SECTION 1

NOTES ON POLICIES AND PROCEDURES
POLICIES AND PROCEDURES – WHAT ARE THEY?

POLICY

A policy is a statement that reflects the moral, ethical and legal position of an agency or organisation in regards a particular issue or activity.

There are two general types of policy. Most policy documents contain elements of both types.

i) Guiding policies: These are broad statements, such as those in human rights documents and legislation, for example both Commonwealth and Northern Territory Disability Services Acts. They are usually written in a philosophical style, highlighting principles and rights to be achieved and maintained.

ii) Organisational policies: These, as the title indicates, are specific to a particular agency or service and inform day-to-day operation. Organisational policies usually follow on from guiding policies by putting stated principles and rights into practice.

PROCEDURES

Procedures are clear, practical steps to be followed consistently through the whole agency or service in order to meet the policy statement.

WHY HAVE POLICIES AND PROCEDURES?

While the presence of policies and procedures alone will not guarantee better services, the benefits of policies and procedures include;

- Policies and procedures are an objective means of showing an agency is meeting the objectives and principles of the Northern Territory Disability Services Act 1993 and subsequently the best practices outlined in the Northern Territory Disability Service Standards

- Consumers, their families, carers and support workers have a clear framework about what procedures should be followed and why

- The process of drafting policies involves all relevant people including consumers, family members, support workers, management and the wider community, working together for a common goal

- Written policies and procedures are an indication that the agency is operating in a professional and accountable manner

- Decisions made in the agency do not have to be made “on the run”, rather are made in reference to policies and procedures, avoiding risks of inconsistency
Policies and procedures form the basis of comprehensive orientation for any new consumers, family members, support workers or management staff

WRITING POLICIES

Policies are most valid and effective when written in consultation with the people for whom they will have the most importance, namely, consumers, people in their support network (for example family members, carers, agency support workers, staff and members of governing bodies). They should reflect the vision and mission statements of the agency or service.

There are countless ways to write policies and procedures. Listed below are some useful strategies gathered from a range of policy documents from agencies for people with disabilities around Australia.

- Form a working party or committee made up of management, support worker and consumer/family member representatives. This group may only meet once to write one policy, or may be involved in policy writing on an ongoing basis
- Identify what policies and procedures the service needs to meet the standards and to achieve best outcomes for consumers
- Clarify the statements about the service such as the type of services provided, eligibility criteria and service funding arrangements and sources, for inclusion in the policy documents
- Form a consumer/family member focus group to gather the opinions and wishes of agency consumers and families, to review drafted policy documents and to provide feedback to any policy working group or committee
- Seek appropriate expert advice and/or training when required. For example, examine and discuss policy and procedure documents from other agencies
- Make suggested changes to the policy in consultation with the consumer focus group and the agency governing body
- Seek endorsement of the policy and procedure document from the agency governing body
- Add the endorsed policy document to the agency’s policy and procedure manual
- Advise all consumers, family members, support workers and funding bodies of the new or amended policy document and make copies available.

POLICY FORMATS

Listed on the following pages are a number of sample policy writing formats, given on the basis of their clarity and ease of reading. These examples are not
prescriptive, as agencies will have already developed their own policies and procedures, but may wish to examine other samples.
ISO 9000 SYSTEM FORMAT

Many agencies will already be familiar with this format as it is widely used in a range of business and human service agencies. For example, the policy and procedure manual developed by the Disability Services Commission in Western Australia uses this format.

It must be noted, however, that the ISO 9000 format is not necessarily easily understood by the widest audience. Some more “user-friendly” terms are suggested in brackets.

- **Title** *(Name of the policy)*
- **Background** *(About the service)*
- **Purpose and Scope** *(What the service does and who the service is for)*
- **Policy Statement** *(What the service believes)*
- **Procedures** *(Getting the service right for you)*
- **Performance Indicators** *(How we know if we’re doing a good job)*
- **Review** *(Checking we’re doing a good job)*

**Title** *(Name of the policy)*

A title page includes:

- Name of the agency
- Policy title
- Date the policy was written
- Date the policy should be reviewed
- Actual date the review was conducted

**Background** *(About the service)*

Background information includes:

- The vision and mission statements of the organisation
- The type of service it is
- Source(s) of funding.
Having such information in each policy document may appear repetitious, however it ensures each document stands alone even if removed from the agency’s policy and procedure manual.

**Purpose and Scope** *(What the service does and who the service is for)*

This includes:

- A brief description of the purpose of the policy
- Legislation and/or government policies that impact on the policy

The scope of the policy describes the areas or programs within the agency to which the policy applies. For example a particular policy may apply to only one of the services provided by the agency.

**Policy Statement** *(What the service believes)*

This section gives a brief statement of the agency’s position with respect to the specific policy area.

**Procedures** *(Getting the service right for you)*

The procedures are a series of actions or steps to be followed which convert the policy into practice.

**Performance Indicators** *(How we know if we’re doing a good job)*

These indicators are an objective method of measuring whether or not procedures are being followed.

**Review** *(Checking we’re doing a good job)*

The policy should include a review date. While the Disability Services Commission recommend policies be reviewed at least every two years, some policies may require more frequent review periods.

On the following page is an example of a policy written using this suggested ISO 9000 format and adapted from a policy of the Disability Services Commission of Western Australia.
SERVICE ACCESS AND CONSUMER ORIENTATION POLICY
(“HOW YOU CAN USE THIS SERVICE”)

Date Written..................................................

Latest Date for Review ..............................

Date Reviewed ............................................
1. **BACKGROUND (ABOUT OUR SERVICE)**

*(Name of agency)* is a non-profit community organisation established to support people with disabilities and their families living in *(specify town/area).*

The services offered by *(name of the agency)* include *(define services here).*

A management committee elected annually by the members governs *(Name of Agency).* *(Name of agency)* receives its operating funds from *(name of funding body/ies)* in the form of *(insert funding arrangement).*

2. **PURPOSE AND SCOPE (WHAT THE SERVICE DOES AND WHO THE SERVICE IS FOR)**

The purpose of this policy is to set out the circumstances and conditions under which people can be accepted for services with *(name of the agency).* The policy has been written following eligibility criteria outlined in the *Northern Territory Disability Services Act 1993* and Standard 1 of the Northern Territory Disability Services Standards (1999).

This policy applies to *(specify here the scope of the policy).*

3. **POLICY STATEMENT (WHAT THE SERVICE BELIEVES)**

*Insert here any specific eligibility criteria the agency may use and the reason for these criteria.*

*The Northern Territory Disability Services Act (1993) defines disability as;*

a) which is attributable to an intellectual, psychiatric, cognitive, neurological, sensory physical or psychiatric impairment, or a combination of those impairments;

b) is permanent or likely to be permanent;

c) which results in:

i) a substantially reduced capacity of the person for communication, learning or mobility; and

ii) the need for continuing support services; and

d) which may or may not be of a chronic episodic nature.

The agency’s funded activities, as stated in its funding agreement with Territory Health Services, are *(insert description here, for example supported community living, family support, and community access)* and its geographic area of operation is the *(insert name of town/area here).*
The agency recognises the right of consumers to transfer to an alternative service.

The agency recognises its responsibility to adequately orientate consumers new to the service.

4. **PROCEDURES** *(GETTING THE SERVICE RIGHT FOR YOU)*

The following procedures are to be implemented to enable the agency to meet its policy objective of ensuring that, within the constraints of available funding and resources, those people with disabilities who most need the services provided by the agency are accepted for services and that services are only withdrawn at the consumer’s initiative.

The agency will:

- Develop an information brochure in appropriate formats regarding the agency’s services, and distribute it through major health, welfare, and local government and education outlets in the area

- Accept referrals from consumers, family members, advocates, or other government or non-government agencies

- Within two weeks of receiving the referral, meet with the referred person, involved family members and advocates to determine the person’s eligibility for services and collect background information in accordance with agency policy on privacy, dignity and confidentiality

- Make a determination about offering services to persons found eligible, based on the agency’s available resources and the person’s relative need

- If no other eligible persons are currently seeking services, and the agency has spare service capacity, accept the eligible person for services

- If a person is found to be ineligible for services from the agency, refer that person to an alternative service, where such a service exists

- If a person is found to be eligible for services, but the agency is not in a position to provide a service, offer to place the person on a waitlist for agency services and inform the person of the possible waiting time before services might become available

- Contact people who are on the agency’s waitlist at least every three months and advise them of their current status on the waitlist

- Maintain a record of people who have been referred to the agency and denied a service summarising reasons for their being found ineligible or, if found eligible, reasons for being placed on the waitlist
Notify in writing those people found to be ineligible for services giving reasons for the decision

Withdraw services only if requested by the consumer or their legal guardian

If the consumer has elected to no longer receive services from the agency, ask that the consumer or their legal guardian put the request in writing

Develop a comprehensive orientation strategy for all consumers new to the agency. This orientation plan will be individualised as required by the consumer and either be implemented immediately the person enters the service or beforehand if the person requires gradual orientation to the service

5. **Performance Indicators** *(How we know if we’re doing a good job)*

The following performance indicators can be used to measure how well procedures are being implemented:

- An information brochure describing the agency’s services has been distributed at least annually to local health, welfare, education and local government outlets in the area

- People referred for services have been interviewed within two weeks of the referral being received by the agency

- Services have been offered on the basis of eligibility, relative need and available services

- Records have been kept on a central file of people who were found to be ineligible or found to be eligible, but denied services based on insufficient resources or relativity of need

- Eligible people who were unable to access services, have been placed on a waitlist, and are contacted at least three monthly with respect to their progress up the waitlist

- Records are kept on a central file of people who are on the agency waitlist and the contact they have had with the agency while on the waitlist

- The agency has sent a letter informing those not eligible for a service of this decision and the reasons for the decision

- Where a consumer or family has elected to no longer receive services from the agency, the agency has endeavoured to secure that request in writing, has placed the written request on the consumer’s file and has advised the funding body of this outcome
The agency’s orientation plan for new consumers is implemented within appropriate time frames to meet the person’s needs.

6. **REVIEW OF THE POLICY** (*CHECKING WE’RE DOING A GOOD JOB*)

This policy will be reviewed on a two-year basis. However, if at any time legislative, policy or funding changes occur and the policy is no longer appropriate, it shall be reviewed immediately and amended accordingly.
FAMILY PLANNING NSW DISABILITY AND INFORMATION SERVICES UNIT FORMAT

This organisation has written a very useful guide on writing sexuality policy for people with disabilities, which includes a standard format for writing any policy documents. The following is a summary of the unit’s policy writing suggestions.

PRINCIPLE

This is a statement of a principle or right that forms the basis for the policy. For example, principles and objectives of the Northern Territory Disability Services Act 1993 could be used. (Selected Principles and Objectives from the Act are given at the start of each standard description in Section 2).

POLICY

The policy statement spells out the position held by agency or services in regard to a particular issue or activity.

PROCEDURE

Using this model, the procedures are a series of steps to be followed across the agency to achieve consistency. Procedures can also include performance indicators of the success or otherwise of the policy.

RESPONSIBLE PERSON

This model suggests nominating a person responsible for implementing and monitoring procedures.

IMPLEMENTATION AND INDUCTION

This section of the document outlines what training will need to be carried out, with whom and by whom, in order for the policy and procedures to be successful. This section also outlines timelines for policy implementation.

INDICATORS

This section outlines the activities or outcomes needed to measure the success of the policy.

Following is an example of a Sexuality Education policy written in this format and adapted from the Family Planning NSW booklet Rights and Recognition – a guide to sexuality policy and education for people with learning disabilities. This style of writing is shorter and less detailed than that used in the previous example using the ISO 9000 format.
SEXUALITY EDUCATION POLICY

Date Written.............................................

Latest Date for Review .............................

Date Reviewed ...........................................
1. Principle

The (insert name of agency) recognises that people with disabilities are individuals who have the inherent right to respect for their human worth and dignity. In recognising this right the agency affirms the right of consumers to appropriate sexuality education.

2. Policy

It is the policy of the (insert name of agency) to provide consumers with access to a sex education program individualised to their needs, within the first twelve months of them using (insert name of agency).

3. Procedure

- Any sexuality education program will be developed in consultation with the consumer, and the people he or she wishes to be involved, for example, family and friends, support workers
- All sexuality education programs will be guided by the wishes and needs identified by the consumer and if appropriate, his or her guardian
- All sexuality education programs will be developed in collaboration with agencies or individuals with qualifications and experience in developing and implementing such programs

Depending on the needs and wishes of the individual, the program may cover all or some of the following topics;

- Parts of the body
- Puberty for boys and girls
- Social skills including self-awareness, assertiveness, sex roles
- Relationships, marriage, living together
- Parenting and its responsibilities
- Reproduction
- Birth control
- Sexual health including STDs and HIV
- Heterosexual and homosexual relationships
- Each program should be reviewed at least 6 monthly
4. **Responsible Person**

It will be the responsibility of a consumer’s key worker, his or her family, guardian and/or advocate, as well as appropriate and experienced health professionals and health workers, to develop and implement the program.

Complaints about the program should be registered with the Manager of *(insert name of agency).*

5. **Implementation and Induction**

All consumers, their families, friends, advocates and/or guardians, will be made aware of the sexuality education programs offered by the service when they first contact the agency.

All new consumers will, with their consent, have programs developed on commencement with the service.

6. **Indicators**

- All consumers will have an individualised program developed with their consent within three months of commencing with *(insert name of agency).*
- All programs will be reviewed at least 6 monthly
- Consumers will show a greater understanding of human relations and sexuality issues
- Consumers will have opportunities for making friends in their everyday lives
**PLAIN ENGLISH FORMAT**

The following is an example of a policy written in plain English with the intention of making the document as easy to understand as possible for all readers. It differs from the previous examples in that it is written from the perspective of the consumer.

Listed below are three main headings used for this plain English format.

**What is a Policy?**

Gives a plain English explanation of the purpose of any policy document.

**What is this Policy About?**

Gives a plain English explanation of the specific areas covered by the document.

**What Does this Policy Say?**

Gives a plain English description of the procedures to be followed to meet the policy statement.

This section can also cover other related issues and topics as well as describe performance indicators.
SUPPORT FOR PEOPLE WITH CHALLENGING BEHAVIOUR

Date Written..............................................

Latest Date for Review ...............................  

Date Reviewed ...........................................
**Support for People with Challenging Behaviour**

What is a Policy?

A policy is a definition of what a service believes in and the way it thinks services should be provided to people with disabilities.

What is this Policy About?

This policy is about support for people with challenging behaviour.

Challenging behaviour is explained in the Northern Territory Disability Service Standards. It is behaviour where someone could hurt themselves or other people, or act in ways that stops them from going out very often or having many friends. The person’s behaviour can stop them from enjoying a good life.

What does this Policy Say?

The policy says that people with challenging behaviour should be treated with respect. Challenging behaviour happens because someone is trying to express something, not because he or she is a bad person.

How does this Policy Work?

Support for people with challenging behaviour should involve finding out about the person’s life, including their likes and dislikes, any medical, physical or mental health problems they might have and what they would like to do with their lives.

Finding out why someone has challenging behaviour can be complicated and so should be done by someone who is specially trained. This person or group of people has to listen to the person with the challenging behaviour, their family, support workers and friends. Then they will suggest some alternative activities and behaviours for the person to use instead of the negative ones they have already been using.

The person with challenging behaviour should never be hurt, insulted or locked up. He or she should not be given drugs without their permission or the permission of their family or guardian.

Keeping Personal Information Private

Any assessments, reports or files written about a person with challenging behaviour have to be kept in a safe place, to be read only by the people allowed to by the person with challenging behaviour, or his or her legal guardian.

Making Complaints

If a person is not happy with the service he or she is receiving, a complaint can be made to the management of the service. If the person complaining is still not happy with the outcome, he or she can speak with a family or guardian, a support worker, an advocacy service, or the Health and Community Services Complaints Commission.
Acknowledgment

Information in this section has been adapted from:


*Rights and Recognition: A guide to sexuality policy and education for people with learning disabilities*, available from Healthrites Bookshop

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*Standards in Action* (1998) Ageing and Disability Department NSW