

## Safe Transportation of Participants Policy

St Giles Society Limited recognises that transportation for people living with a disability is important to enable full participation in the community and provides tailored service delivery options to meet our participants needs.

The purpose of this policy is to provide guidance and outline the requirements and responsibilities of employees when transporting and/or travelling with participants, and aims to ensure the safety of participants, employees, and broader community. This policy also seeks a commitment from participants, who access transportation related services from our organisation.

We acknowledge that transport assistance may include but not limited to, participants;

- utilising a St Giles' owned vehicle,
- utilising an employee's personally owned vehicle, and/or
- being supported to navigate and access public transport services.

This policy should be read in conjunction with our [Fleet Management Policy](#) that outlines the requirements and responsibilities of employees who are utilising St Giles owned fleet vehicles, and circumstances in which personal owned vehicles can be utilised.

### Policy

As part of the Organisation's risk management framework, St Giles will take all reasonable steps to mitigate risks associated with the transportation of participants and others, recognising that our participants and employees have the right to remain safe when travelling. These include but are not limited to having defined processes for;

- maintaining knowledge of and comply with all relevant legislative and regulatory requirements, Australian standards and best practice guidelines which are reflected within our policies and are embedded within our service delivery,
- monitoring compliance with employee responsibilities, as outlined within the Fleet Management Policy,
- ensuring the coordinated maintenance and timely repairs of St Giles owned vehicles occurs,
- ensuring support staff are familiarised and trained in the safe operation of nominated vehicle(s) that are assigned to worksite(s), through the successful completion of a Vehicle Orientation,

In addition, where participants require transport assistance, effective support planning including risk assessments are undertaken prior to commencement and are to be regularly reviewed by operational leaders when circumstances highlight changes in support needs and/or additional risks.

Risk assessments must identify and assess any risks that transportation may pose to the safety, health or wellbeing of the participant and employees involved in the delivery of services and/or supports and must specify how the identified risks will be managed and minimised.

### Participant Responsibilities

St Giles seeks the commitment from participants and families to;

- disclose any behaviours of concern which may impact on the levels of support and/or the health and safety of our employees,
- collaborate and work with all necessary parties to develop, implement and maintain safe transportation processes relevant to their individual needs, and
- raise concerns or new issues that arise that may impact the delivery of safe and quality services and supports, and
- adhere to all Tasmanian road rules and laws as a passenger, within their capacity.

### Employee Responsibilities

Employees are required to always adhere to all Tasmanian road rules and laws and must take all reasonable and necessary safety precautions to safeguard the health and wellbeing of participants, the broader community and themselves when providing transport assistance and services.

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Employees must ensure that they understand and adhere to the individualised requirements listed within the participant related documentation and seek clarification where necessary. It is also expected that employees utilise travel time with participants to enhance relationships and outcomes for participants that they are supporting.

If an employee ever feels unsafe or unequipped to safely transport a participant, they must notify their leader as soon as practicable and seek support.

Under no circumstances are employees expected to continue transporting a participant whose behaviour may endanger themselves or anyone within the vehicle. In instances where this occurs, employees are to notify their leader and/or manager of the incident via phone, who will provide assistance and determine next steps. An incident report will also need to be submitted through the Organisation's incident management system.

### Safe transportation of participants with behaviours of concern

Behaviours of concern for the purposes of this policy are defined as a participant's behaviour that may distract the driver of a vehicle and/or put themselves or others at increased risk of harm. It is everyone's responsibility to identify and report behaviours of concern, enabling appropriate and timely coordination of services to take place, such as but not limited to Occupational Therapy and Behaviour Support services.

Whilst waiting for referrals to be accepted, St Giles will assess our ability to continue delivering safe transport services and make any amendments possible, ensuring that these decisions are made in consultation with the participant and /or family involved.

Amendments to support strategies that may be considered include;

- adapting the communication and preparation strategies leading up to travel.
- adapting the location that the participant is positioned in the vehicle (for example; seating the participant in the rear seat opposite the driver, and/or seating them in the third row of a larger vehicle where possible).
- the use of standard safety features within vehicles such as, child proof locks and limit window controls to the driver.

Where there is an identified need, mechanical restraints and/or additional accessories to support safe transportation may be considered under the guidance and direction of Occupational Therapists.

Under the [Tasmanian Disability services Act 2011](#), standard car restraints are not considered a restrictive intervention if it is deemed as having a primary use of "therapeutic purpose" or for the "safe transportation of a person".

However, under the [NDIS \(Restrictive Practice and Behaviour Support\) Rules 2018](#), a restraint or device used for the sole purpose of preventing a behaviour of concern to support safe transportation is considered to be a restrictive practice.

It is acknowledged that recommendations and the prescribing of mechanical restraints can also relate to physical needs, and may not relate or have any links to behaviours of concern.

### St Giles as a Prescribing Provider

Our Occupational Therapists have working knowledge of the relevant standards that apply in these circumstances and are positioned to assess and develop strategies that support the safe transportation of participants. Under their guidance and scope of practice, and in collaboration with all relevant stakeholders, our therapists work in the best interest of our participants and those involved in the delivery of services to identify and implement the least restrictive interventions available to maintain everyone's safety.

Where these least restrictive practices are proven to have had limited results on reducing the frequency or severity of behaviours of concerns, our therapists will trial the use of and make recommendations for mechanical restraints or devices in consultation with the participant and/or families, such as but not limited to the use of a buckle guard and/or harness, vest, or special purpose car restraints and/or booster seat etc.

Our Occupational Therapists also ensure that when making recommendations and prescribing restraints and/or devices, that the least modified alternative is used, and that appropriate consultation with all relevant stakeholders and regulatory bodies occurs.

Internal resources, processes and support from our clinical leads are in place to support our therapists when navigating these situations.

### St Giles as an Implementing Provider

St Giles acknowledges and identifies an implementing provider of mechanical restrictive practices for individual participants that have been prescribed a restraint and/or device to prevent and/or minimise the occurrence or severity of a behaviour of concern whilst travelling.

Where this known, St Giles will ensure that appropriate authorisations and/or approvals are sought, detailed documentation is maintained within participant files, and that this is effectively communicated with those directly involved in the service delivery. Employees who are responsible for the safe transportation of a participant, are also supported and trained in the appropriate use of these and emergency protocols, which may be facilitated through therapist led training (where required), team meeting discussions and shadow shifts hosted by experienced staff.

St Giles has effective internal processes in place to fulfil our mandatory reporting requirements. Where clarification or additional guidance is required, consultation and advice will be sought from the prescribing provider and relevant state based and federal regulatory bodies.

### Safe transportation of participants in wheelchairs

St Giles recognises that there are additional considerations and requirements needed to enable safe transportation services for participants requiring the use of wheelchairs and are well positioned to meet these needs.

### St Giles as a Prescribing Provider

Our Occupational Therapists have working knowledge of the relevant Australian Standards that apply when considering equipment needs and/or strategies, and how these link to safely accessing the community and travelling in vehicles and prescribe items that adhered with these.

On occasion, where there are no suitable items that meet the participants need that adhere to the Australian Standards, consideration to alternative items may be given if conditions stipulated by the Commissioner for Transport can be met to seek an exemption. Our teams are equipped to support participants and their families through this process, where it is recommended.

Participants and families must note that a non-Australian Standards approved restraint or device cannot be provided to them until proof of exemption is provided.

For more information on the Australian Standards, participants and families are able to consult with their therapist.

### St Giles as an Implementing Provider

Effective service planning for individual participant takes place to facilitate safe transportation services and St Giles relies heavily on the advice and guidance of the Occupational Therapists and regulatory bodies to ensure compliance is upheld and adhered to at all times. This is documented within participant records and effectively communicated with those directly involved in the service delivery.

In addition, established protocols are in place that define what St Giles considers to be safe work practices in order to deliver quality services, recognising that participant specific training will compliment and work in addition to our standard outlined processes.

Where required, St Giles will ensure that appropriate authorisations, approvals and/or exemptions relating to mechanical restraints for therapeutic purposes are sought, detailed documentation is maintained within participant files.

Employees must ensure;

- that they have read and understood the individual participant's manual handling plan prior to commencing transport related assistance, and that they have been shown via shadow shifts how to safely perform the required tasks,
- that the participant's headrest is firmly in place prior to entering the vehicle,
- that the participants are forward facing in their wheelchairs, and that the wheelchair breaks are engaged,
- that the wheelchair is firmly secured using the four identified tie down or anchor points as specified by the wheelchair manufacturer, and that the tie down straps are in good order with no signs of wear and tear (such as fraying, rips and/or other damage etc.),
- that all other removable non-essential objects attached to wheelchairs such as cushions, trays and fittings that could detach during an accident are removed, fastened securely and stored safely within the vehicle, and
- that all recommendations and instructions provided by a prescribing provider are adhered to.

If employees are unable to facilitate and adhere to all of the above, then the planned travel must not take place, and alternate options considered. Immediate notification must be made to a senior staff member and/or operational leader, raising the relevant concerns.

### St Giles related Vehicle Agreements

St Giles maintains our Operator Accreditation through Department of State Growth, for the provision of safe transport services utilising St Giles owned and modified vehicles, that are fit for purpose for wheelchair access and use. The vehicles are well maintained and subject to annual inspections as part of the accreditation requirements, and are offered and assigned to our Support Independent Living (SIL) properties, whereby participants can elect and enter into a Vehicle Agreement for the regular use of transport related services. These agreements focus on mutually agreeable terms and agreements, and outline the financial contributions required of participants.

In some instances, St Giles may enter into an agreement with participants and families, enabling employees to drive participant owned vehicles. This agreement focuses on mutually agreeable terms and agreements that can uphold our commitment to providing safe and quality services, and a safe working environment for our employees.

### Motor Vehicle Accidents / Incidents

Employees who are responsible for the safe transportation of participants, must ensure that they understand their duty of care, and ensure that they have read and understood the Fleet Management Policy that provides guidance on the standard response to a motor vehicle accident.

To support this, St Giles will ensure that appropriate transport protocols, including what to do in an emergency are thoroughly documented within individual participant records.

Where mechanical restraints are in place, seat belt cutters must be available (with appropriate labelling easily identified on the restraint advising of its location). Employees are responsible for checking this prior to commencing each trip. Any concerns are to be reported to the participant and/or family to coordinate a suitable replacement, and notification must be made to their leader as soon as practicable.

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The immediate safety of our participants and employees is at the foremost of priority when responding to an accident, and where required, emergency services must be sought. Employees are to follow the directions provided by ambulance services and support the participant to exit the vehicle if safe to do so.

Our support services employees are trained in First Aid and CPR and are positioned to render first aid assistance when required.

In addition, all St Giles owned vehicles are equipped with first aid supplies and a mini fire extinguisher. Our support services employees are encouraged to maintain a basic first aid kit within their personal vehicles, where these may be utilised for the safe transportation of participants.

### Breach of Policy

In circumstances where breaches to this policy are identified regarding participant responsibilities, St Giles reserves the right to refuse on-going services and must provide reasoning to the participant and all involved stakeholders, within a 24-hour period, as outlined within our [Service Delivery Policy](#).

In circumstances where breaches to this policy are identified as a result of employee actions, disciplinary action may be taken. Employees are encouraged to seek clarification pertaining to any of the requirements outlined within this policy, if there is any uncertainty.

### Relevant Legislation and Standards

- [Tasmanian Road Amendment Rules 2016](#)
- [Tasmanian Disability services Act 2011](#)
- [National Disability Insurance Scheme Act 2013](#)
- [NDIS \(Restrictive Practice and Behaviour Support\) Rules 2018](#)
- AS/NZS 1754 Child restraints systems for use in motor vehicles
- AS/NZS 8005 Accessories for child restraints for use in motor vehicles
- AS/NZS 4370 Restraint of children with disabilities, or medical conditions, in motor vehicles

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