

# **NDIS Practice Standards Certification Guidebook**

## Contents

<b>1</b>	<b>National Disability Insurance Scheme (NDIS) Practice Standards overview .....</b>	<b>3</b>
<b>2</b>	<b>Steps to Certification.....</b>	<b>3</b>
2.1	Initial Inquiry.....	3
2.2	Client Set Up and Contact.....	4
2.3	Initial Certification Process.....	4
2.3.1	Stage 1 Audit .....	5
2.3.2	Audit Planning .....	5
2.3.3	Stage 2/Certification Audit.....	7
2.3.4	Reporting.....	7
2.4	Certification Decision.....	8
2.5	Non-Conformances .....	8
2.5.1	Minor Non-Conformances.....	8
2.5.2	Major Non-Conformance .....	9
2.6	Observations .....	10
<b>3</b>	<b>Steps after Registration Approval .....</b>	<b>10</b>
3.1	Provisional Certification .....	10
3.2	Surveillance/Mid-Term Audits.....	10
3.3	Re-Certification Audits.....	11
3.4	“Out of Cycle” Assessment.....	12
<b>4</b>	<b>Auditor Team and Auditor Competency.....</b>	<b>12</b>
<b>5</b>	<b>Critical Risks.....</b>	<b>12</b>
<b>6</b>	<b>Suspension, Termination or Refusal of Certification .....</b>	<b>13</b>
<b>7</b>	<b>Standard Owner Information .....</b>	<b>13</b>
<b>8</b>	<b>Confidentiality.....</b>	<b>13</b>
<b>9</b>	<b>Additional Obligations .....</b>	<b>13</b>
<b>10</b>	<b>Observers .....</b>	<b>14</b>
<b>11</b>	<b>Misleading Statements .....</b>	<b>14</b>
<b>12</b>	<b>Complaints and Appeals .....</b>	<b>14</b>
12.1	Whistle-blower Policy .....	15

This Certification Guidebook is designed to assist your organisation on the requirements for certification to the National Disability Insurance Scheme (NDIS) Practice Standards.

## **1 National Disability Insurance Scheme (NDIS) Practice Standards overview**

The National Disability Insurance Scheme (NDIS) Quality and Safeguards Commission (the "NDIS Commission") is the Federal Government regulatory body overseeing the administration and regulation of the NDIS. The NDIS Commission manages the register of providers of NDIS services and supports and is responsible for the registration of NDIS providers in New South Wales and South Australia from 1 July 2018, from 1 July 2019 for providers in Australian Capital Territory, Victoria, Queensland, Northern Territory and Tasmania, and from 1 July 2020 for providers in Western Australia.

All registered providers must undertake a third party quality assessment by way of either certification or verification against the NDIS Practice Standards. NDIS Providers who provide complex supports or are Australian corporations or associations are required to undertake certification to the NDIS Practice Standards. This involves an audit against the Core Module that will assess:

- Risk, governance and operational management
- Rights and responsibilities
- Provision of supports
- The environment in which the supports are delivered

The audit may also cover additional supplementary NDIS Practice Standard modules if your service delivery includes behaviour support, early childhood supports, specialised support coordination or specialist disability accommodation.

BSI is approved by the NDIS Commission to undertake quality audits against the NDIS Practice Standards. All functions related to approved quality auditors and the assessments are covered under the *National Disability Insurance Scheme Act 2013* (Act).

In addition, the Commission may utilise BSI for surveillance activities and outputs for its complaints investigation processes, compliance notices, banning orders, enforceable undertakings, and/or injunctions.

## **2 Steps to Certification**

The following section outlines the steps for engaging BSI as your Approved Quality Auditor (AQA) for NDIS Practice Standard certification. BSI reserves the right to provide its clients and those that request quotations with marketing and technical information relating to standards, training and compliance services.

The delivery of certification services by BSI is in alignment with ISO/IEC 17065:2012. BSI Group is accredited by JAS-ANZ for ISO 17065:2012.

### **2.1 Initial Inquiry**

Requests for quote for certification to the NDIS Practice Standards will be handled by the BSI sales team. A BSI sales team member will send you a quotation request form so you can provide us with some details about your business and your NDIS service delivery. This will assist us in preparing a proposal that tailors our audit services to your organisation's needs. All quotes are provided free of charge and on a no-obligation basis.

When you apply to become a registered NDIS provider on the NDIS Commission's portal, you will be provided with an 'initial scope of audit' document. Please provide this to BSI along with your completed quotation request form as it outlines what your audit must include and details on your organisation and service delivery. This will also provide information on whether you are required to undertake a certification or verification assessment. Any change in the scope of the audit may impact upon the final cost.

There may be instances where a verification assessment would be more expensive than undertaking a certification assessment. In such circumstances, BSI will provide a separate quote for verification and certification. You may then decide whether to proceed with a verification audit or go through the certification audit process.

## **2.2 Client Set Up and Contact**

Once you have signed the BSI proposal we will begin planning your certification assessment. The proposal together with this document forms the contract between your organisation and BSI. You will receive this guidebook and self-assessment checklists to help you prepare for the upcoming audits.

Your requirements will be entered into our database and a Client Services Officer (CSO) will be appointed to look after your certification assessment requirements. The CSO will be your primary point of contact with BSI and is responsible for ensuring that our assessment services are delivered to your organisation in the most effective manner possible.

The CSO will contact you to -

- discuss your NDIS service delivery in order to plan for the certification assessment including a date for the assessment to take place;
- know your NDIS application reference number (ARN) in order to be able to access your NDIS portal site as required by BSI;
- confirm the NDIS registration groups, number of participants, number of staff and number of sites/outlets in order to plan your assessment;
- for information regarding types of participants receiving services, including disability type, age groups, diversity factors such as whether a participant is indigenous or culturally and linguistically diverse

This is to ensure the composition of the audit team are matched to your organisation's requirements. The duration of the assessment will be based on the information you provide us.

Provision of incorrect information may result in allocation of insufficient time or incorrect technical skill for your service delivery. In such circumstances, the audit may not be able to be completed during the allocated time and additional time may be required at a later date at an additional cost.

## **2.3 Initial Certification Process**

There are two parts to a certification assessment – a stage 1 document review, followed by a stage 2 on site assessment.

Some helpful links to assist you in preparing for your NDIS certification journey are below –

**Workers orientation module:** <https://www.ndiscommission.gov.au/workers/training-course>

**Workers screening:** <https://www.ndiscommission.gov.au/workers/worker-screening-workers>

**Complaint management rule:** <https://www.legislation.gov.au/Details/F2018L00634>

**Incident management rule:** <https://www.legislation.gov.au/Details/F2018L00633>

**Note:** If you are a new provider entering the NDIS market and you do not have any participants for a few or all of your applied registration group(s), you will be required to undergo a provisional audit. In this instance, all requirements of stage 1 and 2 audits stated below apply except for seeking feedback through participants. The purpose of provisional audits is to verify you have a compliant system in place to provide support and service delivery when your organisation has participants in the future.

### **2.3.1 Stage 1 Audit**

BSI will conduct a stage 1 assessment prior to your initial stage 2 certification assessment and prior to every three yearly re-certification assessment. The stage 1 assessment is usually conducted off-site may also be referred to as a "desk-top audit". Stage 1 audit may be conducted on site where request is made by your organisation in writing. This document review/assessment determines your readiness for the stage 2 certification assessment.

Please ensure the self-assessment responses are completed appropriately on your file on the NDIS Commission's portal system.

At the stage 1 audit, a qualified BSI auditor will undertake a review of the following –

- the self-assessment responses completed as part of your registration application, or registration renewal process;
- associated documents (policies, procedures and other documentation) submitted and available through your application record on the Commission's system;
- prior certification or verification outcome, corrective actions & audit report, if applicable;
- any additional requirements raised by the Commission

Your BSI auditor will provide you with a written report following the stage 1 assessment. The report will detail any areas the auditor has identified which needs to be addressed prior to the stage 2 assessment. This report is based on a review of your documents. A more detailed assessment will be conducted during the certification/stage 2 audit at your premises where evidence of implementation will be sighted.

The stage 2 assessment is usually conducted within three (3) months of the stage 1 assessment. The CSO will notify the Commission of the intended stage 2 audit date using the Commission's system.

The BSI auditor will inform you if your organization is unlikely to be suitably prepared for the stage 2 audit. The Commission will also be informed through the Commission's system that the stage 2 audit is likely to be delayed while your organization corrects the identified, or likely to be identified, non-conformances.

### **2.3.2 Audit Planning**

As part of the audit planning process, your organisation is required to -

- Complete the Client Details Form and return to your CSO prior to 8 weeks from the start of your audit. Failure to provide this information to your CSO in a timely manner may result in postponement of your audit;
- Provide a de-identified participant list including all your participants to your BSI auditor. This needs to be completed and returned to the BSI auditor no less than 28 days from the start of your audit. Failure to provide your BSI auditor with a de-identified participant list in a timely manner may result in postponement of your audit. Using this list, the BSI auditor will

randomly select some participants for interview and file review during the audit

- Inform all participants that participation in the audit process by way of interview or file review is an “opt-out” approach. You are required to have a process for identifying any participants who do not wish to be part of the audit;
- Ensure the selected participants are offered information about the audit process and independent support to engage in the process prior to any consent being obtained;
- Ensure the participants are aware that participation at the audit is at all times voluntary and be based on the principal of informed consent. Please note a participant has the right to decline consent for auditing purposes;
- Ensure you have written consent from your selected participants for the BSI auditor to access their records, discuss the participant’s supports or make contact with them, and then disclose those records containing personal information to the Commission;
- Keep a record of all known complaints relating to meeting the requirements of the NDIS. These records must be made available to the audit team when requested;
- Demonstrate you have taken appropriate action to address these complaints through investigation and correct any deficiencies found. These actions must be documented;
- Make all necessary arrangements to allow the assessment activities to take place including participant interviews;
- Ensure you have following documents ready for review by the BSI auditor. Some examples of required documents include, but are not limited to the below
  - 100 Points of ID for business key personnel (e.g. Driver’s License, Passport , Medicare card, Bank card)
  - Business insurances
    - Professional Indemnity & Public Liability – required for all providers
    - Workers Compensation - required for any provider that hires staff, even if that staff is the owner of the business
  - Business plan/Strategic plan proportionate to the size and complexity of your business
  - Policies, procedures, and other documents and records including but not limited to Internal audit schedule/plan, Conflicts Management, Risk Management, Human Resource Management, Performance Management proportionate to the size and complexity of your business
  - Organisation chart to explain your capacity to provide service for each registration group(s)
  - Job descriptions for key roles including delegation of responsibilities
  - Police Checks for all staff
  - Working with Children’s Check for all staff (if applicable)
  - Staff qualifications certificates (in line with the guide of suitability including Professional Body Memberships specific to registration groups)
  - Completion of workers orientation module by all staff
  - Copy of your service agreement
  - Copy of other documents you provide to participants on registration

- E.g. Easy to read documents are required for complaints, incident management, service agreements, the right to have an advocate etc.

Your organization is required to confirm acceptance of the assessment plan in writing to the BSI audit team.

As part of all audits (certification or stage 2/surveillance/re-certification), the BSI audit team is required to seek feedback from a minimum number of participants via interviews and file reviews. We request your co-operation to make necessary arrangements. The BSI audit team will advise you of the minimum number.

### **2.3.3 Stage 2/Certification Audit**

Following the stage 1 assessment, a certification audit (stage 2) assessment is conducted. The certification audit will be carried out on-site by a qualified audit team.

The BSI audit team leader will be in communication with you to plan and prepare for your certification assessment as per Section 2.3.2. He/she will confirm your service delivery information such as the NDIS registration groups, number of staff, number of outlets, and number of participants prior to preparing the assessment plan.

During the stage 2 assessment, the BSI audit team will:

- Confirm your organisation is adhering to its policies, procedures & objectives and conforms with all the requirements of the NDIS Practice Standards;
- Verify appropriate procedures, records, controls and guidelines are in place, and roles and responsibilities are defined;
- Ensure you have obtained prior informed consent from each participant selected to be part of the audit;
- Engage with participants during the audit to collect, examine and analyse feedback with respect to the NDIS Practice Standards and service delivery;
- Review participant files and follow up on issues raised by participants;
- Collect evidence through
  - information directly from participants;
  - information from family/friends/carer/nominees and/or independent advocates (with participant consent);
  - the documented support plan and evidence of the delivery of supports to execute the plan;
  - all the supports delivered by the NDIS provider to the participant

Your BSI auditor will conduct an opening meeting at the commencement of the assessment and conclude with a closing meeting. Your participants should be notified of the opening and closing meeting dates/times in order to participate in the audit process if they wish. At the audit closing meeting, your BSI audit team will provide a written summary of the non-conformances (if any) and discuss the process to address them.

The BSI audit team will ensure the auditing process is respectful of participants and their family and causes minimal disruption to your service delivery.

### **2.3.4 Reporting**

At the completion of the stage two audit, the BSI audit team prepares a written report and completes  
...making excellence a habit.™

all required fields in your record in the Commission's system.

You will receive an audit report even if the recommendation is not to certify, within 14 calendar days of completion of the stage 2 audit.

The audit report will also include the following information:

- whether your organisation will be recommended for full certification or provisional certification (if conditions should be applied to the registration requiring an on-site audit for registration group(s) where service delivery could not be witnessed i.e. where you have no participants)
- Executive summary
- Non-conformances, opportunities for improvement and positive finding areas
- The registration groups, number and type of interviews conducted with participants
- Evidence from reliable sources e.g. documented records, staff and participant interviews, procedures, policies etc.
- Ratings against each outcome and indicator as determined at the time of the audit
  - 3 - Conformity with elements of best practice
  - 2 - Conformity
  - 1 - Minor Non-conformity
  - 0 - Major Non-conformity

If you are unclear of the meaning of anything in your audit report, please contact your BSI auditor.

If you disagree with the findings in the audit report, please follow the process described in section 12: Complaints and Appeals in this document to lodge an appeal of the audit findings.

## **2.4 Certification Decision**

The audit report along with any non-conformance closeout information (if applicable) is subject to an independent technical review process. Certification may be recommended where audit ratings of Conformity (2) or Conformity with elements of best practice (3) have been identified. If non-conformances are raised, certification may be recommended after the actions stated in Section 2.5 are completed. Once the review is completed by the BSI technical team, a recommendation for registration is made to the NDIS Commission.

The final registration decision is made at the discretion of the NDIS.

## **2.5 Non-Conformances**

Non-conformances are categorised as minor (1) and major (0).

It is your organisation's responsibility to respond to the non-conformances detailed in your audit report by the designated time frame. Failure to do so may result in delay in initial certification and suspension or cancellation of your existing certification/registration.

Appropriate outcomes and associated indicators will be further monitored at subsequent audits.

### **2.5.1 Minor Non-Conformances**

Minor non-conformances are audit findings that reveal an isolated incident of non-compliance where -

- There is evidence of appropriate process (policy/procedure/guideline etc.), system or structure implementation, without the required supporting documentation OR
- A documented process (policy/procedure/ guideline etc.), system or structure is evident but you are unable to demonstrate implementation review or evaluation where this is required

Your organization is required to submit a corrective action plan to your BSI audit team leader within five (5) days of the audit's closing meeting. The audit team leader will advise you in writing of acceptance of the corrective action plan.

The corrective action plan must include the following:

- correction (how will you fix the non-conformance?)
- root cause analysis (why did the non-conformance occur?)
- corrective action (how will you fix the root cause of the non-conformance to prevent it from reoccurring?)
- timeframes and responsible people who will action the plan

Minor non-conformances are required to be closed out within twelve (12) months of the assessment. Failure to close minor non-conformances within twelve (12) months of the date of issue will result in a major non-conformance being raised.

### **2.5.2 Major Non-Conformance**

Major Non-conformances are raised where the provider is unable to demonstrate quality and safety system process meet the outcomes and indicators of the applicable NDIS Practice Standards and/or the gaps present a high risk. Three (3) Minor Non-Conformances within the same module may also constitute a Major Non-Conformance.

All major non-conformances must be closed out before recommendation is made to the NDIS Commission for initial certification, continued certification or renewal.

Where the major non-conformance does not place a participant at risk of significant harm, the NDIS provider is required to -

- Submit a corrective action plan to the BSI audit team leader within five (5) days of the assessment. The plan must meet include the information as stated in section 2.5.1 and be accepted by the BSI audit team leader
- Undergo a closeout review of the implemented corrective action plan within three (3) months to close out or downgrade the non-conformance(s)

BSI may conduct the closeout review remotely or on-site. This is determined based on the complexity and nature of the non-conformance, in addition to your location and costs associated with undertaking an onsite closeout assessment. Where practical, BSI will use a range of cost effective methods to close non-conformances via telephone/Skype interviews and desktop reviews.

Your BSI auditor or CSO will contact you to book the non-conformance closeout review following which a written report will be prepared for the NDIS Commission. This will be invoiced at the usual BSI day rate.

If your organisation is currently certified, failure to close out the major non-conformance within three (3) months of the date of written notification, or take action sufficient to downgrade the major non-conformance to a minor non-conformance within this timeframe will result in automatic suspension of certification. If the major non-conformance is downgraded to a minor, that non-conformance is required to be closed out within a further nine (9) months (maximum of twelve (12) months from the

date of issue).

If a minor non-conformance has been escalated to a major, failure to close out the major non-conformance within three (3) calendar months will result in automatic suspension of certification (i.e. a minor non-conformance that has been escalated to a major non-conformance shall not be downgraded back to a minor non-conformance).

## **2.6 Observations**

These are comments, which may include praise, or comments that may be relevant for the next audit. Actions do not necessarily have to be taken for observations however; it is recommended that these have been considered as part of your continuous improvement process.

## **3 Steps after Registration Approval**

### **3.1 Provisional Certification**

If your organization is provisionally approved, a further stage 2 audit may be required once you have commenced service delivery. This generally needs to occur before the mid-term audit.

### **3.2 Surveillance/Mid-Term Audits**

The initial cycle is three (3) years long and begins on the registration approval date.

A mid-term audit must commence no later than 18 months after the registration approval date.

Mid-term audit applies to all providers except where:

- The provider is an individual or partnership and registered for early intervention supports for early childhood only or;
- The provider is registered for Specialist Disability Accommodation (SDA) only or;
- A transitioned provider

Your CSO will contact you prior to your audit to confirm your sites, service delivery, and participant and staff numbers. Your audit duration will be determined based on these details.

The BSI CSO will calculate your audit duration and notify you of the duration and cost of your audit.

For each registration group for which a mid-term audit is required, the audit will assess whether your organisation has met, and is meeting, the following applicable standards for the registration group(s).

- The standards in Part 3 of Schedule 1 of NDIS Practice Standards i.e. Provider governance and operational management
  - Standards relating to provider governance and operational management
  - Governance and operational management
  - Risk management
  - Quality management
  - Information management
  - Complaints management and resolution
  - Incident management
  - Human resource management
  - Continuity of supports

- Any standard for which the previous stage 2 audit identified a need to implement a corrective action plan (any standard where previous non-conformances were raised)
- Any standard specified in relation to the audit by the Commissioner in a written notice given to your organisation

During the surveillance assessment, the BSI audit team will review:

- your compliance with any conditions of registration and any material changes;
- effectiveness in achieving the objectives of the NDIS, as applicable to the scope of registration;
- effectiveness of the management system given the size and scope of the services provided, and progress of planned activities aimed at continual improvement;
- changes in registration groups that require your organization to be certified against additional modules or parts of the NDIS Practice Standards;
- participant feedback through interview and file review (Section 2.3.2 applies)

All non-conformances must be addressed as stated in Section 2.5.

The audit report along with any non-conformance closeout information (if applicable) is subject to an independent technical review process. Once the review is completed by the BSI technical team, a recommendation for continued registration is made to the NDIS Commission.

### **3.3 Re-Certification Audits**

The re-certification cycle for this program is three (3) yearly. A stage 1 audit is required prior to every three yearly re-certification assessment.

In preparation for this stage 1 audit, you are required to complete self-assessment responses indicating any variation or changes that have occurred since your previous self-assessment. This will be reviewed by the BSI auditor.

The purpose of the re-certification audit is to review previous surveillance audit reports and consider the performance of the management system over the most recent certification cycle.

Your re-certification audit must be conducted prior to expiration of certification but no earlier than six (6) months before the registration renewal date. If it is not completed and processed within the required timeframe, your certification will no longer be valid. Extensions and/or changes to these timeframes will only be granted at the discretion of the NDIS Commission.

The CSO will confirm your sites/outlets, participant and staff numbers and service delivery including changes to NDIS Registration Groups, prior to your audit.

The CSO will calculate your audit duration based on these details. You will be notified of the duration and cost.

During the re-certification assessment, the BSI audit team will review:

- effectiveness of the service in its entirety, and its continued appropriateness for meeting the conditions of registration;
- demonstrated commitment to maintain the effectiveness and improvement of the service to enhance overall performance;
- effectiveness of the service with regard to achieving your objectives and the intended results

of service to your participants;

- participant feedback through interview and file review (Section 2.3.2 applies)

All non-conformances must be addressed as stated in Section 2.5.

The audit report along with any non-conformance closeout information (if applicable) is subject to an independent technical review process. Once the review is completed by the BSI technical team, a recommendation for renewal of registration is made to the NDIS Commission.

### **3.4 “Out of Cycle” Assessment**

Any changes to your service delivery, additional registration groups or changes to sites will usually be assessed at the next audit. However, occasionally, it may be necessary to conduct an “extension to scope” audit to assess these before your next scheduled audit.

At times the NDIS Commission may request BSI to conduct an additional “out of cycle” assessment. These audits may be short notice or unannounced and may cover a specified component or all of the applicable NDIS Practice Standards as directed by the NDIS Commission. These will be invoiced to your organisation at the usual BSI day rate.

## **4 Auditor Team and Auditor Competency**

The on-site component of a certification and re-certification audit is conducted by an audit team consisting of a minimum of two (2) auditors. The desktop review, report writing and surveillance audits may be conducted by a single auditor.

All BSI auditors are qualified and experienced and have undertaken the mandatory auditor training with the NDIS Commission. BSI ensures all our auditors are trained in quality auditing principles. We are required to regularly assess our auditors auditing skills by way of written tests and observing them during an audit. We provide our auditors with regular training to ensure consistency between audit teams.

All auditors comply with the Code of Conduct as defined by the NDIS Commission and hold valid police checks.

As far as possible and practical, the composition of the audit team will reflect the service types/registration groups, characteristics of the supports provided and the participants receiving the supports including nature of the disability; cultural background; or other diversity factors.

If required, the audit team may include a technical expert in the relevant field. For example, if you are required to be audited against NDIS Practice Standards Module 1 (High Intensity Daily Personal Activities), the audit team will include a registered nurse with current Australian Health Practitioners Regulation Agency registration, as a technical expert in relation to a clinical matter.

Further information on auditor competency may be provided on request.

## **5 Critical Risks**

Critical risk means any uncontrolled risk which may impact on participant safety.

In the event a critical risk relating to criminal acts or child protection concerns is identified at any audit or otherwise, an appropriate BSI staff will

- immediately notify the Commission and any relevant authorities (such as the police) of the risk
- cease the audit until the Commission notifies BSI that it may recommence

In all other events of critical risks, an appropriate BSI staff will

- document the critical risk, and mitigations taken to date and submit to the Commission using the Commission's system within 24 hours
- provide a written copy of the audit findings at the closing meeting

The Commission will recommend the next course of action.

Critical risks or other serious matters would normally require an on-site follow-up or re-audit within three (3) calendar months. BSI staff will contact you with relevant information.

BSI may also be required to provide the NDIS Commission any additional information in relation to the audit process if requested.

## **6 Suspension, Termination or Refusal of Certification**

In the event your organisation is unable to comply with the requirements of the NDIS Practice Standards, BSI may refuse to grant certification. The decision to refuse certification, and the grounds for the decision, will be communicated to your organisation and the Commission in writing.

If your organisation's certification is suspended, terminated or refused, you are required to withdraw and cease to use any advertising or promotional material that promotes or advertises the fact your organisation is certified.

Non-payment of fees may also lead to suspension of certification.

If your organisation's certification is suspended, BSI will advise your organisation in writing of the processes that will need to be completed to reinstate certification. During the period of suspension your organisation shall continue to pay all fees levied by BSI.

BSI is required to notify the NDIS Commission prior to suspending or withdrawing a certification as well as prior to making any decisions to resolve suspension of a certification decision.

## **7 Standard Owner Information**

The standard owner is the Australian Government NDIS Quality and Safeguards Commission.

## **8 Confidentiality**

BSI will adhere to the requirements of the Privacy Act 1988 (Cth), the Act and instruments, Competition and Consumer Act 2010 (Cth), Work Health and Safety Act 2011 (Cth) or equivalent Work Health & Safety legislation in the jurisdiction of the NDIS provider, and all other relevant legislation or regulations where applicable.

## **9 Additional Obligations**

Your organisation is required as part of the Terms & Conditions to ensure BSI has been formally briefed in a timely manner when any variations occur.

Your organisation is required to -

- Continue compliance with the NDIS Practice Standards and the conditions of certification at all times (including any changes to the scheme as advised by the NDIS Quality and Safeguards Commission);
- Comply with the BSI Standard Commercial Terms and Conditions and obligations as specified

in this document as well as other guidance documentation that may be specifically provided from time-to-time;

- Advise BSI of any changes without delay to circumstances that may affect certification including significant changes in the structure (key responsibilities and management system), ownership and operations of your organisation to enable the impact of such changes to be evaluated;

Other examples of such changes include but are not limited to;

- Authorised Representative, Key Management responsibilities
  - Business name (Legal entity) and Trading Name (where applicable), ABN, Ownership
  - Location, site addresses, business activity/ies, scope of certification, registration groups
  - Number of employees covering all shifts and sites, Contact details, Billing Details
  - Major management system changes and capability information
- Notify BSI of any litigation or serious events or matters that relate to the scope of your certification

## **10 Observers**

From time to time BSI requires an observer to be in attendance at an audit. This may be related to training of new staff and witness assessment of existing staff. It is a requirement of BSI's accreditation that your organisation allows these activities to occur. BSI will, at all times, ensure the use of observers is kept to a minimum and your organisation will be advised prior to the assessment activity. The Observer does not take an active part in an assessment.

## **11 Misleading Statements**

Your organisation is not permitted to use its certification in a manner that could bring BSI into disrepute. This includes making misleading or unauthorized statements. If you are unsure if a statement could be misleading you are advised to contact BSI prior to making the statement. Statements include but are not limited to advertising (including your website) and internal communication.

## **12 Complaints and Appeals**

BSI takes complaints relating to our service delivery seriously and all complaints will be investigated and the originator of a complaint will be advised of the outcomes, as appropriate.

BSI will also investigate legitimate complaints, relevant to operation of the system, from customers of your organization. Organizations shall, at all reasonable times, provide representatives of BSI with access to its premises and records for the purposes of investigating such complaints.

If your organisation's application for certification has been refused, or your organization's certification has been suspended, cancelled, or reduced in scope, you may appeal against the decision.

If your organisation formally disagrees with the audit findings, BSI is required to notify the NDIS Commission within 10 working days of learning of the disagreement, if it has not been resolved within that time.

Should your organisation or its participants wish to raise a complaint with regard to your BSI experience or in the event your organisation wishes to appeal the audit findings or audit outcome

...making excellence a habit.™

please contact:

General Manager - Technical and Operations  
Email: [technical.anz@bsigroup.com](mailto:technical.anz@bsigroup.com)  
Phone: 1300 730 134

Whilst we prefer complaints and appeals to be in writing, BSI will accept complaints and appeals from a variety of platforms.

## **12.1 Whistle-blower Policy**

BSI and our staff are committed to providing services in a safe and honest way. We will support and respect anyone who acts as a whistle-blower to draw attention to alleged abuse or harm in respect of NDIS providers audited by BSI. BSI will support whistle-blowers, who in good faith and without malice, disclose information or raise concerns about alleged improper activity.

This is applicable to members of public, all staff in your organisation including permanent and casual, contract workers, temporary workers, and volunteers. This also applies to any feedback/complaints the auditor receives about alleged wrongdoing during an NDIS audit.

BSI encourages people to speak up, to make complaints and raise concerns about service integrity, safety and quality of NDIS providers audited by BSI.

BSI has good governance and responds appropriately to concerns about alleged harm or abuse, whether that's provided as feedback, a complaint or via a person that acts as a whistle-blower.

People who 'blow the whistle' will be treated fairly and their details will be maintained in a confidential manner.

BSI has a global internal whistleblowing procedure. The process for handling of any whistleblowing in relation to alleged abuse or harm in respect of NDIS providers certified by BSI is below –

1. Anyone can contact BSI via email [technical.anz@bsigroup.com](mailto:technical.anz@bsigroup.com) regarding alleged abuse or harm by/at a NDIS provider certified by BSI
2. BSI staff to whom the disclosure was made will secure any records or information related to the alleged issue
3. Information can be provided in any format (preferably in writing). Claims made in conversation will be documented by the BSI staff receiving the claim. The record of conversation will be shared with the whistle-blower to ensure its accuracy
4. Any information shared about the allegations raised by a whistle-blower will be de-identified to protect the whistle-blower's identity and stored securely
5. The details of the alleged issue will be provided to the NDIS Commission for investigation and action within 24 hours of receipt
6. BSI will await advice from the Commission on the next course of action in relation to the issue

The NDIS Code of Conduct applies at all times.

Where permitted, BSI will keep the whistle-blower and all other relevant parties informed about the process and the outcome of the investigation.

In the event the matter is referred to police or another investigating body, there may be limits on what information can be shared. In this instance, involved parties will be advised of any limitations on the release of information accordingly.