarding: Report suspected abuse, neglect, or exploitation to appropriate authorities

Police: Report criminal conduct immediately to NSW Police: 000

Participant Notification: Where safe and appropriate, participants are informed of mandatory reporting obligations and their limits on confidentiality

#### 4.8 Privacy and Confidentiality

Forge Clarity maintains rigorous privacy and confidentiality standards in compliance with Privacy Act 1988 and Australian Privacy Principles.

##### 4.8.1 Unique Record-Keeping System

Forge Clarity employs a unique privacy-protective record-keeping system:

- De-Identified Digital Records: All digital session notes and clinical records use unique client codes (not legal names)
- Physical Ledger: Client legal names and corresponding codes maintained in physical ledger only, stored in locked cabinet
- Backup System: Digital notes printed and added to locked physical cabinet once per month for redundancy
- Legal Documents: Signed service agreements and consent forms (containing legal names) stored in locked physical cabinet
- Access: Only Director/Lead Therapist (Tegan Elza Banks) has access to client records
- Security Benefit: In the event of data breach, client identities remain protected as digital records contain only de-identified codes.

#### 4.8.2 Data Storage and Security

Digital Storage: Google Workspace (Australian-based servers, encrypted at rest and in transit, 2FA enabled)

Backup: Weekly encrypted backup to external hard drive stored in fireproof safe

Physical Storage: All physical records in locked filing cabinet in secure location

Retention: Records retained for 7 years post final session (NSW health records requirements)

Disposal: Secure destruction after retention period (shredding for physical, secure deletion for digital)

Full Policy Reference: Secure Client Record Keeping Policy or our Privacy Policy (available at <https://forgeclarity.com.au/documents>)

#### 4.8.3 Participant Access to Records

Under Australian Privacy Principle 12, participants have the right to:

- Access their own clinical records
- Request corrections to inaccurate information
- Receive copies of records within 30 days of request
- Be informed how their information is collected, used, and disclosed

#### 4.9 Quality Improvement and Service Evaluation

Forge Clarity implements continuous quality improvement processes to enhance service delivery and ensure NDIS compliance.

##### 4.9.1 Feedback Collection

Regular Check-Ins: Informal feedback sought during therapy sessions

Anonymous Feedback: Anonymous feedback form available on website

Response: All feedback carefully considered; non-anonymous feedback receives personal acknowledgment

Implementation: Effective changes implemented based on feedback to ensure continuous improvement

##### 4.9.2 Policy and Procedure Review

All policies and procedures are reviewed:

- Annually (minimum) to ensure currency and compliance
- When NDIS Practice Standards or legislation changes
- Following serious incidents or complaints
- As part of continuous quality improvement processes

##### 4.9.3 Self-Assessment

Annual self-assessment against NDIS Practice Standards Modules 1, 2, and 3

Review of service delivery outcomes and participant satisfaction

Identification of areas for improvement and implementation of corrective actions

### 5. MODULE 3: Service Delivery

#### 5.1 Services Provided

Forge Clarity provides evidence-based therapeutic counselling and psychotherapy for NDIS participants presenting with:

- General counselling and mental health support
- Trauma counselling and PTSD
- Grief and loss counselling
- Anxiety and depression
- Addiction and substance use concerns
- Relationship and interpersonal difficulties
- Life transitions and adjustment
- Self-harm and suicidal ideation (with appropriate safety planning)

Service Philosophy: Tailored therapeutic supports to meet each participant's individual needs, with referrals to other services available upon request or as clinically indicated.

## 5.2 Service Delivery Model

### 5.2.1 Session Options

Duration: 1-hour or 2-hour sessions (participant choice)

Frequency: As regularly as participant requests (typically weekly or fortnightly)

Modality: Zoom video, phone, or secure text messaging (WhatsApp encrypted)

Scheduling: Flexible appointment times based on participant and practitioner availability

### 5.2.2 Telehealth Advantages

- Increased accessibility for regional, remote, and metropolitan participants
- Reduced travel barriers and associated stress
- Flexible scheduling without commute time
- Therapy in familiar, comfortable environment (participant's home)
- Platform flexibility to accommodate participant preferences and accessibility needs

### 5.2.3 Telehealth Standards

Secure Platforms: Zoom with end-to-end encryption, waiting room, password protection | WhatsApp encrypted messaging

Privacy: Private, confidential session environment for both participant and practitioner

Technology Backup: Phone available if video fails; session continues or is rescheduled with time credited

Technology Requirements: Participants responsible for their own devices and internet connection (smartphone, computer, tablet)

Full Policy Reference: Emergency and Disaster Management Plan | Telehealth Session Documentation Template (available at <https://forgeclarity.com.au/documents>)

## 5.3 Therapeutic Process

### 5.3.1 Initial Assessment

First sessions typically include:

- Comprehensive intake and informed consent process
- Understanding participant NDIS goals and how therapy can support them
- Assessment of presenting concerns and therapeutic needs
- Risk assessment (suicide risk, harm to self/others, safety concerns)
- Telehealth suitability assessment and technology check
- Emergency contact information collection
- Collaborative discussion of therapeutic approach options



### 5.3.2 Goal Setting and Treatment Planning

Therapeutic goals are developed collaboratively:

Participant-Led: Participants lead goal-setting processes based on what matters most to them

NDIS Alignment: Goals aligned with NDIS plan outcomes where applicable

Flexibility: Goals can be adjusted as therapy progresses based on participant needs and preferences

No Pressure: Participants cannot be pushed to set goals; practitioner assists only as requested

Documentation: Goals documented in session notes using de-identified client codes

### 5.3.3 Ongoing Therapy Sessions

Regular therapeutic sessions involve:

- Evidence-based therapeutic interventions tailored to participant goals
- Skill development and coping strategy building
- Processing of emotions, experiences, and challenges
- Progress monitoring toward goals
- Safety planning and harm reduction when indicated
- Adjustment of therapeutic approach based on participant feedback

### 5.3.4 Progress Monitoring

- Session-by-session clinical notes documenting progress
- Regular review of goals and therapeutic approach effectiveness
- Progress reports to NDIS plan managers/support coordinators as required
- Participant feedback sought regarding satisfaction with therapy

## 5.4 Addressing Behavioural Concerns

Important Distinction: Forge Clarity is registered as 0128 Therapeutic Supports, NOT 0110 Specialist Behavioural Support. We do not develop formal Positive Behaviour Support (PBS) plans or implement restrictive practices.

When participants present with behavioural concerns (such as self-harm, substance use, or challenging behaviours), Forge Clarity addresses these through therapeutic counselling approaches.

### 5.4.1 Therapeutic Approach to Behaviour

- Initial assessment of presenting behaviours and underlying factors
- Safety planning and risk management
- Harm reduction strategies
- Therapeutic interventions (CBT, DBT, ACT, MI) to address underlying concerns
- Development of coping skills and emotional regulation
- Ramping up response based on severity of situation
- Referral to specialist behavioural support practitioners if formal PBS plan is needed

Note: Forge Clarity does NOT create official PBS documents, functional behaviour assessments (FBA), or manage restrictive practices. These require 0110 Specialist Behavioural Support registration.

## 5.5 Crisis Response and Emergency Management

As a remote telehealth practice, Forge Clarity maintains comprehensive crisis protocols to ensure participant safety.

### 5.5.1 Crisis Assessment

- Risk assessment at intake and ongoing throughout therapy
- Safety plans developed collaboratively when risks identified
- Emergency contact information collected and kept current

### 5.5.2 Crisis Response During Telehealth Session

If Participant Responsive and Safe to Talk:

- Real-time safety planning and de-escalation
- Safety contracting (if appropriate)
- Identification of immediate local supports
- Follow-up scheduled within 24 hours
- If Participant Unresponsive or in Imminent Danger:
  - 0-2 minutes: Attempt contact via priority method (call/text/email)
  - Immediately: Call emergency services (000 Australia | 112 International)
  - Simultaneously: Contact emergency contact persons
  - Within 2 hours: Confirm participant safety, notify clinical supervisor
  - Within 24 hours: Document with timestamps; NDIS Commission report (if reportable incident)