

2.2 RISK MANAGEMENT POLICY AND PROCEDURE

1.0 Purpose

To ensure that risks to participants, workers and the provider are identified and managed.

2.0 Scope

This policy applies to:

- All ESG Inclusive Homes employee, whether permanent or casual, contractors, volunteers, and stakeholders; and
- All Participants, their families, carers and/or advocates.

3.0 Definitions

Terminology	Definition					
Risk	 Any internal or external situation or event that has: The potential to have a negative impact by causing harm to individuals associated with the organisation Prevents an organisation from successfully achieving its outcomes and delivering its services; or Reducing an organisation's viability or damaging its reputation. 					
Risk Assessment	A process for analysing and controlling risk. Risk assessments assist in determining: - What levels of harm can occur - How harm can occur; and - The likelihood that harm will occur.					

4.0 Policy

ESG Inclusive Homes is committed to proactively identifying, managing, evaluating, and mitigating organisational risks to ensure safe and effective operation and delivery of support to participants that is consistent with ESG Inclusive Homes risk management system. ESG Inclusive Homes maintains a documented risk management system through comprehensive registers that effectively manages:

- Risk assessments that are regularly undertaken and include the following:
 - Consideration of the degree to which participants rely on the provider's services to meet their daily living needs; and
 - The extent to which their health and safety would be affected if those services were disrupted.
- Incident management
- Complaints management and resolution
- Financial management
- Governance and operational management
- Human resource management
- Information management
- Work health and safety
- Emergency and disaster management; and
- Prevention and control of infections and outbreaks.

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The Director and/or appointed delegate is ultimately responsible for identifying and managing risks that impact or have the potential to impact ESG Inclusive Homes. ESG Inclusive Homes employees (where applicable) are expected to act responsibly to minimise risk to themselves and others, and report hazards and other risks as soon as they are noticed.

ESG Inclusive Homes maintains appropriate insurance covers including Public Liability Insurance, Professional Indemnity Insurance and Comprehensive Car Insurance which can be provided in a physical copy upon request.

5.0 Procedure

ESG Inclusive Homes risk management system provides a transparent and systematic approach to risk management that is provides clear accountability, ownership, and governance.

The risk management model below underpins ESG Inclusive Homes approach to risk management:

Terminology	Definition		
Identify	Identify the risk events that may prevent or delay the achievement of ESG Inclusive Homes strategic goals and objectives.		
Analyse	Outline the causes, impacts and existing treatments to assess the consequence and likelihood of the risk and determine the risk rating. Escalate incident reporting where the risk rating indicates decision making is required to be made at management level.		
Treat	Implement existing and future treatments to prevent or mitigate the risk.		
Monitor And Report	Continually monitor and evaluate the risks and treatments to maintain the effectiveness and appropriateness in ESG Inclusive Homes risk management.		
	Provide regular reports and updates to assure ESG Inclusive Homes and its stakeholders that risks are being appropriately managed and treated.		

5.1 Identification of Risk

- Specific risks to each participant are identified and recorded using an *Initial Assessment and Support Plan Form* during the initial intake assessment process
- It is the responsibility of ESG Inclusive Homes employees to record any identified risk to participants, employees and all other stakeholders on a *Risk Identification Form* which is to be sent to the Director and/or appointed delegate and or their relevant management team

5.2 Analyse

The Director and/or appointed delegate are responsible for entering and categorising risks into ESG Inclusive Homes *Risk Register* according to the following broad categories:

- Incident management
- Complaints management and resolution
- Financial management
- Governance and operational management
- Human resource management
- Information management
- Work health and safety
- Emergency and disaster management; and

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- Prevention and control of infections and outbreaks.

Once categorised, the Director and/or appointed delegate are responsible for entering the relevant information associated with the identified risk including but not limited to:

- A description of the risk
- The date the risk was identified
- Risk rating
- Potential consequences of the identified risk
- Actions required to eliminate, mitigate, or control the identified risk
- Changes or proposed changes to existing controls; and
- Risk review dates.

Once entered, the Director and/or appointed delegate are responsible for analysing the root causes, significance and potential consequences of the identified risk and determine a risk rating.

5.3 Risk Calculation Process

5.3.1 – Enter Risk Information

			FICATION REGISTER													
		Identification of As	pects of the Business			Risk	Significance =	impact + legal -	likelihood x fr	equency				Objecti	ves & Targets	
Ref.	Business Objective	Aspect Category	Aspect Description	Impact Description	Impact Upon Business	A - Impact (1 to 4)	B - Legal (1 to 4)	C-Likelihood (3 to 4)	D - Frequency (1 to 4)	Risk Significance	Risk Level	Response Priority	Compliance Obligation	Methods	Goals & Objectives	Target
1	Qualified and reliable staff providing services to participants	Human Resources	Recruiting Issues	Difficulty finding appropriatley trained staff	Damage to business reputation, unable to fulfil obligations to participants, financial loss	4		3	3	34	High	Mitigate the Risk	EBA	Create employee incentives, seek feedback from current employees about areas that could improve	Employee retention and positive work culture	Retain current and proseptive employees for a minimum term of 18 months
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5.3.2 - Determine Significance of Risk

Significance of Risk	Risk Significance Criteria								
Significance of Kisk	1	2	3	4					
A. Impact	Low	Noticeable	Great	Severe					
B. Legal Requirement	No Regulations	Guidelines & ACoPs	Standards	Laws & Regulaions					
C. Likelihood	<0.1%	10%	50%	>95%					
D. Frequency	Almost Never	Rare	Regularly	Always					

5.3.3 - Calculate Risk Rating

Impact Exposure							
Score	Risk Level	Response Priority	Management Control Action (MCA)				
1 to 7	Low	Accept the Risk	No mitigation, no action is required, the risk is ALARP. Monitor to ensure that the risk remains tolerable at this level. Maintain assurance that the risk remains tolerable at this level. Monitor and manage by routine procedures, unlikely to need specific application of resources (managers and key staff).				
8 to 13	Medium	Transfer the Risk	Tolerable if the cost of reduction would exceed the improvement gained. Mitigate through management by specific reviews and monitoring of procedures (Managers) but regular monitoring should occur.				
14 to 19	14 to 19 High		Tolerable only if risk reduction is impractical or if cost is disproportionate to the improvement gained. Mitigate by implementing controls to reduce the risk to as low as is reasonably practicable. Where this cannot happen, continual monitoring should occur.				
20 to 24	Very High	Avoid the Risk	Intolerable, the risk cannot be justified, expect in extraordinary circumstances. Mitigate by ceasing all related activities.				

5.4 Treat

The Director and/or appointed delegate and relevant management teams are responsible for implementing strategies to assist in the prevention and mitigation of existing and future risks which may include but is not limited to:

- Starting or continuing an activity likely to create or maintain a positive outcome
- Modifying the likelihood of the risk so to increase possible beneficial outcomes
- Trying to manipulate possible consequences so to increase the expected gains
- Sharing the risk with other contributing parties (if applicable) by providing additional resources which could increase the likelihood of possible beneficial outcomes
- To avoid the risk by deciding to stop, postpone, cancel, divert, or continue with an activity that may be the causation for an identified risk for that risk; and/or
- Seek external professional advice, if required.

5.5 Review

The Director and/or appointed delegate is responsible for monitoring and reviewing the ESG Inclusive Homes risk management practices including the ongoing development, implementation, review, and improvement of ESG Inclusive Homes risk management model which includes but is not limited to:

- Supporting the ongoing implementation of risk management in all areas of ESG Inclusive Homes operations
- The identification, analysis, treatment, monitoring and reporting of risks
- Providing regular reports and updates to assure ESG Inclusive Homes and its stakeholders that risks are being appropriately managed and treated.
- Ensuring employees understand relevant risk management responsibilities
- Fostering a positive risk-aware culture within their area of responsibility
- Ensuring all necessary insurance policies are in to protect ESG Inclusive Homes as an organisation, as well as employees, participants, and all relevant stakeholders
- Financial and asset management
- Service delivery and participant and occupational health and safety
- Environmentally responsible practice
- Working with vulnerable peoples such as those with as disability, older people, and children)
- Business continuity and disaster management and recovery; and
- Fire safety, building and equipment maintenance and security systems.

The Director and/or appointed delegate will review ESG Inclusive Homes *Risk Register* monthly and report on risks relevant to individual areas of influence. The Director and/or appointed delegate will include reports on actions taken to mitigate high risks and risk awareness and identification on agendas for staff meetings.

5.6 Participant-Related Risk Assessments

Regularly conducted risk assessments are a critical component of ensuring the safety and well-being of individuals who rely on a service provider for their daily living needs. These assessments go beyond the typical evaluation of potential risks and delve into the unique circumstances of participants. They carefully consider the degree to which individuals depend on ESG Inclusive Homes services to meet their essential daily living requirements. Furthermore, these assessments comprehensively analyse the extent to which the health and safety of participants would be compromised if these vital services were ever disrupted. This approach not only helps identify potential risks but also allows service providers to develop robust contingency plans and strategies that prioritize the security and continued support of those they serve, ensuring a more resilient and responsive care environment.

ESG Inclusive Homes completes a comprehensive Intake Assessment and Support Plan at initial contact with a participant to identify potential risks. ESG Inclusive Homes then completes Participant

Risk Assessments on a regular basis to ensure identify any potential risks to a participant. Each participant is to have a *Participant Emergency and Disaster Management Plan* completed and regularly reviewed to ensure comprehensive measures can be put in place if a participant's vital services were ever disrupted.

5.7 Ongoing Training and Development

Upon commencement of employment, all employees will undergo a comprehensive training induction which will include risk assessment and management training. *Annual Performance Reviews* will assess employee awareness of this *Risk Management Policy and Procedure* and their roles and responsibilities in respect to risk management. Additional on-the-job and formal training will be provided where required which will be monitored by the Director and/or appointed delegate.

6.0 Related Documents, Legislation, Regulations and Standards

- Participant Handbook
- Incident Report
- Risk Register
- Risk Management Plan
- Feedback, Compliments and Complaints Register
- Continuous Improvement Plan
- Business Emergency and Disaster Management Plan
- Employment Register (including risk-assessed roles)
- Quality and Continuous Improvement Register
- National Disability Insurance Scheme Act 2013
- National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018
- National Disability Insurance Scheme (Practice Standards-Worker Screening) Rules 2018
- NDIS Code of Conduct
- NDIS Terms of Business
- Corporations Act 2001

7.0 Policy Review

This *Risk Management Policy and Procedure* will be reviewed tri-annually to ensure that ESG Inclusive Homes operates in accordance with legal, regulatory and company standards. This process will include a review and evaluation of current practices and service delivery types and locations, relevant policies and procedures, forms and registers and will incorporate ESG Inclusive Homes employee, participant, and other stakeholder feedback.

ESG Inclusive Homes *Quality and Continuous Improvement Register* will be used to record and monitor progress of any improvements identified and where relevant feed into service planning and delivery processes.

ESG Inclusive Homes may make changes to this *Risk Management Policy and Procedure* at any time to allow for continual improvement, evaluation, and implementation of best practices to improve the effectiveness of its operation.