APMP9.1

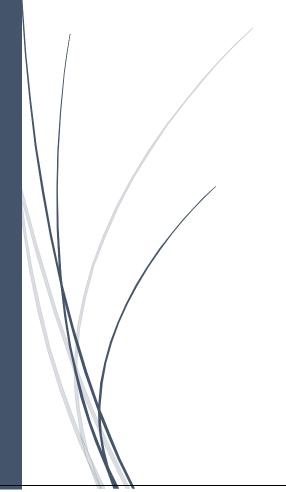
# Risks Management System

This document contains:

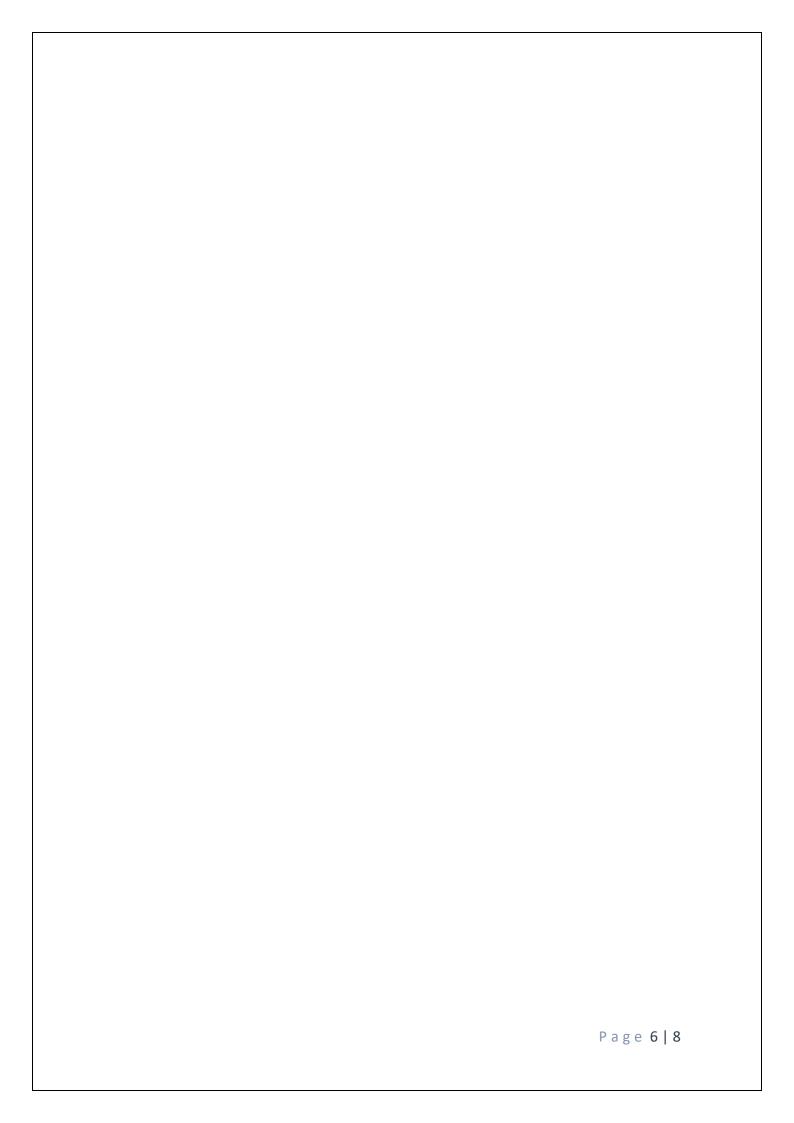
A>Instructions how the Risk management system can be used

B> The way Risk Matrix is to be used

C>The format of the Risk Register used at Agile Plan Management Pty Ltd ("APMP")



DOCUMENT REF: APMP9.1/ REVISION DATE: 22-08-25 APPROVED BY: STANLEY JAYANTHAKUMAR - DIRECTOR



# Risk Management System

### **Risk Ownership**

Risk management is the responsibility of APMP and consequently the Director is responsible, in consultation with his/her staff, if any. If new workers are added, the risk register should be brought to the attention of all employees working with the Participants of APMP.

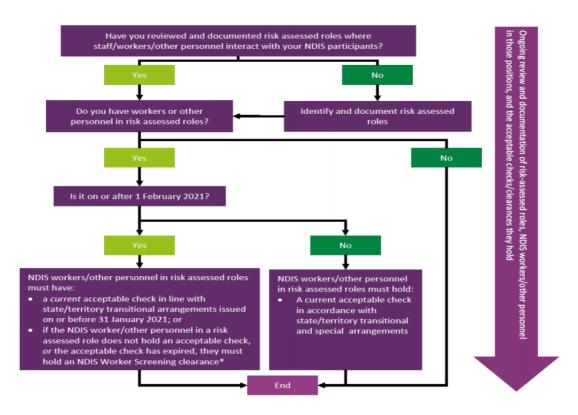
#### Worker screening risks when applicable

A critical part of the risk register is an action component to address the additional controls identified as required to reduce the risk to an acceptable level.

A risk that cannot be eliminated must, nevertheless, be recorded in the relevant risk register along with a list of controls to be in place to reduce the risk to an acceptable level. These accepted risks will be monitored by the Director on a regular basis.

The prime risk of APMP is relating to new worker screening checks which is not relevant to APMP right now with one Director/Worker. This risk will suddenly emerge when a new worker is added to APMP.

This flowchart explains the worker screening checks or clearances that must be in place if you are a registered NDIS provider supporting NDIS participants with workers in risk assessed roles.



<sup>\*</sup> In some states or territories, local laws may, in certain circumstances, permit a registered NDIS provider to allow a worker to begin working in a risk assessed role after they apply for a Worker Screening Check but before they have been granted a clearance.

If the laws of your state or territory allow you to engage the worker in a risk assessed role after submitting an application, but before an outcome has been issued, you must have appropriate safeguards in place.

The potential risks would be identified that would create a situation that would contradict the code of conduct of NDIS:

## The NDIS Code of Conduct

The Code of Conduct requires workers and providers who deliver NDIS supports to:

- act with respect for individual rights to freedom of expression, self-determination, and decision-making in accordance with relevant laws and conventions
- respect the privacy of people with disability
- provide supports and services in a safe and competent manner with care and skill
- act with integrity, honesty, and transparency
- promptly take steps to raise and act on concerns about matters that might have an impact on the quality and safety of supports provided to people with disability
- take all reasonable steps to prevent and respond to all forms of violence, exploitation, neglect, and abuse of people with disability
- take all reasonable steps to prevent and respond to sexual misconduct.
- There are guidelines available to help both NDIS providers and workers understand their obligations under the NDIS Code of Conduct.

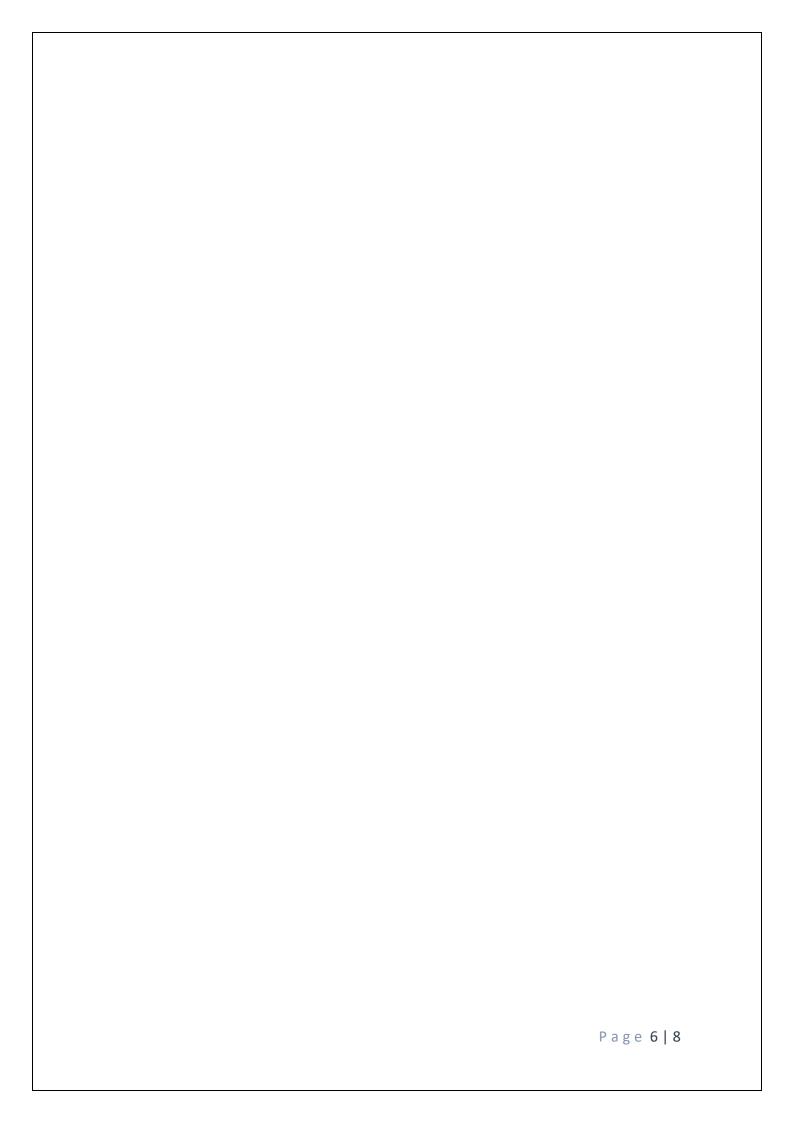
Any event that would result breach any of the above NDIS codes of conduct, within the scope of APMP scope, would be classified as a Risk. Refer to the New Participant Engagement Letter for the scope of APMP. Whenever such a risk event occurs, it should be evaluated against to Risk Matrix and recorded in the Risk register. (Both these documents are attached at the end of this document).

## **Emergency Disaster Planning**

The key risk that will have to be considered is the sole worker (Plan Manager) was unable to provide his/services due to non-availability to provide the services committed to the Participants and the Providers. Therefore, the contingency plans in place are as follows:

- Migrate to a much simpler automated system with Direct link to NDIS plans and approval/payment systems (using MYP software) and Payment to Providers (using HICAPS – Both NDIS and HICAPS are linked). This was completed on 15-08-2025
- It will be much easier to train 2 replacement potentials in the event of a disaster
- Appoint a company to manage the Website Appointed since 01-07-2024 (Immeka Pty Ltd)
- Make sure that all software used are cloud based Actioned from 01-01-2024
- As a last resort find another Plan Management Services to take over my Business
- Infection prevention and control standard precautions are implemented although it has
  minimal relevance to the Plan Manager who does not travel for Business and does not
  engage in Face-to-Face discussions with Providers nor Participants. Awareness in the areas
  such as infection prevention and practicing standard precautions including hand hygiene
  practices, respiratory hygiene, cough etiquette, by the use of masks and PPE is emphasised
  during general business

Any Health or Safety risks involved for Providers and other service Providers are not within the scope of a Plan Manager. Hence no emergency Disaster planning is not required.



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# **Risk Matrix**

## **Evaluation method**

Risk Matrix is used to evaluate the critical and urgency nature of the risk. The following matrix will be used to determine the rating of the Risk Matrix. The rating of High, Medium or Low determined the priority in which the follow-up action will be commenced. Every risk must be evaluated, and the rating recorded in the risk register under "Risk Rating".

**Exceptions when Risk Matrix should not be used:** 

There may be very critical cases that may happen once only which may be classified 'very high' impact. In such cases this matrix should not be used. Instead treat the Risk Rating as 'High" and act on it immediately.

	IMPACT					
P R O		LOW	Medium	HIGH		
B A B	HIGH	Low	Medium	High		
I L I	MEDIUM	Low	Medium	Medium		
T Y	LOW	Low	Low	Low		

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# Risk Register

ID	Recorded By	Date Recorded	Risk Description	Risk Rating	Action	Completed date	Risk Owner
1	SJ	01-04-21	Payment delayed. Not recurrent. Rare occurrence.	Low	Review system. Follow-up any re- occurrence next month		SJ
2	SJ	02-04-21	Incorrect categorisation of the spending. Rare occurrence.	Medium	Provide weekly report for Participant ratification		SJ
3	SJ	03-04-21	Email Account hacked	High	Report to Participant, change password, notify all concerned	03-04-21	SJ
4	SJ	04-04-21	E-mails to Participant being rejected	High	Use phone to update the contact register or contact through authorised person	04-04-21	SJ
5	SJ	05-04-21	Breach of privacy of Participant data	High	Report to Participant, review and correct system, notify all concerned	05-04-21	SJ
6	SJ	02-04-21	Payment delayed. Provider hold back service. Health risks to participant	High	Contact Provider. Resolve conflict. Ensure provider provide service.	02-04-21	SJ
7	SJ	03-04-21	Computer Failure	High	Ensure all files are stores in the cloud with a backup in another location	03-04-21	SJ
8	SJ	04-04-21	In-ability to work due to Sickness or going overseas	High	Ensure that there is a backup person, qualified to provide APMP service	04-04-21	SJ
9	SJ	04-04-21	Budget exhausted prior to plan end date	Medium	Communicate to participant / authorised person (may need an early review)	04-04-21	SJ
10	SJ	04-04-21	Invoices received in Bulk rather than when service was provided may cause unplanned overspend	Medium	Communicate to provider for regular invoicing	04-04-21	SJ

ID	Recorded	Date	Risk Description	Risk	Action	Completed	Risk Owner
	By	Recorded		Rating		date	
11	SJ	04-04-21	Plan style is not set as Plan management by NDIA planner (error)	Medium	Communicate to participant / authorised person to request plan management change		SJ
12	SJ	22-08-25	ID 08, 09, 10 & 11	Low	These risks are now minimal or non- existent due to Linking directly with NDIS and HICAPS system	15-08-2025	SJ
13	SJ	22-08-25	Provider/Registration Groups - Work health and safety risks  - Being unable to provide service  - Ability to find occupational, Speech Therapists (OT & ST) and Physio professionals	Low	Plan Manager is not responsible for provision of any services that the Provider and other Registration groups provide. Therefore, risks related to Worker/Other Groups providing services are not a risk. Further, finding replacement therapy specialists is easy.	22-08-25	SJ
14	SJ	22-08-25	Risks on Plan Manager's health and safety	Low	Action of ID 12 applies – This makes the Plan Management workflow process easy and simple to operate and worker training for temporary replacement is easy to manage.	15-08-2025	SJ
15	SJ	22-08-25	Participant relies on the provider's services to meet their daily living needs and the extent to which the participant's health and safety would be affected if those services were disrupted.	Low	Other than professional's participant may rely on household helps, daily living helps etc. – Such services are very generic and easily replaceable	22-08-2025	SJ
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