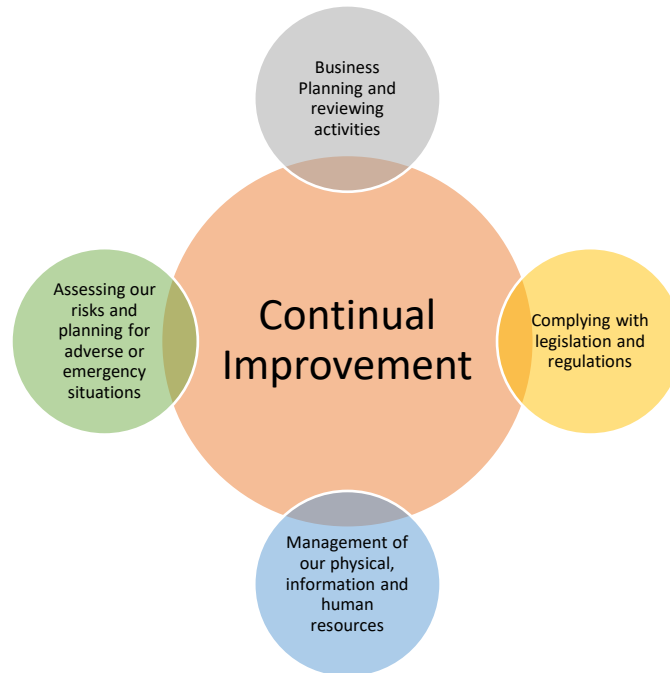


Good Governance of our organisation has been established to ensure our participants are ensured of a strong business foundation that will support their service sustainability, our business success and to meet the legislative and regulatory needs of our industry. Governance to us is a systematic approach of continually planning and reviewing our business activities which are broken down into relevant manageable sections within this manual.



Governance & Operational Management

Lifestyle Mentor Services is an Australian Private Company registered with an ABN since March 2018 and is located at 23 Phaeton Street, Upper Coomera Qld. Lifestyle Mentor Services provides support services including daily living activities, improved living arrangements, improved learning, finding, and keeping employment, community social and recreational activities, improved relationships, short term accommodation, group-based programs, support coordination (level 1 and 2) and specialises for people with younger onset dementia, disability, education and supported independent living option.

Our facilities are:

23 Phaeton Street, Upper Coomera Qld – which houses head office, short term accommodation, day respite and training rooms.

Fitzpatrick Street, Upper Coomera Qld – a standard residential house currently used as a Supported Independent Living (SIL) House, consisting of four-bedroom home (including Onsite Overnight Assistant OOA), main bedroom has ensuite, including a main bathroom, we currently have one female resident is funded to receive 24 / 7 care.

Sundew Place, Logan Village Qld – Supported Disability Accommodation (SDA) for Supported Independent Living (SIL) disability purposed built home, consisting of a four-bedroom home (including Onsite Overnight Assistant OOA), three main bedrooms with a fully accessible ensuite, with a standard ensuite in OOA's room, our two female residents are funded to receive 24 / 7 care.

Therese Court, Augustine Heights Qld – Supported Disability Accommodation (SDA) for Supported Independent Living (SIL) disability purposed built home, consisting of a four-bedroom home (including Onsite Overnight Assistant OOA), three main bedrooms with a fully accessible ensuite, with a standard ensuite in OOA's room, our two male residents are funded to receive 24 / 7 care.

Lifestyle Mentor Services Governing Body is depicted within our **LMS-F-006 - Organisational Chart**, Governing body members are managed as per our **HR Management System** which includes how they are retained, assessed as suitable, trained and reviewed. The organisations delegation process is depicted within the **LMS-F-006 - Organisational Chart** and in our position descriptions.

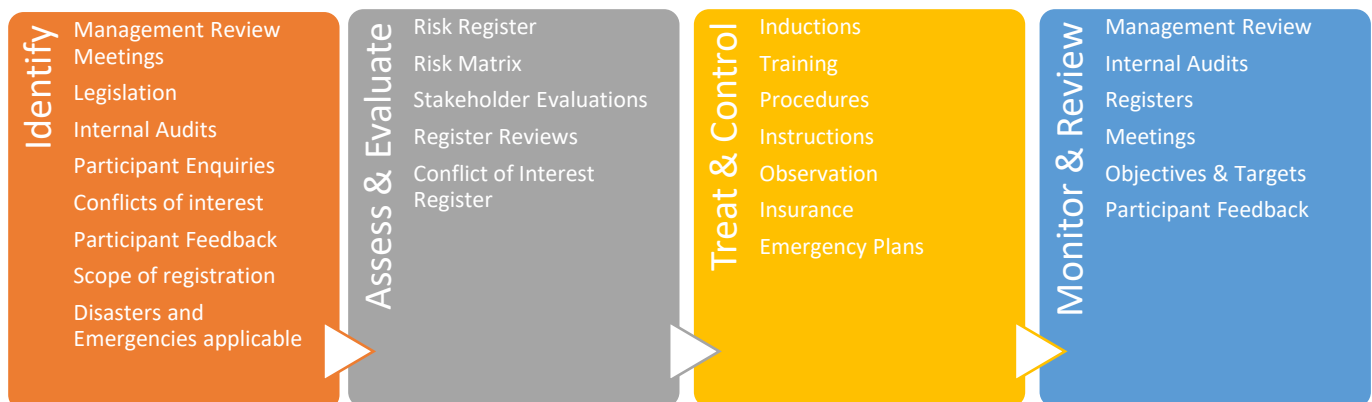
Governance planning is undertaken at set time during management meetings and recorded using the **Management meeting agenda** which is located within Flowlogic. The strategic planning is undertaken to ensure that all relevant items are discussed, reviewed or actioned that meet our organisational planning, financial, legislative, regulatory and contractual responsibilities and to monitor and respond to quality and safeguarding matters associated with delivery support to participants. Included within this meeting is feedback from Participants that is used to provide input in our development of policy and procedure changes.

Lifestyle Mentor Services has a conflict-of-interest process which includes the use of the **LMS-R-006 Conflict of Interest Register** for documenting any identified conflicts of interest and ways they will be managed, monitored and reviewed. Conflicts of interest may occur in our organisation through the provision of dual services, associations between our stakeholders and our participants or our support community. Whilst we endeavour to limit any conflict of interest we will identify and implement relevant, formal strategies to control any negative effects of these.

Risk Management

Lifestyle Mentor Services has a system in place which will identify and manage all risks to the organisation, its services and its people. We also identify opportunities.

The Diagram below illustrates how risks and opportunities are to be managed at Lifestyle Mentor Services.



Identification

Risks will and can be identified:

- Prior to commencement of business activities
- When a location / environmental change occurs
- When a new registration group is added
- When a new piece of major equipment is purchased
- When legislation is changed
- Through results of audits and reviews
- When service provision is significantly changed, or planned reviews take place

Initial organisational risks will be identified transferred to the **LMS-R-002 Risk Register** for measurement, control, and review. Our risk categories identify specific areas within our organisation that we need to manage risks and include, incident management, complaints management, financial management, governance and operational management, human resource management, information management, work health and safety and emergency and disaster management.

Participant risks will be identified during intake through the **LMS-F-001 Participant risk assessment** form.

Worker risks will be identified during recruitment and induction and be recorded within worker files and **Flowlogic software**.

Assess and Evaluate

Lifestyle Mentor Services will use consultative and best practice methods to measure the risks probability vs consequence rating of either low, medium, high or extreme. A risk appetite will be set which indicates the organisations acceptable risk level.

Treat & Control

Lifestyle Mentor Services uses various control methods to identified risks and these will be put in place and communicated to all stakeholders to ensure that risks are managed appropriately. Methods include induction, training, this manual, Flowlogic software, forms and registers.

Monitor and Review

Once a control method has been implemented a method to measure its success will be established and dates set for review. Quantitative and qualitative measures will be used to document the success of the control method. In the event it is not achieved then the treat and control method will be reviewed and amended.

The **LMS-R-002 Risk Register** process will be reviewed at **Management Review Meeting** and all identified improvements will be actioned as per our **Quality Management - Continual Improvement Process**

Quality Management

Lifestyle Mentor Services has a quality management system that promotes continuous improvement of support delivery. To achieve consistent within our NDIS Management System we integrate our systems and operate from a data collection method to ensure that improvement opportunities are identified and documented so that decision makers can implement continual improvement.

We collect and review information related to areas of our business to review outcomes meet our planning, these reviews include register and Flowlogic reporting data:

Our Registers include:

- LMS-R-001 Document Register
- LMS-R-002 Risk Register
- LMS-R-003 Legislation Register
- LMS-R-004 Control Register
- LMS-R-005 Audit & Review Schedule
- LMS-R-006 Conflict of Interest Register

Flowlogic reporting:

- Worker records and training
- Meeting actions and outcomes
- Incident reporting

- Feedback and complaints reporting
- Workplace inspections
- Participant goals and service delivery (case notes)
- Financial records / billing

Legislation Obligations

Lifestyle Mentor Services will identify and comply with all Acts, Regulations, Standards and Codes of Practice that apply to us. All identified Acts, Regulations, Standards and Codes of Practice are contained within the **LMS-R-003 Legislation Register**.

The **LMS-R-003 Legislation Register** is reviewed to identify any new or changes to existing requirements.

1. **LMS-R-005 Audit & Review Schedule** will identify the review timing.
2. Click on each hyperlink in register, if the link connects with the identified legislation, it is current – insert date checked and any outcomes
3. If link does not connect it could mean that the legislation has been updated or changed if this is the case review legislation and investigate changes.
4. If change is not relevant to the IMS note change details in comments column and update new legislation link
5. If change is relevant to the NDIS Management System, make improvement action in the **LMS-R-004 Control Register** for actioning by the Director (or nominated person) changes to be made as per the **LMS-R-001 Document Register**.

The **LMS-R-003 Legislation Register** will be formally reviewed at the management review meeting to ensure the relevant to the business and operations.

Internal Audit

Lifestyle Mentor Services will periodically verify that the NDIS Management System is correctly implemented, maintained and conforms.

Internal Audits are carried out for the entire NDIS Management System including the manual, forms, registers etc to ensure that all elements of the system are performing as required. These are carried out as per the **LMS-R-005 Audit & Review Schedule** and all sections will be completed at least once over a 12-month period.

Identified high risk areas will be audited at time required to ensure the conformity of the system and outcomes are achieved, these will be planned on the **LMS-R-005 Audit & Review Schedule**. High risk could be because of inspections, audit results or changes.

The Director or delegate persons will perform the audits based upon their knowledge of the element, audit skills and position within the organisation. This process will ensure that audits are conducted by suitably trained personnel and will be independent from the areas that they are auditing. Lifestyle Mentor Services may also engage the services of qualified external consultants to perform this function to ensure impartiality of the audit process.

The auditor will conduct the audit by referring to the relevant section of the NDIS Management System and associated procedures (these may be printed or viewed electronically). The auditor will examine and record objective evidence and ascertain whether the system element is operating in accordance with Lifestyle Mentor Services documented requirements, and whether the documentation is written in accordance with actual practices.

Audit results are to be recorded on the **LMS-F-007 - Internal Audit Report** and returned on completion to the Director. Elements not meeting Lifestyle Mentor Services requirements are to be recorded in detail and transferred to the **LMS-R-004 Control Register** for actioning.

A summary of audit results will be reviewed at the next scheduled **Management Review Meeting**.

Continual Improvement

Continual improvement opportunities can be achieved through many methods, including (but not limited to):

- Changes to Compliance Obligations.
- Risk and opportunities.
- Business objectives.
- Communication.
- Planning of services.
- Customer communication.
- Customer requirements.
- Customer satisfaction and feedback.
- Analysis and evaluation of performance.
- Internal Audits.
- Management review meetings.
- Non-conforming procedures, products or services; and
- Improvements, suggestions and ideas – which can be made anytime, via email or in person to any member of the management.

Lifestyle Mentor Services relies on all employees to contribute to the improvement of the NDIS Management System to correct, prevent or reduce undesirable outcomes, to continue to meet participant requirements and to enhance participant satisfaction.

Methods for ensuring suitability and improving are described below.

Non-conformity / Opportunity for improvement / meeting action

- A non-conforming process is any process that produces an undesirable or unintended outcome (audit result, incident or complaint).
- Improvement is a suggestion, identification of possible issue or a good idea.
- Opportunity for improvement is an identified area that is not functioning as expected without a current negative outcome (audit result, inspection result, meeting action).

In all cases, action is required to correct the non-conformance or implement an improvement. These will be documented using the **LMS-R-004 Control Register** or through meeting actions within Flowlogic.

Where a non-conformance / Opportunity for Improvement / meeting action has been raised, a review of, and investigation into, the non-conformance will be carried out to identify the most effective methods to correct the non-conformance, prevent further occurrences of the non-conformance, and to ensure that the methods used to correct the non-conformances, have been effective. This review may use methods such as internal audits and continual inspection.

The raised non-conformance will not be closed out until the review has been completed, and corrective action verified (if required), usually through management review meetings.

The **LMS-R-004 Control Register, Flow logic records for meeting actions, feedback, complaints and incidents** are to be informally reviewed monthly and formally reviewed at the **management review meetings**.

Information Management

Information that is collected from participants includes data that is required to establish service delivery purposes only or required by government departments (NDIA, ATO etc).

- We will only use and share this information (written, audio and visual) when it is given freely and with **LMS-F-002 Consent Form**. We believe that consent needs to be formalised and also includes specific agreements between identified parties. Our participants have the right to define who they share specific information with and who they don't.
- We will clearly explain our privacy information storage and protection process through the provision of the **LMS-F-005 Participant Information Handbook** (specific to their communication needs including language, mode of communication and language)
- We will train our workers and staff and obtain confidentiality agreements and understanding of information sharing process through inductions and ongoing training.
- We will support our participants to make informed decisions about their right to access, change their information at any time and withdraw consent options.

Documents & Records

All NDIS Management System documents are controlled, are electronically stored on the cloud and Flowlogic, with restricted edit access to prevent unauthorised change, and are referenced within the NDIS Management System Manuals.

Currently all documents that are to be controlled are documented on the **LMS-R-001 Document Register**.

Creating & Updating

New documents must be developed and authorised before they are included, this can be registered on the **LMS-R-004 Control Register** if it is an action from a non-conformance or audit result.

Change of existing documents is to be done the same as the new document process and the reason for the change is to be recorded either in the **LMS-R-004 Control Register** or **LMS-R-001 Document Register** reason for change column.

All NDIS Management System documents will contain a document title, revision number and issue date, and the following identification convention:

Example	LMS-F-001
LMS	Lifestyle Mentor Services
F	Form
000	Unique Sequential Number

Control of Documented Information

No controlled printed copies are maintained. All printed copies of the NDIS manuals and documents downloaded electronically from the cloud or Flowlogic must be considered uncontrolled. Only the current version of the NDIS documents must be used.

When changes to documents occur, ensure that obsolete printed copies are identified as obsolete or destroyed, and electronic versions are archived, to prevent their use, and communicate the change through internal communication.

Record control

Records, which include completed Lifestyle Mentor Services forms and registers, as well as external records (eg supplier documents, customer purchase orders etc) which demonstrate compliance to the NDIS Management System are to be retained in the (identify platform).

All records are retained as electronic records, with any paper copies being scanned. Once scanned, the paper record may be destroyed once approved for destruction.

Record Details	Storage Location	Storage Type	Retention Duration	Destruction Method
Safety	Server	Electronic	Indefinitely	NA
Participant	Server	Electronic	Indefinitely	NA

HR Records	Server / Hardcopy	Electronic / Archive Boxes	Indefinitely	NA
Plant & Equipment Records	Server /hardcopy	Electronic / Archive Boxes	Life of equipment	Deletion / Shredding
Accounting Records	Server	Electronic	7 years	Deletion

All stored records must be readily retrievable, identifiable and legible.

Data Storage and Backup

Server Maintenance and Backup Schedules are controlled by an external IT company.

Occurrence	Information / Content:	Review Method
Daily	All drives	Notifications sent daily to confirm or to advise of failure

Feedback and Complaints Management

Lifestyle Mentor Services take all complaints and feedback seriously, all people treated fairly, and all corrective actions completed in a timely manner. All feedback received is run through our continual improvement process (see **Quality Management**).

At Lifestyle Mentor Services each Participant has knowledge and access to the providers complaints management and resolution system. Complaints and other feedback made by all parties are welcomed, acknowledged, respected and well managed.

To achieve this our Feedback and Complaints management process is provided to Participants with the **LMS-F-005 Participant Information Handbook** (specific to their communication needs including language, mode of communication and language) train our staff regarding complaints and feedback (see **HR Management**).

Lifestyle Mentor Services ensures that our participants and their care givers, community and support people can make a complaint or give feedback to us or to the NDIS Commission at their discretion. Complaints and feedback can be made using the **LMS-F-008 Feedback and Complaints form**, through our website or verbally to one of our staff members who will document the complaint within the Flowlogic software for actioning. Our process for managing complaints is:

- Recording: - **LMS-F-008 Feedback and Complaints form and / or Flowlogic software**
- Actioning: - **In consultation with relevant parties, referrals or external agencies**
- Communication: - **All parties (including external agencies) will be communicated the actions or outcomes of the complaint or feedback (if necessary).**

Management review all feedback and complaints received, to ensure communication timeframes are met, stakeholders are consulted and collaborated with and to ensure that the process is working effectively within our systems.

Incident Management

Lifestyle Mentor Services take all incidents seriously, and each Participant is safeguarded by our system to ensure that incidents are acknowledged, responded to, well managed and learnt from. All incidents are run through our continual improvement process (see **Quality Management**).

At Lifestyle Mentor Services each Participant has knowledge of and access to the providers Incident Management system. Through the provision of the **LMS-F-005 Participant Information Handbook** (specific to their communication needs

including language, mode of communication and language) train our staff regarding Incident Management (see **HR Management**).

Our system defines incidents including serious incidents and incidents which are reportable to the NDIS Quality and Safeguards Commission and other authorities. An incident is broadly defined as:

- Any event or circumstances that resulted, or could have resulted, in unintended and / or unnecessary harm to a person, or loss or damage to property.
- A near miss which did not cause harm, but had the potential to do so
- A medication error involving a preventable event that may cause or lead to inappropriate medication use or harm to a participant while being supported
- Any event which deviates from standard policy or procedures
- Anything illegal

If an incident occurs, we will promptly and appropriately respond to the incident in an equitable objective and fair manner. To do this we will record all incidents using Flowlogic software which records date, time, location and stakeholders of the incident, summary of the incident including prior, during and post details, identification of reportable requirements, contact details, corrective actions taken and continuous improvement. Lifestyle Mentor Services will also:

- Immediately respond to an incident to ensure the safety and wellbeing of participants and others at risk
- Report to police (if appropriate)
- Contact relevant support services
- Preserve evidence of the incident
- Notify relevant next of kin, family or guardians
- Plan and undertake actions to provide ongoing support to those affected by the incidents
- Support a participant to obtain independent advocacy services.
- Feedback incident and outcomes within our Quality management process and review actions and success by management.

Reportable Incidents

Incidents that must be reported to the NDIS Quality and Safeguard Commission include any incident involving:

- The death of a participant
- The serious injury of a participant
- Abuse or neglect of a participant
- Unlawful sexual or physical contact with, or assault of, a participant
- Sexual misconduct committed against, or in the presence of a participant including grooming for sexual activity
- Unauthorised use of a restrictive practice in relation to a participant.

Other incidents may require reporting to other agencies, for example:

- Data breach or breach of personal information (OAIC)
- Injury or death of an employee while on duty (WHS)
- Illegal activity or action (police)
- Child neglect or harm (legislative authority)

We will follow the NDIS reportable incident process which includes submitting an Immediate Notification Form via the NDIS Commission portal within a 24-hour period (5 business days for the use of a restrictive practice) and a 5 Day form (within 5 days of incident) with additional information of actions taken as a result of the incident. A final report will be submitted if required by the NDIS.

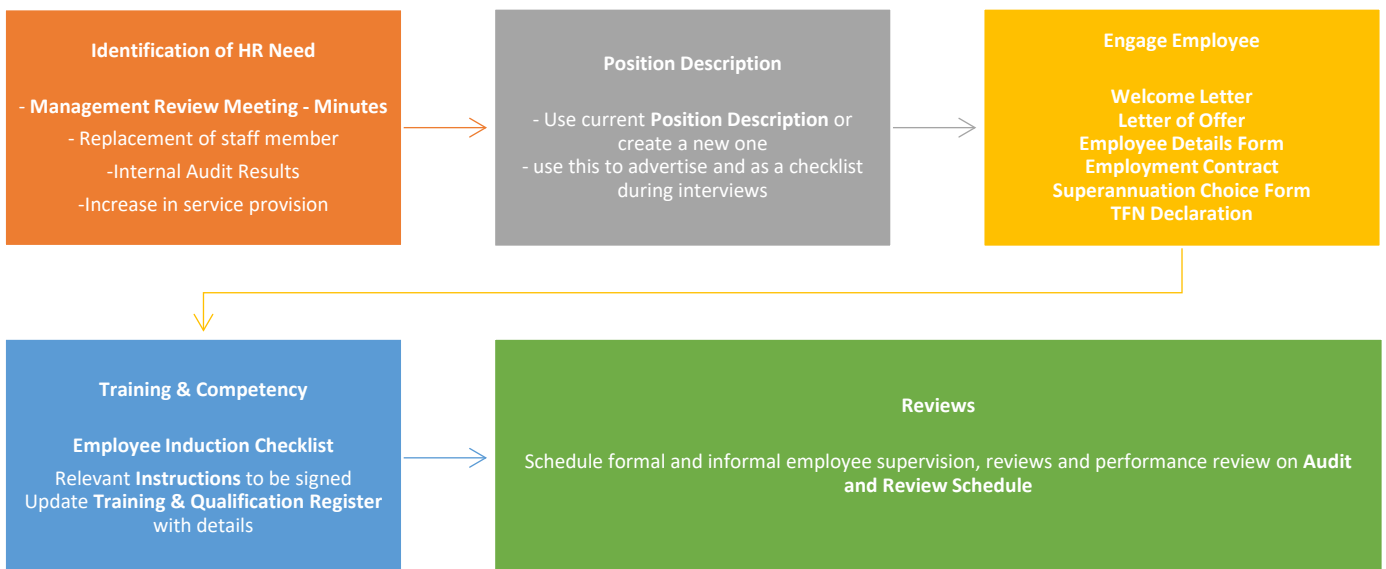
Management review all incidents, to ensure correct records are kept, communication timeframes are met, stakeholders are consulted and collaborated with and to ensure that the process is working effectively within our systems.

Human Resource Management

Lifestyle Mentor Services is committed to ensure each participants support needs are met by workers who are competent in relation to their roles, hold relevant qualifications, and who have relevant expertise and experience to provide person-centred support.

Lifestyle Mentor Services has determined the personnel necessary for the effective implementation, operation and control of the NDIS Management System, this is identified in the **LMS-F-006 - Organisational Chart**. Lifestyle Mentor Services can amend the personnel required within the **LMS-F-006 - Organisational Chart** as required to maintain the effective implementation of the system and Participant satisfaction for the business, the recruitment process will then be followed.

Recruitment Process



During the recruitment process applicants will be assessed as meeting the criteria as specified in the **LMS-F-009 Position Description Template** for the position in which they have applied for. Once the applicant has been considered competent for the position and approval has been sought, the applicant may be offered a position within Lifestyle Mentor Services. Records of worker pre-employment checks, qualification and experience are maintained in the HR File.

The employee details are to be captured using **Flowlogic**. A HR file is to be created for all new employees. The employee details are entered, which is used by to plan and monitor current licenses, qualifications, training and any expiry dates.

Induction

At the commencement of duties at Lifestyle Mentor Services, all employees will be inducted using the **Flowlogic software** which will be completed and filed within the HR File.

Induction includes:

- an awareness and understanding of Lifestyle Mentor Services policies, objectives, obligations in contributing to the effectiveness, improvement and relevant risks associated with the NDIS Management System. Including:
 - code of conduct
 - Incident management process – inc reportable incidents

- Complaint and feedback process
- Privacy and confidentiality
- Emergency response
- review in detail those elements, which directly relate to the work to be carried out by the person or persons being inducted and their responsibilities include specific Participant training and awareness; and
- any statutory, regulatory or industry training required.

Competency and Training

If a qualification or license exists from a Registered Training Organisation (RTO) or Government Department, the employee is deemed to be competent.

Training which has been identified by Lifestyle Mentor Services is listed within Flowlogic software, each employee will have specific training identified and scheduled and completed. Outcomes of training will be recorded within this including any certificates of completion and feedback will be recorded in their HR File.

Ongoing evaluation of employee competency is monitored informally on an ongoing basis with informal feedback meetings (positive or improvement suggestions) to be held as required. Formal supervision and employee reviews are to be held at least annually and scheduled in Flowlogic.

Management is to discuss the any training provided with the employees to evaluate the effectiveness of training provided, and ensure the training provided has produced the required outcomes, including qualifications, demonstrated knowledge, skills and competency.

Continuity of Supports

Lifestyle Mentor Services will ensure each participant has access to timely and appropriate support without interruption. To achieve this the organisation will:

- comply with the NDIS Management System processes
- plan and schedule workers to ensure that in a worker absence of vacancy, a suitably qualified and /or experienced person performs the role.
- Identify risks associated with support continuity during intake using the **LMS-F-001 Participant risk assessment**.
- ensure that workers are paired with participants to meet their specific needs, and this is documented on the service planning records
- comply with our cancellation process as documented in our service agreements
- communicate effectively with our participant in the event that changes, and cancellations are unavoidable

Lifestyle Mentor Services uses Flowlogic software to develop service schedules, notices and alerts. Information within this platform is provided to workers associated with the Participants and includes relevant information to ensure specific participants needs and expectations are met by temporary or late notice worker changes.

Emergencies and Disaster Preparedness

Lifestyle Mentor Services will identify all safety, health and wellbeing risks of the organisation and each participant before, during and after an emergency or disaster. This will be recorded within:

- **LMS-F-010 Emergency Plan**
- Participant Emergency Plan (care support actions plan) – within flowlogic

Emergency plans will be developed by management during business planning and management review meetings and include input and feedback from all stakeholders including participants, community, government and local authorities. Emergency plans will be communicated with all stakeholders including:

Employees – during induction and through annual training activities

Participants – during intake and through the review process.

Stakeholders – website / posters / notifications / emergency evacuation plans

Emergencies identified for the organisation, location or participant will be tested and reviewed at least annually (as per the audit and review schedule or participant review schedule) and the results of the reviews will be analysed by management to ascertain suitability. This will be recorded on the **LMS-F-011 Emergency Drill**.