

**WholeFlow** Inclusion Co.

# Policy Pack

Support Services - Public Website Edition

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August 2026

23 organisational policies

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SECTION 01

# Participant Rights & Service Delivery

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# WholeFlow Inclusion Co.

## Practice Philosophy Policy

### Purpose

This policy outlines the philosophy that guides every interaction, decision and support provided by WholeFlow Inclusion Co. It establishes the principles all employees are expected to understand and apply when working alongside participants, families, colleagues and the wider community.

Rather than focusing solely on tasks or routines, WholeFlow is committed to building genuine relationships that create meaningful opportunities for growth, independence and belonging.

### Scope

This policy applies to:

- Directors
- Employees
- Casual Support Workers
- Students
- Volunteers
- Contractors
- Any person representing WholeFlow Inclusion Co.

This philosophy underpins every service delivered by WholeFlow regardless of whether support is provided in the participant's home, school, community or another setting.

### WholeFlow Values

At WholeFlow we believe that every person deserves to feel safe, understood and valued exactly as they are.

We recognise that behaviour is communication, regulation comes before expectation, and meaningful change happens through trusted relationships—not compliance.

Our role is not to "fix" people. Our role is to walk alongside them, recognising strengths, supporting capacity building, and creating opportunities for genuine participation in everyday life.

Every interaction should leave a participant feeling respected, empowered and heard.

# Policy Statement

WholeFlow Inclusion Co. delivers neuroaffirming, person-centred supports that respect the rights, dignity, culture, identity and individual goals of every participant.

Support workers will prioritise connection before correction, curiosity before judgement, and collaboration before control.

Services will always aim to:

- Promote independence rather than dependence.
- Build capacity through everyday experiences.
- Respect each participant's communication style.
- Support emotional regulation through co-regulation and understanding.
- Work alongside families and professionals as one team.
- Encourage choice, autonomy and informed decision-making.
- Celebrate progress in all forms, recognising that growth looks different for every individual.

Staff are expected to exercise professional judgement while adapting their approach to meet each participant's unique needs.

## Procedures

### Before Providing Support

Staff will:

- Read participant profiles, goals and risk assessments.
- Familiarise themselves with communication preferences and sensory needs.
- Prepare any required resources before commencing the shift.
- Approach each participant without assumptions or predetermined expectations.

### During Support

Support workers will:

- Build rapport before introducing demands or activities.
- Respect participant choices wherever it is safe to do so.
- Use strengths-based language.
- Offer support in ways that preserve dignity and independence.
- Encourage participation rather than completing tasks for the participant.
- Adapt activities to meet the participant's regulation, interests and energy levels.
- Work collaboratively with families and therapists where appropriate.
- Maintain professional boundaries while creating genuine, trusting relationships.

## After Support

Staff will:

- Complete accurate progress notes.
- Record achievements, observations and emerging needs.
- Communicate important information with families where appropriate.
- Report any incidents, risks or safeguarding concerns immediately.

## If Challenges Arise

When situations become difficult, staff will:

- Remain calm and emotionally regulated.
- View behaviour as communication rather than defiance.
- Reduce environmental demands where appropriate.
- Seek to understand the underlying need before responding.
- Request support from management when additional guidance is required.

Punitive, shaming or coercive practices are not consistent with WholeFlow's philosophy and are not permitted.

## Staff Responsibilities

Every WholeFlow team member is responsible for:

- Treating every participant with dignity and respect.
- Upholding participant rights.
- Following neuroaffirming practices.
- Building trusting relationships.
- Maintaining professional boundaries.
- Working collaboratively with families and professionals.
- Seeking guidance whenever unsure.
- Reflecting on their own practice and continually improving.

# What This Looks Like at WholeFlow

Connection before correction means slowing down to understand why a participant may be finding something difficult rather than immediately trying to change their behaviour.

For example:

- ✓ Joining a participant in a favourite activity before introducing a new challenge.
- ✓ Offering choices instead of giving unnecessary directives.
- ✓ Recognising signs of overwhelm and supporting regulation before expecting participation.
- ✓ Celebrating small achievements such as trying a new activity, communicating a need, or attempting greater independence.
- ✓ Adjusting plans when a participant's emotional or sensory needs change throughout the shift.

Success is measured by the quality of the relationship we build—not simply by the number of tasks completed.

## Record Keeping

Staff must complete and maintain:

- Participant Progress Notes
- Incident Reports (where applicable)
- Risk Assessments (where applicable)
- Communication Records with families or professionals
- Goal Progress Documentation
- Any required NDIS documentation relating to the support provided

Records must be completed accurately, objectively and as soon as practical following each shift.

## Related Documents

- Code of Conduct
- Participant Rights Policy
- NDIS Service Delivery Policy
- Behaviour Support Policy
- Child Safe Policy
- Incident Management Policy
- Privacy and Confidentiality Policy

## **Review Schedule**

This policy will be reviewed:

- Every 12 months;
- Following changes to relevant legislation or NDIS Practice Standards;
- Following significant incidents or complaints;
- Following participant, family or staff feedback that identifies opportunities for improvement.

Any updates will be communicated to all staff as part of WholeFlow's continuous improvement process.

# WholeFlow Inclusion Co.

## Participant Rights & Choice Policy

### Purpose

The purpose of this policy is to ensure every participant supported by WholeFlow Inclusion Co. is treated with dignity, respect and fairness, and is empowered to make informed choices about their own life.

WholeFlow is committed to creating environments where participants feel safe, heard and genuinely involved in decisions that affect them. We recognise that every person has the right to direct their own life, regardless of age, disability, communication style or level of support required.

### Scope

This policy applies to:

- Directors
- Employees
- Casual Support Workers
- Students
- Volunteers
- Contractors
- Any person representing WholeFlow Inclusion Co.

It applies during every interaction with participants, families, carers and other professionals.

## WholeFlow Values

At WholeFlow, we believe every person deserves to be listened to.

Rights are not something we "give" participants—they already belong to them.

Our role is to remove barriers, create opportunities for participation and support people to make decisions in ways that work for them.

We recognise that communication looks different for everyone. Whether someone communicates through speech, gestures, behaviour, AAC, visuals, technology or trusted supporters, every voice deserves to be heard.

## Policy Statement

WholeFlow Inclusion Co. is committed to protecting and promoting the rights of every participant.

Participants have the right to:

- Be treated with dignity and respect.
- Be free from abuse, neglect, exploitation and discrimination.
- Make choices about their own life and supports.
- Be involved in decisions affecting them.
- Receive services that are culturally safe and inclusive.
- Take reasonable risks while being supported safely.
- Communicate in ways that suit them.
- Access information they understand.
- Have their privacy respected.
- Make complaints without fear of negative consequences.
- Change or withdraw services at any time in accordance with their service agreement.

Staff will actively support participants to exercise these rights in everyday practice.

## **Procedures**

### **Supporting Choice**

Staff will:

- Offer genuine choices wherever possible.
- Present options in ways the participant understands.
- Allow additional processing time before expecting a response.
- Respect a participant's decision, even when it differs from staff preferences, provided it does not place the participant or others at immediate risk.
- Avoid making assumptions about what is "best" for a participant without involving them.

Choice should never be tokenistic. Wherever possible, participants should influence how support is delivered.

### **Supporting Communication**

Staff will:

- Learn each participant's preferred communication methods.
- Use visual supports, AAC, gestures or other communication tools where appropriate.
- Observe non-verbal communication and recognise behaviour as meaningful communication.
- Speak directly to participants rather than only to family members or support persons.
- Confirm understanding rather than assuming comprehension.

## **Respecting Dignity**

Staff will:

- Knock before entering private spaces.
- Seek consent before providing personal care or physical assistance.
- Protect participant privacy during support.
- Use respectful language at all times.
- Support participants in ways that preserve independence and self-esteem.

## **Positive Risk-Taking**

WholeFlow recognises that growth often involves trying new things.

Staff will:

- Balance safety with independence.
- Support participants to make informed choices.
- Complete risk assessments where required.
- Encourage participants to learn through everyday experiences.
- Seek guidance where risks become significant or unclear.

The goal is not to eliminate all risk but to support people to live full and meaningful lives as safely as possible.

## **If a Participant's Rights Are Limited**

If staff believe a participant's rights are being restricted, they must:

- Raise concerns with management immediately.
- Document observations factually.
- Follow relevant safeguarding procedures.
- Never implement restrictive practices unless appropriately authorised and documented in accordance with legislation.

## **Staff Responsibilities**

Every WholeFlow team member is responsible for:

- Respecting participant rights at all times.

- Promoting choice and independence.
- Supporting accessible communication.
- Protecting privacy and confidentiality.
- Reporting concerns about abuse, neglect or rights restrictions.
- Challenging discriminatory attitudes or practices.
- Continuing to learn about person-centred and neuroaffirming practice.

## What This Looks Like at WholeFlow

Supporting rights happens in everyday moments.

Examples include:

- ✓ Asking "Would you like to choose where we go today?" instead of deciding for the participant.
- ✓ Waiting patiently while someone using an AAC device finishes communicating.
- ✓ Respecting when a participant says they need a sensory break.
- ✓ Offering two or three realistic options rather than asking broad questions that may feel overwhelming.
- ✓ Including participants in conversations about their own support, even when family members are present.
- ✓ Explaining activities before beginning rather than assuming consent.
- ✓ Supporting participants to try something new while remaining available if they need assistance.

Rights are protected through the small choices we honour every day.

## Record Keeping

Where applicable, staff will document:

- Participant preferences.
- Communication supports used.
- Goal planning discussions.

- Risk assessments.
- Incidents affecting participant rights.
- Complaints relating to participant rights.
- Any concerns regarding abuse, neglect or restrictive practices.

Documentation must be factual, objective and completed promptly.

## **Related Documents**

- Practice Philosophy Policy
- Code of Conduct Policy
- Safeguarding Children & Vulnerable People Policy
- Privacy & Confidentiality Policy
- Behaviour Support Policy
- Restrictive Practices Policy
- Complaints & Feedback Policy
- Incident Management Policy
- Risk Assessment Policy

## **Review Schedule**

This policy will be reviewed:

- Every 12 months;
- Following changes to legislation or NDIS Practice Standards;
- Following participant or family feedback;
- Following any incident involving participant rights or safeguarding concerns.

Policy updates will be communicated to all staff and incorporated into ongoing training and supervision.

# WholeFlow Inclusion Co.

## NDIS Service Delivery Policy

### Purpose

The purpose of this policy is to outline how WholeFlow Inclusion Co. plans, delivers and reviews supports that are person-centred, neuroaffirming and aligned with each participant's goals.

We believe quality support is about more than providing care. It is about building relationships, creating opportunities for growth, strengthening independence and supporting meaningful participation in everyday life.

Every service delivered by WholeFlow should leave participants feeling respected, capable and genuinely understood.

### Scope

This policy applies to:

- Directors
- Employees
- Casual Support Workers
- Students
- Volunteers
- Contractors

It applies to all NDIS-funded and privately funded supports delivered by WholeFlow Inclusion Co.

### WholeFlow Values

WholeFlow exists to walk alongside participants—not in front of them and not behind them.

We support people to build confidence, develop skills and participate in the life they choose.

Our supports are flexible because people are unique. We recognise that progress is rarely linear, and we celebrate every step forward, no matter how small.

### Policy Statement

WholeFlow delivers services that are:

- Person-centred.
- Neuroaffirming.
- Goal-focused.
- Evidence-informed.
- Strengths-based.
- Safe.
- Respectful.
- Responsive to changing needs.

Support is tailored to each participant's goals, communication style, sensory profile, interests, culture and preferences.

No two WholeFlow shifts should look exactly the same because no two participants are the same.

## **Procedures**

### **Before Support Begins**

Prior to commencing services, WholeFlow will:

- Complete a Service Agreement.
- Gather participant information.
- Identify goals and desired outcomes.
- Understand communication preferences.
- Complete risk assessments where required.
- Obtain required consents.
- Develop an understanding of family expectations.
- Allocate a suitable support worker wherever possible.

### **Preparing for Each Shift**

Support workers will:

- Read previous progress notes.
- Review participant goals.
- Check any current risks or important updates.
- Prepare any resources required.
- Arrive on time and ready to engage.

### **Delivering Support**

During support, staff will:

- Build rapport before introducing expectations.
- Follow participant-led interests where appropriate.
- Encourage independence through everyday activities.

- Support emotional regulation using neuroaffirming approaches.
- Adapt plans when participant needs change.
- Encourage decision-making and choice.
- Work collaboratively with families and therapists.
- Respect participant routines while remaining flexible.

Support should always feel purposeful rather than task-driven.

## **Capacity Building**

WholeFlow believes everyday moments provide opportunities for learning.

Support workers should look for opportunities to build skills including:

- Communication.
- Emotional regulation.
- Community participation.
- Daily living skills.
- Social connection.
- Confidence.
- Problem-solving.
- Self-advocacy.
- Independence.

Capacity building should happen naturally within meaningful activities rather than through unnecessary drills or rigid programs.

## **Community Access**

When supporting participants in the community, staff will:

- Promote inclusion.
- Encourage participation.
- Respect participant choices.
- Follow transport and risk management procedures.
- Support participants to develop confidence in community settings.
- Adapt plans if the environment becomes overwhelming.

## **Responding to Changing Needs**

If participant needs change during a shift, staff will:

- Slow down.
- Prioritise regulation and wellbeing.
- Modify activities.
- Communicate with families where appropriate.

- Document significant changes.

A successful shift is not measured by completing every planned activity—it is measured by meeting the participant where they are.

## Ending Support

At the end of each shift, staff will:

- Debrief with the participant where appropriate.
- Share relevant information with families.
- Complete progress notes before finishing work.
- Record incidents if required.
- Identify achievements and next steps.

## Staff Responsibilities

Every WholeFlow support worker is responsible for:

- Delivering supports safely.
- Working within their scope of practice.
- Following participant goals.
- Building respectful relationships.
- Promoting independence.
- Maintaining professional boundaries.
- Communicating effectively.
- Completing accurate documentation.
- Seeking support whenever unsure.

## What This Looks Like at WholeFlow

Quality support is found in everyday moments.

Examples include:

- ✓ Turning a trip to the supermarket into an opportunity to practise communication, money handling and decision-making.
- ✓ Supporting a participant to cook dinner instead of preparing it for them.

✓ Using a participant's favourite interests, such as Minecraft or animals, to encourage movement, communication and problem-solving.

✓ Changing plans when a participant becomes overwhelmed instead of pushing through the original schedule.

✓ Celebrating effort, curiosity and confidence—not just outcomes.

Every interaction is an opportunity to build capacity.

## Record Keeping

Staff will complete and maintain:

- Service Agreements.
- Participant Profiles.
- Progress Notes.
- Goal Reviews.
- Risk Assessments.
- Incident Reports (where applicable).
- Communication Records.
- Consent Forms.

Documentation must be completed promptly, accurately and objectively.

## Related Documents

- Practice Philosophy Policy
- Code of Conduct Policy
- Participant Rights & Choice Policy
- Professional Boundaries Policy
- Risk Assessment Policy
- Behaviour Support Policy
- Incident Management Policy
- Privacy & Confidentiality Policy
- Progress Notes & Documentation Policy
- Community Access & Transport Policy

## Review Schedule

This policy will be reviewed:

- Every 12 months;
- Following changes to NDIS legislation or Practice Standards;
- Following participant or family feedback;
- Following service reviews, incidents or quality improvement activities.

Updates will be communicated through staff induction, supervision and ongoing professional development.

# **WholeFlow Inclusion Co.**

## **Complaints, Feedback & Compliments Policy**

### **Purpose**

The purpose of this policy is to encourage open, respectful and honest communication by providing clear pathways for participants, families, staff and stakeholders to share feedback, raise concerns or recognise positive experiences.

WholeFlow Inclusion Co. believes that listening is one of the most important things we do. Feedback helps us celebrate what is working, identify opportunities for improvement and continue providing high-quality, person-centred supports.

Every person has the right to express their views without fear of judgement or negative consequences.

### **Scope**

This policy applies to:

- Participants
- Parents and guardians
- Nominees
- Employees
- Casual Support Workers
- Students
- Volunteers
- Contractors
- Community members
- Referring professionals

It applies to all WholeFlow services and interactions.

## **WholeFlow Values**

At WholeFlow, we welcome conversations—not just compliments.

We understand that concerns are a normal part of providing human services. Raising a concern demonstrates trust, and responding well demonstrates respect.

We are committed to listening with curiosity, responding with professionalism and learning from every experience.

Feedback is an opportunity to strengthen relationships and continuously improve our practice.

## **Policy Statement**

WholeFlow is committed to ensuring all feedback, complaints and compliments are:

- Taken seriously.
- Treated respectfully.
- Managed fairly.
- Handled confidentially where appropriate.
- Responded to promptly.
- Used to improve our services.

No person will be treated unfairly because they have made a complaint or provided honest feedback.

Participants and families have the right to seek advocacy or make complaints to external organisations at any stage.

## **Procedures**

### **Providing Feedback**

Feedback may be provided:

- In person.
- By phone.
- By email.
- Through Storypark where appropriate.
- Through WholeFlow's website or feedback forms.
- Through an advocate, nominee or family member.

Feedback may be positive, constructive or suggest ideas for improvement.

### **Making a Complaint**

When a complaint is received, WholeFlow will:

- Listen respectfully.

- Acknowledge receipt as soon as practicable.
- Gather relevant information.
- Review the concern fairly.
- Maintain confidentiality where possible.
- Keep the person informed throughout the process.
- Work towards a practical resolution.

Where appropriate, participants and families will be involved in developing solutions.

## **Responding to Compliments**

Positive feedback is valuable.

Compliments will be:

- Shared with relevant staff members.
- Recognised during supervision where appropriate.
- Used to celebrate good practice.
- Considered during performance reviews.

Recognising great work helps strengthen our culture and encourages high-quality support.

## **If a Complaint Involves Staff**

Where concerns relate to a WholeFlow employee:

- The matter will be reviewed objectively.
- Staff will be given an opportunity to respond.
- Participant safety will remain the priority.
- Appropriate actions will be taken based on the findings.

WholeFlow is committed to procedural fairness while maintaining a safe environment for everyone involved.

## **External Complaints**

If a person is not satisfied with WholeFlow's response, they may choose to contact an external advocacy or complaints body.

WholeFlow will provide information about available options and will not discourage or disadvantage anyone for seeking independent advice or making an external complaint.

## **Staff Responsibilities**

Every WholeFlow team member is responsible for:

- Welcoming feedback respectfully.

- Remaining calm and professional when concerns are raised.
- Reporting complaints to management promptly.
- Maintaining confidentiality.
- Cooperating with complaint investigations.
- Reflecting on feedback as an opportunity for growth.
- Treating everyone with dignity throughout the process.

## What This Looks Like at WholeFlow

Listening happens every day—not just when something goes wrong.

Examples include:

- ✓ A parent shares that transition times have been difficult. The support worker thanks them, listens carefully and works collaboratively to adjust the support approach.
- ✓ A participant says they would prefer a different community activity. Their preference is acknowledged and incorporated into future planning where appropriate.
- ✓ A family emails to recognise a support worker's kindness and professionalism. The compliment is shared with the staff member and celebrated during supervision.
- ✓ A support worker identifies an opportunity to improve a process and shares the suggestion with management.

Every voice matters because every experience teaches us something.

## WholeFlow's LISTEN Approach

When receiving feedback or a complaint, remember **LISTEN**:

### **L – Listen**

Give the person your full attention without interrupting.

### **I – Inquire**

Ask respectful, open questions to understand the concern.

### **S – Show Empathy**

Acknowledge the person's experience and thank them for sharing it.

### **T – Take Action**

Explain what will happen next and follow through.

### **E – Evaluate**

Reflect on what can be learned or improved.

### **N – Notify**

Inform management promptly so concerns can be addressed appropriately.

The goal is not to defend ourselves—it is to understand, resolve and improve.

## **Record Keeping**

WholeFlow will maintain:

- Feedback Records.
- Complaint Records.
- Compliment Records.
- Investigation Notes where applicable.
- Outcome and Resolution Records.
- Continuous Improvement Actions arising from feedback.

Records will be stored securely and managed in accordance with WholeFlow's Privacy & Confidentiality Policy.

## **Related Documents**

- Code of Conduct Policy
- Participant Rights & Choice Policy
- Incident Management & Reporting Policy
- Continuous Improvement Policy
- Privacy & Confidentiality Policy
- NDIS Service Delivery Policy

## **Review Schedule**

This policy will be reviewed:

- Every 12 months;
- Following significant complaints or identified trends;
- Following legislative or NDIS Practice Standard updates;
- Following participant, family or staff feedback regarding the complaints process.

Findings from complaints and feedback will contribute to WholeFlow's quality improvement planning and ongoing staff development.

# **WholeFlow Inclusion Co.**

## **Community Access & Transport Policy**

### **Purpose**

The purpose of this policy is to ensure community access and transport provided by WholeFlow Inclusion Co. are safe, purposeful and centred around each participant's goals, interests and independence.

WholeFlow believes the community is one of the greatest learning environments. Everyday places such as parks, libraries, supermarkets, cafés and community events provide meaningful opportunities to build confidence, communication, emotional regulation, social skills and independence.

Community access is not about filling time—it is about creating opportunities for participation, belonging and growth.

### **Scope**

This policy applies to:

- Directors
- Employees
- Casual Support Workers
- Students
- Volunteers
- Contractors

It applies whenever WholeFlow staff provide transport or accompany participants into the community.

### **WholeFlow Values**

Every participant has the right to participate in their community in ways that are meaningful to them.

We believe community access should reflect each participant's interests, goals and preferences—not simply the convenience of the support worker.

We aim to build confidence gradually while respecting sensory needs, communication styles and individual pace.

### **Policy Statement**

WholeFlow is committed to providing community access that is:

- Safe.
- Purposeful.
- Person-centred.
- Neuroaffirming.
- Goal-focused.
- Inclusive.
- Flexible.

Transport and outings will be planned in collaboration with participants and, where appropriate, their families or guardians.

Staff will balance participant choice with appropriate risk management to support safe and meaningful participation.

## **Procedures**

### **Planning Community Access**

Before leaving, staff will consider:

- Participant goals.
- Participant preferences.
- Weather conditions.
- Accessibility of the destination.
- Sensory environment.
- Toileting requirements.
- Medication requirements.
- Food and hydration.
- Emergency contacts.
- Relevant risk assessments.

Planning should maximise opportunities while reducing foreseeable risks.

### **During Community Access**

Support workers will:

- Promote participant choice.
- Encourage independence.
- Maintain appropriate supervision.
- Monitor regulation and wellbeing.
- Adapt plans if circumstances change.
- Respect participant dignity at all times.
- Encourage community participation without forcing interaction.

Support should remain participant-focused throughout the outing.

## **Transport**

When transporting participants, staff must:

- Hold a current and valid driver's licence.
- Ensure their vehicle is roadworthy, registered and insured in accordance with WholeFlow requirements.
- Follow all road rules.
- Ensure participants use appropriate seatbelts or approved restraints.
- Never use a mobile phone while driving unless legally permitted through hands-free operation.
- Drive calmly and defensively.
- Never leave participants unattended in a vehicle.

Vehicle safety takes priority over arrival times.

## **Unexpected Situations**

If circumstances change, staff will:

- Prioritise participant safety.
- Modify or end the outing if necessary.
- Communicate with families where appropriate.
- Notify management if significant concerns arise.
- Complete documentation if required.

Flexibility is encouraged when it improves participant wellbeing.

## **Money During Outings**

Support workers must:

- Follow WholeFlow financial procedures.
- Never borrow or lend money.

- Only assist participants with purchases where authorised.
- Keep receipts where required.
- Accurately document participant spending if requested.

## Community Inclusion

WholeFlow encourages participants to:

- Explore new environments.
- Build social confidence.
- Develop everyday life skills.
- Participate in local events.
- Practise communication.
- Build independence through real-life experiences.

Community access should always have purpose beyond simply "going out."

## Staff Responsibilities

All WholeFlow staff are responsible for:

- Planning safe outings.
- Following transport procedures.
- Reading participant risk assessments.
- Promoting independence.
- Respecting participant choices.
- Monitoring participant wellbeing.
- Reporting incidents or hazards.
- Maintaining professional conduct while representing WholeFlow in the community.

## What This Looks Like at WholeFlow

Community access is an opportunity to learn.

Examples include:

✓ Visiting the supermarket to practise shopping, budgeting, communication and decision-making.

- ✓ Exploring the local library to build confidence, literacy and community participation.
- ✓ Visiting a park where climbing equipment supports gross motor skills, problem-solving and emotional regulation.
- ✓ Going to a café where participants practise ordering food, handling money and engaging socially.
- ✓ Visiting an art gallery or museum to encourage curiosity, conversation and sensory exploration.

At WholeFlow, every outing has a purpose connected to the participant's goals.

## Record Keeping

Staff will maintain:

- Progress Notes.
- Transport records where required.
- Vehicle safety documentation.
- Risk Assessments.
- Incident Reports.
- Community Access Plans where applicable.

Documentation should clearly describe how community access supported participant goals and capacity building.

## Related Documents

- NDIS Service Delivery Policy
- Risk Assessment Policy
- Incident Management & Reporting Policy
- Participant Rights & Choice Policy
- Medication Assistance Policy
- Work Health & Safety Policy
- Progress Notes & Documentation Policy

## Review Schedule

This policy will be reviewed:

- Every 12 months;
- Following transport or community access incidents;
- Following changes to legislation or NDIS Practice Standards;
- Following participant or family feedback.

Updates will be incorporated into staff training and continuous improvement.

SECTION 02

# Safety, Safeguarding & Risk

---

# **WholeFlow Inclusion Co.**

## **Safeguarding Children & Vulnerable People Policy**

### **Purpose**

The purpose of this policy is to ensure every participant supported by WholeFlow Inclusion Co. is protected from abuse, neglect, exploitation, violence and harm.

WholeFlow is committed to creating safe environments where children, young people and vulnerable people are respected, heard and protected. We believe safeguarding is everyone's responsibility and is embedded into every interaction, decision and relationship.

Safeguarding is not simply about responding to concerns—it is about creating environments where participants feel safe enough to communicate, trusted enough to ask for help, and supported to exercise their rights.

### **Scope**

This policy applies to:

- Directors
- Employees
- Casual Support Workers
- Students
- Volunteers
- Contractors
- Any person representing WholeFlow Inclusion Co.

This policy applies during all WholeFlow activities, including participant homes, community settings, schools, therapy appointments, transport and online communication.

### **WholeFlow Values**

At WholeFlow, every participant deserves to feel physically, emotionally and psychologically safe.

We understand that safety grows through trusted relationships, predictable support and respectful communication.

We believe children and vulnerable people should always be listened to, believed when they raise concerns, and supported in ways that preserve their dignity and autonomy.

Safeguarding is not a separate task—it is part of every conversation, every activity and every decision we make.

## **Policy Statement**

WholeFlow Inclusion Co. has zero tolerance for abuse, neglect, exploitation, discrimination or violence.

Every staff member has a legal, ethical and professional responsibility to:

- Protect participants from harm.
- Recognise signs of abuse or neglect.
- Respond appropriately to concerns.
- Report concerns immediately.
- Act in the participant's best interests.
- Maintain confidentiality while ensuring participant safety.

The safety and wellbeing of the participant will always be prioritised over organisational reputation or personal relationships.

## **Procedures**

### **Creating Safe Environments**

Staff will:

- Build trusting relationships with participants.
- Respect participant rights and choices.
- Use age-appropriate and neuroaffirming communication.
- Encourage participants to express their thoughts and feelings.
- Follow risk assessments and behaviour support strategies.
- Supervise participants appropriately.
- Maintain professional boundaries.

### **Recognising Concerns**

Staff should remain alert to possible indicators of:

Physical abuse, including unexplained injuries or repeated injuries.

Emotional abuse, including fearfulness, withdrawal, humiliation or significant changes in behaviour.

Neglect, including poor hygiene, unmet medical needs, lack of supervision or ongoing failure to meet basic needs.

Sexual abuse, including inappropriate sexual knowledge, disclosures, behaviours or unexplained distress.

Financial exploitation, including misuse of participant funds or coercion.

Psychological abuse, including threats, intimidation, coercion or controlling behaviour.

Staff should remember that one sign alone does not confirm abuse; however, all concerns must be taken seriously.

## **If a Participant Discloses Harm**

If a participant tells you they have been harmed:

Staff will:

- Stay calm.
- Listen without judgement.
- Believe what the participant is telling you.
- Thank them for speaking up.
- Reassure them they have done the right thing.
- Avoid asking leading or investigative questions.
- Never promise to keep the information secret.
- Explain that you need to share the information with people who can help keep them safe.

## **Reporting Concerns**

If staff suspect abuse, neglect or exploitation they must:

- Ensure immediate safety if there is an urgent risk.
- Notify management immediately.
- Complete an Incident Report.
- Follow mandatory reporting obligations where applicable.
- Cooperate with any investigation.
- Maintain confidentiality throughout the process.

Concerns should be reported even if staff are uncertain. It is better to raise a concern than ignore a potential risk.

## **Allegations Against Staff**

If concerns involve a WholeFlow employee:

- The staff member may be removed from participant contact while concerns are assessed.
- Management will follow procedural fairness.
- Relevant authorities will be notified where required.
- Participant safety will remain the highest priority.

## Staff Responsibilities

Every WholeFlow team member must:

- Prioritise participant safety.
- Complete safeguarding training.
- Understand mandatory reporting obligations.
- Recognise possible signs of abuse.
- Report concerns immediately.
- Maintain professional boundaries.
- Treat all disclosures seriously.
- Continue developing safeguarding knowledge through professional learning.

Failure to report safeguarding concerns may result in disciplinary action.

## What This Looks Like at WholeFlow

Safeguarding often happens through everyday observations.

Examples include:

- ✓ Noticing a usually confident participant becoming unusually withdrawn.
- ✓ Recognising repeated unexplained bruising and documenting concerns factually.
- ✓ Respecting when a participant says they do not feel safe around someone.
- ✓ Following up when a participant's communication or behaviour changes significantly.
- ✓ Reporting concerns immediately rather than waiting for more evidence.
- ✓ Helping participants understand they always have the right to say "no" and to tell a trusted adult when something doesn't feel right.

Safeguarding begins with paying attention.

## Record Keeping

Where applicable, staff will complete:

- Incident Reports
- Safeguarding Reports
- Risk Assessments
- Progress Notes
- Mandatory Reporting documentation
- Behaviour observations
- Communication records with management

Documentation must:

- Be factual.
- Be objective.
- Be completed as soon as practical.
- Avoid assumptions or personal opinions.
- Be stored securely.

## **Related Documents**

- Practice Philosophy Policy
- Code of Conduct Policy
- Participant Rights & Choice Policy
- Professional Boundaries Policy
- Child Safe Policy
- Incident Management Policy
- Behaviour Support Policy
- Complaints & Feedback Policy
- Privacy & Confidentiality Policy
- Risk Assessment Policy

## **Review Schedule**

This policy will be reviewed:

- Every 12 months;
- Following changes to legislation or NDIS Practice Standards;
- Following safeguarding incidents;
- Following participant, family or staff feedback;
- Following recommendations arising from investigations or quality reviews.

Updates will be communicated to all WholeFlow staff through induction, supervision and ongoing training.



# WholeFlow Inclusion Co.

## Risk Assessment & Risk Management Policy

### Purpose

The purpose of this policy is to ensure risks are identified, assessed and managed in a way that protects the health, safety and wellbeing of participants, staff and the wider community while promoting independence, choice and meaningful participation.

WholeFlow recognises that everyday life involves risk. Rather than avoiding all risk, we work alongside participants and families to understand potential hazards, reduce unnecessary risks and support positive risk-taking that contributes to growth, confidence and capacity building.

Risk management is not about limiting opportunities—it is about making opportunities safer.

### Scope

This policy applies to:

- Directors
- Employees
- Casual Support Workers
- Students
- Volunteers
- Contractors

It applies to all supports delivered by WholeFlow, including participant homes, community access, transport, therapy appointments, recreation and online service delivery.

### WholeFlow Values

At WholeFlow, we believe that every person has the right to make choices, explore new experiences and develop independence.

Supporting participants sometimes means stepping outside of our own comfort zone while ensuring appropriate safeguards are in place.

We balance dignity of risk with our duty of care by working collaboratively with participants, families and other professionals to make informed decisions.

Risk management should enable participation—not restrict it.

# Policy Statement

WholeFlow is committed to identifying, assessing and managing risks in a proactive, collaborative and person-centred manner.

Risk assessments will:

- Support participant safety.
- Promote informed decision-making.
- Encourage independence and skill development.
- Be individualised to each participant.
- Be reviewed regularly and whenever circumstances change.
- Be documented and communicated appropriately.

Support workers must understand relevant risk assessments before commencing support.

## Procedures

### Identifying Risks

Before providing support, staff will consider:

- The participant's goals and support needs.
- Communication methods.
- Medical conditions.
- Allergies.
- Mobility and physical access.
- Behavioural or emotional risks.
- Environmental hazards.
- Community access considerations.
- Transport requirements.
- Emergency planning.

Risks may change over time and should be continually reviewed.

### Assessing Risks

When assessing risk, staff will consider:

- What could happen?
- How likely is it?
- What would the impact be?

- What supports already exist?
- What additional strategies could reduce the risk?
- Can the participant still safely participate?

The aim is not to remove every risk, but to reduce unnecessary harm while preserving meaningful participation.

## Managing Risks

Where appropriate, strategies may include:

- Increased supervision.
- Environmental modifications.
- Visual supports.
- Communication aids.
- Adaptive equipment.
- Gradual skill development.
- Activity modifications.
- Emergency planning.
- Collaboration with families or allied health professionals.

Risk management strategies should be the least restrictive option possible.

## Dynamic Risk Assessment

Support workers are expected to continually observe and reassess situations throughout every shift.

Examples include:

- Changes in weather.
- Participant illness.
- Emotional dysregulation.
- Fatigue.
- Unexpected environmental hazards.
- Equipment failures.
- Community changes.

If circumstances change, staff should adjust support accordingly.

## Reviewing Risks

Risk assessments must be reviewed:

- When a participant's needs change.
- Following an incident or near miss.
- When introducing new activities.
- Following changes to the participant's environment.

- During regular participant reviews.

## Staff Responsibilities

All WholeFlow staff are responsible for:

- Reading participant risk assessments before support.
- Identifying new hazards.
- Reporting emerging risks.
- Following agreed risk management strategies.
- Completing Incident Reports where required.
- Participating in risk reviews.
- Seeking guidance whenever uncertain.

Risk management is everyone's responsibility.

## What This Looks Like at WholeFlow

Risk management is part of everyday support.

Examples include:

- ✓ Supporting a participant to cook with a sharp knife while providing close supervision, teaching safe techniques and encouraging independence.
- ✓ Checking playground equipment before encouraging climbing activities.
- ✓ Adjusting a planned community outing when a participant becomes overwhelmed or the environment becomes too busy.
- ✓ Carrying emergency medication according to the participant's support plan.
- ✓ Modifying activities on hot days to reduce the risk of dehydration or heat-related illness.
- ✓ Recognising when a participant needs a sensory break before continuing an activity.

We don't remove opportunities because they involve risk—we make them as safe as reasonably possible.

## WholeFlow's Approach to Positive Risk-Taking

WholeFlow believes that growth often happens when participants are supported to try something new.

Positive risk-taking means helping participants:

- Learn new skills.
- Build resilience.
- Develop confidence.
- Increase independence.
- Participate in meaningful community experiences.

We carefully balance participant choice, dignity of risk and our duty of care.

Whenever possible, participants are actively involved in discussions about risks that affect them.

## Record Keeping

WholeFlow will maintain:

- Participant Risk Assessments.
- Environmental Risk Assessments.
- Excursion Risk Assessments.
- Vehicle Safety Checks.
- Incident Reports.
- Near Miss Reports.
- Risk Review Records.
- Emergency Planning Documentation.

Documentation must be reviewed regularly and updated whenever circumstances change.

## Related Documents

- Incident Management & Reporting Policy
- NDIS Service Delivery Policy
- Community Access & Transport Policy
- Medication Assistance Policy
- Safeguarding Children & Vulnerable People Policy
- Behaviour Support Policy
- Work Health & Safety Policy
- Emergency Management Policy

## Review Schedule

This policy will be reviewed:

- Every 12 months;
- Following incidents or near misses;
- Following participant reviews where risks have changed;
- Following legislative or NDIS Practice Standard updates.

Risk management practices will also be discussed during supervision, team meetings and continuous improvement activities.

# **WholeFlow Inclusion Co.**

## **Incident Management & Reporting Policy**

### **Purpose**

The purpose of this policy is to ensure all incidents involving participants, staff, visitors or members of the public are managed promptly, safely and consistently.

WholeFlow Inclusion Co. is committed to learning from incidents, improving the quality of our services and maintaining safe environments for everyone.

We recognise that mistakes, accidents and unexpected situations can occur. Our focus is on responding calmly, protecting those involved, meeting our legal obligations and using each incident as an opportunity to strengthen our practice.

### **Scope**

This policy applies to:

- Directors
- Employees
- Casual Support Workers
- Students
- Volunteers
- Contractors

It applies during all WholeFlow services, including participant homes, community access, transport, therapy appointments, online supports and work-related activities.

### **WholeFlow Values**

At WholeFlow, safety comes before paperwork.

When an incident occurs, our first priority is always the wellbeing of the participant and everyone involved.

We respond with honesty, compassion and professionalism. We encourage a culture where staff feel safe to report mistakes, near misses and concerns without fear of blame, recognising that openness supports learning and continuous improvement.

### **Policy Statement**

WholeFlow requires all incidents, injuries, hazards, near misses and safeguarding concerns to be reported promptly.

Incidents will be:

- Responded to immediately.
- Documented accurately.
- Reported to management.
- Reviewed to identify contributing factors.
- Used to improve future practice.

Where required, WholeFlow will meet all obligations under the NDIS Practice Standards and applicable legislation, including the reporting of reportable incidents.

## **Procedures**

### **Step 1 – Ensure Immediate Safety**

When an incident occurs, staff must first:

- Remain calm.
- Ensure the participant and others are safe.
- Remove or minimise immediate risks where possible.
- Provide first aid within their level of training.
- Contact emergency services if required.
- Seek assistance from management when necessary.

Participant safety always takes priority over documentation.

### **Step 2 – Notify Management**

Staff must notify management as soon as practicable after becoming aware of:

- Participant injuries.
- Staff injuries.
- Aggressive or unsafe behaviour.
- Property damage.
- Missing participants.
- Medication errors.
- Vehicle incidents.
- Safeguarding concerns.
- Restrictive practice concerns.
- Any event that could place participants or WholeFlow at risk.

### **Step 3 – Document the Incident**

An Incident Report must be completed as soon as practical and include:

- Date and time.
- Location.
- People involved.
- What happened.
- Immediate actions taken.
- Any injuries sustained.
- Witnesses.
- Notifications made.
- Recommendations or follow-up required.

Documentation must remain factual and objective.

## **Step 4 – Follow-Up**

Management will:

- Review the incident.
- Determine whether further investigation is required.
- Notify relevant authorities where legally required.
- Communicate with participants or families as appropriate.
- Review risk assessments if necessary.
- Identify opportunities for improvement.

## **Near Misses**

WholeFlow encourages reporting of near misses.

A near miss is an event that could have caused harm but did not.

Examples include:

- A participant almost falling.
- Incorrect medication identified before administration.
- Unsafe equipment identified before use.
- A vehicle hazard avoided.

Reporting near misses helps prevent future incidents.

## **Learning from Incidents**

Following significant incidents, WholeFlow may:

- Review procedures.
- Update risk assessments.

- Provide additional staff training.
- Review participant support strategies.
- Improve policies or documentation.

The goal is improvement—not blame.

## Staff Responsibilities

All WholeFlow staff are responsible for:

- Prioritising participant safety.
- Reporting incidents promptly.
- Completing Incident Reports accurately.
- Cooperating with investigations.
- Maintaining confidentiality.
- Participating in follow-up actions where required.
- Learning from incidents to improve future practice.

## What This Looks Like at WholeFlow

Incidents are handled with calm professionalism.

Examples include:

✓ A participant trips during community access. Staff provide first aid, reassure the participant, notify the family, complete an Incident Report and review whether additional risk controls are needed.

✓ During cooking, a participant receives a small cut while learning knife skills. First aid is provided, the incident is documented, and future supports are adjusted to include additional supervision and adaptive equipment if appropriate.

✓ A staff member notices a loose handrail at a participant's home that could create a fall risk. Although no one is injured, the hazard is reported to the family and documented as a near miss.

Every incident is an opportunity to improve safety while maintaining dignity and respect.

## Record Keeping

WholeFlow will maintain:

- Incident Reports.
- Near Miss Reports.
- Injury Records.
- First Aid Records.

- Risk Assessments.
- Investigation Records.
- Corrective Action Plans.
- Notifications to relevant authorities where applicable.

All records must be completed promptly, stored securely and retained in accordance with legislative requirements.

## **Related Documents**

- Safeguarding Children & Vulnerable People Policy
- Risk Assessment Policy
- Behaviour Support Policy
- Medication Assistance Policy
- Community Access & Transport Policy
- Work Health & Safety Policy
- Progress Notes & Documentation Policy
- Privacy & Confidentiality Policy

## **Review Schedule**

This policy will be reviewed:

- Every 12 months;
- Following any significant incident or reportable incident;
- Following legislative or NDIS Practice Standard updates;
- Following audits or quality improvement activities.

Findings from incident reviews will be incorporated into staff training and future policy improvements.

# WholeFlow Inclusion Co.

## Emergency Management Policy

### Purpose

The purpose of this policy is to ensure WholeFlow Inclusion Co. responds quickly, safely and effectively during emergencies while protecting the health, safety and wellbeing of participants, staff and members of the community.

Emergencies are unpredictable, but preparation helps reduce risk, supports confident decision-making and promotes calm responses in stressful situations.

WholeFlow is committed to creating a culture where staff are prepared, informed and supported to respond appropriately in emergency situations.

### Scope

This policy applies to:

- Directors
- Employees
- Casual Support Workers
- Students
- Volunteers
- Contractors

It applies to all WholeFlow services delivered in participant homes, community settings, workplaces, schools, vehicles and any other location where supports are provided.

### WholeFlow Values

At WholeFlow, people always come before plans.

During an emergency, our priority is protecting life, preserving dignity and supporting participants to feel as safe and regulated as possible.

We understand that emergencies can be particularly distressing for neurodivergent participants and those with communication or sensory differences. Staff will respond with calm, clear communication and adapt their approach to meet individual needs wherever possible.

### Policy Statement

WholeFlow is committed to maintaining effective emergency preparedness and response procedures.

All staff are expected to:

- Prioritise immediate safety.
- Remain calm.
- Follow emergency procedures.
- Contact emergency services when required.
- Notify management as soon as practicable.
- Document all emergencies and significant incidents.
- Participate in emergency training and reviews.

Where appropriate, participant Emergency Plans and Risk Assessments must be followed.

## Procedures

### General Emergency Response

When an emergency occurs, staff will:

- Remain calm.
- Assess immediate danger.
- Remove people from danger if safe to do so.
- Call **000** if emergency assistance is required.
- Provide first aid within the limits of their training.
- Follow instructions from emergency services.
- Notify WholeFlow management as soon as practical.
- Remain with the participant until appropriate support is available, unless remaining would place anyone at immediate risk.

### Medical Emergencies

Examples include:

- Difficulty breathing.
- Seizures.
- Chest pain.
- Loss of consciousness.
- Serious allergic reactions.
- Significant injuries.

Staff will:

- Follow the participant's Emergency or Health Management Plan where available.
- Call **000** when required.
- Administer first aid within their level of training.
- Stay with the participant.
- Contact management and the participant's emergency contact as directed.

## **Fire, Smoke or Gas Leak**

Staff will:

- Remove everyone from immediate danger if safe to do so.
- Call **000** if required.
- Follow evacuation procedures.
- Never re-enter a building until authorised.
- Account for everyone involved.
- Notify management.

## **Natural Disasters**

This includes:

- Floods.
- Bushfires.
- Severe storms.
- Heatwaves.
- Other significant weather events.

Staff will:

- Monitor local warnings where relevant.
- Modify or cancel community access if conditions become unsafe.
- Relocate participants to a safe location if necessary.
- Follow advice from emergency authorities.
- Keep participants informed using calm and accessible communication.

## **Vehicle Emergencies**

If involved in a vehicle accident or breakdown:

Staff will:

- Ensure everyone is safe.
- Contact emergency services if required.
- Move to a safe location where possible.
- Notify management.
- Contact roadside assistance if appropriate.
- Keep participants calm and supervised.
- Document the incident once safe.

## **Missing Participant**

If a participant cannot be located:

Staff will:

- Immediately search the immediate area.
- Consider known preferences or favourite locations.
- Notify emergency services if appropriate.
- Notify management immediately.
- Notify the participant's family or guardian in consultation with management.
- Continue following police directions.

Time is critical when responding to a missing participant.

## **Aggressive or Unsafe Situations**

If another person becomes threatening or violent:

Staff will:

- Prioritise participant safety.
- Leave the area if safe to do so.
- Contact emergency services if required.
- Avoid escalating the situation.
- Notify management.
- Complete required documentation.

## **Staff Responsibilities**

Every WholeFlow staff member is responsible for:

- Knowing emergency procedures.
- Maintaining current First Aid and CPR certification where required for their role.
- Reading participant Emergency Plans.
- Carrying a charged mobile phone during community supports.
- Reporting emergencies promptly.
- Participating in emergency training and reviews.

# What This Looks Like at WholeFlow

Emergency preparedness starts long before an emergency happens.

Examples include:

- ✓ Checking where exits are when entering a new community venue.
- ✓ Confirming emergency medications are available before leaving the participant's home.
- ✓ Carrying emergency contact information during community outings.
- ✓ Cancelling an outdoor activity when extreme heat makes it unsafe.
- ✓ Remaining calm and reassuring a participant during an unexpected evacuation.
- ✓ Calling **000** without delay when someone is experiencing a life-threatening emergency.

Our calm can help participants feel safe during uncertain moments.

## WholeFlow Emergency Principles

When faced with an emergency, remember **CALM**:

### **C – Check Safety**

Is anyone in immediate danger?

### **A – Act**

Call **000**, provide first aid and remove immediate hazards if safe to do so.

### **L – Let Others Know**

Notify management and emergency contacts as appropriate.

## **M – Make a Record**

Complete required documentation once the situation has been safely managed.

Keeping calm allows us to think clearly and respond effectively.

# **Record Keeping**

WholeFlow will maintain:

- Emergency Plans.
- Participant Health Management Plans.
- Incident Reports.
- First Aid Records.
- Vehicle Incident Reports.
- Emergency Contact Information.
- Risk Assessments.
- Emergency Training Records.

All emergency documentation must be completed as soon as practical following the event.

## **Related Documents**

- Incident Management & Reporting Policy
- Risk Assessment & Risk Management Policy
- Medication Assistance Policy
- Community Access & Transport Policy
- Work Health & Safety Policy
- Safeguarding Children & Vulnerable People Policy
- Behaviour Support Policy

## **Review Schedule**

This policy will be reviewed:

- Every 12 months;
- Following any emergency event;
- Following legislative or NDIS Practice Standard updates;
- Following emergency drills or identified improvements.

Lessons learned from emergencies will inform WholeFlow's continuous improvement processes and staff training.

# WholeFlow Inclusion Co.

## Work Health & Safety (WHS) Policy

### Purpose

The purpose of this policy is to provide a safe, healthy and supportive working environment for all WholeFlow Inclusion Co. staff while ensuring the health, safety and wellbeing of participants, families and members of the community.

WholeFlow believes that quality support begins with healthy, supported workers. By identifying risks, promoting safe work practices and encouraging open communication, we create environments where both participants and staff can thrive.

Safety is everyone's responsibility and should be considered before, during and after every shift.

### Scope

This policy applies to:

- Directors
- Employees
- Casual Support Workers
- Students
- Volunteers
- Contractors

It applies across all WholeFlow services, including participant homes, community settings, vehicles, workplaces and any location where WholeFlow staff perform work-related duties.

### WholeFlow Values

Safety is more than preventing injuries.

At WholeFlow, we care about physical safety, emotional wellbeing and psychological safety. We encourage staff to ask for help, speak up about concerns and support one another without fear of blame.

We believe safe workers provide better support, and safe participants create safer workplaces for everyone.

### Policy Statement

WholeFlow is committed to providing, so far as is reasonably practicable, a safe and healthy work environment in accordance with applicable work health and safety legislation.

WholeFlow will:

- Identify and manage workplace hazards.
- Provide appropriate training and supervision.
- Promote safe work practices.
- Encourage early reporting of hazards and injuries.
- Support staff wellbeing.
- Review incidents to improve future safety.

Every staff member has a responsibility to contribute to a safe workplace.

## **Procedures**

### **Before Every Shift**

Staff will:

- Review participant information and risk assessments.
- Ensure they are fit for work.
- Check they have required equipment.
- Consider environmental or weather-related risks.
- Plan community access safely.

### **Working in Participant Homes**

Every home is different.

Staff should assess the environment for hazards such as:

- Trip hazards.
- Aggressive pets.
- Smoking or vaping.
- Poor lighting.
- Unsafe furniture.
- Access and exit points.
- Unsafe equipment.
- Hygiene concerns.

If staff identify significant safety concerns, they must notify management promptly.

### **Manual Handling**

Staff will:

- Encourage participant independence wherever possible.
- Avoid lifting participants unless trained and authorised.
- Use correct body mechanics.
- Ask for assistance if a task cannot be completed safely.
- Report any injuries immediately.

Protecting your own body allows you to continue supporting others.

## Community Work

When supporting participants in the community, staff will:

- Remain aware of their surroundings.
- Consider weather conditions.
- Carry emergency contact information.
- Follow transport procedures.
- Adapt plans if environments become unsafe.

## Psychological Health

WholeFlow recognises that support work can be emotionally demanding.

Staff are encouraged to:

- Seek supervision.
- Debrief after difficult shifts.
- Access support early.
- Maintain healthy work-life boundaries.
- Speak openly about workload concerns.

Looking after your own wellbeing is a professional responsibility, not a weakness.

## Workplace Injuries

If injured at work, staff must:

- Ensure immediate safety.
- Seek first aid or medical treatment.
- Notify management as soon as possible.
- Complete required documentation.
- Participate in return-to-work processes where required.

## Hazards

Examples include:

- Broken equipment.
- Aggressive animals.

- Unsafe driving conditions.
- Slippery surfaces.
- Fatigue.
- Heat stress.
- Violence or aggression.
- Faulty child restraints.
- Unsafe lifting situations.

Hazards should be reported even if no injury occurs.

## Staff Responsibilities

Every WholeFlow staff member is responsible for:

- Working safely.
- Following WHS procedures.
- Reporting hazards.
- Reporting injuries.
- Using equipment correctly.
- Participating in training.
- Looking after their own physical and mental wellbeing.
- Cooperating with safety investigations.

## What This Looks Like at WholeFlow

Work health and safety happens in everyday decisions.

Examples include:

- ✓ Asking a parent to secure an excited dog before entering the home.
- ✓ Using a step stool rather than climbing on furniture to reach an item.
- ✓ Choosing a shaded playground during extreme heat instead of remaining in direct sun.
- ✓ Taking a moment after a challenging shift to debrief with management rather than carrying the stress alone.
- ✓ Stopping an activity if it becomes unsafe instead of pushing through because "it was the plan."
- ✓ Reporting a loose stair railing in a participant's home so it can be addressed before someone is injured.

Looking after yourself is part of looking after participants.

# WholeFlow SAFE WORK Principles

Before beginning any activity, ask yourself:

## **S – Scan**

Have I checked my surroundings for hazards?

## **A – Assess**

What risks are present for the participant and for me?

## **F – Fit**

Am I physically and emotionally fit to complete this task safely?

## **E – Engage**

Can I adapt this activity to make it safer while still supporting participation?

## **WORK**

If something doesn't feel safe, stop, seek guidance and work together to find another way.

# Record Keeping

WholeFlow will maintain:

- Hazard Reports.
- Incident Reports.
- Injury Reports.
- Risk Assessments.
- Training Records.
- First Aid Records.
- WHS Meeting Notes where applicable.
- Return to Work documentation where required.

All WHS documentation must be completed promptly and stored securely.

# Related Documents

- Risk Assessment & Risk Management Policy
- Incident Management & Reporting Policy
- Emergency Management Policy
- Community Access & Transport Policy
- Infection Prevention & Control Policy
- Medication Assistance Policy

- Staff Wellbeing Policy (if developed)

## **Review Schedule**

This policy will be reviewed:

- Every 12 months;
- Following workplace incidents or injuries;
- Following legislative changes;
- Following identified hazards or quality improvement initiatives.

Safety improvements will be discussed during supervision, team meetings and annual policy reviews.

SECTION 03

# Health & Support Practices

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# WholeFlow Inclusion Co.

## Medication Assistance Policy

### Purpose

The purpose of this policy is to ensure medication assistance is provided safely, respectfully and consistently, while protecting the health and wellbeing of participants.

WholeFlow recognises that medication can play an important role in supporting a participant's health and daily functioning. Our role is to assist participants with medication only where this has been agreed to, authorised and is within the scope of our workers' training and responsibilities.

Medication assistance must always prioritise participant safety, dignity, choice and independence.

### Scope

This policy applies to:

- Directors
- Employees
- Casual Support Workers
- Students (where authorised and supervised)
- Contractors authorised to provide supports

This policy applies whenever WholeFlow staff assist with, prompt, observe or administer medication as part of a participant's agreed supports.

### WholeFlow Values

Medication support should empower participants rather than reduce their independence.

Wherever possible, participants should be encouraged to manage their own medication with the least amount of assistance required.

Staff will respect participant choice while ensuring medication support is delivered safely, accurately and in accordance with relevant legislation, participant plans and organisational procedures.

### Policy Statement

WholeFlow staff will only assist with medication when:

- Medication support forms part of the participant's agreed services.
- Appropriate consent has been obtained.
- Clear written instructions are available.
- The staff member has received appropriate training where required.
- The assistance is within the worker's role and competence.

Medication must never be provided outside a worker's level of training or authority.

## Procedures

### Before Assisting with Medication

Staff will:

- Review the participant's Medication Record or Medication Support Plan.
- Confirm they are authorised to assist.
- Check for any recent medication updates.
- Wash or sanitise hands.
- Minimise distractions.
- Explain the process to the participant.

If there is any uncertainty, staff must stop and seek guidance before proceeding.

### The Five Rights of Medication Assistance

Before assisting, staff must confirm:

- The **right participant**.
- The **right medication**.
- The **right dose**.
- The **right time**.
- The **right route** (for example, oral, topical or inhaled).

If any of these cannot be confirmed, medication must not be provided until clarification is obtained.

### During Medication Assistance

Staff will:

- Encourage participants to take as much responsibility as possible.
- Follow written instructions exactly.
- Observe the participant taking the medication where required.

- Respect participant dignity and privacy.
- Remain calm and attentive throughout the process.

## **Refusal of Medication**

Participants have the right to refuse medication unless legal arrangements state otherwise.

If medication is refused, staff will:

- Remain calm.
- Avoid pressure or coercion.
- Ask if the participant wishes to explain their decision.
- Notify the family, guardian or authorised contact where required.
- Notify management if appropriate.
- Record the refusal accurately.

## **Medication Errors**

Examples include:

- Wrong medication.
- Wrong participant.
- Wrong dose.
- Missed medication.
- Medication given at the wrong time.
- Incorrect documentation.

If a medication error occurs, staff must:

- Ensure participant safety.
- Seek urgent medical advice if required.
- Notify emergency services where necessary.
- Notify management immediately.
- Inform the participant or authorised representative.
- Complete an Incident Report.
- Document the error factually.

Mistakes must always be reported. Prompt reporting protects participants and supports learning.

## **Storage of Medication**

Staff must:

- Respect participant medication storage arrangements.
- Keep medication out of reach of children where applicable.
- Never transfer medication into different containers unless instructed by a pharmacist.
- Never leave medication unattended in public areas.

# Staff Responsibilities

All WholeFlow staff are responsible for:

- Working within their scope of practice.
- Following participant Medication Support Plans.
- Checking medication carefully.
- Reporting medication concerns immediately.
- Completing accurate documentation.
- Respecting participant dignity and choice.
- Maintaining current medication training where required.

## What This Looks Like at WholeFlow

Medication support is calm, respectful and person-centred.

Examples include:

- ✓ Prompting a participant that it is time for their evening medication and observing them take it independently.
- ✓ Assisting a participant to open medication packaging where reduced hand strength makes this difficult.
- ✓ Supporting a participant to use an asthma inhaler according to their documented support plan.
- ✓ Recording medication assistance immediately after it has been provided.
- ✓ Contacting management immediately if staff discover medication has already been administered by another person and there is uncertainty about the next dose.

Medication support should never feel rushed or routine. Every check matters.

## WholeFlow Medication Principles

Before assisting with medication, staff should remember:

### **STOP**

#### **S – Stop and Check**

Never rush.

#### **T – Think**

Am I trained and authorised to provide this support?

### **O – Observe**

Does everything match the Medication Record?

### **P – Proceed**

Only continue when you are confident the participant can receive the medication safely.

If in doubt, stop and ask.

## **Record Keeping**

Where applicable, staff will complete:

- Medication Administration Records (MAR).
- Medication Support Plans.
- Progress Notes.
- Incident Reports.
- Communication Records.
- Training Records relating to medication competency.

All medication documentation must be completed immediately after assistance is provided and stored securely.

## **Related Documents**

- NDIS Service Delivery Policy
- Incident Management & Reporting Policy
- Risk Assessment Policy
- Participant Rights & Choice Policy
- Progress Notes & Documentation Policy
- Emergency Management Policy
- Work Health & Safety Policy

## **Review Schedule**

This policy will be reviewed:

- Every 12 months;
- Following medication incidents or near misses;
- Following changes to legislation or best practice guidance;
- Following participant or staff feedback.

Updates will be incorporated into staff training and competency assessments.

# WholeFlow Inclusion Co.

## Infection Prevention & Control Policy

### Purpose

The purpose of this policy is to minimise the risk of infection while supporting safe, respectful and person-centred services.

WholeFlow Inclusion Co. is committed to protecting the health and wellbeing of participants, families, staff and the wider community by following practical infection prevention measures that reduce the spread of illness without creating unnecessary barriers to meaningful participation.

Good infection control is part of quality care. It allows us to continue providing safe, reliable supports while respecting the dignity and comfort of every participant.

### Scope

This policy applies to:

- Directors
- Employees
- Casual Support Workers
- Students
- Volunteers
- Contractors

It applies during all WholeFlow supports, including participant homes, community settings, transport and any work-related activity.

### WholeFlow Values

Protecting health is a shared responsibility.

At WholeFlow, infection prevention should feel calm, respectful and practical. We explain what we are doing, involve participants where appropriate and avoid creating fear or stigma around illness.

Our goal is to keep people healthy while maintaining meaningful relationships and positive experiences.

### Policy Statement

WholeFlow is committed to preventing and reducing the spread of infectious diseases through evidence-informed practices.

Staff are expected to:

- Follow standard infection prevention precautions.
- Practise good hand hygiene.
- Use appropriate personal protective equipment (PPE) when required.
- Maintain clean equipment and environments.
- Stay home when unwell in accordance with organisational expectations.
- Report infectious disease risks promptly.
- Follow current public health advice where applicable.

## **Procedures**

### **Hand Hygiene**

Hand hygiene is the single most effective way to reduce the spread of infection.

Staff will wash or sanitise their hands:

- Before commencing support.
- Before preparing or handling food.
- Before assisting with medication.
- Before and after providing personal care.
- After using the bathroom.
- After contact with bodily fluids.
- After removing gloves.
- After coughing, sneezing or blowing their nose.
- Before leaving a participant's home.

Participants should be encouraged and supported to practise hand hygiene where appropriate.

### **Personal Protective Equipment (PPE)**

Staff will use PPE when there is a foreseeable risk of exposure to:

- Blood.
- Bodily fluids.
- Vomit.
- Urine.
- Faeces.
- Saliva where appropriate.
- Other potentially infectious materials.

PPE may include:

- Disposable gloves.
- Face masks.
- Protective eyewear.
- Disposable aprons or gowns where appropriate.

PPE should be used correctly and disposed of safely after use.

## **Cleaning Equipment**

Items used during supports should be kept clean.

Staff will:

- Clean reusable equipment between participants where required.
- Disinfect frequently touched items.
- Store equipment appropriately.
- Report damaged equipment.

Where practical, participants should have their own equipment rather than sharing items.

## **Illness During a Shift**

If a participant becomes unwell, staff will:

- Monitor the participant's wellbeing.
- Notify the family or authorised contact where appropriate.
- Follow any relevant health management plan.
- Seek urgent medical assistance if required.
- Document significant concerns.

## **Staff Illness**

Staff must not attend work if they have symptoms that could place participants at risk, including:

- Vomiting.
- Diarrhoea.
- Fever.
- Contagious respiratory illness.
- Other infectious conditions as advised by a medical practitioner.

Staff should notify management as soon as possible so appropriate arrangements can be made.

## **Food Safety**

When preparing or assisting with food, staff will:

- Wash hands thoroughly.
- Use clean utensils and preparation areas.
- Store food safely.
- Check expiry dates where appropriate.
- Consider participant allergies and dietary requirements.

## **Exposure to Blood or Bodily Fluids**

If exposure occurs, staff will:

- Follow appropriate first aid procedures.
- Wash the affected area immediately.
- Seek medical advice where required.
- Notify management.
- Complete an Incident Report.

## **Staff Responsibilities**

Every WholeFlow team member is responsible for:

- Practising good hand hygiene.
- Following infection prevention procedures.
- Using PPE correctly.
- Reporting illness promptly.
- Maintaining clean work practices.
- Participating in infection control training.
- Protecting participant dignity while providing care.

## **What This Looks Like at WholeFlow**

Infection prevention is part of everyday practice.

Examples include:

- ✓ Washing hands together before baking or cooking activities.
- ✓ Wearing gloves when assisting with wound care or managing bodily fluids.
- ✓ Cleaning toys and sensory equipment after use when appropriate.
- ✓ Rescheduling supports in consultation with management when illness creates an unacceptable risk.
- ✓ Explaining to a participant why you are wearing gloves in a calm and reassuring way.
- ✓ Sanitising hands before assisting with medication.

Small actions every day help protect everyone.

## WholeFlow Clean Care Principles

Before providing support, remember **CLEAN**:

### **C – Check**

Am I well enough to work? Is the environment safe?

### **L – Lather**

Have I washed or sanitised my hands?

### **E – Equipment**

Is any equipment clean and ready to use?

### **A – Avoid Spread**

Do I need gloves, a mask or other protective equipment?

### **N – Notify**

If there is an infection risk or illness, have I informed the appropriate people?

Protecting health begins with simple, consistent habits.

## Record Keeping

WholeFlow will maintain:

- Incident Reports relating to infection risks.
- Participant Health Management Plans.

- Staff infection control training records.
- Cleaning records where applicable.
- Exposure reports.
- Relevant public health notifications where required.

All documentation must be completed promptly and stored securely.

## **Related Documents**

- Work Health & Safety Policy
- Medication Assistance Policy
- Incident Management & Reporting Policy
- Risk Assessment & Risk Management Policy
- Emergency Management Policy
- Participant Health Plans
- Progress Notes & Documentation Policy

## **Review Schedule**

This policy will be reviewed:

- Every 12 months;
- Following changes to public health advice or legislation;
- Following infection outbreaks or significant incidents;
- Following audits or identified improvement opportunities.

Any updates will be communicated through staff training, supervision and ongoing professional development.

# WholeFlow Inclusion Co.

## Positive Behaviour Support & Responding to Distress Policy

### Purpose

The purpose of this policy is to guide WholeFlow staff in responding to behaviour in a way that is respectful, neuroaffirming and focused on understanding the person behind the behaviour.

WholeFlow recognises that behaviour is a form of communication. Rather than asking, "How do we stop this behaviour?" we ask, "What is this person trying to tell us?"

Our approach prioritises safety, connection, emotional regulation and skill development while protecting each participant's dignity and rights.

### Scope

This policy applies to:

- Directors
- Employees
- Casual Support Workers
- Students
- Volunteers
- Contractors

It applies during all WholeFlow supports, including home, school, community, transport and recreational activities.

### WholeFlow Values

At WholeFlow, we believe every behaviour has meaning.

Participants are not "being difficult"; they may be communicating pain, overwhelm, frustration, excitement, uncertainty or an unmet need.

We respond with curiosity rather than judgement.

We recognise that emotional regulation develops through safe relationships, not punishment.

Our role is to support participants to feel safe enough to learn, communicate and grow.

# Policy Statement

WholeFlow is committed to delivering support that:

- Is neuroaffirming.
- Respects participant dignity.
- Promotes emotional regulation.
- Builds communication skills.
- Reduces distress through understanding.
- Encourages positive relationships.
- Uses the least restrictive approach possible.

Staff will never use punishment, humiliation, threats, intimidation or coercion to influence behaviour.

Where a participant has an authorised Behaviour Support Plan, staff must follow that plan and work within their level of training and competence.

## Procedures

### Before Behaviour Occurs

Support workers should proactively:

- Build rapport.
- Learn the participant's communication style.
- Understand sensory preferences and triggers.
- Follow established routines where appropriate.
- Offer choices throughout the shift.
- Prepare participants for transitions.
- Identify early signs of dysregulation.
- Create environments that promote success.

Prevention is always preferred over reaction.

## Recognising Distress

Every participant communicates differently.

Possible indicators include:

- Withdrawal.
- Changes in communication.
- Increased movement or pacing.
- Covering ears or eyes.
- Avoidance.
- Crying.
- Shouting.
- Repetitive movements.
- Increased emotional sensitivity.
- Aggression towards objects or others.
- Self-injurious behaviour.

Staff should consider the whole context rather than focusing solely on the behaviour itself.

## **Responding to Distress**

When a participant becomes distressed, staff will:

- Stay calm and emotionally regulated.
- Reduce demands where appropriate.
- Lower their voice.
- Allow processing time.
- Reduce sensory input if needed.
- Offer familiar regulation strategies.
- Respect the participant's communication style.
- Maintain everyone's safety.

Staff should avoid escalating the situation through unnecessary demands, confrontation or power struggles.

## **After the Incident**

Once the participant has regulated:

- Rebuild connection before discussing what happened.
- Support reflection where appropriate and in a way the participant can understand.
- Reinforce strengths and successful regulation strategies.
- Complete required documentation.
- Review whether support strategies need adjusting.

The goal is learning—not punishment.

## **Restrictive Practices**

WholeFlow is committed to reducing and eliminating restrictive practices wherever possible.

Staff must not implement restrictive practices unless:

- They are authorised.
- They form part of an approved Behaviour Support Plan.
- They comply with relevant legislation and NDIS requirements.

Any unauthorised restrictive practice must be reported immediately.

## **Staff Responsibilities**

All WholeFlow staff are responsible for:

- Viewing behaviour as communication.
- Remaining calm during challenging situations.
- Following Behaviour Support Plans where applicable.
- Protecting participant rights.
- Using neuroaffirming approaches.
- Reporting incidents appropriately.
- Reflecting on their own responses and seeking support when needed.

## **What This Looks Like at WholeFlow**

Responding to behaviour begins with understanding.

Examples include:

✓ A participant becomes upset when plans change. Rather than insisting they continue, the support worker offers visual choices and allows time to adjust.

✓ A child begins throwing toys during play. The worker notices signs of sensory overwhelm, reduces environmental demands and supports regulation before returning to the activity.

✓ A participant refuses to leave the playground. Instead of forcing compliance, the support worker validates their feelings, provides a visual countdown and offers a meaningful transition activity.

✓ During community access, a participant becomes anxious in a noisy shopping centre. The worker relocates to a quieter area, offers sensory supports and revisits the outing when the participant feels ready.

WholeFlow measures success by how safe the participant feels—not simply by whether the behaviour stopped.

## WholeFlow's Approach to Behaviour

Rather than asking...

"What behaviour needs to change?"

We ask...

- What happened before this?
- What might the participant be communicating?
- What need is currently unmet?
- How can we reduce stress?
- What skills can we help build?
- How can we strengthen the relationship?

Understanding always comes before intervention.

## Record Keeping

Where applicable, staff will complete:

- Progress Notes.
- Incident Reports.
- Behaviour Observations.
- ABC (Antecedent–Behaviour–Consequence) records if required.

- Communication with families or therapists.
- Behaviour Support Plan reviews where relevant.

Documentation must remain factual, respectful and objective.

## **Related Documents**

- Practice Philosophy Policy
- Participant Rights & Choice Policy
- Safeguarding Children & Vulnerable People Policy
- Incident Management & Reporting Policy
- Risk Assessment Policy
- Restrictive Practices Policy
- NDIS Service Delivery Policy

## **Review Schedule**

This policy will be reviewed:

- Every 12 months;
- Following changes to legislation or NDIS Practice Standards;
- Following participant reviews or Behaviour Support Plan updates;
- Following incidents involving behaviour support.

Updates will be incorporated into staff induction, supervision and ongoing professional development.

# WholeFlow Inclusion Co.

## Restrictive Practices Policy

### Purpose

The purpose of this policy is to ensure WholeFlow Inclusion Co. protects the rights, dignity and freedom of every participant by preventing, reducing and, wherever possible, eliminating the use of restrictive practices.

WholeFlow is committed to providing supports that are relationship-based, neuroaffirming and person-centred. We believe the safest and most effective way to reduce behaviours of concern is through understanding, collaboration and proactive support rather than restriction or control.

Restrictive practices are only ever considered within the requirements of relevant legislation and the NDIS Quality and Safeguards Commission, and only when properly authorised.

### Scope

This policy applies to:

- Directors
- Employees
- Casual Support Workers
- Students
- Volunteers
- Contractors

It applies whenever WholeFlow staff provide supports to participants who have an authorised Behaviour Support Plan or where there is a risk that a restrictive practice may occur.

### WholeFlow Values

Every participant has the right to dignity, choice and freedom.

At WholeFlow, we understand that behaviour communicates a need. Before considering any restriction, we ask what the participant may be communicating and what supports can be changed to better meet their needs.

We believe that strong relationships, predictable environments, emotional regulation, communication supports and collaborative planning significantly reduce the need for restrictive practices.

# Policy Statement

WholeFlow is committed to:

- Preventing restrictive practices wherever possible.
- Using proactive and positive behaviour support strategies.
- Respecting participant rights.
- Following all legislative and NDIS requirements.
- Reporting any unauthorised restrictive practice immediately.
- Working collaboratively with participants, families and behaviour support practitioners.

WholeFlow staff must never introduce or use a restrictive practice because it is convenient, quicker or easier.

## Procedures

### Preventing Restrictive Practices

Support workers should always begin by asking:

- What is the participant communicating?
- Has something changed in the environment?
- Is the participant overwhelmed, tired, hungry or in pain?
- Have communication supports been provided?
- Are expectations realistic?
- Can the activity be adapted?

Many situations can be resolved through proactive support rather than restriction.

### Positive Support Strategies

WholeFlow staff are encouraged to use strategies such as:

- Building trusted relationships.
- Providing visual supports.
- Offering meaningful choices.
- Reducing sensory demands.
- Supporting co-regulation.
- Allowing additional processing time.
- Modifying environments.
- Following participant interests.
- Supporting communication.

These approaches should always be considered before restrictive responses.

## Authorised Restrictive Practices

Where a participant has an authorised restrictive practice:

Staff must:

- Read and understand the Behaviour Support Plan before providing support.
- Follow the documented strategies exactly as written.
- Work within their level of training and competence.
- Record every use as required.
- Notify management immediately following implementation.
- Participate in reviews and debriefing.

Staff must never modify or create restrictive practices independently.

## Unauthorised Restrictive Practices

If a restrictive practice occurs without authorisation, staff must:

- Prioritise participant safety.
- Notify management immediately.
- Complete an Incident Report.
- Document the circumstances objectively.
- Participate in any required review.

WholeFlow will meet all relevant reporting obligations where applicable.

## Learning & Reflection

Following any use of a restrictive practice, WholeFlow will consider:

- What happened before the incident?
- What support strategies were effective?
- Could anything have been changed earlier?
- What can we learn?
- How can we further reduce the likelihood of future restrictions?

Our focus is always on improving support rather than assigning blame.

## Staff Responsibilities

Every WholeFlow team member is responsible for:

- Protecting participant rights.
- Understanding Behaviour Support Plans.
- Using proactive support strategies.
- Reporting restrictive practices.

- Maintaining accurate documentation.
- Participating in ongoing training.
- Seeking support whenever unsure.

## What This Looks Like at WholeFlow

WholeFlow works to reduce the need for restrictive practices through thoughtful support.

Examples include:

- ✓ Recognising that a participant becomes overwhelmed by noisy environments and choosing quieter community settings.
- ✓ Offering visual schedules and transition warnings to reduce distress during changes in routine.
- ✓ Supporting a participant to communicate "I need a break" before frustration escalates.
- ✓ Adjusting expectations when a participant is tired or unwell rather than insisting on completing every planned activity.
- ✓ Collaborating with families and therapists to understand patterns rather than reacting only to behaviours.

At WholeFlow, success is measured by reducing distress—not increasing control.

## WholeFlow's FREEDOM Framework

Before considering any restrictive response, ask yourself:

### **F – Feelings**

What might the participant be feeling?

### **R – Reasons**

What need or message might they be communicating?

### **E – Environment**

Is something in the environment contributing?

### **E – Engage**

How can I reconnect before redirecting?

### **D – Dignity**

Does my response protect the participant's rights and dignity?

### **O – Options**

What positive alternatives can I try first?

### **M – Monitor**

What can I learn from this situation to prevent it happening again?

Restriction should never be the starting point. Understanding always comes first.

## **Record Keeping**

WholeFlow will maintain:

- Behaviour Support Plans.
- Restrictive Practice Records where applicable.
- Incident Reports.
- Behaviour Observations.
- Progress Notes.
- Communication with Behaviour Support Practitioners.
- Review Records.

Documentation must be completed promptly, objectively and in accordance with legislative requirements.

## **Related Documents**

- Positive Behaviour Support & Responding to Distress Policy
- Participant Rights & Choice Policy
- Incident Management & Reporting Policy
- Risk Assessment & Risk Management Policy
- Safeguarding Children & Vulnerable People Policy
- NDIS Service Delivery Policy

# Review Schedule

This policy will be reviewed:

- Every 12 months;
- Following any use of a restrictive practice;
- Following changes to legislation or NDIS Practice Standards;
- Following recommendations from Behaviour Support Practitioners or quality reviews.

WholeFlow will continuously review practices to identify opportunities to further reduce and eliminate restrictive practices wherever possible.

SECTION 04

# Privacy, Information & Documentation

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# WholeFlow Inclusion Co.

## Privacy & Confidentiality Policy

### Purpose

The purpose of this policy is to protect the privacy, dignity and personal information of every participant, family, employee and stakeholder connected with WholeFlow Inclusion Co.

We recognise that participants and families place significant trust in us by sharing personal information about their lives. Protecting that information is essential to building safe, respectful and professional relationships.

WholeFlow is committed to collecting, using, storing and sharing information responsibly and in accordance with the Privacy Act 1988 (Cth), the Australian Privacy Principles (APPs), and relevant NDIS Practice Standards.

### Scope

This policy applies to:

- Directors
- Employees
- Casual Support Workers
- Students
- Volunteers
- Contractors
- Any individual representing WholeFlow Inclusion Co.

It applies to all forms of information, including verbal conversations, written records, electronic records, photographs, videos, emails, text messages and digital communication.

## WholeFlow Values

Privacy is about more than protecting information—it is about respecting people.

At WholeFlow, confidentiality is an everyday act of trust. Whether we are writing a progress note, speaking with a parent or supporting someone in the community, we consider how our actions protect each participant's dignity.

We only collect information that genuinely supports quality care, and we treat every person's information with the same respect we would expect for our own.

### Policy Statement

WholeFlow will only collect, use and share personal information where it is necessary to provide safe, effective and lawful services.

Staff must:

- Respect participant privacy at all times.
- Keep confidential information secure.
- Only access information required to perform their role.
- Share information only with authorised people.
- Obtain appropriate consent before collecting or sharing information, unless required by law.
- Follow all privacy and confidentiality requirements during and after employment.

Confidentiality continues even after employment with WholeFlow ends.

## **Procedures**

### **Collecting Information**

WholeFlow will only collect information that is necessary to:

- Deliver supports.
- Meet legal obligations.
- Ensure participant safety.
- Communicate effectively with families and professionals.
- Support participant goals.

Where possible, information will be collected directly from the participant or their authorised representative.

### **Using Information**

Information will only be used for purposes including:

- Delivering participant supports.
- Developing support plans.
- Completing documentation.
- Coordinating services.
- Meeting legal or regulatory requirements.
- Managing billing and administration.

Information will never be used for personal purposes.

### **Sharing Information**

Information may only be shared:

- With participant consent.
- With authorised family members or nominees.
- With therapists or professionals involved in participant supports where appropriate.
- Where required by law.
- Where necessary to protect someone's safety.

Staff must never discuss participants with friends, family or anyone not directly involved in their care.

## **Conversations**

Staff will:

- Hold confidential conversations privately.
- Avoid discussing participants in public places.
- Ensure others cannot overhear sensitive information.
- Speak respectfully when discussing participants with colleagues.

## **Electronic Records**

Staff will:

- Use approved WholeFlow systems.
- Protect passwords.
- Lock devices when unattended.
- Log out of systems when finished.
- Report any suspected privacy breach immediately.

## **Photographs and Videos**

Photographs or videos may only be taken:

- With informed consent.
- For approved WholeFlow purposes.
- Using approved devices where possible.

If a personal phone is used during exceptional circumstances:

- Images must be uploaded immediately to the approved system.
- Images must then be permanently deleted from the personal device.
- Images must never be stored in personal galleries, cloud storage or shared through personal messaging applications.

## **Working in Participant Homes**

Staff will respect participant privacy by:

- Knocking before entering bedrooms.

- Seeking permission before opening cupboards or using personal items.
- Keeping participant information out of sight of visitors.
- Maintaining confidentiality during home visits.

## Privacy Breaches

If confidential information is accidentally shared, lost or accessed by an unauthorised person, staff must:

- Notify management immediately.
- Document the incident.
- Assist in containing the breach.
- Cooperate with any investigation.
- Participate in any required follow-up actions.

## Staff Responsibilities

All WholeFlow staff must:

- Maintain confidentiality.
- Protect participant records.
- Follow consent requirements.
- Use technology responsibly.
- Report privacy breaches immediately.
- Respect participant dignity in every interaction.
- Complete privacy training as required.

## What This Looks Like at WholeFlow

Protecting privacy happens in small everyday moments.

Examples include:

- ✓ Completing progress notes discreetly rather than discussing the shift in public.
- ✓ Positioning your laptop or phone so others cannot read participant information.

✓ Asking, "Is it okay if I share this update with your therapist?" before passing on information.

✓ Closing a participant's file before stepping away from your computer.

✓ Deleting photographs from your phone immediately after securely uploading them to the approved WholeFlow platform.

✓ Avoiding conversations about participants while shopping, at cafés or in other public places.

Every action contributes to maintaining trust.

## Record Keeping

WholeFlow will securely maintain:

- Participant files.
- Service Agreements.
- Consent Forms.
- Progress Notes.
- Risk Assessments.
- Incident Reports.
- Communication Records.
- Employment Records.
- Privacy Breach Reports.

Records will only be retained for the period required by law and organisational requirements before being securely destroyed.

## Related Documents

- Code of Conduct Policy
- Participant Rights & Choice Policy
- Phone & Technology Use Policy
- Social Media Policy
- Progress Notes & Documentation Policy
- Incident Management Policy
- Safeguarding Children & Vulnerable People Policy
- Record Keeping Policy

# Review Schedule

This policy will be reviewed:

- Every 12 months;
- Following changes to privacy legislation or NDIS Practice Standards;
- Following any privacy breach;
- Following audits or quality improvement activities.

Any updates will be communicated to all WholeFlow staff through induction, supervision and ongoing professional development.

# WholeFlow Inclusion Co.

## Progress Notes & Documentation Policy

### Purpose

The purpose of this policy is to ensure all documentation completed by WholeFlow Inclusion Co. is accurate, objective, meaningful and reflective of the participant's progress.

Progress notes are more than an administrative task. They provide a record of the participant's journey, demonstrate accountability, support continuity of care, and communicate meaningful outcomes to participants, families, plan managers and other professionals where appropriate.

Every progress note should tell the story of the participant's shift while clearly demonstrating how support contributed to their goals, wellbeing and independence.

### Scope

This policy applies to:

- Directors
- Employees
- Casual Support Workers
- Students
- Volunteers
- Contractors

It applies to all documentation completed on behalf of WholeFlow Inclusion Co.

## WholeFlow Values

Documentation should reflect the same care and respect that we provide during support.

At WholeFlow, we write about people with dignity, recognising strengths before challenges and describing observations rather than making assumptions.

Our documentation should help someone understand not only what happened, but how the participant engaged, grew and experienced the support.

## Policy Statement

All documentation completed by WholeFlow staff must be:

- Accurate.
- Objective.
- Respectful.
- Timely.
- Professional.
- Confidential.
- Person-centred.
- Relevant to the participant's goals.

Progress notes must reflect the support actually provided and must never be copied, fabricated or completed by another person.

Documentation should be completed as soon as practical after each shift and, wherever possible, before leaving the participant's location.

## **Procedures**

### **During the Shift**

Support workers should make brief mental or written reminders of:

- Activities completed.
- Participant engagement.
- Goal progression.
- Communication observed.
- Emotional regulation.
- Social interactions.
- Community participation.
- Independence demonstrated.
- Any incidents or concerns.

Staff should remain engaged with participants and avoid excessive note-taking during active support unless clinically necessary.

### **Completing Progress Notes**

Each progress note should include:

- Date and time of support.
- Location.

- Support provided.
- Activities completed.
- Participant engagement.
- Capacity-building opportunities.
- Progress towards goals.
- Any changes in wellbeing.
- Significant observations.
- Communication with family where relevant.
- Any incidents or follow-up required.

Documentation should clearly explain why activities were meaningful.

## Writing Style

Staff will:

- Write objectively.
- Describe observations rather than opinions.
- Use respectful, strengths-based language.
- Avoid judgemental wording.
- Use professional grammar and spelling.
- Clearly distinguish facts from interpretation.

Example:

Instead of:

"Jhon was naughty today."

Write:

"Jhon became frustrated when the activity changed unexpectedly. After being offered a movement break and visual choices, he returned to the activity and completed the task with support."

## Confidentiality

Documentation must:

- Only contain relevant information.
- Never include unnecessary personal opinions.
- Be stored securely.
- Be shared only with authorised people.

## Corrections

If an error is identified:

- Correct it promptly.
- Never falsify records.
- Do not delete documentation without authorisation.
- Notify management if significant changes are required.

## Staff Responsibilities

Every WholeFlow staff member is responsible for:

- Completing documentation after every shift.
- Recording information accurately.
- Protecting participant confidentiality.
- Reporting concerns promptly.
- Asking for guidance if unsure how to document an event.
- Maintaining professional language.

## What This Looks Like at WholeFlow

Our progress notes tell the story behind the support.

Examples include:

- ✓ Explaining how cooking dinner supported independence, sequencing and fine motor skills.
- ✓ Describing how a Minecraft game encouraged teamwork, communication and flexible thinking.
- ✓ Recording how a participant regulated after using sensory strategies.
- ✓ Highlighting moments of confidence, self-advocacy or problem-solving.
- ✓ Celebrating progress, even when it looks different from what was planned.

We don't simply record activities—we document growth.

## WholeFlow Documentation Principles

Every progress note should answer five questions:

**What happened?**

Describe the activities completed.

**Why did it matter?**

Explain the purpose or capacity-building opportunity.

**How did the participant engage?**

Describe communication, regulation, motivation and participation.

**What changed?**

Identify progress, new learning, challenges or achievements.

**What's next?**

Record anything future staff should know or continue supporting.

## Record Keeping

WholeFlow maintains:

- Progress Notes.
- Incident Reports.
- Risk Assessments.
- Behaviour Observations.
- Communication Records.
- Goal Reviews.
- Consent Documentation.
- Medication Records (where applicable).

Documentation must be stored securely in accordance with privacy legislation and WholeFlow's Privacy & Confidentiality Policy.

## Related Documents

- NDIS Service Delivery Policy
- Participant Rights & Choice Policy
- Privacy & Confidentiality Policy
- Incident Management Policy

- Risk Assessment Policy
- Behaviour Support Policy
- Code of Conduct Policy

## Review Schedule

This policy will be reviewed:

- Every 12 months;
- Following legislative or NDIS Practice Standard changes;
- Following documentation audits;
- Following incidents or identified quality improvement opportunities.

Documentation practices will also be reviewed during supervision and staff performance discussions to support ongoing learning and consistency.

# **WholeFlow Inclusion Co.**

## **Document & Records Management Policy**

### **Purpose**

The purpose of this policy is to ensure all records created, received and maintained by WholeFlow Inclusion Co. are accurate, secure, accessible and managed responsibly throughout their lifecycle.

Good record keeping supports continuity of care, participant safety, accountability and legal compliance. It also reflects the professionalism and integrity of WholeFlow.

Every document tells part of a participant's story or supports the effective operation of our organisation. These records deserve to be managed with care, accuracy and respect.

### **Scope**

This policy applies to:

- Directors
- Employees
- Casual Support Workers
- Students
- Volunteers
- Contractors

It applies to all paper and electronic records created or maintained on behalf of WholeFlow Inclusion Co.

### **WholeFlow Values**

At WholeFlow, documentation is an extension of the care we provide.

We value records that are accurate, respectful and meaningful. Our documentation should support participants, strengthen communication and provide confidence that quality care is being delivered.

We write records with the understanding that participants, families and regulatory bodies may one day read them.

### **Policy Statement**

WholeFlow is committed to maintaining records that are:

- Accurate.
- Complete.
- Timely.
- Confidential.
- Secure.
- Accessible to authorised people.
- Retained in accordance with legislative requirements.
- Disposed of securely when no longer required.

Staff must only create, access or modify records that relate to their role.

## **Procedures**

### **Creating Records**

Staff will ensure all records are:

- Factual.
- Objective.
- Respectful.
- Legible.
- Dated.
- Completed promptly.
- Signed or electronically attributed where applicable.

Records must reflect what actually occurred and must never be altered to misrepresent events.

### **Accessing Records**

Only authorised individuals may access WholeFlow records.

Staff must:

- Access only information required for their role.
- Protect participant confidentiality.
- Log out of electronic systems when finished.
- Never share passwords or login credentials.
- Report any unauthorised access immediately.

### **Storing Records**

WholeFlow records will be stored securely using approved systems.

Electronic records will be protected through:

- Password protection.
- Secure cloud-based systems.
- Controlled user access.
- Regular backups where applicable.

Paper records, where used, will be stored securely and protected from loss or unauthorised access.

## Updating Records

Where information changes, staff will:

- Update records promptly.
- Record the date of any changes.
- Maintain an accurate history where appropriate.
- Notify management of significant updates.

Historical information should remain available where required for legal or clinical purposes.

## Correcting Records

If an error is identified:

- Correct it promptly.
- Do not falsify information.
- Do not delete records without authorisation.
- Ensure corrections remain transparent.

The integrity of records must always be maintained.

## Retention & Disposal

WholeFlow will retain records in accordance with relevant legislation and organisational requirements.

When records are no longer required, they will be securely destroyed or permanently deleted using approved methods to protect confidential information.

## Staff Responsibilities

Every WholeFlow staff member is responsible for:

- Creating accurate records.
- Protecting confidential information.
- Following documentation procedures.
- Reporting record security concerns.
- Maintaining secure passwords.

- Completing documentation within required timeframes.
- Respecting participant privacy at all times.

## What This Looks Like at WholeFlow

Good record management happens through everyday habits.

Examples include:

- ✓ Completing progress notes before leaving a shift wherever practical.
- ✓ Updating emergency contact details when a family advises of a change.
- ✓ Uploading participant photographs to the approved system before deleting them from a personal device.
- ✓ Recording supervision discussions following staff meetings.
- ✓ Filing signed consent forms promptly.
- ✓ Reporting accidental access to the wrong participant file immediately.

Good documentation protects participants, staff and the organisation.

## WholeFlow's CLEAR Record Standard

Every record should be:

**C – Complete**

Does it tell the whole story?

**L – Lawful**

Does it meet legal and organisational requirements?

### **E – Evidence-Based**

Is it factual and objective?

### **A – Accurate**

Would another person understand exactly what happened?

### **R – Respectful**

Does it protect the dignity of the participant?

If a record is not CLEAR, it is not complete.

## **Record Keeping**

WholeFlow maintains records including:

### **Participant Records**

- Service Agreements.
- Participant Guides.
- Risk Assessments.
- Progress Notes.
- Goal Reviews.
- Consent Forms.
- Medication Records.
- Incident Reports.
- Emergency Information.

### **Staff Records**

- Employment Agreements.
- Qualifications.
- Screening Checks.
- Training Records.
- Supervision Records.
- Performance Reviews.
- Professional Development Records.

### **Organisational Records**

- Policies and Procedures.
- Continuous Improvement Register.
- Complaints Register.
- Incident Register.

- Risk Register.
- Audit Records.
- Insurance Documentation.
- Governance Records.

All records will be stored securely and only accessed by authorised individuals.

## **Related Documents**

- Progress Notes & Documentation Policy
- Privacy & Confidentiality Policy
- Phone, Technology & Digital Information Policy
- Continuous Improvement Policy
- Incident Management & Reporting Policy
- Complaints, Feedback & Compliments Policy
- Staff Induction, Supervision & Professional Development Policy

## **Review Schedule**

This policy will be reviewed:

- Every 12 months;
- Following legislative or NDIS Practice Standard updates;
- Following identified record management issues;
- Following audits or quality reviews.

WholeFlow will continually review record management practices to ensure documentation remains secure, accurate and supports the delivery of high-quality services.

# **WholeFlow Inclusion Co.**

## **Phone, Technology & Digital Information Policy**

### **Purpose**

The purpose of this policy is to ensure phones, tablets, computers and other digital technology are used safely, professionally and responsibly while delivering supports through WholeFlow Inclusion Co.

Technology plays an important role in modern disability support. It allows staff to access participant information, complete documentation, communicate with families and management, navigate safely during community access and capture approved records where appropriate.

WholeFlow is committed to using technology in ways that protect participant privacy, support high-quality service delivery and maintain professional standards.

### **Scope**

This policy applies to:

- Directors
- Employees
- Casual Support Workers
- Students
- Volunteers
- Contractors

It applies to both personal and company-owned devices used for WholeFlow business.

### **WholeFlow Values**

Technology should strengthen relationships—not replace them.

Participants deserve our attention, presence and engagement. Devices are tools that support quality care, not distractions from it.

When using technology, we ask ourselves whether it improves the participant's experience while protecting their dignity and privacy.

### **Policy Statement**

WholeFlow staff may use digital devices for approved work-related purposes only while supporting participants.

Technology may be used to:

- Access Storypark participant information.
- Complete progress notes.
- View participant goals, risk assessments or support plans.
- Navigate to community locations.
- Communicate with management.
- Take approved participant photographs.
- Access approved therapeutic resources.

Technology must never interfere with active supervision or meaningful engagement with participants.

## **Procedures**

### **Appropriate Use**

Staff may use phones or tablets to:

- Review participant information before support.
- Complete documentation.
- Access communication supports or AAC applications.
- Use timers, visual schedules or therapeutic apps.
- Navigate safely during community access.
- Contact emergency services or management when required.

Devices should support quality care rather than distract from it.

### **Personal Phone Use**

Personal phone use during shifts should be limited to essential matters.

Staff must not:

- Browse social media.
- Watch videos.
- Play games.
- Shop online.
- Complete personal business.
- Engage in lengthy personal messaging.

Brief personal communication may be appropriate during breaks or genuine emergencies.

Participants should never feel they are competing with a phone for a worker's attention.

## Participant Photographs & Videos

Photographs or videos may only be taken:

- With documented consent.
- For approved WholeFlow purposes.
- To support participant learning, communication or family updates where agreed.

If a personal phone is used:

- Images must be uploaded to the approved WholeFlow platform as soon as practicable.
- Images must then be permanently deleted from the device, including the "Recently Deleted" folder and any automatic cloud backups where possible.
- Images must never be shared through personal messaging apps or social media.

## Storypark & Digital Records

Staff are expected to:

- Read participant guides before commencing support.
- Access only the information necessary for their role.
- Complete documentation promptly.
- Log out of systems when finished.
- Protect passwords and account access.

Staff must never share login details with another person.

## Artificial Intelligence (AI)

WholeFlow recognises that AI tools may assist with administrative tasks such as drafting documents, brainstorming activity ideas or improving written communication.

Staff must not enter any information into AI tools that could identify a participant, family member or employee.

This includes names, addresses, dates of birth, photographs, NDIS numbers, medical information or any other identifying details.

Where AI is used for administrative support, all content must be reviewed for accuracy before use. Staff remain responsible for the final content and must ensure it reflects WholeFlow's values, professional standards and participant-specific requirements.

**AI must never replace professional judgement or clinical decision-making.**

## Security

Staff will:

- Use secure passwords.
- Lock devices when unattended.
- Enable screen locks where available.
- Report lost or stolen devices immediately.
- Avoid using public Wi-Fi for accessing confidential participant information where possible.

## Digital Communication

Staff will:

- Communicate respectfully.
- Use approved communication methods.
- Maintain professional language.
- Keep participant information confidential.
- Avoid discussing participants through personal group chats or unofficial messaging platforms.

## If Technology Fails

If staff cannot access digital systems, they will:

- Continue providing safe participant support.
- Notify management.
- Complete documentation as soon as systems become available.
- Record any delays honestly.

## Staff Responsibilities

Every WholeFlow team member is responsible for:

- Using technology professionally.
- Protecting confidential information.
- Following consent requirements.
- Maintaining digital security.
- Reporting technology or privacy concerns immediately.
- Remaining present and engaged with participants.
- Using AI ethically and responsibly in accordance with this policy.

## What This Looks Like at WholeFlow

Technology should support relationships—not interrupt them.

Examples include:

- ✓ Using Storypark to review a participant's communication profile before arriving.

✓ Taking a photograph of a completed cooking activity after confirming consent, uploading it to the approved system and deleting it immediately from the phone.

✓ Using a visual timer on your phone to support transitions.

✓ Pulling over safely before using GPS or responding to an urgent work call while driving.

✓ Completing progress notes before leaving the participant's driveway where practical.

✓ Keeping your phone in your pocket during play, conversation and community activities unless it is actively being used for an approved purpose.

Participants should experience your presence first and your technology second.

## WholeFlow's PRESENT Check

Before reaching for your device, ask yourself:

### **P – Purpose**

Why am I using my device right now?

### **R – Respect**

Does this protect the participant's dignity and privacy?

### **E – Engagement**

Will this improve the participant's experience, or distract from it?

### **S – Security**

Am I using an approved, secure method?

### **E – Essential**

Is this necessary right now, or can it wait?

### **N – Notice**

Have I explained what I'm doing if the participant or family might be wondering?

### **T – Trust**

Would a participant or family member feel confident watching how I'm using this device?

Technology should always strengthen trust, never weaken it.

## Record Keeping

WholeFlow will maintain:

- Staff Phone & Technology Agreements.
- Consent Forms for photography and video.
- Digital Communication Records where applicable.
- Privacy Breach Reports.
- Training records relating to digital security and technology use.

## Related Documents

- Privacy & Confidentiality Policy
- Progress Notes & Documentation Policy
- Code of Conduct Policy
- Social Media Policy
- Community Access & Transport Policy
- Incident Management & Reporting Policy
- Information & Records Management Policy

## Review Schedule

This policy will be reviewed:

- Every 12 months;
- Following technological changes or identified security risks;
- Following any privacy or technology-related incident;
- Following changes to legislation or organisational systems.

Updates will be communicated through staff induction, ongoing supervision and continuous professional development.

# WholeFlow Inclusion Co.

## Social Media & Public Representation Policy

### Purpose

The purpose of this policy is to provide clear expectations for the responsible use of social media and other public platforms by anyone representing WholeFlow Inclusion Co.

Social media can be a powerful tool for education, connection and celebrating meaningful moments. However, it also carries responsibilities relating to participant privacy, professional boundaries and public trust.

WholeFlow is committed to ensuring that all online activity reflects our values of respect, integrity, inclusion and professionalism.

### Scope

This policy applies to:

- Directors
- Employees
- Casual Support Workers
- Students
- Volunteers
- Contractors

It applies to all social media platforms, online forums, messaging platforms, blogs, websites and any other public or semi-public digital space where a staff member may be identified as representing WholeFlow.

### WholeFlow Values

Every post, comment and interaction contributes to the trust families place in WholeFlow.

We believe our online presence should educate, encourage and inspire while protecting the dignity, privacy and rights of every participant.

Staff are encouraged to think carefully before sharing content online and to consider whether it reflects the culture and professionalism of WholeFlow.

### Policy Statement

WholeFlow staff are expected to use social media responsibly and professionally.

Staff must:

- Protect participant privacy.
- Maintain professional boundaries.
- Follow consent requirements.
- Communicate respectfully.
- Avoid behaviour that could damage the reputation of WholeFlow.
- Separate personal opinions from organisational communication.

Online behaviour should reflect the same professionalism expected during face-to-face support.

## **Procedures**

### **Participant Information**

Staff must never:

- Share participant names.
- Share identifiable photographs or videos without documented consent.
- Share participant addresses or locations.
- Discuss participant diagnoses or personal information.
- Describe incidents in a way that could identify a participant or family.

Even where names are removed, staff must consider whether a participant could still be identified through other details.

### **Approved Content**

Only authorised staff may publish content on behalf of WholeFlow.

Approved content may include:

- Educational information.
- Service updates.
- Community events.
- Recruitment advertisements.
- Approved participant success stories where written consent has been obtained.
- Resources created by WholeFlow.

### **Personal Accounts**

Staff are welcome to use personal social media; however, they must not:

- Present themselves as speaking on behalf of WholeFlow unless authorised.

- Discuss confidential workplace matters.
- Post content that could reasonably damage WholeFlow's reputation.
- Engage in online arguments while identifying themselves as WholeFlow staff.

Staff should consider that online behaviour may affect professional relationships.

## **Friend Requests & Online Relationships**

To maintain professional boundaries, staff should not:

- Add current participants to their personal social media accounts.
- Add parents or guardians where doing so may blur professional boundaries.
- Send private messages unrelated to participant support.
- Follow participant accounts where it is not professionally appropriate.

Where uncertainty exists, staff should seek guidance from management.

## **Photography & Video**

Any photographs or videos taken during support must:

- Follow WholeFlow's Photography Consent procedures.
- Be used only for approved purposes.
- Be stored securely.
- Be deleted from personal devices immediately after uploading to the approved WholeFlow platform.
- Never be shared through personal social media or messaging applications.

## **Media Enquiries**

Only authorised representatives may:

- Speak to the media.
- Provide interviews.
- Respond publicly to complaints on behalf of WholeFlow.
- Release organisational statements.

Staff who receive media enquiries should refer them directly to management.

## **If a Mistake Happens**

If content is accidentally shared or confidentiality may have been breached, staff must:

- Notify management immediately.
- Remove the content where possible.
- Complete required documentation.
- Cooperate with any investigation.

Prompt reporting allows WholeFlow to respond quickly and minimise potential harm.

## Staff Responsibilities

Every WholeFlow team member is responsible for:

- Protecting participant privacy.
- Maintaining professional boundaries online.
- Following consent requirements.
- Reporting social media concerns promptly.
- Representing WholeFlow respectfully.
- Thinking carefully before posting online.

## What This Looks Like at WholeFlow

Professionalism extends beyond the workplace.

Examples include:

- ✓ Sharing an educational post about emotional regulation without referring to a specific participant.
- ✓ Asking management before posting photographs from a community event.
- ✓ Politely declining a participant's friend request on a personal social media account while explaining WholeFlow's professional boundaries.
- ✓ Sharing WholeFlow's public Facebook posts rather than creating personal posts about participants.
- ✓ Checking that consent has been obtained before using any participant image in promotional material.

Trust is built through consistency, both online and offline.

## WholeFlow's SHARE Check

Before posting anything online, ask yourself:

### **S – Secure**

Does this protect participant privacy?

### **H – Honest**

Is the information accurate and respectful?

### **A – Authorised**

Do I have permission to share this?

### **R – Reputation**

Would this reflect positively on WholeFlow if a participant or family saw it?

### **E – Ethical**

Does this align with WholeFlow's values and professional standards?

If the answer to any question is "no" or "I'm not sure," don't post until you've spoken with management.

## **Record Keeping**

WholeFlow will maintain:

- Photography and Media Consent Forms.
- Records of approved promotional content.
- Reports relating to social media or privacy breaches.
- Staff acknowledgements of this policy where applicable.

Documentation will be stored securely in accordance with WholeFlow's Privacy & Confidentiality Policy.

## **Related Documents**

- Privacy & Confidentiality Policy
- Phone, Technology & Digital Information Policy
- Professional Boundaries Policy
- Code of Conduct Policy
- Participant Rights & Choice Policy
- Complaints, Feedback & Compliments Policy

## **Review Schedule**

This policy will be reviewed:

- Every 12 months;
- Following any social media or privacy incident;
- Following legislative changes affecting privacy or digital communication;
- Following identified opportunities for improvement.

Updates will be communicated during staff induction, supervision and ongoing professional development.

SECTION 05

# Professional Standards & Workforce

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# WholeFlow Inclusion Co.

## Code of Conduct Policy

### Purpose

The purpose of this policy is to outline the professional standards, behaviours and expectations of every person representing WholeFlow Inclusion Co.

Our Code of Conduct exists to protect participants, families, staff and the reputation of WholeFlow. It provides a clear framework for ethical decision-making while encouraging compassionate, relationship-based practice.

Every interaction should reflect WholeFlow's commitment to respect, integrity, professionalism and genuine human connection.

### Scope

This policy applies to:

- Directors
- Employees
- Casual Support Workers
- Students
- Volunteers
- Contractors
- Any individual representing WholeFlow Inclusion Co.

This policy applies at all times while performing work-related duties, attending training, participating in meetings, communicating with participants or families, using company technology, or representing WholeFlow online or within the community.

## WholeFlow Values

At WholeFlow, professionalism and compassion go hand in hand.

We believe participants deserve support workers who are trustworthy, emotionally regulated, respectful and committed to continuous learning.

Being a great support worker is about far more than completing tasks—it is about creating safe relationships where people feel valued, respected and empowered to grow.

Every action reflects not only you as an individual but the culture and reputation of WholeFlow Inclusion Co.

# Policy Statement

All WholeFlow team members are expected to behave honestly, ethically and professionally at all times.

Staff will:

- Treat every participant with dignity and respect.
- Act in the participant's best interests.
- Protect participant privacy and confidentiality.
- Maintain professional boundaries.
- Follow all WholeFlow policies and procedures.
- Comply with relevant legislation and the NDIS Code of Conduct.
- Speak respectfully to participants, families, colleagues and members of the community.
- Report concerns, incidents or unsafe practices promptly.
- Take responsibility for their own actions and professional development.

Discrimination, bullying, harassment, abuse, neglect, intimidation or exploitation of any person will not be tolerated.

## Procedures

### Professional Behaviour

Staff will:

- Arrive on time and prepared for every shift.
- Wear clean, practical and appropriate clothing.
- Present themselves in a professional manner.
- Maintain appropriate language at all times.
- Remain calm and respectful during difficult situations.
- Communicate honestly if running late or unable to attend work.

### Working Alongside Participants

Staff will:

- Respect participant choices wherever possible.

- Support independence rather than creating dependence.
- Ask permission before assisting with personal tasks.
- Recognise that every participant communicates differently.
- Adapt supports to meet individual needs rather than expecting participants to adapt to staff.

## **Working With Families**

Staff will:

- Treat families as valued members of the support team.
- Listen respectfully to family knowledge and lived experience.
- Communicate openly while maintaining confidentiality.
- Avoid judgement or criticism of parenting decisions.
- Escalate concerns professionally rather than engaging in conflict.

## **Working With Colleagues**

Staff will:

- Support one another respectfully.
- Share information professionally.
- Accept feedback with openness.
- Offer assistance where appropriate.
- Raise concerns through appropriate channels.

Gossip, disrespectful conversations or behaviour that damages team culture is inconsistent with WholeFlow values.

## **Social Media & Public Behaviour**

Staff must never:

- Share participant information online.
- Post photographs without written consent.
- Discuss participants on social media.
- Represent personal opinions as WholeFlow's position.
- Create content that could damage the reputation of WholeFlow or participant trust.

## **Gifts & Conflicts of Interest**

Staff must:

- Declare any actual, perceived or potential conflicts of interest.
- Politely decline gifts or benefits that could influence professional judgement.
- Seek guidance from management if unsure whether accepting a gift or favour is appropriate.

Small tokens of appreciation (such as a thank-you card or homemade gift from a child) may be accepted where appropriate and declared to management.

## **If Concerns Arise**

If a staff member observes behaviour inconsistent with this Code of Conduct, they must:

- Take immediate action if participant safety is at risk.
- Report concerns to management as soon as practicable.
- Cooperate with any investigation.
- Maintain confidentiality throughout the process.

WholeFlow encourages staff to raise concerns without fear of retaliation.

## **Staff Responsibilities**

Every WholeFlow employee is responsible for:

- Reading and understanding this policy.
- Acting professionally at all times.
- Maintaining participant safety.
- Protecting confidential information.
- Following lawful and reasonable directions.
- Seeking clarification whenever unsure.
- Reporting incidents, misconduct or unsafe practice.
- Participating in ongoing professional development.
- Reflecting on and improving their own practice.

## **What This Looks Like at WholeFlow**

Professionalism is demonstrated through everyday actions.

Examples include:

- ✓ Greeting participants warmly and by their preferred name.
- ✓ Speaking to participants rather than about them.

✓ Putting your phone away during support unless it is being used for approved work purposes.

✓ Admitting mistakes honestly and reporting them promptly.

✓ Maintaining calm body language during moments of dysregulation.

✓ Respecting a participant's "no" and exploring alternative ways to achieve the goal.

✓ Leaving a participant's home exactly as you found it—or better.

✓ Asking for help when you feel outside your scope of practice.

Professionalism is not about being perfect. It is about being accountable, respectful and committed to learning.

## Record Keeping

Where relevant, staff will complete:

- Progress Notes
- Incident Reports
- Complaint Records
- Conflict of Interest Declarations
- Training Records
- Supervision Records
- Any documentation relating to breaches of this Code of Conduct

All records must be completed accurately and stored securely in accordance with WholeFlow's Privacy and Confidentiality Policy.

## Related Documents

- Practice Philosophy Policy
- Participant Rights Policy
- Professional Boundaries Policy
- Privacy & Confidentiality Policy
- Child Safe Policy
- Phone & Technology Use Policy
- Social Media Policy
- Incident Management Policy
- Complaints & Feedback Policy

# Review Schedule

This policy will be reviewed:

- Every 12 months;
- Following legislative or NDIS Practice Standard changes;
- Following any serious incident, complaint or identified breach of conduct;
- Following staff, participant or family feedback.

Any revisions will be communicated to all staff as part of WholeFlow's continuous improvement process.

# WholeFlow Inclusion Co.

## Professional Boundaries Policy

### Purpose

The purpose of this policy is to establish clear professional boundaries that protect participants, families, staff and WholeFlow Inclusion Co.

WholeFlow believes that meaningful relationships are at the heart of quality support. We encourage genuine connection, trust and compassion while recognising that healthy professional boundaries are essential to providing safe, ethical and consistent services.

Professional boundaries allow support workers to build strong relationships without creating dependency, conflicts of interest or situations that may place participants or staff at risk.

### Scope

This policy applies to:

- Directors
- Employees
- Casual Support Workers
- Students
- Volunteers
- Contractors
- Any individual representing WholeFlow Inclusion Co.

It applies in participant homes, community settings, schools, workplaces, online communication and any interaction connected to WholeFlow services.

### WholeFlow Values

Connection is one of our greatest strengths—but it must always be balanced with professionalism.

At WholeFlow, we strive to become trusted people in a participant's life, not to replace family members, therapists or friends.

Healthy boundaries allow relationships to grow safely. They create consistency, build trust and ensure every decision remains focused on what is best for the participant.

### Policy Statement

WholeFlow staff are expected to maintain professional boundaries at all times.

Staff will develop warm, respectful and supportive relationships while ensuring those relationships remain focused on the participant's goals, wellbeing and rights.

Support workers must never use their position for personal gain or place participants in situations where professional judgement may be compromised.

## **Procedures**

### **Building Positive Relationships**

Staff are encouraged to:

- Show genuine interest in participants.
- Celebrate achievements.
- Engage in play, conversation and shared activities.
- Use humour appropriately.
- Be approachable and emotionally safe.
- Develop trust over time.

These relationships should always support the participant's independence and wellbeing.

### **Maintaining Professional Boundaries**

Staff must:

- Maintain appropriate professional language.
- Keep conversations participant-focused.
- Avoid sharing unnecessary personal information.
- Politely redirect conversations that become inappropriate.
- Maintain appropriate physical boundaries.
- Respect participant privacy at all times.

### **Personal Relationships**

Staff must not:

- Develop romantic or sexual relationships with participants or immediate family members.
- Accept invitations that blur professional roles without management approval.
- Become financially involved with participants or families.
- Borrow or lend money.
- Purchase expensive gifts.
- Ask participants for favours.
- Use participants for personal or business gain.

## **Communication Outside Scheduled Supports**

Staff should:

- Communicate through approved WholeFlow methods where possible.
- Keep communication professional.
- Avoid unnecessary personal messaging.
- Direct service-related questions through appropriate channels.

Participants should know how to contact WholeFlow if support is required rather than relying solely on an individual worker.

## **Social Media**

Staff must not:

- Add participants or parents/guardians on personal social media accounts.
- Share participant information online.
- Comment on participant posts.
- Tag participants in photographs.
- Use social media to communicate privately about support unless specifically authorised through WholeFlow systems.

## **Gifts**

Staff may accept small, low-value tokens of appreciation where culturally appropriate.

Examples include:

- Handmade cards.
- Children's artwork.
- Small Christmas gifts.
- Homemade baking where appropriate.

Staff must decline gifts that could influence professional judgement or create expectations.

Any uncertainty should be discussed with management.

## **When Boundaries Become Blurred**

If staff notice professional boundaries beginning to blur, they must:

- Reflect honestly on the situation.
- Discuss concerns with management.
- Document any significant concerns where appropriate.
- Adjust support arrangements if required.

Seeking support early is viewed as good professional practice.

## **Staff Responsibilities**

All WholeFlow staff are responsible for:

- Maintaining healthy professional relationships.
- Recognising when boundaries may be changing.
- Seeking guidance when unsure.
- Protecting participant dignity.
- Avoiding conflicts of interest.
- Maintaining confidentiality.
- Acting in the participant's best interests at all times.

## **What This Looks Like at WholeFlow**

Professional boundaries don't mean being distant—they mean being dependable.

Examples include:

✓ Comforting a distressed participant while encouraging them to use their own regulation strategies.

✓ Celebrating birthdays during a scheduled shift if this aligns with the participant's goals and family wishes.

✓ Politely declining invitations to private family events outside your role.

✓ Listening with empathy without taking on the role of counsellor or family member.

✓ Saying, "Let's check with your family" instead of making promises you cannot keep.

✓ Being friendly, genuine and engaged while remembering you are there in a professional capacity.

Healthy boundaries create relationships that are safe, sustainable and built on trust.

## Record Keeping

Where applicable, staff will document:

- Boundary concerns.
- Conflict of interest declarations.
- Relevant incidents.
- Management discussions.
- Participant complaints relating to professional conduct.

Documentation must remain factual and confidential.

## Related Documents

- Practice Philosophy Policy
- Code of Conduct Policy
- Participant Rights & Choice Policy
- Privacy & Confidentiality Policy
- Phone & Technology Use Policy
- Social Media Policy
- Complaints & Feedback Policy
- Incident Management Policy

## Review Schedule

This policy will be reviewed:

- Every 12 months;
- Following legislative or NDIS Practice Standard updates;
- Following incidents involving professional boundaries;
- Following feedback from participants, families or staff.

Updates will be communicated through induction, supervision and ongoing professional development.

# WholeFlow Inclusion Co.

## Staff Induction, Supervision & Professional Development Policy

### Purpose

The purpose of this policy is to ensure every WholeFlow team member receives the knowledge, support, supervision and professional development required to deliver safe, high-quality and neuroaffirming supports.

WholeFlow believes that exceptional support begins with exceptional people. Learning does not end after induction—it is a continuous journey of reflection, growth and professional development.

We are committed to creating a culture where staff feel supported to ask questions, develop confidence and continually improve their practice.

### Scope

This policy applies to:

- Directors
- Employees
- Casual Support Workers
- Students
- Volunteers
- Contractors where appropriate

It applies from recruitment through to ongoing employment with WholeFlow Inclusion Co.

### WholeFlow Values

At WholeFlow, we invest in people.

We believe confidence grows through guidance, reflection and experience—not by expecting staff to know everything from day one.

We value curiosity over perfection, learning over ego and collaboration over competition.

Every staff member deserves opportunities to grow both personally and professionally.

### Policy Statement

WholeFlow is committed to providing structured induction, regular supervision and ongoing professional development to all staff.

Every employee will receive:

- A structured induction.
- Access to organisational policies and procedures.
- Role-specific training.
- Ongoing supervision.
- Opportunities for reflective practice.
- Access to continuing professional development.
- Regular feedback and support.

Professional learning is viewed as an essential part of providing quality participant supports.

## **Procedures**

### **Recruitment**

Prior to commencing employment, WholeFlow will ensure:

- Appropriate qualifications and experience are verified.
- Required screening and clearances are current.
- References are completed.
- Employment documentation is finalised.
- Mandatory training requirements are identified.

### **Staff Induction**

Every new team member will complete an induction covering:

- WholeFlow's vision, values and philosophy.
- Code of Conduct.
- Policies and procedures.
- Participant rights.
- Safeguarding.
- Professional boundaries.
- Privacy and confidentiality.
- Incident reporting.
- Emergency procedures.
- Storypark systems.
- Progress note expectations.
- Workplace health and safety.
- Participant-specific information before commencing support.

Where appropriate, new staff will complete shadow shifts before working independently.

# Supervision

WholeFlow recognises supervision as a supportive partnership rather than a performance inspection.

Supervision may include:

- Reflective discussions.
- Case reviews.
- Goal setting.
- Problem solving.
- Skill development.
- Participant updates.
- Emotional wellbeing check-ins.
- Professional guidance.

Supervision should provide staff with a safe space to ask questions, reflect on practice and seek support.

# Professional Development

WholeFlow encourages staff to continually expand their knowledge.

Professional development may include:

- Online learning.
- Workshops.
- Conferences.
- Reading current research.
- Internal training.
- Team learning sessions.
- Guest presenters.
- Peer learning.

Staff are encouraged to share new knowledge with the wider team.

# Reflective Practice

Reflection is an important part of WholeFlow's culture.

Staff are encouraged to regularly consider:

- What went well?
- What challenged me?
- What did I learn?
- What would I do differently next time?
- How did I support participant dignity and choice?

Reflection supports continual growth rather than self-criticism.

## **Performance Support**

Where additional support is required, WholeFlow will:

- Identify learning needs collaboratively.
- Develop achievable improvement goals.
- Provide coaching and mentoring.
- Monitor progress.
- Celebrate improvements.

Our goal is to help staff succeed wherever possible.

## **Staff Responsibilities**

Every WholeFlow staff member is responsible for:

- Participating in induction.
- Reading organisational policies.
- Attending supervision.
- Maintaining required qualifications.
- Seeking guidance when unsure.
- Engaging in reflective practice.
- Participating in ongoing learning.
- Applying new knowledge to everyday practice.

## **What This Looks Like at WholeFlow**

Learning is embedded into everyday work.

Examples include:

✓ Debriefing after a challenging shift to identify what worked well and what could be improved.

- ✓ Sharing a helpful strategy discovered during a webinar with the rest of the team.
- ✓ Asking for support before attempting an unfamiliar task.
- ✓ Reflecting on participant progress during supervision rather than focusing only on paperwork.
- ✓ Celebrating a support worker who developed a creative way to help a participant achieve greater independence.

Growth is expected—not perfection.

## WholeFlow's GROW Together Framework

Professional development begins with reflection.

### **G – Gather**

What happened during my shift?

### **R – Reflect**

What worked well and what challenged me?

### **O – Opportunities**

What can I learn or improve?

### **W – Walk Forward**

How will I apply this learning during my next shift?

Learning is not about avoiding mistakes—it is about becoming a better support worker every day.

## Record Keeping

WholeFlow will maintain:

- Staff induction records.
- Training records.
- Supervision notes.
- Competency assessments.
- Professional development records.
- Qualification and certification records.
- Performance review documentation.

Documentation will be stored securely and reviewed regularly.

## **Related Documents**

- Practice Philosophy Policy
- Code of Conduct Policy
- Work Health & Safety Policy
- Phone, Technology & Digital Information Policy
- Positive Behaviour Support Policy
- Incident Management & Reporting Policy
- Continuous Improvement Policy

## **Review Schedule**

This policy will be reviewed:

- Every 12 months;
- Following legislative or NDIS Practice Standard updates;
- Following staff feedback;
- Following quality reviews or identified learning needs.

Professional development priorities will be reviewed regularly to ensure WholeFlow continues to provide contemporary, evidence-informed supports.

SECTION 06

# Quality & Governance

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# WholeFlow Inclusion Co.

## Continuous Improvement Policy

### Purpose

The purpose of this policy is to ensure WholeFlow Inclusion Co. continually reflects on, evaluates and improves the quality of the supports and services we provide.

Continuous improvement is more than meeting standards—it is part of our culture. We believe every conversation, every shift, every success and every challenge provides an opportunity to learn and grow.

By listening to participants, families, staff and our wider community, we strengthen our practice and continue building a service that is responsive, innovative and person-centred.

### Scope

This policy applies to:

- Directors
- Employees
- Casual Support Workers
- Students
- Volunteers
- Contractors

It applies to all areas of WholeFlow's operations, including participant supports, staffing, documentation, systems, policies, communication and service delivery.

## WholeFlow Values

Growth is one of WholeFlow's core values.

We believe that quality is never "finished." There is always an opportunity to learn, refine and improve.

We value curiosity, openness and reflection. We encourage our team to ask questions, share ideas and challenge the way things have always been done when there is a better way.

Every person connected to WholeFlow has something valuable to contribute.

## Policy Statement

WholeFlow is committed to maintaining a culture of continuous improvement by:

- Seeking regular feedback.
- Reviewing our services.
- Monitoring outcomes.
- Learning from incidents.
- Reviewing complaints and compliments.
- Updating policies and procedures.
- Investing in staff development.
- Encouraging innovation and collaboration.

Improvement activities will be proactive rather than only occurring after problems arise.

## **Procedures**

### **Gathering Feedback**

WholeFlow will regularly seek feedback from:

- Participants.
- Families and carers.
- Staff.
- Referring professionals.
- Community partners where appropriate.

Feedback may be collected through conversations, surveys, reviews, supervision, Storypark, emails or other communication methods.

### **Reviewing Practice**

WholeFlow will regularly review:

- Participant outcomes.
- Progress towards goals.
- Documentation quality.
- Incident trends.
- Complaints and compliments.
- Staff feedback.
- Training needs.
- Risk management processes.
- Compliance with policies and procedures.

Where improvements are identified, action plans will be developed.

### **Learning from Incidents**

Following incidents or near misses, WholeFlow will consider:

- What happened?
- Why did it happen?
- What worked well?
- What could be improved?
- Do any policies or procedures need updating?
- Is additional staff training required?

The purpose of review is learning—not blame.

## **Staff Involvement**

WholeFlow believes the best ideas often come from those delivering support every day.

Staff are encouraged to:

- Suggest improvements.
- Share creative ideas.
- Raise concerns early.
- Participate in policy reviews.
- Reflect during supervision.
- Recommend new resources or training.

Every suggestion will be considered respectfully.

## **Reviewing Policies**

All organisational policies and procedures will be reviewed:

- At least every 12 months.
- Following legislative changes.
- Following significant incidents.
- Following audits.
- When improvements are identified through feedback.

Updated policies will be communicated to all relevant staff.

## **Innovation**

WholeFlow encourages innovation where it:

- Improves participant outcomes.
- Supports independence.

- Strengthens relationships.
- Improves efficiency.
- Enhances staff wellbeing.
- Aligns with WholeFlow's values.

Innovation should always be balanced with safety, ethics and participant rights.

## Staff Responsibilities

Every WholeFlow team member is responsible for:

- Participating in quality improvement activities.
- Providing honest feedback.
- Reporting concerns.
- Reflecting on their own practice.
- Suggesting improvements.
- Applying lessons learned.
- Supporting a positive learning culture.

Improvement is everyone's responsibility.

## What This Looks Like at WholeFlow

Continuous improvement happens through small, meaningful actions.

Examples include:

- ✓ A family suggests introducing visual schedules before community outings. The idea is trialled and becomes part of WholeFlow's standard practice.
- ✓ Staff notice that participants engage more successfully when given additional transition warnings. This strategy is shared with the wider team.
- ✓ An Incident Report identifies a recurring risk during transport. The transport procedure is updated and additional training is provided.
- ✓ During supervision, a support worker shares a new sensory strategy that improves regulation for several participants. The strategy is added to staff training resources.

Great organisations are built through thousands of small improvements rather than a few major changes.

## WholeFlow's RIPPLE Framework

Improvement begins with one small ripple.

## **R – Reflect**

What have we learned?

## **I – Improve**

What could we do better?

## **P – Plan**

What practical changes will we make?

## **P – Put Into Practice**

Implement the improvement.

## **L – Look Back**

Did it make a positive difference?

## **E – Evolve**

Keep refining and growing.

Every positive change creates another ripple that benefits participants, families and staff.

# **Record Keeping**

WholeFlow will maintain:

- Continuous Improvement Register.
- Feedback Records.
- Complaint and Compliment Records.
- Audit Findings.
- Policy Review Records.
- Staff Suggestions.
- Training Records.
- Quality Improvement Action Plans.

These records will be reviewed regularly to monitor progress and identify future priorities.

# **Related Documents**

- Complaints, Feedback & Compliments Policy
- Staff Induction, Supervision & Professional Development Policy
- Incident Management & Reporting Policy
- Work Health & Safety Policy
- NDIS Service Delivery Policy

- Practice Philosophy Policy
- Document & Records Management Policy

## Review Schedule

This policy will be reviewed:

- Every 12 months;
- Following significant organisational changes;
- Following audits or external reviews;
- Following legislative or NDIS Practice Standard updates.

Continuous improvement activities will be monitored throughout the year to ensure WholeFlow continues to deliver high-quality, participant-centred supports.