

1. Purpose

The purpose of this policy is to enable Lighthouse Disability (the Company or LD) to provide transparent and timely information and have open dialogue with clients and their families and/or guardians when an incident or adverse event occurs that results in a client being harmed or at risk of harm.

This policy provides a framework for open disclosure that is supportive of clients, their families and guardians, and employees. Lighthouse Disability's approach to open disclosure adheres to the principles of the Australian Open Disclosure Framework.

2. Scope

This policy applies to all communication with clients and families/guardians following actual or potential harm from an incident or adverse event. Open disclosure applies to all client experiences of actual and potential harm suffered, and does not have to be permanent or serious for open disclosure principles to apply.

3. Responsibilities

3.1 Community Support Worker

- Participate in open disclosure training and education as required
- Support colleagues following an adverse event without attributing blame
- Report complaints, incidents and other adverse events in accordance with organisational policies and procedures

3.2 Service Lead

- Promote an environment that fosters peer support
- Support open disclosure as a client right, organisational requirement, integral part of service delivery, and an opportunity to learn from adverse events and client experiences
- Mentor colleagues preparing for and participating in open disclosure

3.3 Manager, Service Delivery

- Provide advice on the management of adverse events and incidents
- Facilitate open discussion of incidents, framing these as learning opportunities
- Provide information to clients and their guardians on incident investigation and its outcomes



3.4 General Manager, Client Services

- Promote a culture that encourages notification of, and open and honest communications about, adverse events
- Implement processes for identifying and implementing change to improve client safety and wellbeing
- Provide support to staff throughout and after the open disclosure process

3.5 CEO

- Actively promote and disseminate information about this policy to staff
- Integrate open disclosure principles with governance, risk management and quality improvement processes
- Implement appropriate monitoring and review mechanisms for the open disclosure process

4. Policy Statement

Open disclosure is:

- a) A client's right to clear information and support in a way that meets their needs
- b) An acknowledgement or expression of regret that an adverse event or incident has occurred
- c) A core professional requirement and obligation
- d) A normal part of support should an incident or adverse event occur
- e) A critical element of open and honest communication
- f) An important part of risk management and quality improvement
- g) Not a legal process
- h) Not acceptance of blame

Lighthouse Disability:

- Recognises the importance of supporting employees through the open disclosure process.
- Adopts a "no blame" approach to incident investigation.
- Will consider and implement appropriate recommendations to improve practice, services and systems.
- Is guided by the following eight principles that underpin the Open Disclosure Policy.

4.1 Principle 1: Open and Timely Communication

If an adverse event or incident resulting in actual or potential harm occurs, the client and their family/guardian will be provided with timely, open and honest information about what happened in a way that meets their needs. The process will often involve



the provision of ongoing information. Consideration will be given to the needs of the client and their family/guardian in providing appropriate support, which may include referral to an external advocate.

4.2 Principle 2: Acknowledgement

All adverse events and incidents resulting in actual or potential harm will be acknowledged to the client and their family/guardian as soon as practicable. Lighthouse Disability will acknowledge when an incident has occurred and initiate open disclosure.

4.3 Principle 3: Apology or Expression of Regret

As early as possible, the client and their family/guardian will receive an apology or expression of regret for any potential or actual harm that has resulted from the adverse event or incident. This apology or statement or regret is a sincere expression of regret but is not an admission of liability or apportioning of blame.

4.4 Principle 4: Supporting and meeting the needs and expectations of clients and their family/guardians

The client and their family/guardian can expect to be fully informed of the facts surrounding an adverse event or incident and its consequences. They will be treated with empathy, respect and consideration, and supported in a manner that is appropriate to their needs.

4.5 Principle 5: Supporting and meeting the needs and expectations of employees

Through education and training, Lighthouse Disability creates an environment in which all employees are able to recognise and are encouraged to report adverse events and incidents resulting in actual or potential harm. Employees are supported to participate in the open disclosure process.

4.6 Principle 6: Integrated risk management and systems improvement

The review and investigation of adverse events and incidents will focus on risk management and quality improvement, with outcomes aimed to improve the effectiveness of systems.



4.7 Principle 7: Good governance

Open disclosure is underpinned by good governance frameworks, incident and risk management and quality improvement processes. These systems allow for investigation and analysis of adverse events and incidents to prevent recurrence. Good governance involves a system of accountability through the Company's Senior Leadership Team, Chief Executive Officer (CEO) and the Board to ensure appropriate changes are implemented and their effectiveness is evaluated. Good governance will include the organisation's performance monitoring and reporting.

4.8 Principle 8: Confidentiality

Lighthouse Disability's policies and procedures are developed with full consideration of the privacy and confidentiality of employees, clients, and their family/guardians, in compliance with relevant legislation.

5. Legal and Insurer Advice

All written correspondence containing acknowledgement of an adverse event or incident resulting in actual or potential harm will be approved by the Company's CEO. Advice will be sought from LD's insurer if necessary.

Legal advice about the wording of an apology or expression of regret will be sought by the CEO where appropriate. In some circumstances the CEO or insurer may advise that a letter not be sent. In this case, an alternative process for communication will be determined.

Where there is evidence or concern that a client has suffered harm as a direct result of Lighthouse Disability's negligent acts or omissions, prior to engaging in open disclosure advice will be sought from the CEO and LD's insurer will be notified about the incident.

6. Related Documents

6.1 Policies, Procedures and Supporting Documents

- Risk Management Policy
- Client Privacy Policy
- Compliments and Complaints Policy
- Incident Management Procedure

6.2 Standards and Conventions

- Australian Open Disclosure Framework



- Information Privacy Principles
- NDIS Practice Standards
- National Standards for Disability Services

6.3 Legislation

- Freedom of Information Act 1991
- Privacy Act 1988 (Clth)
- National Disability Insurance Scheme Act 2013 (Clth)

7. Definitions

Key Word / Abbreviation	Definition
Adverse event	An incident in which unintended harm resulted to a client.
Apology	An empathetic expression of regret that the person experienced an adverse event.
Expression of regret	An expression of sorrow for the person's experience or the harm experienced by the person. Expressing regret is not the same as admitting liability.
Harm (actual or potential)	Actual or potential impairment of structure or function of the body and/or any deleterious effect arising there from, including disease, injury, suffering, disability and death. Actual or potential harm may be physical, social or psychological. Examples of social and psychological harm include not having dignity, autonomy or beliefs respected, or a person being demeaned or insulted.
Incident	An act, omission, event or circumstance that occurred in connection with providing supports or services to a person with disability and caused harm to the person, or had the potential to cause harm.

8. Document Control

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