



Tip Sheet: Auditing Non-conformities

For NDIS Practice Standards and Quality Indicators

February 2022

Are you preparing to undergo an audit as an NDIS Provider or to renew your registration?

If you answered yes to either of these questions your organisation will be required to undergo an audit to demonstrate compliance with the NDIS Practice Standards (PS). The type of audit you need to undertake (verification or certification) will depend on the NDIS Services and Supports you want to provide as an organisation.

To help you prepare for your audit, we have listed some common audit non-conformities below and have included some tips to help you avoid these pitfalls. This list of non-conformities has been compiled from a variety of sources including [DSC's Common Audit Fails document](#); [Centro Assist's NDIS Audit Outcomes: How You can prevent 3 common non-conformities](#); the NDIS Audit workshop – Addressing non-conformities workshop and from conversations with NDIS Approved Quality Auditors.

Risk management

Providers get a non-conformity in this area because they do not consider or comprehensively assess **all** the below areas of risk within their organisation. Further, providers do not develop or maintain a robust risk management system which links their risk management strategies to the identified risks.

To be compliant in this area your organisation's risk management system should cover risks related to incident management, complaints management, financial management, governance and operational management, human resource management, information management, work health and safety and emergency and disaster management.

Also, your risk management system should consider each participant's individual risks (including their circumstances, supports, living arrangements, health, disability, support networks etc) and apply the appropriate risk treatments required for each participant.

▶ **Tip: Consider each element of risk identified above and keep an up-to-date risk register relating to all areas of organisational risk. Complete a risk assessment matrix and indicate what risk treatments you will put in place to mitigate or eliminate identified risks in each of these areas. Review your risk register regularly.**

Quality Management Systems (Internal Audits)

The NDIS PS state that providers must have "...a documented program of internal audits relevant (proportionate) to the size and scale of the provider and the scope and complexity of supports delivered." Providers get a non-conformity in this area because they do not have an internal audit system in place or because they do not conduct regular internal audits.

Performing regular internal audits can help cultivate a culture of continuous improvement within your organisation. It can also help you confirm via your participants, staff, systems, and processes that your organisation is doing what you say you are doing. This will put you in good stead for your external audit and will also show auditors that your organisation has a commitment to continuous quality improvement as required by the NDIS PS.

▶ **Tip: Have an internal audit schedule in place and abide by it conscientiously. Develop a policy and procedure which includes information on how often you will undertake internal audits, what your organisation will do with the audit results and where information on changes to policy/process/practice resulting from internal audits will be stored as evidence. [Download a copy of the DSC Internal Audit Tool](#) from our website (under Operational Tools and Templates) to help get you started.**

Governance

The NDIS PS requires that "participant support is overseen by robust governance and operational management systems relevant (proportionate) to the size, and scale of the provider and the scope and complexity of supports delivered". Providers get non-conformities in this area for numerous reasons. Firstly, they do not have a clearly defined structure to meet the governing body's "financial, legislative, regulatory and contractual responsibilities to monitor and respond to quality and safeguarding matters" associated with delivering supports to participants (DSC Common Audit Fails).

Secondly, workers (particularly those in risk assessed roles) do not have all the required worker checks in place.

Thirdly, workers appointed in certain positions do not hold the qualifications required for those positions.

Fourthly, providers' policies and procedures and incidents and complaints management systems do not align with NDIS Commission's specific requirements set out in the relevant [Rules](#).

Lastly, providers purchase policies and procedures and do not amend the templates to ensure they accurately reflect what their organisation does and that they are fit for purpose.

▶ **Tip: Define your organisation's regulatory environments and monitor them to ensure they are fit for purpose. Ensure that you are keeping track of all Worker screening requirements. Use our [Worker Screening Compliance Tracker Tool](#) (under Operational Tools and Templates) to help you get started. Invite participants and where relevant their support network to contribute to organisational policies and processes relating to support provision and participant rights. [Download NDS's Risk, Incidents and Complaints Management Resource](#) to help ensure your systems are compliant. If you purchase templates, make sure that these are revised to reflect what your organisation actually does.**

Accessibility of Information

The NDIS PS require that each participant receives information “*using the language, mode of communication and terms the participant is most likely to understand*”. Providers receive non-conformities in this area when participants indicate that the information they are provided (including service agreements) is complicated and inaccessible. All information including advocacy, complaints, decision making, abuse and neglect information should be provided to the participant in a format that they understand.

▶ **Tip: Make sure that information you provide to participants is accessible in different formats, languages and modes. Check to see if participants understand the information, if not, offer them the information in another format. Document their preferred format for future reference and always provide information in that format.**

Worker Training

Training is an element that appears under multiple outcome areas and indicators in the NDIS PS. Providers receive non-conformities in this area because their staff undertake training during induction and there is little or no evidence showing that workers undertake refresher training post induction to reinforce their learning. All workers are required to under the mandatory NDIS '[Worker Orientation Module and Worker Induction Module](#)'.

▶ **Tip: Develop a training register and ensure all staff complete all mandatory training and undertake refresher training on a regular basis. Check in with workers to see if they require training during supervision or performance review sessions.**

Behaviour Support and Restrictive Practices

Implementing providers receive non-conformities in this area because they do not have a system in place to meet the requirements of Module 2A (Implementing Behaviour Support Plans) and the [NDIS \(Restrictive Practices and Behaviour Support\) Rules](#). Non-conformities also arise where Providers do not understand and comply with the Authorisation of Restrictive Practices requirements and reporting requirements. Compliance notices are also issued for failing to take [reasonable steps](#) (and failing to record evidence of the steps taken) to facilitate the development of a Behaviour Support Plan (BSP) within the required timeframes and for the incorrect implementation of BSPs.

▶ **Tip: If you are an implementing provider of Restrictive Practices, ensure that you have a comprehensive system in place to meet the requirements of Module 2A in the NDIS PS. This includes the development of a Behaviour Support Plan (BSP) by a Behaviour Support Practitioner within the required timeframes and the [authorisation of restrictive practices via a Quality Assurance Panel](#). [Download our Module 2A workbook to help you get started.](#)**

Further Resources available at waamh.org.au/ndis

NDIS Quality and Safeguards Commission contact Providers: Telephone: 1800 035 544 Email:contactcentre@ndiscommission.gov.au

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