

## SBSS Pandemic Policy and Procedures: COVID-19 Policy

**Pandemic is defined as:** “an epidemic occurring worldwide, or crossing international boundaries, usually affecting a large number of people”

### Preparedness and Planning

SBSS acknowledge pandemics pose the following risks:

- *Health and safety risks:* if normal business operations put our participants at an increased risk of contracting an infectious disease.
- *Operational risks:* if a pandemic situation creates an environment where we are no longer able to continue our usual operations (due to government restrictions)
- *Environmental risks:* if a pandemic situation compromises the safety of our service environment.
- *Economic risks:* if our organisation experience financial difficulties due to limited or ceased operations.
- *Resource risks:* if we do not have sufficient resources (e.g. human resources, PPE) to continue normal operations due to a pandemic situation.
- *Compliance risks:* if a disruption to normal operations due to a pandemic situation leads to non-compliance with NDIS rules and other relevant legislation.
- *Reputational risks:* if a lack of appropriate response to a pandemic situation impacts on the way in which our organisation is perceived in the wider community.

SBSS will work to streamline the management of these risks by completing our organisational risks register and a pandemic management plan. This will help ensure that, in the event of a pandemic, we have a planned and coordinated response. Our pandemic management plan will identify:

- the key actions we need to take to prepare for a pandemic
- our plan for ensuring business continuity
- the names, contact details and roles of people required to ensure business continuity
- services/functions that are deemed essential
- action plans for maintaining each essential service
- skillsets required to perform essential services
- facilities required to continue essential services
- participants that are most at risk
- how we collaborate with providers and community organisations
- how we will activate our pandemic management plan.

The Directors of SBSS will review the pandemic management plan quarterly to ensure it is current. This Policy and procedures will be reviewed with SBSS staff immediately following direction given from Victoria's or Federal government around lockdown and or other social restrictions.

### **Participant and Service Users Vulnerability**

At SBSS we understand that people with disability are more vulnerable to developing illness during a pandemic because they are more likely to:

- have complex pre-existing conditions including multiple morbidities
- have wounds
- have a compromised immune system (e.g. due to pre-existing conditions or medications)
- require the use of medical equipment (e.g. urinary catheters, tracheostomies).

SBSS will aim to manage risks for all our participants and take into account each participant's wishes, goals and situation to determine how to best continue engagement and services without increasing health risks towards participants, services users or SBSS staff.

### **Basic Prevention Measures through a Pandemic**

There are basic hygiene and cleaning measures that we take at all times. These are recorded in detail in our infection control and waste management policies. Some basic measures that taken include:

- washing hands frequently and at relevant times
- maintaining respiratory hygiene at all times
- ensuring all areas are cleaned with appropriate tools and cleaning agents
- managing all forms of waste in a safe and suitable way
- wearing appropriate PPE when required.

During a pandemic SBSS recognise that it is important to maintain a high level of hygiene and continue this when social distancing and/or isolation is required.

## Social Distancing

Social distancing involves restrictions on movement that may need to be enforced to prevent/slow the spread of an illness. To be effective, it must apply to all workers and participants. Social distancing typically involves:

- being at least 1.5 metres apart from others at all times
- limiting unnecessary touching (e.g. handshakes and hugging)
- limiting face-to-face meetings where possible (i.e. conducting most meetings over the phone or virtually instead – in line with SBSS Telehealth policy)
- avoiding all non-essential national and international travel
- avoiding mass gatherings
- working/studying from home if practicable As an NDIS provider, it is SBSS's responsibility and obligation to meet the NDIS Code of Conduct and NDIS Practice Standards for the supports and services we provide. During a pandemic there are a number of risks that may compromise these requirements and therefore SBSS must adequately identify these risks and plan effective responses.

## Isolation

SBSS staff or a participant may require to isolate if they:

- have been tested positive for a pandemic-level illness
- are experiencing symptoms of a pandemic-level illness
- have recently been in contact with someone that has tested positive for a pandemic-level illness
- have recently travelled to a country experiencing a large-scale outbreak of a pandemic-level illness

Home isolation typically means that the person being isolated must partake in relevant risk-minimisation measures, including:

- limiting their movements to their home and garden/backyard
- observing all appropriate hygiene measures
- practicing social distancing (as outlined above) if there are other people present in the house
- moving quickly through or avoiding common areas
- wearing masks and other necessary PPE
- using a separate bathroom, if available
- using separate cutlery, linens and towels
- avoiding food handling and sharing

Although necessary, isolation can be a stressful experience. Therefore, we will ensure that participants in isolation:

- are still able to receive essential supports and services from SBSS via means of virtual or phone sessions

- are isolated in a comfortable, clean and well-ventilated environment
- keep in touch with their support network via various telecommunication methods
- learn about and discuss their experience
- keep normal daily routines where possible (e.g. eating, sleeping and exercise)
- partake in home-based activities they enjoy.
- Are provided with information (social stories) that explain to the participant the restrictions that are being imposed and what isolation means

SBSS Staff who are required to isolate is also just as stressful, they will be supported by:

- SBSS Director will maintain regular contact with the staff member over the phone or via virtual meetings
- Employees will be supported to ensure their working from home arrangements are adequate and supportive to maintain quality and confidential services to service users and participants via various telecommunication methods.
- There will be no negative consequences for staff who are required to isolate

Breaches in isolation requirements will be taken very seriously and considered a reportable offence given the implications for participants, service users and the wider community.

### **Restrictive Practices**

Restrictive practices are used in the event that a participant responds to a situation with a behaviour of concern. These behaviours often stem from triggering factors such as a maladaptive environment, fear or in response to a real or perceived threat. In the event of a pandemic outbreak, these factors may be heightened, thus it is SBSS responsibility to ensure to provide comprehensive and suitable support to inform the participant of what is occurring and why certain restrictions are in place. If a restrictive practice is utilised, we will follow all standard debriefing, reporting and legislative procedures outlined in our restrictive practice policy.

Whilst home isolation for therapeutic reasons is not considered a restrictive practice, it is important that such requirements during these events are discussed with the participant and their support network. This applies to all participants, not only those that have restrictive practices incorporated in the positive behaviour support plan.

The NDIS Quality and Safeguards Commission has developed a series of easy read information sheets to share with participants. <https://www.ndiscommission.gov.au/participants/covid-19-people-disability>

## **Incidents and Complaints**

SBSS will address any complaints or incidents that arise during (or as a result of) a pandemic situation. Where possible, we will always follow the same procedures that are specified in relevant policies, processes and legislation. We will also make all reasonable attempts fast-track incident and complaint reports that arise as a result of a pandemic as reports of this nature are likely to be urgent and time sensitive.

## **Privacy and Confidentiality**

SBSS is committed to maintaining privacy and confidentiality in accordance with all relevant policies and legislation. Under usual circumstances, the participant can decide whether or not they reveal health information to us. The only time information about a health condition will be requested is if it is a notifiable disease under the National Notifiable Disease Surveillance System or if directed under National and State laws about reducing community spread of a virus.

This may occur in the event of a pandemic. SBSS will request this information or the presence of symptoms related to the pandemic in order to:

- give the person the support they need
- ensure the safety of all people within our organisation, including participants, workers and visitors
- put risk-minimisation (safety) measures in place.

SBSS do not tolerate bullying, harassment or discrimination for any reason. This includes bullying, harassment or discrimination on the basis of disclosed health information.

## **Communication Strategies**

As a pandemic situation is likely to develop very quickly, SBSS understands the importance of consistent communication across the entire organisation. To do this, SBSS will implement the following strategies as required:

- utilise appropriate telecommunications (email, phone, online chat etc.) to:
  - share important operational updates across the organisation
  - conduct meetings and appointments
- provide relevant information to participants in a format they are most likely to understand, this may include the use of communication aids such as:
  - easy read documents
  - choice boards
  - communication apps

- alphabet boards.
- record key events and decisions in a way that allows workers and participants to reference them in the future.



## SBSS COVID-19 Policy and Procedures / Response Plan

**Context:** Symptoms can include:

- fever
- cough
- sore throat
- fatigue, and
- shortness of breath

Since March 2020, Victoria and Australia has been under a 'State of Emergency' in relation to the spreading of the novel and untrained virus- COVID-19. This response came with a series of social restrictions for people to apply within their personal lives and employment. SBSS has remained committed to stay aware and responsive to the announcements from the Victorian Government and National Cabinet and advice from the NDIS Quality and Safety Commissioner in relation to continuation of services under the NDIS.

**Update:** In July 2020, Victoria was placed under stage 3 restrictions due to increasing numbers of positive COVID-19 cases, and increased risk of communal transmission. During this time, social distancing, diligent hygiene practices and efforts to work from home functioned as the primary community management approach.

On 3 August 2020, the Victorian Premier placed Victoria under a 'State of Disaster' and issued a series of additional restrictions defined under Stage 4. This policy has been updated to adhere to the additional restrictions imposed.

On 27 September 2020, the Victorian Premier announced that as of 5:00am on 28 September 2020, a fitted face mask that covers both the nose and mouth must be worn at all times.

As of 11:59pm on 27 October 2020, Victoria has returned to Stage 3 restrictions. The Stage 3 Risk Management Plan has been updated as per the amended restrictions.

### COVID-19 specific definitions

The following definitions are Australian Government Department of Health guidelines on when workers should stop working and self-isolate. It is important that organisations consider the supports they provide (and the level of their participant's vulnerabilities) before they consider following these guidelines.

Term	Description
casual contact	<p>This will include healthcare workers who have taken recommended infection control precautions, including the full use of PPE, while making close contact with someone with confirmed symptoms of COVID-19.</p> <p>Workers who fall under this category are allowed to continue working, but they should be advised to self-monitor and to self-isolate if they develop symptoms consistent with COVID-19.</p>
close contact	<p>A form of contact with someone with confirmed symptoms that involves:</p> <ul style="list-style-type: none"><li>• consistently sharing a closed space (e.g. living in the same household)</li><li>• face-to-face contact longer than 15 minutes</li><li>• direct contact with any bodily fluids</li><li>• spending two or more hours in the same room.</li></ul> <p>Individuals will need to self-isolate in the event of close contact with someone with confirmed symptoms of COVID-19.</p>

### Workers suspected of having COVID-19 or have had known exposure to COVID-19

It's important that workers who experience any COVID-19-like symptoms, self-isolate and seek medical advice. If you need assistance, Healthdirect provides an [online symptom checker](#). You can also contact the National Coronavirus Helpline on 1800 020 080.

If a worker has recently returned from overseas he or she must self-isolate for 14 days.

If a worker has or is suspected of having been in close contact with someone with COVID-19, that worker must get tested and self-isolate pending notification of the test results. The staff member should also immediately inform his or her supervisor of both the suspected contact and of the test results when they are known.

Once an SBSS director receives notice that an SBSS worker may either be infected or been in close proximity with someone known to be positive for Covid-19, the director will notify by phone or preferred contact method all persons known to have had contact with that staff member since the date of that staff member's potential contact with the virus if known, or 14 days if not known.

All SBSS staff members work from home and do not share a work office. All contact between SBSS colleagues and supervisors is done via telehealth.

### Training

The Australian Government's Department of Health has released an [online training module](#) to assist support workers with understanding how to best navigate provision of care during this pandemic. The training covers infection prevention and control (IPC) for COVID-19, including:

- COVID-19 – what is it?
- signs and symptoms
- keeping safe – protecting participants and your workforce
- Mythbusting.

At the end of the course, the support worker should be able to:

- understand the basics about the COVID-19 virus, including how it is spread
- describe what you can do to protect participants and your workforce
- know what to do if you develop symptoms.
- know what to do if the person you are supporting develops symptoms.
- tell the difference between myths and facts of COVID-19.

It is strongly advised that workers complete the online training, so as to improve the likelihood of acting correctly in the event of a COVID-19 outbreak.

The Department of Health has also created a [webinar](#) on COVID-19 preparedness for In-home and the Community Aged Care which is also useful to NDIS providers. Additional information can be found on the Australian Government's [Department of Health website](#) as well as the NDIS's [COVID-19 website](#), both of which are updated regularly with new information and resources.

## Personal Protective Equipment (PPE)

In the event a case of COVID-19 is suspected by a medical professional and during Stage 4 restrictions, PPE will be required in settings where:

- supports being provided are essential to the participant's life, health or safety due to withdrawal or alteration of critical supports
- guidelines for social distancing or isolation can't be maintained
- there are heightened risks to people with disability due to their vulnerabilities

Further information can be found on the [Department of Health website](#).

In the event that practitioners are unable to source PPE, SBSS will make a request for stock to the National Medical Stockpile, with the request being sent to: [Stockpile.Ops@health.gov.au](mailto:Stockpile.Ops@health.gov.au).

- In the event of an outbreak of COVID-19 in a supported independent living setting, providers should contact the Department to request PPE from the Stockpile immediately.

## General Support provider responsibilities during the COVID-19 outbreak

It is important that support providers ensure their workers are up to date with the latest information on COVID-19 and that they know their responsibilities, including what to do if a participant is suspected of having COVID-19.

Support providers must ensure supports continue for the participants they support. In the event that this can no longer be accomplished (e.g. worker shortages or inability to provide the care participants require), notify the NDIS Commission.

Support providers can help participants understand the NDIS's response to the COVID-19 outbreak with an [easy read](#), which is available in multiple languages.

## **Responsibilities of Workers and SBSS Directors**

When providing services during a pandemic, the SBSS practitioners must:

- stop harmful germs from entering the environment by complying with the infection control and waste management policies and community expectations at all times
- Report any known or suspected contact with persons who are positive to infection with Covid-19
- help participants understand how they can stop the spread of germs by using appropriate communication methods, such as the infection control easy read document
- maintain person-centred practice
- communicate organisational changes and special provisions in a way that is most likely to be understood by each participant
- ensure the service provision environment is safe
- remove or mitigate any factors that make a service environment unsafe
- incorporate all organisational and government recommendations into support provision including recommendations regarding:
  - A. movement and travel restrictions
  - B. social distancing
  - C. additional hygiene measures
  - D. isolation measures
- report all complaints and incidents in accordance with relevant policies and legislation
- ensure hand washing facilities are readily available at all times, and/or access to hand sanitiser
- ensure relevant PPE is utilised at all times
- limit face-to-face contact with participants where possible
- limit the touching of participants (and other workers) where possible
- monitor their own health status and act accordingly
- monitor the health status of participants and act accordingly
- self-isolate, if required
- consistently liaise with participants support organisations.

### **Responsibilities of SBSS Directors**

When undertaking services during a pandemic SBSS Directors must:

- coordinate pandemic preparedness and response
- undertake managerial responsibilities specified in the pandemic management plan
- make key decisions about ceasing/scaling back operations
- communicate key decisions clearly and cohesively across the organisation
- monitor the Australian Department of Health and NDIS websites, as well as the websites of other organisations that govern health and/or disability services
- implement state and federal recommendations and coordinate any lockdown measures.

## COVID Safety / Response Plan

Stage 3 Risk Management Plan	Who is Responsible
<ul style="list-style-type: none"> <li>• Working permits are no longer required</li> <li>• If an SBSS employee is seeing a service user or stakeholder face to face, they must follow our pre-session procedures verifying the health status of the service user and staff supporting them before entering onsite</li> <li>• SBSS employees must ensure that their supervisor is aware of their intention to resume face to face sessions, including the name of the person, onsite location, likely frequency and/or dates of the scheduled appointments</li> <li>• SBSS employees must ensure that face to face sessions are pre-booked on Cliniko</li> <li>• Following a face to face session, SBSS employees must ensure that they complete a treatment note on Cliniko that includes the date/time/duration of contact and the names of all other people (including staff, family and/or other clients) they had contact with during their onsite visit</li> </ul>	<ul style="list-style-type: none"> <li>• SBSS Practitioners</li> <li>• SBSS Directors</li> </ul>
Stage 4 Risk Management & Response Plan	Who is Responsible
<ol style="list-style-type: none"> <li>1. All SBSS staff should try to work from home much as possible and provide services in line with SBSS Telehealth Policy.</li> <li>2. All participants and service users must be notified as soon as possible regarding SBSS COVID policy during Stage 4 using language the participant is able to understand.</li> <li>3. Practitioners should work with the service providers and participant/ service users to identify resources required to utilise telehealth options, during Stage 4 restrictions. Practitioners can write a letter to the Support Coordinator of NDIS Participants requesting urgent funding for a computer or IPAD, and mobile service to be able to continue with service via telehealth (such as video conferencing).</li> <li>4. SBSS practitioners will speak with their SBSS supervisor as soon as practical to identify any higher risk or vulnerable participants and service users that may require in person support during Stage 4 restrictions.</li> <li>5. In the first instance, it is the obligation of SBSS staff to identify and declare if they are comfortable providing 'on site' or in person services to the identified participant.</li> </ol>	<ul style="list-style-type: none"> <li>• All SBSS staff</li> <li>• SBSS Directors</li> </ul> <p>SBSS is considered a 'permitted work' (defined as a <i>'community-based service which is required to ensure the health, safety and wellbeing of vulnerable people'</i>). As per the Victorian Stage 4 Restrictions, SBSS is available to remain open for on-site work with a <b>permitted worker permit</b> signed by SBSS Director and the staff member.</p> <p>In order to maintain the safety of all persons the</p>

<p>6. SBSS staff will not be reprimanded in any way if they do not want to provide in person/ on-site support; the practitioner is not required to disclose their reasons for not conducting face to face sessions to the SBSS Director and there will be no consequences for that decision.</p> <p>7. The Director will work with the SBSS staff member to identify alternative options for maintaining services to the person without conducting face to face sessions.</p> <p>Alternative options, may include:</p> <ul style="list-style-type: none"> <li>• <i>Various telehealth methods</i></li> <li>• <i>Use of observation checklists and training of the carers supporting the participant and service users</i></li> <li>• <i>Use of video recording of the practitioner to participant, and vice versa (after additional consent to take photos and video record are obtained).</i></li> <li>• <i>Another SBSS practitioner steps into the case to provide in face to face sessions as required to ensure minimal disruption for the participant.</i></li> </ul> <p>8. If the staff member is agreeable and in optimal health condition to conduct face to face sessions on site with participants, the following criteria must be discussed with an SBSS Director and recorded in writing on the <b>SBSS Stage 4 COVID Onsite Checklist for each onsite activity</b>:</p> <ul style="list-style-type: none"> <li>○ Practitioner name</li> <li>○ Participant / service user details</li> <li>○ Reason for face to face contact rather than telehealth (i.e. degree of vulnerability of the person)</li> <li>○ Address/location face to face session will be conducted at and primary contact details for that location</li> <li>○ Date/ time session is scheduled for and expected duration of services</li> <li>○ Who else will be at this location at that same time</li> <li>○ Who the practitioner will have contact with during the provision of services</li> </ul> <p>9. If the onsite activity is approved by the SBSS Director, the Director will complete a <b>Permitted Worker Permit</b> (Vic Gov) for the practitioner. This will need to be signed by both the practitioner and the Director of SBSS, that is specific to the site approved.</p> <p>10. The Practitioner is required to carry this permit on them at all times working outside of their home. Breaches of the COVID Worker Permit Scheme can result in a fine of approximately 20K for individuals and 100K for businesses.</p> <p>11. <b>If an SBSS staff member is not carrying their permit on them or breaches procedures outlined in this COVID safety plan, such as working onsite outside of any approval process and permit provided,</b></p>	<p>following behaviours must be adhered to:</p>
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the staff member will be liable for any fines the individual and SBSS incurs.

**12. Prior and During the actual onsite visit staff must:**

- Wear both a face shield and a fitted face mask that covers the nose and mouth at all times during the provision of services.
- Department of Health has developed advice for persons with a disability about PPE you can refer to:  
<https://www.health.gov.au/news/health-alerts/novel-coronavirus-2019-ncov-health-alert/advice-for-people-at-risk-of-coronavirus-covid-19/coronavirus-covid-19-advice-for-people-with-disability>
  
- Staff must maintain social distancing rules (1.5 metres), respiratory etiquette and healthy hygiene (handwashing pre and post all visits to residential centres)
- Contact a manager from the service location prior to the scheduled service and request:
  - *has anyone presented with any of the following symptoms: fever, cough, sore throat, fatigue and shortness of breath in the last two weeks*
  - *Have any staff taken recent sick leave, in relation to potential exposure to COVID, and or have staff or any participants on site been required to isolate in relation to potential exposure to COVID.*
  - *Has anyone tested positive for COVID in the last 10 days.*
- If any of those questions are answered with yes, SBSS staff must contact a director for additional approval prior to entering the service location.

**13. SBSS Directors will retain information on the SBSS central risk register regarding which staff member provided face to face services, to which participants, and when. A copy of the *Stage 4 COVID Participant Checklist* will be saved on the participant's or Service users Cliniko file.**