NSW GOVERNMENT Communities & Justice

NSW Restrictive Practices Authorisation System User Guide

Part 4: Recording Outcomes and Decisions

Version 5.0

Version Number	Updated By Description	Date of Update
5.0	Central Restrictive Practices Team *Update in line with System upgrade*	October 2020
4.0	Central Restrictive Practices Team *Update in line with System upgrade*	04/06/2020
3.0	Central Restrictive Practices Team *Update in line with System upgrade*	05/08/2019
2.0	Central Restrictive Practices Team *Update in line with System upgrade*	11/01/2019
1.0	Central Restrictive Practices Team *Release*	13/11/2018

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1. Purpose of the User Guide

1.1 Introduction

The Restrictive Practices Authorisation (RPA) User Guide (the User Guide) has been developed to assist NDIS Registered Service Providers (Service Providers) and Behaviour Support Practitioners (Practitioners) navigate the NSW (DCJ) RPA System (the System) in order to implement and comply with the RPA Policy and Procedural Guide. This user guide aims to provide the link between policy and practice.

The NSW Restrictive Practices Authorisation System User Guide ***Part 4: Recording Outcomes and Decisions*** takes users through the Outcome Summary and details how to record decisions made by the Restrictive Practices Authorisation Panel.

The User Guide has been updated and divided into 6 parts to allow users easier access to information. Each part is related to specific steps within the RPA System, therefore ***Part 4: Recording Outcomes and Decisions*** should be read in conjunction with all 6 parts (see following page).

This User Guide will be progressively updated as additional functions are added to the System.

Throughout the User Guide,

BEST PRACTICE SUGGESTIONS

have been included that your organisation may wish to use when establishing RPA processes.

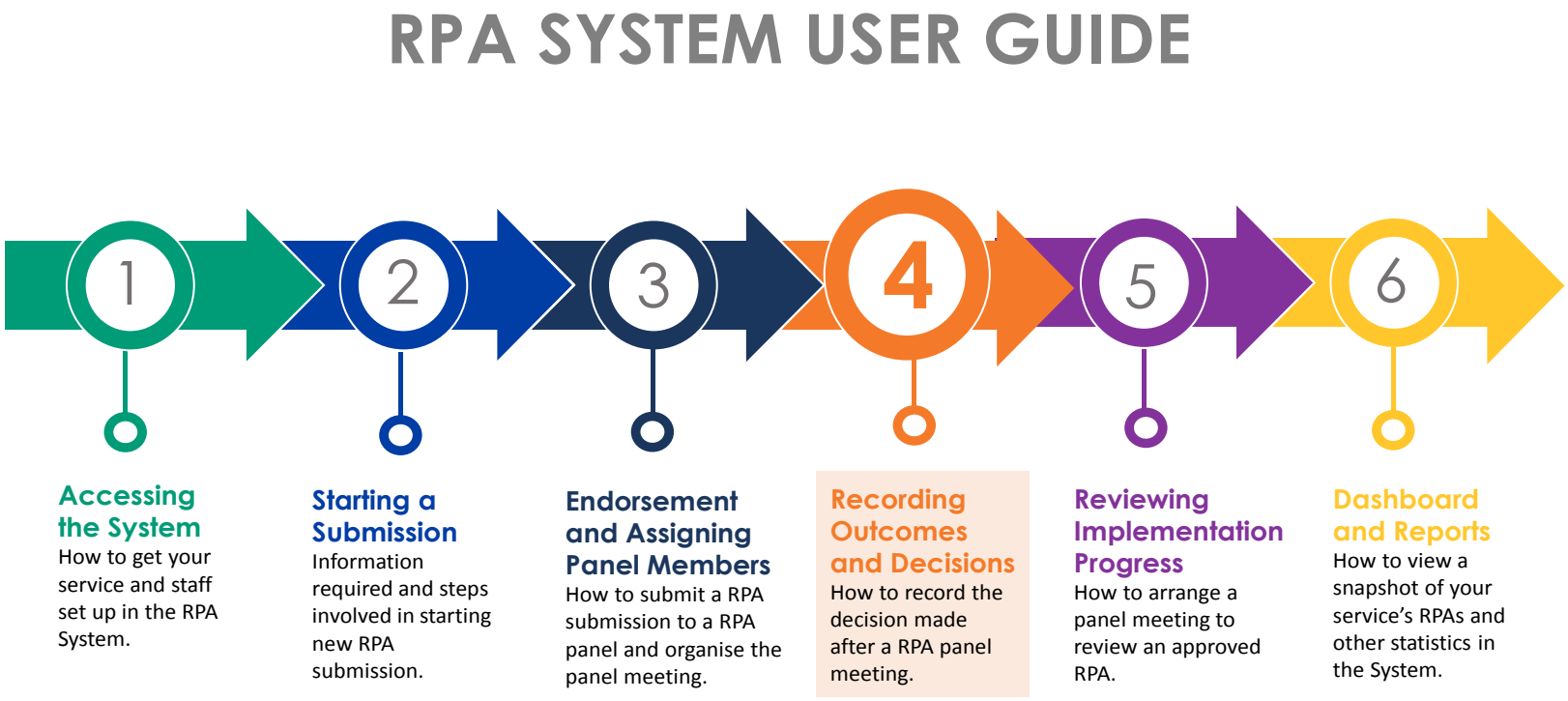
Quick Reference Guides

Quick Reference Guides are highlighted throughout the guide.

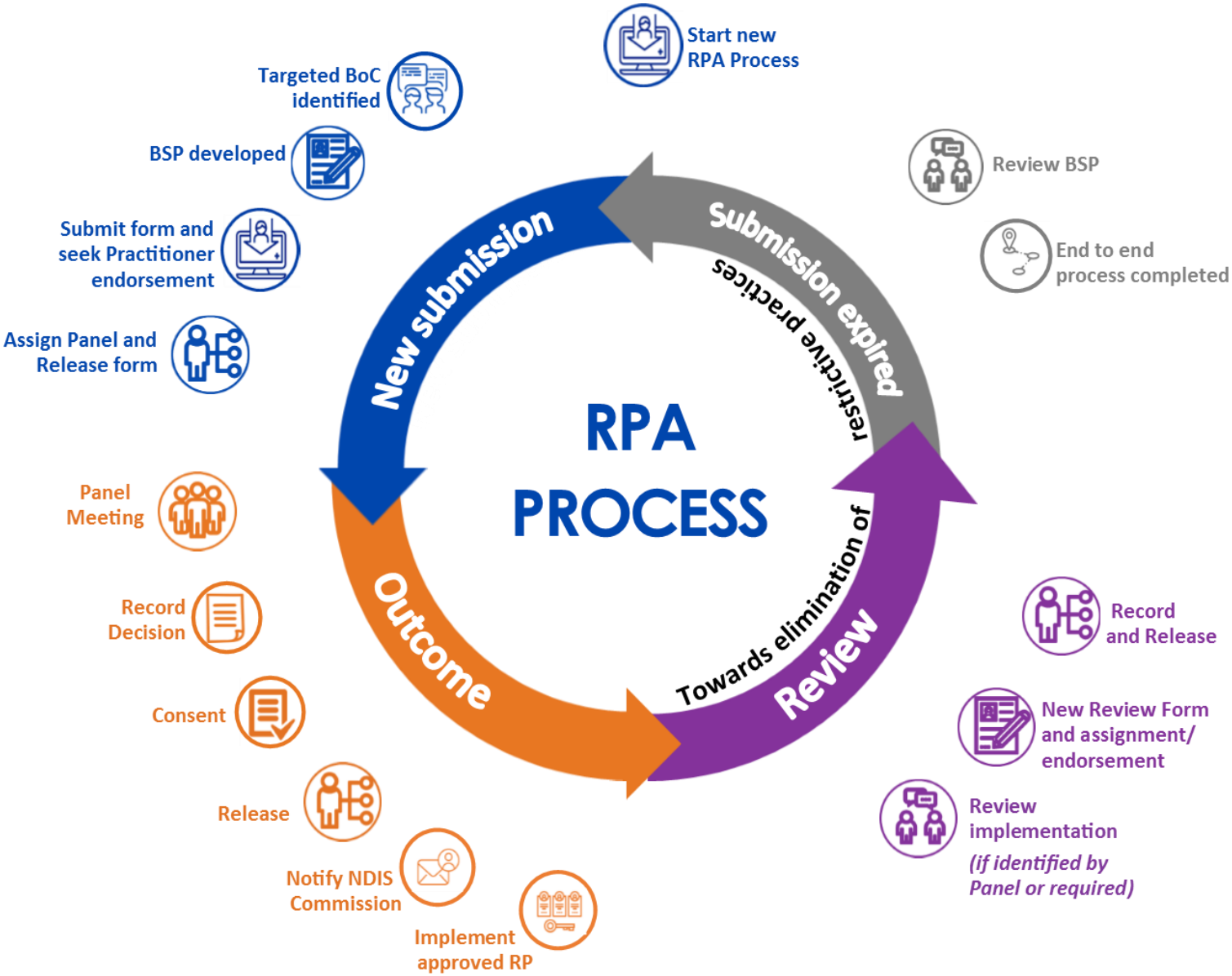
They can be found in the System under the Help menu.

1.2 How to use the User Guide

The RPA System User Guide has been divided into the following Parts:



1.4 Authorisation Process Map



2. The Outcome Summary explained

2.1 Status of the Outcome Summary

The 'RPA with Outcomes' (*Outcome Summary*) is created when the release button is clicked on the RPA Submission Form.

➔ *Refer to* ***User Guide Part 2: Submitting an Application*** and ***User Guide Part 3: Lodging a Submission***

The status of each section of the Outcome Summary will be referred to through out this User Guide:

Status: New

1	**Status: New**	Entering information into Sections 1 - 6 of the RPA with Outcomes is the first stage of recording the decision made at the RPA Panel. The Status of the RPA with Outcomes will be *New*.
2	**Status: Pending Panel Approval**	Clicking on '*Release*' after all information has been entered into Sections 1 - 6, opens up Sections 7 - 8 of the RPA with Outcomes. The status of the RPA with Outcomes will change from *New* to *Pending Panel Approval.*
3	**Status: Pending Consent**	Once all Panel members have approved the RPA with Outcomes, Consent is to be entered. The *Complete* button is to be clicked which finalises the end to end RPA process. The status will change from *Pending Consent* to *Completed.*

Panel Approval & Consent can occur concurrently.

2.2 Button Descriptors

The below buttons appear at the bottom of the screen during the different stages of the RPA with Outcomes:

Release	• This button releases the information to all the Panel members for approval. • The information already entered in the RPA with Outcomes will be locked.
Back	• Clicking on this button will take you back to the RPA with Outcomes page.
Unsubmit	• Once all the information has been released, the information in the RPA with Outcomes is locked. • Clicking Unsubmit unlocks the previous section and allows the applicant to edit information, if required. *Once the RPA Form is released again, new notifications are sent to the Endorsing Practitioner and all Panel Members.*
Save	• This button saves all information entered in the RPA with Outcomes.
Create Review	• Once the RPA with Outcomes is completed, a Review can be created if required.
Print	• This button opens up a PDF version of the RPA with Outcomes that can be printed or saved. This is what is sent to the NDIS Commission.

3. Convene the Panel

Refer to User Guide *Part 3: Endorsement and Assigning Panel Members* for clarification of the roles required on a RPA Panel

The Panel's decision to authorise a RRP is to be unanimous.

The implementing Service Provider is required to hold a properly constituted RPA Panel meeting which meets membership requirements.

3.1 RPA Panel for Planned Authorisation

The Panel can meet face to face, via teleconference, or webinar. The objective is for the Panel to come together to discuss the RPA application and make an informed decision as to whether the RPA submission will be approved, approved with conditions, or not approved.

- The Panel is required to evaluate the appropriateness of a proposed RRP and determine whether it is the least restrictive option available, or whether it will achieve the intended therapeutic outcome. The Panel will do this by considering the BSP, other relevant documentation and recommendations.
- The Panel is to have a regular schedule to enable:
    1. Systematic consideration and progression of applications.
    2. Regular monitoring, review and reporting of RRPs in accordance with the requirements set out by the NDIS Commission.

Unauthorised Restrictive Practices are Reportable Incidents.

- The decision regarding authorisation must be recorded using the Outcome Summary.

No member of the Panel can also bring forward an application for the Panel's consideration.

3.2 Interim Authorisation, no Panel required

Refer to User Guide *Part 3: Endorsement and Assigning Panel Members* for clarification of the roles required on a RPA Panel

In exceptional circumstances, RRP may need to be rapidly implemented. Interim authorisation should be sought as soon as practicable, not exceeding 1 month.

A Senior Manager of the implementing Service Provider can provide interim authorisation based on an interim BSP written by a behaviour support practitioner.

The Senior Manager should consider the content of the interim behaviour supports and be satisfied that the strategies outlined represent the least restrictive option.

- The decision regarding authorisation must be recorded using the Outcome Summary.
- Interim Authorisation should be for the shortest duration required to minimise the risk.

Full (planned) authorisation should be obtained within 6 months, or the restrictive practice(s) should be discontinued.

Application for an Interim RPA follows the same process as a Planned RPA until the assignment of Panel Members.

➔ Refer to ***User Guide Part 2: Starting a Submission*** and ***User Guide Part 3: Lodging a Submission***

4. Outcome Summary

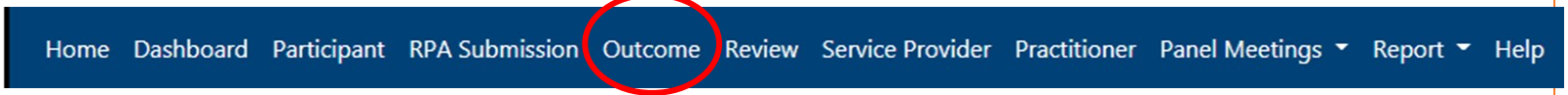
Outcome
Status: New

Before you can start a RPA with Outcomes in the RPA System, a RPA Submission must have been entered in the System and *released*.

➔ ***User Guide Part 2: Submitting and Application*** *and* ***User Guide Part 3: Endorsement and Assigning Panel Members.***

The Senior Manager on the Panel must complete the Outcome Summary.

4.1 How to find the Outcome Summary

Step 1	Navigate to 'Outcome' in the menu bar: 
Step 2	Search for the Participant by Submission ID number, Outcome Status, Participant ID or name.
Step 3	Click the Outcome ID hyperlink to access the outcome summary.

BEST PRACTICE SUGGESTION

Having access to the System during the Panel means information can be immediately recorded on the Outcome Summary.

Note: the session will timeout if left inactive for 10 minutes. If this happens, log back in.

4.2 How to start an Outcome Summary

Outcome
Status: New

Once the Panel has discussed the application and have come to a unanimous decision, the Senior Manager enters the Panel decision into the System.

Outcome ID Number

Each RPA Form will have its own unique Outcome ID number.

This number can be used when searching within the System, and is linked to the Submission ID number.

Section 1 of the RPA with Outcomes

1. NDIS Participant Details

This section has been pre-populated from the information entered into the RPA Submission Form.

To change or update participant details in the System:

➔ Refer to ***User Guide Part 2: Submitting and Application***

Section 2 of the RPA with Outcomes

2. RPA Application Details

Section 2 has been pre-populated with the following:

- Submission ID number,
- Behaviour Support ID (if applicable), and
- Submission Type
- Behaviour Support Plan Expiry Date

To open the RPA Submission press Ctrl and click on the **Submission ID** hyperlink. The RPA Submission will open in a new browser tab.

Information entered in the RPA Submission cannot be changed via the Outcome.

Outcome
Status: New

Section 3 of the RPA with Outcomes

3. Proposed Restrictive Practice

This section has been pre-populated with the following information from the RPA Submission Form:

- Service Setting
- Behaviour of Concern
- Restrictive Practices Category
- Description of Proposed Practice/Strategy
- Fade-out strategies

The Proposed Restrictive Category information entered in Section 6 of the RPA Submission Form can be viewed by clicking the View Details button.

Hover Help is available throughout the RPA System. Clicking on the '?' symbol, will open up a brief summary that may provide assistance to you when entering information in the System.

The Proposed Restrictive Practices information will open in a pop up box.

To close the Restrictive Practices pop up box, click on the *back* button.

Quick Reference Guides

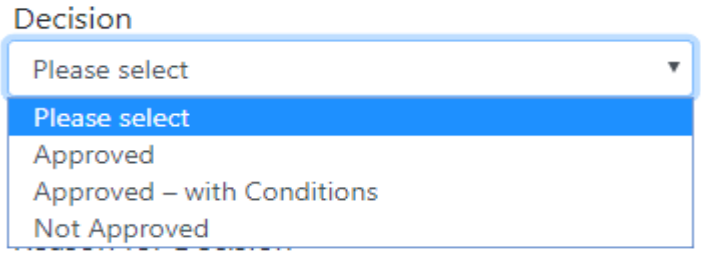
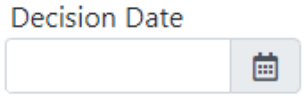
Restrictive Practices Authorisation—Complete a RPA Outcome Summary

Outcome
Status: New

4.3 Entering the RPA Outcome Decision

Section 4 of the RPA with Outcomes Form

4. RPA Outcome Decision

Step 1	Chose the decision the RPA Panel has made from the drop down list: 
Step 2	Enter the Decision Date: 
Step 3	Enter the Meeting Date: 

The Panel's decision to authorise a restrictive practice is to be unanimous.

The Panel needs to discuss the restrictive practice and come to a decision. Therefore, the Decision Date entered ***cannot*** be before the Meeting Date.

Outcome
Status: New

Step 4	A description of why the authorisation was given/declined must be recorded for each RPA submission to a Panel. Recording what was discussed and why a RPA Panel made a particular decision in the 'Why was the authorisation given/declined' field will assist Service Providers to implement, monitor and report on their Organisation's authorised practices.  When recording the Reason for Decision, remember that most recipients of the Outcome Summary will not have been present at the discussion, so it is important to provide a detailed summary of the Panel's discussion and rationale for the decision.
Step 5	The 'Conditions' field is an optional field. If the RPA Panel has applied specific conditions on the authorisation of a practice then this is where they should be recorded. RPA Panels should schedule a Review to monitor actions taken regarding the conditions.

Approved - with Conditions

If the decision of the RPA Panel is *Approved - with Conditions*, the Conditions field becomes mandatory.

When *Approved - with Conditions* has not been selected, the Conditions field is not mandatory.

Outcome
Status: New

Step 6	In the 'Panel Recommendations' field, any additional suggestions/actions that the Panel have determined would be useful for the situation presented in the submission should be recorded here. These are not conditions and the field is optional.
Step 7	Enter the RPA Expiry Date:  The RPA Expiry Date cannot be prior to the Panel Meeting Date.

RPA Expiry Date

The RPA expiry date cannot go beyond the expiry date of the BSP.

Refer to Section 2 of *User Guide Part 1: Accessing the System*

Interim authorisation:
Cannot exceed a *total* of 6 months from the decision date.

Planned authorisation:
Cannot exceed a total of 12 months from the decision date.

Consent

Consent cannot expire before the RPA Expiry Date.

Outcome
Status: New

Step 8	If a Review is required as part of the lifecycle of this particular authorised restrictive practice, then the 'Panel requires a review of use' box should be ticked: ☐ Panel requires a review of use Once the box has been ticked a review date should be entered in the 'Review to occur by' field. The Review to Occur by date is not the same as the RPA Expiry Date. The Review to Occur by date should occur at an interval/s during the authorisaiton period and not shortly prior to the RPA Expiry Date. Where a review date is set by the Panel, the System will automatically generate a draft. If a review is not required, do not tick the box.
Step 9	If the Panel decides that a review is required within the authorisation lifecycle, then enter the 'Review to Occur By' Date: Review to occur by The 'Review to Occur By' date is *not the same* as the RPA Expiry Date. The 'Review to Occur By' date should be *prior to* the RPA Expiry Date. Where a review date is set by the Panel, the System will automatically generate a *draft* Review Submission in the System.

Prior to a RPA Expiry Date, a new RPA Submission Form is to be started.
A Review is a review of a current authorisation, it is ***not*** re-authorisation.

Reviews

A Review can also be initiated after the RPA with Outcomes has been completed, if required due to a number of circumstances, including if a practice is to be ceased or has been superseded.

For further detail, refer to ***User Guide Part 5: Reviewing Implementation Progress***

Outcome
Status: New

Section 5 of the RPA with Outcomes

5. Add any additional documents to support the decision

The Panel can upload any notes or other supporting documents from the Panel meeting into the System, as required, by choosing the **Add Files** button.

Section 6 of the RPA with Outcomes

6. Documents Required for Next Review

If a Next Review Date has been entered by the Panel, the Panel can choose to request additional documents be provided at that Review. This will be recorded within the System, and will be mandatory to provide at the first Review (but not for any adhoc reviews).

This is not a mandatory field within the System. If additional documents are not requested by the Panel, the Panel does not have to complete this field within the System.

Refer to *User Guide Part 5: Reviewing Implementation Progress*

Once all information has been added to the RPA with Outcome, click the **Release** button.

The status of the RPA with Outcomes will change from *New* to *Pending Panel Approval.*

All Panel Members will receive an email notification requesting they log into the system and **Approve** the RPA with Outcomes.

Section 7 of the RPA with Outcomes

Outcome
Status: Pending Panel Approval

7. Evidence of Formal Consent

Enter the Consent Giver details in the System:

- Enter the Date of Consent and the Consent Expiry Date.
- Provide a description of the type of consent provided. For example, verbal or written consent.
- The Senior Manager can upload consent documents to the System by choosing the **Add File** button, if required.
- Once all consent details are entered into the System, either:

  I. click the Save button, if you are still waiting for the Panel to approve, or

  II. Click the **Complete** button if all Panel members have approved the RPA with Outcomes.

Consent is a mandatory requirement for the use of a restrictive practice.

If Panel Members have approved the RPA with Outcomes prior to Evidence of Formal Consent being entered in the System, the status will change from *Pending Panel Approval* to *Pending Consent*.

Section 7 and Section 8 can occur concurrently, and the Outcome Status will reflect the current status.

Reference Documents:

Appendix 3: Consent.

Outcome
Status: Pending Pending Consent

4.4 Panel Member Approval

Section 8 of the RPA with Outcomes

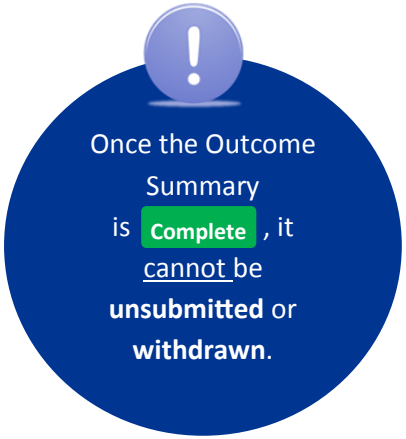
8. Panel Member Approval

Once the RPA with Outcomes has been *released*, all Panel Members will receive an email notification stating that there is one or more outcome summary(s) awaiting endorsement on the System.

All Panel Members are required to log into the System within 24 hours, to **Approve** the Outcome Summary.

Approving the Outcome Summary indicates that the Panel Members agree with the decision and Reason for Decisions recorded in the Outcome Summary.

The status will then change from *Pending Panel Approval* to *Pending Consent*.



Subject: NSW Restrictive Practices Authorisation - Outcome Summary Awaiting Approval

Dear Panel Member,

You have the outcome summary [Outcome Summary ID number] awaiting your endorsement on the NSW restrictive practice authorisation (RPA) portal.

The submission is for [Participant name], [DOB] and the panel held on [date of Panel] convened by [Panel convenors name] on the Panel.

Please provide your endorsement of the decision by [Date by which endorsement is required]. You can access this application and all associated material at https://rpa.facs.nsw.gov.au

Should you have any questions regarding this application, please contact the panel convenor, [Panel convenors name] at [Panel convenors email] or [Panel convenors phone number]

4.5 Completing the RPA with Outcomes

Outcome
Status: Completed

Once consent details and all Panel approvals have been entered in the System, the Senior Manager completes the RPA with Outcomes by clicking the **Complete** button.

The status will change from *Pending Consent* to *Completed.*

Once completed, the System will automatically send a notification email to the RPA Submission applicant to advise that acknowledgement from all the Panel Members has been received, and the decision for one or more RPAs (Submission ID numbers) has been finalised.

The Service Provider can now **Print** the Outcome Summary form to provide to the NDIS Commission to meet their legislative requirements.

Outcome Summary is ready to view

When approval from all Panel Members has been received, the System will send a notification to all involved in the RPA Submission advising that the Outcome Summary is complete and ready to view.

Subject: NSW Restrictive Practices Authorisation - Outcome Summary Awaiting Approval

Dear Panel Member,

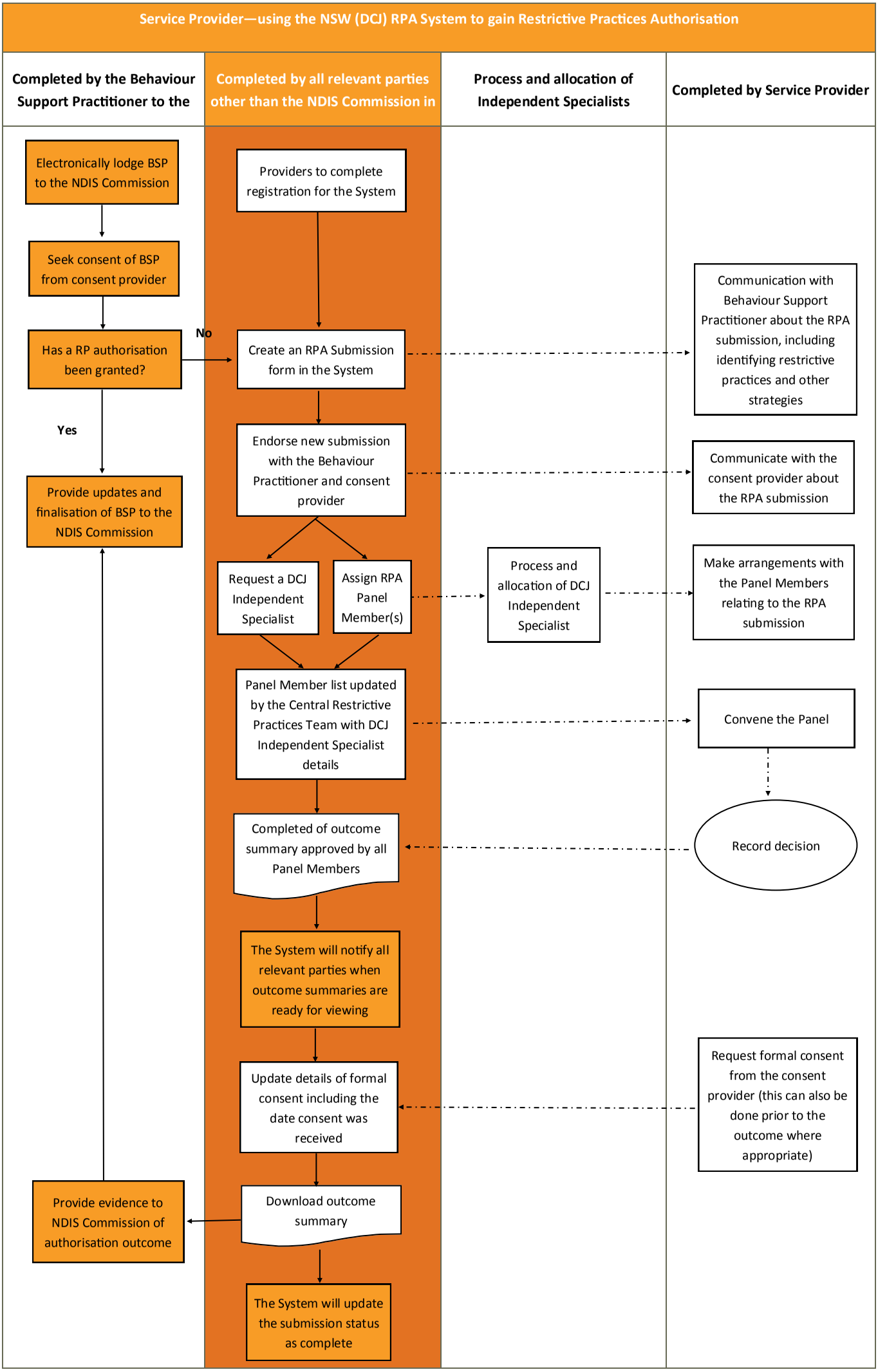
You have the outcome summary [Outcome Summary ID number] awaiting your endorsement on the NSW restrictive practice authorisation (RPA) portal.

The submission is for [Participant name], [DOB] and the panel held on [date of Panel] convened by [Panel convenors name] on the Panel.

Please provide your endorsement of the decision by [Date by which endorsement is required]. You can access this application and all associated material at https://rpa.facs.nsw.gov.au

Should you have any questions regarding this application, please contact the panel convenor, [Panel convenors name] at [Panel convenors email] or [Panel convenors phone number]

Appendix 1: Flow Chart: Using the NSW (DCJ) RPA System



Appendix 2: Documents applicable for an RPA Submission

Documents considered evidence for the use of RPA Panel Members include, but are not limited to, the following:

Interim RPA Submissions	Planned RPA Submissions	Other documents you could consider including for all RPA Submissions	
• Consent • Interim Behaviour Support plan	• Consent • Behaviour Support Plan • Functional Behavioural Analysis • One Page Profile	• Data Collection Summary • Evidence of Implementation Training • Lifestyle Plan • Behaviour Assessment Report • PRN Protocol	• Medical Report • Medication Chart • Risk Assessment • Court Order

Seclusion	• Seclusion Register (This is the same as the data you have submitted to the NDIS Commission as a part of your reporting requirements)
Chemical Restraint	• PRN Protocol and/or Medication Chart • Medical Reports • Information on side effects and symptoms of overdose
Mechanical Restraint	• Restraint Register (This is the same as the data you have submitted to the NDIS Commission as a part of your reporting requirements)
Physical Restraint	• Restraint Register (This is the same as the data you have submitted to the NDIS Commission as a part of your reporting requirements)
Environmental Restraint	• No additional documents are required

It is best practice to provide more than just the mandatory documents.

You need to provide enough detail so Panel Members can make an informed decision about the submission. Not enough detail in the submission could affect the RPA Outcome.

Appendix 3: Consent

Consent for the BSP is separate to consent for the RRP.

Consent is the permission given by the person (where they have the capacity to consent), or the person with authority to consent on that person's behalf (where they do not have capacity to consent).

Consent must be voluntary, informed, specific and current. Consent requirements for RRPs are summarised in the below table: RPA Consent Requirements. *Refer to section 4.3 of the Restrictive Practices Authorisation Policy for further information.*

Consent is needed to use a RRP as a component of an overall BSP.

The Service Provider must ensure that the person, or their consent giver, has been informed of the use of RRPs; the requirement for the RRP to be submitted to the System; and the Outcome Summary from the Panel.

Consent must be obtained from the participant or their guardian at two different points within the System:

1. **Submit a RRP in the System**
   - Ticking the box at this point indicates that the Consent Giver is aware that an RPA submission is underway.
   - Ticking the box does not imply a formal consent to implement an authorised practice. The Service Provider must ensure that the Consent Giver has been informed – this could be by the Practitioner or the Service Provider.

2. **Consent to the Outcome Summary**
   - Providing evidence of Formal Consent at this point indicates that the Consent Giver has been informed of the outcome of the Panel. The panel convenor is required to complete this section and is responsible for ensuring the Consent Giver is notified of the outcome.

Person	Practice			
	Physical or Mechanical Restraint	Chemical Restraint	Environmental Restraint	Seclusion
Children (under 18 years) ***not*** subject to court order reallocating parental responsibility	Parent of Guardian*	Parent of Guardian*	Parent of Guardian*	PROHIBITED
Children (under 18 years) subject to court order reallocating parental responsibility	Person with parental responsibility+	Person with parental responsibility+	Person with parental responsibility+	PROHIBITED
Young people (16-18 years)	Either: a) The person where they have the capacity, or b) Guardian with a restrictive practices function	Either: a) The person where they have the capacity b) The person responsible c) The Guardianship Division	Either: a) The person where they have the capacity, or b) Guardian with a restrictive practices function, or c) The RPA Panel mechanism±	PROHIBITED
Adults (18 years or over)	Either: a) The person where they have the capacity, or b) Guardian with a restrictive practices function	Either: a) The person where they have the capacity b) The person responsible c) The Guardianship Division	Either: a) The person where they have the capacity, or b) Guardian with a restrictive practices function, or c) The RPA Panel mechanism±	Either: a) The person where they have the capacity, or b) Guardian with a restrictive practices function

* *With approval of the principal officer of the designated agency in accordance with Clause 26 of the Children and Young Persons (Care and Protection) Regulation 2012 as appropriate.*

\+ *For children who are subject to a court order reallocating parental responsibility, evidence of the court order must be provided.*

± *The RPA mechanism may direct that an authorised environmental restraint (e.g. response cost or restricted access) strategy may be implemented in the absence of consent in certain circumstances.*

Notes:

1. Androgen-reducing medications prescribed to control behaviour, while not psychotropic, fall under Special Medication (or dental) Treatment and can only the Guardian Division can consent.
2. The consent of the person(s) with appropriate legal authority does not release the registered NDIS provider from the ethical imperative to have access to or to establish and maintain a RPA mechanism which evaluates, authorizes and monitors all instances of the use of a regulated restrictive practice by its staff.