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Opportunities for Improvement – Learning from Incidents and Complaints

Funds Management is committed to help strengthen the capacity of non-government disability service providers. Understanding the nature of incidents and complaints and identifying common issues, challenges and trends can help inform providers to enhance their capacity to provide safe, high quality services to people with disability, their families and carers.

The Quality and Service Development unit will distribute a new bulletin each quarter entitled “*Opportunities for Improvement – Learning from Incidents and Complaints*”. Each bulletin will help build the connection between complaints and quality improvement, so as a sector we can learn from incidents and complaints data and what it tells us about opportunities for improvement. Useful information about a range of resources and sector wide policies will also be included, to help inform and guide best practice across the sector.

Consent, privacy and confidentiality

Consent, privacy and client confidentiality isn't new but Funds Management recognise some of the emerging challenges faced by service providers, particularly given the significant and ongoing growth in the electronic and social networking environment in which we all live. To explore this issue further:

The [Code of Fair Information Practice](#) applies to:

- all Department for Communities and Social Inclusion (DCSI) staff and agencies;
- staff of funded service providers;
- contractors; and
- volunteers;
- who, in the course of their work (whether paid or voluntary), have access to personal information collected, used or stored by or on behalf of the DCSI and/or funded service providers.

The Code provides a framework to ensure that personal information and privacy issues are handled in an appropriate manner. The standards set in the Code are based on the National Privacy Principles (NPPs) contained in the Commonwealth [Privacy Act 1988](#), which are applicable nationally to the private sector.

The Principles set out in the Code apply to personal information acquired or obtained from any source, by any means, in any format, in circumstances where the individual is identified or is identifiable. For example, this would include paper or electronic records, videos, x-rays, photographs and entries on computer databases. It also includes information from which the names and addresses have been removed, but where sufficient information remains that the individual could potentially be identified (for example, by way of a number or reference which, when combined with other information, can be related to an individual/subject).

To check whether your agency is implementing privacy protection procedures successfully, please consider the following:

- Are all staff aware of the underlying principles of information privacy, as well as their responsibilities in complying with the Code?
- Do you have relevant policies and procedures in place that reflect sound practice?
- Do you have mechanisms in place to ensure that staff are competent and adequately informed / trained?
- Are your policies and procedures regularly reviewed?
- Do you have clearly established communication pathways which are promoted, to ensure timely responses to enquiries from clients, their families, carers or staff?

Strong privacy protection can help to build client trust and ensure that when information is shared, it is complete and reliable.

Direct health support

Funds Management acknowledges the importance of establishing good practices in medication management, record keeping, treatment of minor injuries and related communication practices to ensure effective provision of direct health support.

The [Direct Health Support of People with a Disability Policy](#) provides a framework for the provision of direct health support to people with a disability, including those people who have complex health support needs. Direct health support can include supporting a person with their medication, with emergency seizure management or with nutrition via a gastrostomy.

The Policy applies to services provided or funded by DCSI, including Disability Services and non-government disability services funded by Disability SA. It applies to accommodation services, day

options placements, centre based day activities, recreation activities, respite services and other settings where DCSI funding is utilised for the provision of direct health support.

The Policy aims to assist service providers to:

- have clear processes for assessing the level of support required by people with a disability
- enable them to define what level of training their support workers will require
- identify people who require a Registered Nurse (RN) involved in their care.

Access to skilled and experienced support workers will ensure that people with disability who have complex health support needs receive the level of care they require.

The Policy is supported by the [Direct Health Support of People with a Disability Guideline](#). The Guideline aims to assist agencies and their support workers to plan and deliver health support to people with a disability, including those with complex health needs. The Guideline outlines assessment indicators, Registered Nurse (RN) involvement, as well as support worker competencies and training requirements. It aims to assist agencies and their support workers to plan and deliver the health support that individuals, including those with complex health needs, require.

The ongoing provision of supervision, monitoring and review of client health status and support worker competency is a shared responsibility between the provider agency and the supporting RN. Communication between the provider agency or case manager, support workers, individuals, their families and / or carers, health professional(s), and the RN, are vital to the effective delivery of health supports to people with a disability.

To enhance your organisation's ability to effectively manage the direct health support of people with a disability, please consider:

- whether your organisational policies and / or procedures align with, and make reference to the DCSI sector-wide Direct Health Support policy and guideline.
- the importance of clearly defining and documenting the role and responsibilities of all parties involved.
- the different procedures that may be required to effectively manage direct health support needs compared to the response / treatment of minor injuries (e.g. written records, notification of senior management and information provision to families and carers)
- establishing and promoting clear communication pathways with clients, their families, carers and staff.
- the mechanisms needed to ensure that staff are competent and adequately informed / trained.
- seeking feedback and / or suggestions for improvement when reviewing your organisational policies and procedures.

Communication

Effective communication in disability services supports individual decision-making, assists in the management of complex care needs or medical issues and can prevent complaints or conflicts from occurring or escalating.

Services tend to focus on how to communicate with people with disability. However, communication may also take place between support workers, managers, supervisors, advocates, family, friends, carers of people with disability and with other service providers.

Here are some basic principles for good communication that should be used in all situations:

- Keep people informed.
- Give reasons why / why not.
- Consult and listen.
- Be open and direct.
- Honest and frequent feedback.
- Encourage people to seek clarification.
- Encourage people to take on responsibility.
- Be respectful.
- Integrity (only say what you can do).
- Explain what information is kept private and when it may be necessary to share such information.

Communicating with **people with disability** may also need to be carefully planned. For example, is the information in accessible formats, are the right people on hand, is there adequate time available and are staff aware of and use translation or relay services?

The [Interpreting and Translating Centre](#) (ITC) provides comprehensive, high quality, confidential and professional interpreting and translating services. For further details, please contact:

Interpreting Telephone: (08) 8226 1990

Translating Telephone: (08) 8226 1980

Likewise, the [National Relay Service](#) offers a phone solution for people who are deaf or have a hearing or speech impairment. For further details, please contact:

TTY/voice calls Telephone: 133 677

Speak & Listen Telephone: 1300 555 727

Internal communication between staff is an important part of risk management as well as supporting the health, wellbeing and choices of people with disability. To review your communication practices, perhaps consider the following questions:

- How do staff currently communicate?
- Are these communication pathways suitable and protect client's privacy?
- What are the reasons staff communicate?
- Do current practices achieve these aims?

Good practices for **communicating with families, friends and carers of people with disability** supports person-centred practice. To improve your practices, perhaps try and reflect on your current communications with family, friends and carers of people with disability and ask them whether they are satisfied with the information they receive or what could be done to make things better.

Other communication resources

Please find below a list of suggested resources which may be useful:

- Karia, Akash (2013) ['10 Timeless Communication Principles'](#)
- Riddle, J (2012) ['5 Things To Practice for Effective Communication Skills'](#)
- Johnson, H., Hagiliassis, N., Solarsh, B., Iacono, T., Di Marco, M., and Quilliam, C. (2011) ['Building the Foundations for Effective Communication for Victorians with Behaviours of Concern Subject to Restrictive Practices'](#) Melbourne: Scope (Vic) Ltd.
- Scope (2013a) ['Communication Bills of Rights Poster'](#), Scope, Melbourne
- Scope (2013b) ['Project Summaries - Research that supports the inclusion of people with little or no speech'](#), Scope, Melbourne
- State of Queensland (2012) ['Better Communication'](#), Queensland Government, Queensland
- Hume, J. (2011), ['Internal Communication Toolkit'](#), CIVICUS, Johannesburg, South Africa, 8 April 2011
- Quilliam, C., Wilson, E. and Wilson, L. (2010), ['Exploring the world of inter-staff communication and its influence on disability service delivery'](#), Presentation at the 10th Annual Disability Support Worker Conference, Melbourne, 17-18 November 2010
- Department of Human Services and Department of Education and Early Childhood Development (2011), ['Family-centred, person-centred support: a guide for disability support workers'](#), State Government of Victoria, Melbourne.

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