



BUSINESS CONTINUITY PLAN

Allora Options

Purpose



The purpose of the Business Continuity Plan for Allora Options, an NDIS registered PBS and Support Coordination business, is to ensure the uninterrupted delivery of exceptional services to our participants and clients in the face of unforeseen disruptions. This plan serves as a comprehensive framework to guide our organization's response to various challenges, including but not limited to natural disasters, technological failures, health crises, and operational disruptions. By outlining proactive strategies, clear communication protocols, and streamlined procedures, this plan aims to safeguard the well-being of our participants, uphold our commitment to quality service provision, and maintain the resilience of our operations. Through meticulous risk assessment, continuous improvement, and a steadfast dedication to our core values, the Business Continuity Plan empowers Allora Options to navigate uncertainty, adapt to changing circumstances, and emerge stronger, ensuring the continuity of vital support and coordination services for our valued participants and stakeholders.

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Business Continuity Plan

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Signature			
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In alignment with the Allora Options business continuity policy, this plan follows the four phases of prevention, preparedness, response and recovery framework.

Prevention

The objective of the first phase is to conduct a risk management plan.

A risk management plan identifies potential disruptions and accounts for the impact they could possibly have.

Questions that should be asked in this stage include:

- What could cause an impact on our organisation?
- E.g. flood, fire, strike etc.
- What is the severity of the impact?
- How likely is it the impact will occur?
- Can the impact be reduced or eliminated?

- Detail the risk description, rate the impact, likelihood and any preventative strategies that can be put in place to reduce or eliminate the risk.

Risk management plan

Risk description	Impact ¹	Impact on participant /workers	Likelihood ²	RISK MATRIX RATING (untreated)	Preventative actions to avoid impact	Impact preparation strategies	RISK MATRIX RATING (treated)
<p>Office disaster</p> <ol style="list-style-type: none"> 1. Fire in the building 2. Car crashes into the building 3. Flooding 4. Business interruption (building is not useable) or any other unforeseen reason. 	4	<ul style="list-style-type: none"> • Workers unable to work in an office. • Financial cost to business (replace items) • Pause in services. • Chances of unregulated restrictive practices being implemented, plans running out of date – noncompliant with the <u>behaviour support & RP Rules (2018)</u>. • Chances of client files being lost leading to civil liability. • Chance of worker / client injury (WH&S concerns). 	3	HIGH	<ul style="list-style-type: none"> • <u>WH&S Policy</u> in place, that staff have been given to read and sign. • <u>Evacuation procedures</u> are in place. • Signage reminding people to turn off heaters and lights. • Not on a main road. • Nil rivers nearby. • Clear exits from building. • Working from home expectations in place • Staff take laptops, charging cords and work phones home (daily). • Director will back up files once per week to an external hard drive which will be stored offsite to ensure files aren't lost. • <u>Employee assistance program</u> available (6 sessions per year paid for by Allora options) • Saving conventions are in place (make sure everything is saved to SharePoint and not individual desktop) • Memorandum of understanding (MOU) in place with external organisations. This has been communicated to stakeholders in a service level agreement, MOUs can be located on <u>our website</u>. • Incident reporting system (<u>CentroAssist</u>) in place for management to report serious WHS related incidents internally. • Ensure to maintain appropriate records of items in the office and items which were damaged as well as any other relevant information to provide to insurance company. • Pro-actively organised <u>insurances</u>. Including <u>meeting our requirements</u> to pay the <u>work injury insurance</u> cover premiums with ReturnToWorkSA. • <u>Emergency management plans</u> in place. 	<ul style="list-style-type: none"> • Enact relevant section of <u>the emergency management plan</u> • <u>Building disaster management insurance</u>. <ul style="list-style-type: none"> - In the event of an Allora Options office is covered by Business property Insurance covering repairs to ensure the building is safe and usable, contents replacements, damage to glass/signage of the building and business interruptions. - The Business support manager and managing director will complete the necessary reports and gather information to provide the insurance company with relevant evidence to support the claim as soon as practicable. • Enact working from home for all staff members. • Plan for avoiding extended service disruption enacted. (<u>Business continuity action plans</u> below) • MOU's to be enacted as a last resort. • <u>Public and products liability insurance</u> <ul style="list-style-type: none"> - To protect clients or any other person on the property at the time of the incident. • Enact mandatory <u>work injury insurance</u> if any workers have been injured as a result of the disaster. • Enact a claim on <u>data breach insurance</u> in the event of data loss to protect the organisation against financial liability. 	MEDIUM

¹ Impact scale: 1 – Insignificant; 2 – Minor; 3 – Moderate; 4 – Major; 5 – Extreme.

² Likelihood scale: 1 – Rare; 2 – Unlikely; 3 – Possible; 4 – Likely, 5 – Almost Certain.

Risk description	Impact ¹	Impact on participant /workers	Likelihood ²	RISK MATRIX RATING (untreated)	Preventative actions to avoid impact	Impact preparation strategies	RISK MATRIX RATING (treated)
<p>Data Breach</p> <ol style="list-style-type: none"> Participant information is released to the public. Staff information is released to the public. Internal confidential business information is released to the public. 	4	<ul style="list-style-type: none"> Private and confidential information regarding vulnerable persons can fall into the hands of companies or persons who exploit this information and the person with a disability themselves e.g., <i>selling their information to advertisers who may target them due to their vulnerability leaving them open to financial exploitation.</i> Reputational risk to the business of not upholding the <u>practice standards</u> (outlined below) Legal ramifications and NDIS registration loss for not upholding the practice standards (Participant rights to privacy and Governance and operational management: Information management) Staff member confidential information is released opening the company up to civil penalties, infringement notices, enforceable undertakings or injunctions under the <i>'Privacy Act 1988'</i>. These could pose financial risks due to any fines payable or interruptions caused to the business's operations due to the management of a data breach. Employees could release confidential business information regarding business undertaking or client's personal information whilst employed by Allora Options or at the cessation of their employment. Allora Options may become subject to cyber extortion 	2	MEDIUM	<ul style="list-style-type: none"> Participant data is protected by only being stored within the participant management system (SPLOSE) and on SharePoint systems. Employee Data is store within the HR Management system (Employment hero) and on SharePoint systems. Information is shared and disseminated throughout the business and with external stakeholders on a "need to know" basis only. As such the internal cloud-based systems are restricted access based on job description e.g. support coordination clients are only accessible to the support coordination team, admin, business development and executive management team and private employee information is only accessible by them, their direct manager executive management and Managing Director. <ul style="list-style-type: none"> Saving conventions are in place for each department to ensure client and staff confidential data is easily accessible to those who require access, but not to those within the organisation who don't. Internal audits are conducted sporadically by the business development and leadership team in supervisions to ensure compliance with these saving conventions. Information of any kind is not to be kept in paper form. If completed in paper form it must be scanned, saved to the relevant file then disposed of in the confidential bin. <u>Data Breach policy</u> is in place which details prevention, reporting and management process for a data breach that staff have been given to read and sign. All computers are password protected. It is included in each employee's employment contract regarding their obligations regarding the management of any confidential information during and at the conclusion of their employment with Allora Options which 	<ul style="list-style-type: none"> Enact a claim on <u>data breach insurance</u> in the event of a cyber extortion or legal action to cover any associated costs. In the event of a data breach Allora Options is covered. <ul style="list-style-type: none"> The Business support manager and managing director will complete the necessary reports and gather information to provide the insurance company with relevant evidence to support the claim as soon as practicable. Conduct an internal investigation of the data breach incident and conduct the root-cause-analysis and identifying any gaps in security and setting actions to rectify these gaps. Enacting <u>business reputational risk management strategies</u> <u>Professional Indemnity insurance</u> to protect the company and its employees financially against costs associated: <ul style="list-style-type: none"> with any civil liability court proceedings or other associated costs also, intellectual property loss due to employees taking intellectual property and using it for personal gain. Costs of public relations which may reduce the risk of a claim or in connection with a claim. Enact <u>management insurance</u> to protect any directors and officers of Allora Options against liability associated with their involvement in a data breach event. 	LOW

Risk description	Impact ¹	Impact on participant/workers	Likelihood ²	RISK MATRIX RATING (untreated)	Preventative actions to avoid impact	Impact preparation strategies	RISK MATRIX RATING (treated)
		which could carry significant financial risks for the organisation.			all employees have signed and agreed to uphold.		
<p>Natural Disaster/extreme weather disaster</p> <ul style="list-style-type: none"> Bushfires Hurricanes Earthquakes Floods 	4	<ul style="list-style-type: none"> Workers unable to work in an office or possibly at home Financial cost to business (replace items) Pause in services or longer disruption to services due to emergency services being backlogged by multiple call outs, increased demands for trades to fix damage, which is more widespread, risk of worker trauma caused by the natural disaster e.g. death of a family member resulting in extended leave and inability to provide services Chances of unregulated restrictive practices being implemented, plans running out of date – noncompliant with the <u>behaviour support & RP Rules (2018)</u>. Chances of client files being lost leading to civil liability. Chance of worker injury (WH&S concerns). 	3	HIGH	<ul style="list-style-type: none"> <u>WH&S Policy</u> in place, that staff have been given to read and sign. Evacuation procedures are in place. Signage reminding people to turn off heaters and lights. Not on a main road. Nil rivers nearby. Clear exits from building. Working from home policies in place Staff take laptops, charging cords and work phones home (daily). Director will back up files once per week to an external hard drive which will be stored offsite to ensure files aren't lost. <u>Employee assistance program</u> available (6 sessions per year paid for by Allora options) Saving conventions are in place (make sure everything is saved to SharePoint and not individual desktop) Memorandum of understanding (MOU) in place with external organisations. This has been communicated to stakeholders in a service level agreement, MOUs can be located on <u>our website</u>. Incident reporting system (<u>CentroAssist</u>) in place for management to report serious WHS related incidents internally. Ensure to maintain appropriate records of items in the office and items which were damaged as well as any other relevant information to provide to insurance company. Pro-actively organised <u>insurances</u>. Including <u>meeting our requirements</u> to pay the <u>work injury insurance</u> cover premiums with ReturnToWorkSA. <u>Emergency management plans</u> in place. 	<ul style="list-style-type: none"> <u>Building disaster management insurance</u>. <ul style="list-style-type: none"> In the event of an Allora Options office is covered by Business property Insurance covering repairs to ensure the building is safe and usable, contents replacements, damage to glass/signage of the building and business interruptions The Business support manager and managing director will complete the necessary reports and gather information to provide the insurance company with relevant evidence to support the claim as soon as practicable. Enact working from home for all staff members. Plan for avoiding extended service disruption enacted. (<u>Business continuity action plans</u> below) MOU's to be enacted as a last resort. <u>Public and products liability insurance</u> <ul style="list-style-type: none"> To protect clients or any other person on the property at the time of the incident. Enact mandatory <u>work injury insurance</u> if any workers have been injured as a result of the disaster. Enact a claim on <u>data breach insurance</u> in the event of data loss to protect the organisation against financial liability. 	MEDIUM
Power outage	1	<ul style="list-style-type: none"> Workers unable to work in an office or possibly at home Pause in services or longer disruption to services due to emergency services being backlogged by multiple call 	5	MEDIUM	<ul style="list-style-type: none"> <u>WH&S Policy</u> in place, that staff have been given to read and sign. <u>Evacuation procedures</u> are in place. Clear exits from building. Working from home policies in place. 	<ul style="list-style-type: none"> Staff will be directed to work from home. If the power outage is widespread, and it affects there home, the leadership team will find area's in the state that have power utilising the power SA website, and will direct staff to work at a library that has power. 	LOW

Risk description	Impact ¹	Impact on participant /workers	Likelihood ²	RISK MATRIX RATING (untreated)	Preventative actions to avoid impact	Impact preparation strategies	RISK MATRIX RATING (treated)
		<ul style="list-style-type: none"> outs, increased demands for trades to fix damage Chances of client files being lost. Chance of worker injury (WH&S concerns). 			<ul style="list-style-type: none"> Staff take laptops, charging cords and work phones home (daily). Director will back up files once per week to an external hard drive which will be stored offsite to ensure files aren't lost. Saving conventions are in place (make sure everything is saved to SharePoint and not individual desktop) Memorandum of understanding (MOU) in place with external organisations. This has been communicated to stakeholders in a service level agreement, MOUs can be located on our website. Incident reporting system (CentroAssist) in place for management to report serious WHS related incidents internally. Ensure to maintain appropriate records of items in the office and items which were damaged as well as any other relevant information to provide to insurance company. Pro-actively organised insurances. Including meeting our requirements to pay the work injury insurance cover premiums with ReturnToWorkSA. 	<ul style="list-style-type: none"> Should there be a statewide power outage, Allora Options will purchase a generator to power laptops. Staff will then return to the office as usual to work. Building disaster management insurance. In the event of an Allora Options office is covered by Business property Insurance covering repairs to ensure the building is safe and usable, contents replacements, damage to glass/signage of the building and business interruptions. The Business support manager and managing director will complete the necessary reports and gather information to provide the insurance company with relevant evidence to support the claim as soon as practicable. Enact working from home for all staff members. Plan for avoiding extended service disruption enacted. MOU's to be enacted as a last resort. Public and products liability insurance To protect clients or any other person on the property at the time of the incident. e.g. falling down the stairs due to no lighting etc Enact a claim on data breach insurance in the event of data loss to protect the organisation against financial liability. In the event of a power-outage which has caused any financial disruptions Allora Options will claim on their Business interruption insurance The Business support manager and managing director will complete the necessary reports and gather information to provide the insurance company with relevant evidence to support the claim as soon as practicable. Enact mandatory work injury insurance if any workers have been injured as a result of the power outage 	
Burglary	2	<ul style="list-style-type: none"> Financial cost to business (replace items) Property damage Staff injury as a direct result of the burglary e.g. staff were present at the time and the individual was armed, causing harm to the employee. 	3	MEDIUM	<ul style="list-style-type: none"> Use of cloud-based system to ensure data and files are not lost as they are not stored at an individual source which could be destroyed. Office is alarmed and staff are aware of the procedures to alarm the building. Staff take laptops, chargers and work phones home. Ensure to maintain appropriate records of items in the office and items which were stolen as well as any other relevant 	<ul style="list-style-type: none"> Enact relevant section of the emergency management plan. Enact disaster management insurance. In the event of being robbed Allora Options office is covered for the theft of contents as well as damage to the building signage/glass <ul style="list-style-type: none"> The Business support manager and managing director will complete the necessary reports and gather information to provide the insurance company with relevant evidence to support the claim as soon as practicable. 	LOW

Risk description	Impact ¹	Impact on participant /workers	Likelihood ²	RISK MATRIX RATING (untreated)	Preventative actions to avoid impact	Impact preparation strategies	RISK MATRIX RATING (treated)
					<ul style="list-style-type: none"> information to provide to insurance company. <u>Emergency management plans</u> in place. 	<ul style="list-style-type: none"> Enact <u>mandatory work injury insurance</u> if any workers have been injured as a result of the Burglary. 	
Equipment malfunction <ul style="list-style-type: none"> Singular IT items e.g. laptop, mouse, keyboard, phone, desktop screen, projector, iPad etc. Systems or cloud-based malfunction. Personal Vehicle malfunction Wi-Fi network 	2	<ul style="list-style-type: none"> Risk of employees being unable to perform aspects of their role requiring that technology e.g. writing a report or making a phone call Risk of employees being unable to provide a face-to-face service or workplace injury due to vehicle malfunction. Risk of all employees being unable to perform all or aspects of their role requiring access to documentation residing on the cloud-based system. Risk of harm to employees or community members if a personal vehicle malfunctions. Risk of pausing in services due to ongoing issues with WIFI network malfunctions. 	4	MEDIUM	<ul style="list-style-type: none"> Allora abides by the <u>safe work act 2012</u> by ensuring a safe work environment including their personal vehicles. Allora fulfills this primary duty of care by doing the following: <ul style="list-style-type: none"> All employees using a personal vehicle for work purposes must produce a valid registration and compulsory insurance certificate. As stated in the employment contract employees are responsible for the upkeep of their own vehicle, license, insurance and registration. Solid IT are in place to assist with the management of Allora Options IT equipment and cloud-based storage system. Money reserves to pay for damaged or malfunction work equipment. All receipts are kept, and stored in <u>XERO</u>, to be fixed if products are in the warranty period. All work phones have hotspot, therefore team members will have access to the internet at all times. 	<ul style="list-style-type: none"> Solid IT manage IT issues and are contracted as offsite workers by Allora Options. They will be tasked to rectify any cloud-storage issues. Have some basic extra stores of equipment in the event of a malfunction (spare laptop, keyboard, mouse) In the event of a personal vehicle malfunction or accident the employee's own insurance will cover them financially Enact product warranties if needed. Buy equipment within 24-hours if needed. Enact a claim on <u>data breach insurance</u> in the event of data loss to protect the organisation against financial liability. Staff utilise their hotspot. If required, staff will work at a location which has free Wifi and will utilise free Wifi throughout the relevant locations i.e., library, airport, McDonalds, CBD. In the event of an ongoing Wi-Fi malfunction which has caused any financial disruptions Allora Options will claim on their <u>Business interruption insurance</u> <ul style="list-style-type: none"> The Business support manager and managing director will complete the necessary reports and gather information to provide the insurance company with relevant evidence to support the claim as soon as practicable. 	LOW
Extended resource disruption <ul style="list-style-type: none"> Practitioner attrition or mass exodus (high rate of burn out in the industry due to the nature of the work, due to skill shortage of practitioners in the market practitioners are often offered new roles) Staff member extended leave Director or executive management takes extended leave, leaves 	5	<ul style="list-style-type: none"> Practitioner attrition causing: <ul style="list-style-type: none"> Disruption in services to clients Increase utilization of participant funds due to more stakeholder interactions to get the new practitioner up to speed with the client's needs. Reputational damage (seen by clients and stakeholders as unable to provide continuity of services for clients) No one to manage high level organisational risks if executives/director are on extended leave. 	3	HIGH	<ul style="list-style-type: none"> Allora abides by the <u>safe work act 2012</u> by ensuring a safe work environment including employee psychological safety and well-being. Allora fulfills this primary duty of care by doing the following: <ul style="list-style-type: none"> Focus on workplace culture and taking care of Allora Employees Encouraging people to take leave when needed Management modelling principles of self-care and work-life balance boundaries Ensuring KPIs and caseloads are reasonable and proportionate to practitioners self-assessed capability levels, experience and aptitude. 	<ul style="list-style-type: none"> Delegation of authority enacted MOU's enacted <u>Business interruption insurance</u>: additional increase in cost of working enacted. <ul style="list-style-type: none"> The Business support manager and managing director will complete the necessary reports and gather information to provide the insurance company with relevant evidence to support the claim as soon as practicable. Plan for <u>avoiding extended service disruption</u> enacted. Enact plan for <u>avoiding reputational damage</u> 	MEDIUM

Risk description	Impact ¹	Impact on participant/workers	Likelihood ²	RISK MATRIX RATING (untreated)	Preventative actions to avoid impact	Impact preparation strategies	RISK MATRIX RATING (treated)
the company or passes away.		<ul style="list-style-type: none"> Chances of unregulated restrictive practices being implemented, plans running out of date – noncompliant with the <u>behaviour support & RP Rules (2018)</u>. 			<ul style="list-style-type: none"> Adequate supervision and debriefing opportunities <u>Employee assistance program</u> available (6 sessions per year paid for by Allora options) Bonus scheme in place for all practitioners, Support coordinators and department heads. Keeping up with what is being offered to practitioners by other providers and also what practitioners are looking for in terms of remuneration, benefits, professional development opportunities and career progression. Succession planning/delegation of authority (who takes things on when management is on extended leave), higher duties agreements and coaching plans (identifying high aptitude employees with management interest, qualities) (See <u>Allora Options Business plan</u>) Memorandum of understanding (MOU) in place with external organisations. This has been communicated to stakeholders in a service level agreement, MOUs can be located on <u>our website</u>. Ongoing recruitment campaigns to attract talent 		
<p>Pandemic</p> <ul style="list-style-type: none"> Employee becomes infected with Covid-19 Covid-19 or another pandemic like event becomes wide-spread causing lockdowns 	2	<ul style="list-style-type: none"> Short disruption of service to clients when an individual employee is infected. Longer disruption to services (especially face-to-face services) if widespread lockdowns occur Longer disruptions to services may incur risks of a financial nature to the company. 	3	MEDIUM	<ul style="list-style-type: none"> Allora Options has a cash reserve to use if required to ensure the business can remain operational for up to 6-weeks without any assistance from government agencies being provided. Covid and pandemic procedures are in place for what to do if a team member contracts covid. Memorandum of understanding (MOU) in place with external organisations. This has been communicated to stakeholders in a service level agreement, MOUs can be located on <u>our website</u>. Working from home policies in place. <u>Emergency management plans</u> in place. 	<ul style="list-style-type: none"> Enact relevant section of <u>the emergency management plan</u> Practitioners (assigned and delegated by the department head) within Allora Options can cover cases in the interim period for a colleague who has contacted covid. MOUs enacted In the event of a lockdown Allora Employees will cease any visits to clients homes and follow any guidelines set forth by SA Health or other relevant regulatory bodies. Enact cash reserves to pay employees and ensure all other essential business functions remain operational 	LOW
Financial disruptions	5	<ul style="list-style-type: none"> Risk of the businesses cashflow being limited by the inability to claim for services delivered. 	2	HIGH	<ul style="list-style-type: none"> Nil debt – so in the event of a financial disruption Allora Options will not have any debt repayment obligations. 	<ul style="list-style-type: none"> Change banks if required and utilise different systems Payment plans organised for ATO 	MEDIUM

Risk description	Impact ¹	Impact on participant /workers	Likelihood ²	RISK MATRIX RATING (untreated)	Preventative actions to avoid impact	Impact preparation strategies	RISK MATRIX RATING (treated)
<ul style="list-style-type: none"> Provider portal goes down for significant period and Allora Options are unable to claim for services. Widespread lockdown occurs for a significant period of time and employees are unable to provide face-to-face services to clients. NDIS no longer funds behaviour support. NAB internet banking crashes. Allora Options is involved with any sort of legal proceedings 		<ul style="list-style-type: none"> Risk of the businesses cashflow being eliminated entirely due to only once source of funding for the entire company. Unable to pay debts on time i.e., BAS, Super, Payroll. There is a risk that without appropriate insurance Allora Options could be at financial liability as a result of being involved in legal proceedings. 		HIGH	<ul style="list-style-type: none"> Allora options keeps a cash reserve which will keep the essentials of organisation running for a maximum of 6 weeks. Allora Options will continue to provide services in the event of a widespread lockdown by using alternative methods of engaging with clients e.g., phone calls and video calls, as well as continuing to provide non-face-to-face supports from home. 	<ul style="list-style-type: none"> Business Loans if required Utilize cash reserves to pay staff and to ensure other essential business expenses can be paid. Key Management Personnel to identify any opportunities for government compensation that the organisation may be eligible to claim. Key management personnel to identify opportunities to continue to gain income to keep the organisation going. E.g. grants funding or alternative funding lines to utilise under the NDIS to deliver services in line with our current strategic direction and skillset. Key management personnel to re-evaluate the strategic direction of the company and identify new gaps in the market and service opportunities. Professional Indemnity insurance to protect the company and its employees financially against costs associated with any civil liability court proceedings or other associated costs. Business interruption insurance: additional increase in cost of working enacted to ensure workers can be paid and other essential business services. <ul style="list-style-type: none"> The Business support manager and managing director will complete the necessary reports and gather information to provide the insurance company with relevant evidence to support the claim as soon as practicable. 	MEDIUM
<p>Death or serious injury of a client, employee or community member</p> <ul style="list-style-type: none"> Employee is seriously injured whilst performing their work duties. Client is seriously injured resulting in the need for a QSC reportable incident being submitted. Community member is seriously injured due to a client behaviour or employee behaviour. 	5	<ul style="list-style-type: none"> Employee could claim the company as liable due to the company's obligation as the primary duty of care to provide a safe working environment. Employee will be unable to perform their normal duties at work and this will leave a temporary gap in services. Quality and safeguarding commission could investigate and find the company liable for client injury/death, put sanctions on or terminating Allora's NDIS registration. Community member may claim the company is liable 	2	HIGH	<ul style="list-style-type: none"> <u>WH&S Policy</u> in place, that staff have been given to read and sign. Allora abides by the <u>safe work act 2012</u> by ensuring a safe work environment including their personal vehicles. Allora Fulfills this primary duty of care by doing the following: <ul style="list-style-type: none"> All employees using a personal vehicle for work purposes must produce a valid registration, compulsory insurance certificate and proof of vehicle roadworthiness in the form of a 12-monthly service invoice provided by a qualified mechanic. As stated in the employment contract employees are responsible for the upkeep of their own vehicle, license, insurance and registration. 	<ul style="list-style-type: none"> Enact relevant section of <u>the emergency management plan</u> In the event of a personal vehicle malfunction or accident the employee's own insurance will cover them financially Follow crisis response procedures set in the individuals crisis response plans. Contact (SAAS/SAPOL) ambulance and police as required to assist. Submit QSC reportable incident if necessary and comply with any directions from them regarding the investigation of the incident. Conduct an internal investigation of the incident and conduct the root-cause-analysis. Staff will be encouraged to access the EAP for assistance with any trauma related to the incident Succession planning and delegation of authority will be enacted. (See <u>Allora Options Business plan</u>) External recruitment and/or MOUs enacted. 	MEDIUM

Risk description	Impact ¹	Impact on participant/workers	Likelihood ²	RISK MATRIX RATING (untreated)	Preventative actions to avoid impact	Impact preparation strategies	RISK MATRIX RATING (treated)
		due to failure to provide proper training to the people supporting the client who caused serious injury.			<ul style="list-style-type: none"> - Through the implementation of Allora Options <u>managing risks in the workplace</u> procedure we are continuously working to identify, report, control and eliminate all WHS hazards within the office and client based work locations. - <u>Employee assistance program</u> available (6 sessions per year paid for by Allora options) • Monthly risk reporting process for all participants • Relevant policies and procedures in place, in line with the practice standards • Staff members case note all services provided so evidence that adequate training has been provided to support staff can be evidenced. • Crisis response, support plans and individual risk assessments are developed for all clients. • Home visit risk assessments are developed and implemented for all clients to protect employees. • All staff are trained in first aid and CPR. • Incident reporting system in place for management to report serious WHS and client related incidents internally. (<u>CentroAssist</u>) • Allora options will ensure appropriate delegation of authority, succession planning or another appropriately qualified individual is being developed to ensure each role can be fulfilled if an employee is render unable to fulfill their role for an extended period. Failing this Allora Options will utilise MOU's or external recruitment processes to fill any service gaps. (See <u>Allora Options Business plan</u>) • <u>Emergency management plans</u> in place. 	<ul style="list-style-type: none"> • <u>Public and products liability insurance</u> and <u>professional indemnity insurance</u> to protect the company and its employees financially against costs associated with: <ul style="list-style-type: none"> - any civil liability court proceedings or other associated costs - also costs associated with public relations which may reduce the risk of a claim or in connection with a claim. - for the injury of a client or any other person on the property at the time of the incident - for data loss civil liability - for intellectual property - Reputational Protection Expenses • Enact <u>management insurance</u> to protect any directors and officers of Allora Options against liability associated with their involvement in a death or serious injury event. 	
<p>A serious incident occurs.</p> <ul style="list-style-type: none"> • NDIS Reportable incident criteria met (click here) • WH&S Incident occurs 		<ul style="list-style-type: none"> • Complaints of fraudulent activity or other breaches to the practice standards i.e. Breached of the rights and responsibilities of clients, inadequate governance and compliance, inadequate 		HIGH	<ul style="list-style-type: none"> • Ensure all staff members have completed NDIS Workers Orientation module and that it is in their staff file in our HR Management system (Employment Hero). • Ensure all staff have relevant checks on file and within compliance required to 	<ul style="list-style-type: none"> • Allora Options is working on an ongoing basis to address any gaps identified by our senior management and business support team and will remedy these gaps through the use of the risk management system (<u>CentroAssist</u>): • Enact <u>reputational management plan</u> 	MEDIUM

Risk description	Impact ¹	Impact on participant/workers	Likelihood ²	RISK MATRIX RATING (untreated)	Preventative actions to avoid impact	Impact preparation strategies	RISK MATRIX RATING (treated)
<ul style="list-style-type: none"> Complaint against Allora's governance and management Complaints against individual employees conduct. Complaint for a breach of the practice standards in any way Financial and fraud related complaints Loss of NDIS Registration Media / Legal exposure 		<p>support provision including under the relevant supplementary modules to Allora Options (Specialist Behaviour Support) causing sanction or termination of Allora Options NDIS Registration, ultimately causing an inability to function as a business under the framework of the NDIS.</p> <ul style="list-style-type: none"> Negative/critical media coverage causing damage to Allora's reputation for any of the above reasons identified. Complaints against individual employees and executive conduct reflecting poorly on Allora Options as an organisation for any of the above reasons identified. Serious implications to NDIS participants should a reportable incident occur which impacts the reputation of Allora. 			<p>fulfill their roles. This is tracked using our HR Management system (Employment Hero) including when expiry dates upcoming for all checks required for each individual worker.</p> <ul style="list-style-type: none"> 100-point ID NDIS Worker Screening RAN/Child safe environments training. Position description Signed code of conduct for all employees Current police check Current working with children checks. Relevant qualifications for all employees Completed NDIS Worker Orientation Module Infection prevention and control for Covid-19 <ul style="list-style-type: none"> All clients (representatives) are provided with the following documents and that this is recorded and managed in our participant management system (SPLOSE): <ul style="list-style-type: none"> Service agreement Risk assessment Support plan Consent form Client welcome pack Referral form / intake form Conflict of Interest declaration Rights and Responsibilities <p><i>*please note mealtime management is not applicable to Allora Options as they do not provide advice and support for this due to it being outside of the scope of the services we offer.</i></p> <ul style="list-style-type: none"> A complaints management system <u>CentroAssist</u> is being utilised as Allora's complaints management system and reporting system, continuous improvement register and planning tool, WHS Incident and Hazard reporting system and register, business/organisational risk register <ul style="list-style-type: none"> Within the CentroAssist Management system complaints, organisational risks and WHS 	<ul style="list-style-type: none"> Enact <u>upholding the practice standards and code of conduct plan</u> Enact <u>Maintaining NDIS Registration plan</u> Enact <u>management insurance</u> to protect any directors and officers of Allora Options against liability associated with their involvement in a serious incident. <u>Public and products liability insurance</u> and <u>professional indemnity insurance</u> to protect the company and its employees financially against costs associated with: <ul style="list-style-type: none"> any civil liability court proceedings or other associated costs also costs associated with public relations which may reduce the risk of a claim or in connection with a claim. for the injury of a client or any other person on the property at the time of the incident for data loss civil liability for intellectual property Reputational Protection Expenses 	

Risk description	Impact ¹	Impact on participant/workers	Likelihood ²	RISK MATRIX RATING (untreated)	Preventative actions to avoid impact	Impact preparation strategies	RISK MATRIX RATING (treated)
					<p>Incidents/Hazards can be reported as well as linked to controlling factors and any continuous improvement actions already existing in the continuous improvement register or adding to the continuous improvement register based on the type of report made.</p> <ul style="list-style-type: none"> Participants and stakeholders are provided with the opportunity to submit feedback regarding organisational continuous improvement as well as compliance with the practice standards through a consumer feedback survey once per year as well as a consumer forum held once per year. <ul style="list-style-type: none"> Participants and stakeholders are actively encouraged to attend and provide feedback with no potential for any negative repercussions for them. Participants and stakeholders are also encouraged to attend via making the forum accessible for them by holding it in a location accessible to those with a disability, offering them the opportunity to attend online or to just complete the feedback form if unable to attend. The feedback gained from these events are included in the CentroAssist continuous improvement register and planning. 		
<p>Unforeseen circumstances</p> <ul style="list-style-type: none"> Risks due to general nature of business and any external changes which could impact on business activities more broadly. 		<ul style="list-style-type: none"> Due to the nature of this risk the impact is unknown. 		<p>HIGH</p>	<ul style="list-style-type: none"> Allora Executives/management to be trained/mentored/provided with external supervision in the principles of change management in business. Allora Options will consider diversifying funding sources to ensure that changes within the NDIS funding's impact on business activities will be minimised. Allora continues to monitor existing and upcoming organisational risks proactively through the formulation of a risk agenda item being added to all team meetings and senior management meetings. Allora continues to monitor and share information company-wide regarding 	<ul style="list-style-type: none"> Any risks will be communicated up the escalation pathway through team meetings. They will they be added to the Risk Management system to be analysed, evaluated, controlled, minimised and planned for using the ongoing continuous improvement function in the risk management system. Any ideas for continuous improvement from employees are also escalated to relevant management personnel to implement continuous improvement initiatives. <u>Professional Indemnity insurance</u> and <u>public and product liability insurance</u> to protect the company and its employees financially against costs associated with: 	<p>MEDIUM</p>

Risk description	Impact ¹	Impact on participant /workers	Likelihood ²	RISK MATRIX RATING (untreated)	Preventative actions to avoid impact	Impact preparation strategies	RISK MATRIX RATING (treated)
					<p>any sector updates, journal articles or changes by adding an agenda item for team meetings to discuss the changes that may affect their department. This is to be led by department heads and team leaders, but all other employees should be encouraged to contribute to this by sharing their knowledge for Allora Options continuous improvement purposes as well as professional development opportunities.</p> <ul style="list-style-type: none"> • <u>Continuous improvement Policy</u> is in place which details employee and management responsibilities. 	<ul style="list-style-type: none"> - any civil liability court proceedings or other associated costs - also costs associated with public relations which may reduce the risk of a claim or in connection with a claim - for the injury of a client or any other person on the property at the time of the incident - for data loss civil liability - for intellectual property - Reputational Protection Expenses • Enact <u>management insurance</u> to protect any directors and officers of Allora Options against liability associated with their involvement in the unforeseen circumstance. 	
<p>Media/legal exposure</p> <ul style="list-style-type: none"> • Media coverage which puts the reputation of Allora Options at risk • Legal proceeding affecting Allora Options management, employee or organisation. 		<ul style="list-style-type: none"> • Ultimately critical media coverage could have significant impacts on Allora options ability to function in all areas of the business interrupting their ability to provide services and function as a business effectively. • Allora Executives being required to devote significant time and attention to legal proceedings may have significant business impacts including neglecting day-to-day management tasks of employees leading to: <ul style="list-style-type: none"> - Risks of employee dissatisfaction/attrition - Lack of oversight/supervision regarding participant risk factors • If an employee was to leave Allora Options on the basis of mismanagement as stated above, there is a risk of “whistleblowing” on mismanagement (whether it exists or not) causing critical media coverage and possible legal proceedings. 		<p>HIGH</p>	<ul style="list-style-type: none"> • Allora Options will ensure to follow the above controls in section (<u>reportable incidents</u> of this risk management plan) to ensure compliance with the practice standards and code of conduct. • Allora Options will be transparent in their communication with their employees regarding any time constraints they are facing based on legal proceedings and will ensure to reassure employees that their complaints will be heard but that the person responsible for managing the issue/ complaint may take some extra time to respond due to overwhelming demands on their time. <ul style="list-style-type: none"> - The responsible person will be required to offer an immediate relief solution to ensure the immediate safety and well-being of the parties involved. • Allora Options should do their utmost to resolve all employee complaints internally through the use of our complaints management system. <ul style="list-style-type: none"> - Complaints made by employees will remain confidential and they will be afforded all protections outlined in the <u>whistle-blower policy</u> • Allora Options employees will be trained on the whistleblower policy during the company induction to ensure they are aware of the policy and how this is 	<ul style="list-style-type: none"> • In the event of critical media coverage Allora Options Business support manager will enact a <u>recovery plan</u> to manage company image and reputation based on the specific critical media coverage. • Allora Options Managing Director will seek legal advice and counsel regarding how to manage any issues of a legal nature which affect Allora Options and/or Allora Options employee/executive conduct. • If an employee complaint has been made an impartial Allora Options employee who is suitably qualified will be assigned to undertake the investigation into the complaint and they will attempt to resolve the complaint using the principles outlined in the <i>‘An employer’s guide to resolving workplace issues, updated 2023’</i> • <u>Professional Indemnity insurance</u> and <u>public and product liability insurance</u> to protect the company and its employees financially against costs associated with: <ul style="list-style-type: none"> - any civil liability court proceedings or other associated costs - also costs associated with public relations which may reduce the risk of a claim or in connection with a claim. - for the injury of a client or any other person on the property at the time of the incident - for data loss civil liability - for intellectual property - Reputational Protection Expenses 	<p>MEDIUM</p>

Risk description	Impact ¹	Impact on participant /workers	Likelihood ²	RISK MATRIX RATING (untreated)	Preventative actions to avoid impact	Impact preparation strategies	RISK MATRIX RATING (treated)
		<ul style="list-style-type: none"> There are significant financial risks identified if appropriate insurances are not in place to fund any potential legal fees. 			aligned to the Allora Options complaints management system and <u>complaints management procedure</u> and complaints escalation pathway.		

**note: Insurance and relevant data/ documents (including the risk matrix used) related to the type and extent of the have been included as an appendix within this business continuity plan.*

Preparation

Having identified potential impacts on Allora Options and its stakeholders, essential business activities to maintain minimum function must be identified to appropriately plan continuation strategies. This is identified through a business impact analysis.

The business impact analysis identifies:

- Essential business activities, including operations essential to our NDIS terms of registration.
- The timeframe for which our organisation could operate if the essential business activities could not be performed.
- How any disruption to essential business activities will impact on the services participants requires.
- Lists the essential business activities and analyse the impact they will have on Allora Options.
- Prioritises them according to the impact they will have according to the criteria.

An essential service for Allora Options is one which, if not delivered:

- Could impact the health and safety of individuals.
- May lead to failure of business units if activities are not performed in a specified time.
- May lead to a breach in regulatory requirements.
- May have immediate unrecoverable impacts or impacts that occur over a certain period of time that cannot be recoverable.

Business impact analysis		List of essential services/functions					Department/business unit		Applies to all business units	
Essential service/function	Level of impact ³	Financial	Workers	Participants/clients	Stakeholders	Legal/regulatory	Public/community	Reputation	Total score ⁴	
Upholding all practice standards outlined under NDIS QSC legislative requirements. <i>(Including relevant supplementary modules specialist behaviour support and specialist support coordination)</i> <ul style="list-style-type: none"> rights and responsibility for participants governance and operational management the provision of supports, and the support provision environment 	0 – 10	10	10	10	10	10	0	10	60	
<p>1. Major business impacts for the organisation/reputation/employees/financial sustainability/participants/regulatory compliance/legal liability if Allora Options (or an Allora Options employee) were to not uphold the practice standards.</p> <ul style="list-style-type: none"> If they are unable to uphold <u>the practice standards</u>, they could have sanctions put on their registration (which risks limiting ability to provide service, thus income coming into the company) They could lose their NDIS registration entirely ultimately leading to business failure (see <u>maintaining NDIS registration</u> below) They could be at risk of legal ramifications, complaints against them to the regulatory bodies, reputational damage leading to loss of client base and employees and possible involvement from the disability royal commission. They could be risking people’s safety including clients, employees and stakeholders who could be at risk of any of the following if the practice standards are not upheld. These include human rights violations, violence, abuse, neglect, exploitation, and discrimination. If they are no longer able to pay employee’s and pay for essential business expenses, they the company will ultimately lead to business failure which could initiate a number of different voluntary and involuntary legal processes/proceedings i.e. filing for bankruptcy, insolvency arrangements, liquidation or receivership. All of which will result in ensuring compliance with “5.3. Duties and liabilities of directors” under <u>the Corporations Act 2001</u>. <p>2. Minor business impacts for participants/stakeholders if Allora Options (or an Allora Options employee) were to not uphold the practice standards.</p> <ul style="list-style-type: none"> There could be service provision interruptions causing minor distress to clients and stakeholders due to the requirement to now find a new organisation to fulfill the service. There could also be a risk of client funds over utilization due to the transition to a new provider. If they were unable to provide services for an extended period, the impact to the clients/other stakeholders would be being unable to receive behaviour supports from their usual practitioner/support coordinator. This could have detrimental effects on behaviour, mental health and efficiency of supports being provided. However, as behaviour support aren’t a necessary daily support, clients would likely be able to go about their day-to-day life and have their basic needs and human rights met. Due to lack of behaviour support oversight vulnerable clients with high-risk behaviours of concern may pose risks to public/community safety. 										

³ *Individual item business impact scores: Insignificant (0-1) = no financial loss and no risk of harm., Minor (2-4) = minimal financial loss and low risk of harm, Moderate (5-7) = moderate financial loss and medium risk of harm, Major (8-10) = causes business to stop trading or experience significant financial losses and/or carries significant risks or actual harm.

⁴ *Level of total business impact: Severe (53-70) = Needs immediate preventative or corrective action, High (34-52) = Needs preventative or corrective action within 1 month, Moderate (19-33) = Needs preventative or corrective action within 3 months, Low = (18-1) Does not currently require preventative or corrective action.

Note: if the individual potentially impacted by the business scores within the insignificant range, the impact will not be detailed in the related section.

Essential service/function	Level of impact ⁵	Financial	Workers	Participants/ clients	Stakeholders	Legal/ regulatory	Public/ community	Reputation	Total score ⁶
NDIS continues to fund Behaviour Support	0 – 10	10	10	10	10	10	8	0	58

1. **Major business impacts for the organisation/employees/financial sustainability/participants/stakeholders/community** if Allora Options was unable to utilise NDIS funding to provide services for their clients (indefinitely or for a significant period)
- NDIS funded supports are the sole source of income for the organisation. If this was to cease the business would fail, unable to pay employees, pay bills and rent, unable to provide services to clients/stakeholders which could have numerous flow on effects to the risks of other organisations e.g. support workers could not be trained in behaviour management strategies to ensure their own, and the participants safety and the clients may struggle to find necessary supports to assist them to meet their daily needs without support co-ordination.
 - If they were unable to provide services for six weeks, the business would run out of cash reserves to continue to pay their staff members and ensure essential business expenses are paid. (This is covered by an extra two weeks of cover provided by Allora Options business interruption insurance)
 - If they are no longer able to pay employee's and pay for essential business expenses, they the company will ultimately lead to business failure which could initiate a number of different voluntary and involuntary legal processes/proceedings i.e. filing for bankruptcy, insolvency arrangements, liquidation or receivership. All of which will result in ensuring compliance with "5.3. Duties and liabilities of directors" under the Corporations Act 2001.
 - They could be risking people's safety including clients, other organisations employees and stakeholders who could be at risk of any of the following if behaviour support/support coordination is not funded through the NDIS. These include human rights violations, unregulated restrictive practices, prohibited restrictive practices, violence, abuse, neglect, exploitation, and discrimination.
 - If they were unable to provide services indefinitely the impact to the clients/other stakeholders would be being unable to receive behaviour supports from their usual practitioner/support coordinator. This could have detrimental effects on behaviour, mental health and efficiency of supports being provided. However, as behaviour support and support coordination aren't a necessary daily support, clients would likely be able to go about their day-to-day life and have their basic needs and human rights met.
 - Due to lack of behaviour support oversight vulnerable clients with high-risk behaviours of concern may pose risks to public/community safety.
 - Further, without behaviour supports ongoing clients are more likely to engage in risky or harmful behaviours towards others/community members as well as have a lack of connections to necessarily allied health and support services to address their daily needs.

Note: if the individual potentially impacted by the business scores within the insignificant range, the impact will not be detailed in the related section.

Essential service/function	Level of impact	Financial	Workers	Participants/ clients	Stakeholders	Legal/ regulatory	Public/ community	Reputation	Total score
Ability to provide services	0 – 10	10	10	5	5	10	2	10	52

1. **Major business impacts for the organisation/reputation/employees/financial sustainability/participants/regulatory compliance/legal liability** if Allora Options ability to provide services was hindered due to a disaster management incident.
- If they were unable to provide services for six weeks, the business would run out of cash reserves to continue to pay their staff members and ensure essential business expenses are paid. (This is covered by an extra two weeks of cover provided by Allora Options business interruption insurance)
 - If they are no longer able to pay employee's and pay for essential business expenses, they the company will ultimately lead to business failure which could initiate a number of different voluntary and involuntary legal processes/proceedings i.e., filing for bankruptcy, insolvency arrangements, liquidation or receivership. All of which will result in ensuring compliance with "5.3. Duties and liabilities of directors" under the Corporations Act 2001.
 - If they were unable to provide services for an extended period Allora Options would be unable to meet their legal/regulatory obligations to upload behaviour support plans in-line with the compliance timeframes set forth by the NDIS Quality and Safeguarding Commission (National Disability Insurance Scheme (Restrictive Practices and Behaviour Support) Rules 2018). Therefore, risking sanctioning being placed on Allora Options NDIS registration or worst case would be that Allora Options NDIS registration would be terminated.
 - Loss of registration would likely have flow on reputational effects, if Allora Options was to attempt to gain registration again, referral sources may decide to no longer refer to Allora Options due to reputational damage effects.

⁵ *Individual item business impact scores: Insignificant (0-1) = no financial loss and no risk of harm., Minor (2-4) = minimal financial loss and low risk of harm, Moderate (5-7) = moderate financial loss and medium risk of harm, Major (8-10) = causes business to stop trading or experience significant financial losses and/or carries significant risks or actual harm.

⁶ *Level of total business impact: Severe (53-70) = Needs immediate preventative or corrective action, High (54-37) = Needs preventative or corrective action within 1 month, Moderate (19-36) = Needs preventative or corrective action within 3 months, Low = (18-1) Does not currently require preventative or corrective action.

2. **Minor business impacts for participants/stakeholders** if Allora Options ability to provide services was hindered due to a disaster management incident.

- If they were unable to provide services for an extended period, the impact to the clients/other stakeholders would be being unable to receive behaviour supports from their usual practitioner/support coordinator. This could have detrimental effects on behaviour, mental health and efficiency of supports being provided. However, as behaviour support and support coordination aren't a necessary daily support, clients would likely be able to go about their day-to-day life and have their basic needs and human rights met.
- Due to lack of behaviour support oversight vulnerable clients with high-risk behaviours of concern may pose risks to public/community safety.

Note: if the individual potentially impacted by the business scores within the insignificant range, the impact will not be detailed in the related section.

Essential service/function	Level of impact ⁷	Financial	Workers	Participants/clients	Stakeholders	Legal/regulatory	Public/community	Reputation	Total score ⁸
Maintaining NDIS registration	0 – 10	10	10	5	5	10	2	10	52

1. **Major business impacts for the organisation/reputation/employees/financial sustainability/regulatory compliance/legal liability** if Allora Options were to lose their NDIS registration.

- Without a valid NDIS Registration Allora Options would be unable to operate the business units bringing in the sole income to the organisation. Ultimately this would send lead to business failure after six weeks.
- If they were unable to provide services for six weeks, the business would run out of cash reserves to continue to pay their staff members and ensure essential business expenses are paid. (This is covered by an extra two weeks of cover provided by Allora Options business interruption insurance)
- If they are no longer able to pay employee's and pay for essential business expenses, they the company will ultimately lead to business failure which could initiate a number of different voluntary and involuntary legal processes/proceedings i.e. filing for bankruptcy, insolvency arrangements, liquidation or receivership. All of which will result in ensuring compliance with "5.3. Duties and liabilities of directors" under the Corporations Act 2001.
- Loss of registration would likely have flow on reputational effects, if Allora Options was to attempt to gain registration again, referral sources may decide to no longer refer to Allora Options due to reputational damage effects.

2. **Moderate business impacts for participants/stakeholders** If Allora Options were to lose their NDIS registration.

- If they were unable to provide services for an extended period the impact to the clients/other stakeholders/public/community would be being unable to receive behaviour supports from their usual practitioner/support coordination, which could have detrimental effects on their behaviour, mental health and efficiency of their supports being provided. However, as behaviour support and support coordination aren't a necessary daily support, clients would likely be able to go about their day-to-day life and have their basic needs and human rights met.
- Due to lack of support coordination oversight vulnerable clients with high support needs this may pose risks to their health and safety.
- Due to lack of behaviour support oversight vulnerable clients with high-risk behaviours of concern may pose risks to public/community safety.

Note: if the individual potentially impacted by the business scores within the insignificant range, the impact will not be detailed in the related section.

Essential service/function	Level of impact	Financial	Workers	Participants/clients	Stakeholders	Legal/regulatory	Public/community	Reputation	Total score
Human Resources Management <i>Workplace health, safety, and well-being management – employee retention, Managing director and Executive/senior management retention</i>	0 – 10	8	10	6	6	8	2	9	49

1. **Major business impacts for the organisation/employees/reputation/financial sustainability/regulatory compliance/legal liability** if Allora Options were to not maintain adequate HR management.

- If they are unable to abide by safe-work act 2012 and provide a safe workplace, then there could be serious legal and financial ramifications for the director and executive management at Allora Options.
- If they are unable to abide by safe-work act 2012 and provide a safe workplace, then employee serious injury is a possibility.
- If they are unable to abide by the return to work act 2014 and their mandatory return to work insurance obligations then there are significant risks of financial liabilities and civil liabilities that exist
- If they are unable to maintain employee well-being and retention, there is a significant risk of employee attrition or mass exodus leading to an inability to service clients and bring income into the organisation. In the worst-case scenario, if Allora lost all of their employees ultimately this would send lead to business failure.

⁷ *Individual item business impact scores: Insignificant (0-1) = no financial loss and no risk of harm., Minor (2-4) = minimal financial loss and low risk of harm, Moderate (5-7) = moderate financial loss and medium risk of harm, Major (8-10) = causes business to stop trading or experience significant financial losses and/or carries significant risks or actual harm.

⁸ *Level of total business impact: Severe (53-70) = Needs immediate preventative or corrective action, High (54-37) = Needs preventative or corrective action within 1 month, Moderate (19-36) = Needs preventative or corrective action within 3 months, Low = (18-1) Does not currently require preventative or corrective action.

- If Allora was to lose key management personnel, then without adequate succession planning/delegation of authority in place to ensure their respective departments could continue to function adequately in their absence. Ultimately leading to risks of mismanagement, non-compliance with legislative requirements set forth by the NDIS Quality and Safeguarding Commission as well as any other legislative requirements of the business.
- Mismanagement and/or employee dissatisfaction may result in significant reputational damage to Allora Options affecting the organisations' ability to gain referrals, recruit new employees and retain employees. Ultimately leading to an inability to service active clients, an inability to service any new/waitlisted clients, reputation damage as a result of inability to service clients ultimately leading to significant financial losses.

2. **Minor-Moderate business impacts for participants/stakeholders/community/regulatory compliance/legal liability** if Allora Options were to not maintain adequate HR management.

- Service provision quality may be affected due to factors such as employee burn-out, illness or injury caused by inadequate HR management. This could cause slight disruptions to clients and stakeholders e.g. cancelled appointments or decreased quality in the supports provided.
- If they were unable to provide services for an extended period the impact to the clients/other stakeholders/public/community would be being unable to receive behaviour supports from their usual practitioner/support coordination, which could have detrimental effects on their behaviour, mental health and efficiency of their supports being provided. However, as behaviour support and support coordination aren't a necessary daily support, clients would likely be able to go about their day-to-day life and have their basic needs and human rights met.
- If they were unable to fulfill regulatory requirements (practice standards) HR management element it is likely that Allora Options would be required to undertake actions to rectify the non-compliance which will put temporary strain on management to remedy non-compliance areas.

Note: if the individual potentially impacted by the business scores within the insignificant range, the impact will not be detailed in the related section.

Essential service/function	Level of impact ⁹	Financial	Workers	Participants/ clients	Stakeholders	Legal/ regulatory	Public/ community	Reputation	Total score ¹⁰
Client base retention and referrals	0 – 10	10	10	3	3	10	2	8	46

1. **Major business impacts for the organisation/employees/reputation/financial sustainability/regulatory compliance/legal liability** if Allora Options were to not maintain client retention and referrals.

- If they are unable to retain clients or gain new clients this will result in a significant loss of income for the organisation. Without Income, the organisation can't pay their employees resulting in employee's being made redundant or similar. With no clients and no employees, the business would ultimately fail.
- If they are no longer able to pay employee's and pay for essential business expenses, they the company will ultimately lead to business failure which could initiate a number of different voluntary and involuntary legal processes/proceedings i.e. filing for bankruptcy, insolvency arrangements, liquidation or receivership. All of which will result in ensuring compliance with "5.3. Duties and liabilities of directors" under the Corporations Act 2001.
- If Allora Options are unable to retain clients this carries a reputational risk that the organisations work will be perceived as inferior quality. This will lead to decreased new referrals as well as the loss of the existing client base.

2. **Minor business impacts for participants/stakeholders/community/reputation** if Allora Options were to not maintain client retention and referrals.

- There could be service provision interruptions causing minor distress to clients and stakeholders due to the requirement to now find a new organisation to fulfill the service.
- There could also be a risk of client funds over utilization due to the transition to a new provider.
- The impact to the clients/other stakeholders would be being unable to receive behaviour supports from their usual practitioner/support coordinator, which could have detrimental effects on behaviour, mental health and efficiency of supports being provided. However, as behaviour support and support coordination aren't a necessary daily support, clients would likely be able to go about their day-to-day life and have their basic needs and human rights met.
- Due to lack of support coordination oversight vulnerable clients with high support needs this may pose risks to their health and safety.
- Due to lack of behaviour support oversight vulnerable clients with high-risk behaviours of concern may pose risks to public/community safety.

Note: if the individual potentially impacted by the business scores within the insignificant range, the impact will not be detailed in the related section.

⁹ *Individual item business impact scores: Insignificant (0-1) = no financial loss and no risk of harm., Minor (2-4) = minimal financial loss and low risk of harm, Moderate (5-7) = moderate financial loss and medium risk of harm, Major (8-10) = causes business to stop trading or experience significant financial losses and/or carries significant risks or actual harm.

¹⁰ *Level of total business impact: Severe (53-70) = Needs immediate preventative or corrective action, High (54-37) = Needs preventative or corrective action within 1 month, Moderate (19-36) = Needs preventative or corrective action within 3 months, Low = (18-1) Does not currently require preventative or corrective action.

Essential service/function	Level of impact ¹¹	Financial	Workers	Participants/clients	Stakeholders	Legal/regulatory	Public/community	Reputation	Total score ¹²
Access to appropriate technology/access to essential resources to allow employees to deliver services. <ul style="list-style-type: none"> Laptop Mobile phone Vehicle/transportation Workspace/location 	0 – 10	10	10	6	6	10	2	2	46

- Major business impacts for the organisation/employees/financial sustainability/regulatory compliance/legal liability** if Allora Options employees were unable able to access appropriate technology/facilities for a significant period.
 - If they were unable to access appropriate technology/facilities for six weeks, the business would run out of cash reserves to continue to pay their staff members and ensure essential business expenses are paid. (This is covered by an extra two weeks of cover provided by Allora Options business interruption insurance)
 - If they are no longer able to pay employee’s and pay for essential business expenses, they the company will ultimately lead to business failure which could initiate a number of different voluntary and involuntary legal processes/proceedings i.e. filing for bankruptcy, insolvency arrangements, liquidation or receivership. All of which will result in ensuring compliance with “5.3. Duties and liabilities of directors” under the Corporations Act 2001.
 - If they were unable to access appropriate technology/facilities for an extended period Allora Options would be unable to meet their legal/regulatory obligations to upload behaviour support plans in-line with the compliance timeframes set forth by the NDIS Quality and Safeguarding Commission. Therefore, risking sanctioning being placed on Allora Options NDIS registration or worst case would be that Allora Options NDIS registration would be terminated.
 - Inability to maintain NDIS registration will have significant reputational damage effects, as previously stated. However, the likelihood of this occurring due to lack of access to technology/resources is very low.
- Minor business impacts for participants/stakeholders/community/reputation** If Allora Options employees were unable able to access appropriate technology/facilities for a significant period.
 - If they were unable to provide services for an extended period, the impact to the clients/other stakeholders would be being unable to receive behaviour supports from their usual practitioner/support coordinator. This could have detrimental effects on behaviour, mental health and efficiency of supports being provided. However, as behaviour support and support coordination aren’t a necessary daily support, clients would likely be able to go about their day-to-day life and have their basic needs and human rights met.
 - Due to lack of support coordination oversight vulnerable clients with high support needs this may pose risks to their health and safety.
 - Due to lack of behaviour support oversight vulnerable clients with high-risk behaviours of concern may pose risks to public/community safety.

Note: if the individual potentially impacted by the business scores within the insignificant range, the impact will not be detailed in the related section.

Essential service/function	Level of impact	Financial	Workers	Participants/clients	Stakeholders	Legal/regulatory	Public/community	Reputation	Total score
Maintaining business reputation	0-10	10	10	0	0	10	0	10	40

- Major business impacts for the organisation/employees/financial sustainability/reputation** if Allora Options was unable to maintain the business reputation.
 - If they suffered negative media exposure this could cause clients to cease services. In a worst case scenario if all clients decided to “boycott” Allora Option’s as a result of negative media exposure Allora Option’s would have no clients after two weeks as per the service agreement termination section.
 - If they were unable to provide services for six weeks, the business would run out of cash reserves to continue to pay their staff members and ensure essential business expenses are paid. (This is covered by an extra two weeks of cover provided by Allora Options business interruption insurance)
 - If they are unable to retain clients or gain new clients this will result in a significant loss of income for the organisation. Without Income, the organisation can’t pay their employees resulting in employee’s being made redundant or similar. With no clients and no employees, the business would ultimately fail.
 - If they are no longer able to pay employee’s and pay for essential business expenses, they the company will ultimately lead to business failure which could initiate a number of different voluntary and involuntary legal processes/proceedings i.e. filing for bankruptcy, insolvency arrangements, liquidation or receivership. All of which will result in ensuring compliance with “5.3. Duties and liabilities of directors” under the Corporations Act 2001
 - If Allora Options are unable to retain clients this carries a reputational risk that the organisations work will be perceived as inferior quality. This will lead to decreased new referrals as well as the loss of the existing client base.

¹¹ *Individual item business impact scores: Insignificant (0-1) = no financial loss and no risk of harm., Minor (2-4) = minimal financial loss and low risk of harm, Moderate (5-7) = moderate financial loss and medium risk of harm, Major (8-10) = causes business to stop trading or experience significant financial losses and/or carries significant risks or actual harm.

¹² *Level of total business impact: Severe (53-70) = Needs immediate preventative or corrective action, High (54-37) = Needs preventative or corrective action within 1 month, Moderate (19-36) = Needs preventative or corrective action within 3 months, Low = (18-1) Does not currently require preventative or corrective action.

Note: if the individual potentially impacted by the business scores within the insignificant range, the impact will not be detailed in the related section.

Essential service/function	Level of impact ¹³	Financial	Workers	Participants/clients	Stakeholders	Legal/regulatory	Public/community	Reputation	Total score ¹⁴
Face-to-face services can be provided.	0 – 10	5	5	6	6	5	2	7	36

1. **Moderate business impacts for the organisation/employees/financial sustainability/participants/stakeholders/regulatory compliance/legal liability/reputation** if Allora Options employees were unable able to provide face-to-face services for a significant period.
- If they will be unable to evidence person-centred planning which is a requirement of the practice standards. This could lead to breaching the practice standards and possible legal ramifications. However, this is unlikely to cause any significant sanctions to be put on the organisations NDIS registration (or termination)
 - Participants would be unable to access supports which are most appropriate to their needs, goals, and preferences. This could lead to breaching the practice standards, possible legal ramifications and the participant being denied access to services that they need not as a daily requirement but supports to progress them towards their long-term goals.
 - Allora Options could suffer reputational damage as a provider who does not provide person-centred services, involve clients in planning and listen to the clients and stakeholder feedback. This could lead to decreased referrals and difficulties in client retention leading to significant financial impacts on the organisation.

Note: if the individual potentially impacted by the business scores within the insignificant range, the impact will not be detailed in the related section.

¹³ *Individual item business impact scores: Insignificant (0-1) = no financial loss and no risk of harm., Minor (2-4) = minimal financial loss and low risk of harm, Moderate (5-7) = moderate financial loss and medium risk of harm, Major (8-10) = causes business to stop trading or experience significant financial losses and/or carries significant risks or actual harm.

¹⁴ *Level of total business impact: Severe (53-70) = Needs immediate preventative or corrective action, High (54-37) = Needs preventative or corrective action within 1 month, Moderate (19-36) = Needs preventative or corrective action within 3 months, Low = (18-1) Does not currently require preventative or corrective action.

Response

The type of response required is dependent upon the type of disruption that occurs. The Allora Options emergency management and business continuity policies detail some response strategies that may be required and include:

- evacuation procedures
- emergency kits
- documents; including NDIS participant plans, medication lists, emergency contact lists for participants and workers etc.
- plans for ways service delivery can be maintained through different modes of operation (i.e. telecommunication, virtual gatherings, support from home etc.)
- essential equipment required for business operation and service provisions (i.e. laptops, PPE, medical equipment etc.).

Every disruption response will differ and so a detailed list of roles and responsibilities have been provided within this Business Continuity Plan and [Emergency Management Plan](#).

This business continuity plan must be sent to each individual identified as having a role in the response to an incident.

Internal business continuity planning team (or individual)

Role	Responsibilities	Name	Current position/title	Contact phone
Continuity plan coordinator (CPC)	<ul style="list-style-type: none"> Enact communications that the plan is being set in motion to team members, ensuring all are aware of their roles and responsibilities as per this plan. With the activation of the business continuity plan the CPC will be responsible for notifying the NDIS commissioner of changes to our ability to provide the supports we are registered to provide (Refer to Business Continuity Policy in appendix) 	Nicholas Kakolirs	Managing Director	0457 310 614
		Grace Schroder	Business Advisor	
		Shannen Bayley	Business Support Manager	0491 907 971
Backup coordinator/s	<ul style="list-style-type: none"> Perform the duties of the Continuity plan coordinator in the event that they are unavailable for any reason. Assist the Continuity Plan Coordinator in anyway as directed by them. 	Katherine Boeck	Clinical project Coordinator	0487 026 568
		Alicia Phillis	Business Support Officer	0456 241 442
Planning team members	<ul style="list-style-type: none"> Be involved in enacting the business continuity plan as directed by the CPC. Listen to official communications only sent out by the CPC or BC (on behalf of CPC) Act in accordance with their directions to ensure yours and others safety as well as in a such a manner that the organisations reputation is protected. Bring to the attention of your direct supervisor any issues/concerns you have and they will assist or escalate as necessary based on their risk assessment. (refer to <u>risk management procedure</u>) 	Nicholas Kakoliris	Managing Director	0457 310 614
		Scott Murphy	Client Services Manager	0484 577 044
		Sam Taylor	Support Coordination Manager	0416 572 927
		Crystal Johnson	Clinical Lead	0418 350 995

Backup team members	<ul style="list-style-type: none"> • Be involved in enacting the business continuity plan as directed by the CPC in the absence of a planning team member. • Listen to official communications only sent out by the CPC or BC (on behalf of CPC) • Act in accordance with their directions to ensure yours and others safety as well as in a such a manner that the organisations reputation is protected. • Bring to the attention of your direct supervisor any issues/concerns you have, and they will assist or escalate as necessary based on their risk assessment. (refer to risk management procedure) 	Lorraine Lindsay	Clinical Lead	0459 031 908
		Adam Larkin	Clinical Lead	0477 955 139
		Grace Schroder	Business Advisor	n/a
All other Allora Options Employees	<ul style="list-style-type: none"> • Listen to official communications only sent out by the CPC or BC (on behalf of CPC) • Act in accordance with their directions to ensure yours and others safety as well as in a such a manner that the organisations reputation is protected. • Bring to the attention of your direct supervisor any issues/concerns you have and they will assist or escalate as necessary based on their risk assessment. (refer to risk management procedure) 	n/a	PBS Practitioners	n/a

Vulnerable participants

As an NDIS service provider it is vital we also prepare emergency response plans for the participants we support. We have identified that all the participants we support would be vulnerable in the event of a disruption of their day-to-day supports, However, as Allora Options are not a daily support provider that participants day-to-day support needs will not be directly impacted by the temporary loss of our services (therapy / positive behaviour support) As such, refer to client's individual risk assessments and service profiles which outline their vulnerabilities and how Allora Options manages this within their scope of service.

Recovery

The primary aim of the recovery phase is to return function to all areas of Allora Options to full functionality as soon as reasonably practicable following the disruption. This may be staggered dependent upon the criticalness of the service and the available resources.

The necessary steps are detailed to facilitate the return of operation including:

- The order of return for business operations (this will primarily be informed by the business impact analysis and criticalness)
- Resources required to return services.
- Details of suppliers/vendors/workers required to perform the return to operation.

Business continuity action plans

Business operation:	Maintaining Business reputation			Order of return number	1
Who is responsible for implementing this plan?	MD	Phone	0457310614	Email	nick@alloraoptions.com.au
Alternate person responsible	BSM, SCM, CSM, BA	Phone	BSM: 0491 907 971 SCM: 0416 572 927 CSM: 0484 577 044 BA: n/a	Email	BSM: shannen@alloraoptions.com.au SCM: sam@alloraoptions.com.au CSM: scott@alloraoptions.com.au BA: grace@alloraoptions.com.au
Business impact issues	<u>See business impact analysis</u>				
Action plan (Detailed steps to return business operation prior to interruption).	<p>In the event of reputational damage as a result of any disaster event:</p> <ol style="list-style-type: none"> 1. Seek legal advice dependant on the issue that has arisen regarding the best course of action to protect the organisation. 2. Ensure the director is briefed by the business support team to put out a statement to reassure our clients, stakeholders and broader industry of our continuing commitment to provide our clients with a quality service. <ol style="list-style-type: none"> 2.1 Our continuing commitment to upholding the <u>NDIS QSC Practice standards</u>. 2.2 In the event of a data breach reassure clients and stakeholders of our continuing commitment to their privacy <ol style="list-style-type: none"> 2.2.1 Detail how we are going to manage the breach and what this means for them and what are they to expect to happen due to this breach. This will also assist in the prevention of complaints to the NDIS Quality and Safeguards commission if Allora Options is able to rectify the complaint through an internal complaint system. 2.3 Asking them for their feedback, concerns or queries that they may have to ensure that we can address their concerns. 2.4 Ensure that all concerns are followed up in a timely, empathetic and effective manner that leads to demonstrated change within the organisation. 2.5 Ensure that this information is communicated to each person providing a complaint, feedback or concern. 				

	<ol style="list-style-type: none"> 3. In the event of a loss of clients begin social media marketing campaign indicating that Allora Options has immediate capacity for Positive Behaviour Support Services. 4. Advise employees against speaking to media outlets, instead to come to Allora management or business support team with their concerns and they will be resolved internally. 5. If the Allora Options name’s reputation is damaged irreparably then consider re-branding the organisation under a different trading name. 6. Professional indemnity insurance enacted – reputational protection and public relations 7. Public and products liability insurance enacted if required. 8. Cyber Liability and Privacy protection insurance enacted if required. 				
Resource needs (List needs and contact information for resource needs—staffing, equipment, contracting out services)	<ul style="list-style-type: none"> • Legal Advice and <u>professional indemnity insurance/ public & product liability insurance</u> • <u>Disaster management insurance</u> – business interruption • Complains management and reporting system (<u>CentroAssist</u>). • Managing director and executive management team as specified in persons responsible and alternate persons responsible. • <u>Management Liability Insurance</u> • Business support team employees • Accountant • <u>Cyber Liability and Privacy protection insurance</u> 				
Resource vendor/supplier	Wright Street Lawyers		Product/resource	Legal Advice	
Contact person	Spiro Pilouras	Phone	0420 565 012		spiros@wrightstreetlawyers.com.au
Alternate contact person	n/a	Phone	n/a		n/a
Resource vendor/supplier	BERKLEY INSURANCE AUSTRALIA		Product/resource	MANAGEMENT LIABILITY	
Contact person	KELLY KEAST	Phone	(08) 8273 0900	Email	info@holdfast.com.au
Alternate contact person	n/a	Phone	n/a	Email	n/a
Resource vendor/supplier	BizCover/ DUAL Australia		Product/resource	Professional Indemnity and public & product liability insurance	
Contact person	Michael Gottlieb	Phone	1300 295 262	Email	broker@bizcoverforbrokers.com.au
Alternate contact person	n/a	Phone	n/a	Email	n/a
Resource vendor/supplier	Holdfast Insurance Brokers Pty Ltd/ AIG Australia Limited (AIG)		Product/resource	Disaster Management insurance	

Contact person	KELLY KEAST	Phone	(08) 8273 0900	Email	info@holdfast.com.au
Alternate contact person	n/a	Phone	n/a	Email	n/a
Resource vendor/supplier	DUAL Cyber Liability and Privacy Protection		Product/resource	Cyber Liability and Privacy insurance	
Contact person	KELLY KEAST	Phone	(08) 8273 0900	Email	info@holdfast.com.au
Alternate contact person	n/a	Phone	n/a	Email	n/a
Resource vendor/supplier	Commercial and Legal		Product/resource	Accounting	
Contact person	Shaun Argent	Phone	0411 372 457	Email	s.argent@commercialandlegal.com.au
Alternate contact person	Angelina Comley	Phone	0409 697 259	Email	a.comley@commercialandlegal.com.au

Business operation:	Upholding all practice standards and NDIS code of conduct outlined under NDIS QSC legislative requirements.			Order of return number	2
Who is responsible for implementing this plan?	MD	Phone	0457310614	Email	nick@alloraoptions.com.au
Alternate person responsible	BSM, SCM, CSM, BA	Phone	BSM: 0491 907 971 SCM: 0416 572 927 CSM: 0484 577 044 BA: n/a	Email	BSM: shannen@alloraoptions.com.au SCM: sam@alloraoptions.com.au CSM: scott@alloraoptions.com.au BA: grace@alloraoptions.com.au
Business impact issues	<u>See business impact analysis</u>				
Action plan (Detailed steps to return business operation prior to interruption).	<ol style="list-style-type: none"> 1. If Allora Options was to be issued a compliance and/or enforcement action due to a breach of the practice standards or code of conduct an internal audit process and/or investigation into why the practice standard or code of conduct was breached will take place. <ol style="list-style-type: none"> 1.1. Review the information provided by the NDIS Commission regarding why Allora Options has been issued with a compliance/enforcement order. 1.2. On the basis of the internal audit and investigation develop a root-cause-analysis and plan actions to rectify the issues identified in the compliance/enforcement order and any other issues identified. 1.3. Once/if any gaps/causes are identified ensure a timely plan is developed to rectify any issues and control for any risks. Ensure these risks are recorded in the Allora Options risk management system and that these risks are linked to actions and continuous improvements (in Allora's continuous improvement register) 				

- 1.4. Implement the plan to make any necessary changes to ensure all practice standards and NDIS code of conduct are being upheld, risks are being controlled for and the necessary continuous improvement initiatives are set.
- 2. Comply with requests from the NDIS Commission to provide them with information and records regarding the disaster/incident and Allora Options management of the incident including the investigations conducted and what the outcomes of those investigations to ensure that clients are safeguarded in the future.
- 3. In the event that Allora Options has a court-based compliance and enforcement action taken out against them by the NDIS Commission Allora Options will seek private legal counsel and advice on how to proceed.
 - 3.1. Professional indemnity insurance will financially protect Allora Options (and employees) in the event that any of Allora’s recommendations or advice have caused a financial loss for a client and they’re found to be at fault.
 - 3.2. Public and Product Liability insurance covers claims by the public or clients for injuries death and property damage that involve Allora Options.
- 4. ReturnToWorkSA insurance enacted by any injured employees as a result of a disaster event.
 - 4.1. Allora Options will then notify SafeWork SA of the incident if it was life threatening or considered a serious injury.
- 5. Disaster management insurance- business interruption will be enacted in the event of an inability to operate has resulted from any sanctions or registration termination.

Resource needs
 (List needs and contact information for resource needs—staffing, equipment, contracting out services)

- Legal Advice and professional indemnity insurance/ public & product liability insurance
- ReturnToWorkSA insurance
- Disaster management insurance- business interruption
- Risk, actions, continuous improvement, and WHS/Incident/hazards reporting system (CentroAssist).
- Managing director and executive management team as specified in persons responsible and alternate persons responsible.
- Employees from the business support team will conduct the internal audit as directed by the department head and managing director.
- Management Liability Insurance

Resource vendor/supplier	BizCover/ DUAL Australia		Product/resource	Professional Indemnity and public & product liability insurance	
Contact person	Michael Gottlieb	Phone	1300 295 262	Email	broker@bizcoverforbrokers.com.au
Alternate contact person	n/a	Phone	n/a	Email	n/a

Resource vendor/supplier	Holdfast Insurance Brokers Pty Ltd/ AIG Australia Limited (AIG)		Product/resource	Disaster Management insurance	
Contact person	KELLY KEAST	Phone	(08) 8273 0900	Email	info@holdfast.com.au
Alternate contact person	n/a	Phone	n/a	Email	n/a
Resource vendor/supplier	Commercial and Legal		Product/resource	Accounting	
Contact person	Shaun Argent	Phone	0411 372 457	Email	s.argent@commercialandlegal.com.au
Alternate contact person	Angelina Comley	Phone	0409 697 259	Email	a.comley@commercialandlegal.com.au
Resource vendor/supplier	Wright Street Lawyers		Product/resource	Legal Advice	
Contact person	Spiro Pilouras	Phone	0420 565 012	Email	spiros@wrightstreetlawyers.com.au
Alternate contact person	n/a	Phone	n/a	Email	n/a
Resource vendor/supplier	BERKLEY INSURANCE AUSTRALIA		Product/resource	MANAGEMENT LIABILITY	
Contact person	KELLY KEAST	Phone	(08) 8273 0900	Email	info@holdfast.com.au
Alternate contact person	n/a	Phone	n/a	Email	n/a

Business operation:	Maintaining NDIS Registration			Order of return number	3
Who is responsible for implementing this plan?	MD	Phone	0457310614	Email	nick@alloraoptions.com.au
Alternate person responsible	BSM, SCM, CSM, BA	Phone	BSM: 0491 907 971 SCM: 0416 572 927 CSM: 0484 577 044 BA: n/a	Email	BSM: shannen@alloraoptions.com.au SCM: sam@alloraoptions.com.au CSM: scott@alloraoptions.com.au BA: grace@alloraoptions.com.au
Business impact issues	<i>See business impact analysis</i>				

Action plan

(Detailed steps to return business operation prior to interruption).

1. If Allora Options has undergone the external NDIS auditing “verification and certification” process and has not been successful Allora Options is to contact the NDIS Commission to request a review within 3 months of the decision and follow the process set forth by the NDIS Commission.
 - 1.1. Review the information provided by the NDIS Commission regarding why Allora Options was unsuccessful.
 - 1.2. Conduct an internal audit of Allora Options systems and processes to determine any gap areas, non-compliance areas, opportunities for continuous improvement and risks identified. Ensure this is documented in a risk management system linked to actions and continuous improvement actions.
2. If Allora Options was to be issued a compliance and/or enforcement action due to a breach of the practice standards or code of conduct an internal audit process and/or investigation into why the practice standard or code of conduct was breached will take place.
 - 2.1. Review the information provided by the NDIS Commission regarding why Allora Options has been issued with a compliance/enforcement order.
 - 2.2. On the basis of the internal audit and investigation develop a root-cause-analysis and plan actions to rectify the issues identified in the compliance/enforcement order and any other issues identified.
 - 2.3. Ensure these risks are recorded in the Allora Options risk management system and that these risks are linked to actions and continuous improvements (in Allora’s continuous improvement register)
 - 2.4. Implement the plan to make any necessary changes to ensure all practice standards and NDIS code of conduct are being upheld, risks are being controlled for and the necessary continuous improvement initiatives are set.
 - 2.5. Notify the NDIS Commission within the timeframe specified by them in the compliance and/or enforcement notice about the actions you have taken to ensure compliance with the issues they have identified.
3. ReturnToWorkSA insurance enacted by any injured employees as a result of a disaster event.
 - 3.1. Allora Options will then notify SafeWork SA of the incident if it was life threatening or considered a serious injury.
4. Disaster management insurance- business interruption will be enacted in the event of an inability to operate has resulted from any sanctions or registration termination.

Resource needs

(List needs and contact information for resource needs—staffing, equipment, contracting out services)

- Legal Advice and professional indemnity insurance/ public & product liability insurance
- ReturnToWorkSA insurance
- Disaster management insurance – business interruption
- Risk, actions, continuous improvement and WHS/Incident/hazards reporting system (CentroAssist).
- Managing director and executive management team as specified in persons responsible and alternate persons responsible.

	<ul style="list-style-type: none"> • Employees from the business support team will conduct the internal audit as directed by the department head and managing director. • <u>Management Liability Insurance</u> 			
Resource vendor/supplier	BizCover/ DUAL Australia		Product/resource	Professional Indemnity and public & product liability insurance
Contact person	Michael Gottlieb	Phone	1300 295 262	Email broker@bizcoverforbrokers.com.au
Alternate contact person	n/a	Phone	n/a	Email n/a
Resource vendor/supplier	Holdfast Insurance Brokers Pty Ltd/ AIG Australia Limited (AIG)		Product/resource	Disaster Management insurance
Contact person	KELLY KEAST	Phone	(08) 8273 0900	Email info@holdfast.com.au
Alternate contact person	n/a	Phone	n/a	Email n/a
Resource vendor/supplier	BERKLEY INSURANCE AUSTRALIA		Product/resource	MANAGEMENT LIABILITY
Contact person	KELLY KEAST	Phone	(08) 8273 0900	Email info@holdfast.com.au
Alternate contact person	n/a	Phone	n/a	Email n/a
Resource vendor/supplier	Commercial and Legal		Product/resource	Accounting
Contact person	Shaun Argent	Phone	0411 372 457	Email s.argent@commercialandlegal.com.au
Alternate contact person	Angelina Comley	Phone	0409 697 259	Email a.comley@commercialandlegal.com.au
Resource vendor/supplier	Wright Street Lawyers		Product/resource	Legal Advice
Contact person	Spiro Pilouras	Phone	0420 565 012	Email spiros@wrightstreetlawyers.com.au
Alternate contact person	n/a	Phone	n/a	Email n/a

Business operation:	Ability to provide services			Order of return number	4
Who is responsible for implementing this plan?	MD	Phone	0457310614	Email	nick@alloraoptions.com.au

Alternate person responsible	BSM, SCM, CSM, BA	Phone	BSM: 0491 907 971 SCM: 0416 572 927 CSM: 0484 577 044 BA: n/a	Email	BSM: shannen@alloraoptions.com.au SCM: sam@alloraoptions.com.au CSM: scott@alloraoptions.com.au BA: grace@alloraoptions.com.au
Business impact issues	<u>See business impact analysis</u>				
Action plan (Detailed steps to return business operation prior to interruption).	<ol style="list-style-type: none"> 1. Identify a suitable interim location for workers to operate from if they are unable to work from home or the office e.g. local library. <ol style="list-style-type: none"> 1.1. Ensure staff are provided with a procedure regarding working in a public area to ensure client privacy and confidentiality i.e. laptop not to be left unattended or unlocked, any phone calls regarding clients must be done in a private space e.g. booking a private room in the library, in your car etc.) 2. Determine whether the client’s residence is safe to visit by conducting a home visit risk assessment following any disaster type event. <ol style="list-style-type: none"> 2.1 In the event of a covid-19 (other pandemic like event) or any disaster type event that makes a client’s residence unsafe to visit or you are unable to visit due to government regulation, employees will continue to provide non-face-to-face services or use alternative methods of providing face-to-face services e.g. telehealth, video calling or an alternative safe meeting place as approved by the department head and in line with any government regulations at the time. 1. If none of the above options are suitable to continue delivering services, then the MOU’s plan will be enacted and they will be contracted to take over the Allora Options clients until such a time that Allora Options can recommence services. 2. Enact appropriate disaster management insurance claim if the above steps are unable to be actioned to ensure continuity of services. (Please note this insurance does not cover disruptions cause by any type of pandemic) 3. ReturnToWorkSA insurance enacted by any injured employees as a result of a disaster event. <ol style="list-style-type: none"> 3.1. Allora Options will then <u>notify SafeWork SA</u> of the incident if it was life threatening or considered a serious injury. 4. <u>Disaster management insurance-</u> business interruption will be enacted in the event of an inability to operate has resulted from any sanctions or registration termination. 				

Resource needs (List needs and contact information for resource needs—staffing, equipment, contracting out services)	<ul style="list-style-type: none"> • Legal Advice and <u>professional indemnity insurance/ public & product liability insurance</u> • <u>ReturnToWorkSA insurance</u> • <u>Disaster management insurance</u> – business interruption • All staff at Allora Options • Functioning work phones and/or telehealth provider platform. • Protocols regarding maintaining privacy and confidentiality for participants while working from an alternative location. • MOU’s contacted • Risk, actions, continuous improvement and WHS/Incident/hazards reporting system (<u>CentroAssist</u>). • Managing director and executive management team as specified in persons responsible and alternate persons responsible. • All Allora Options employees 			
Resource vendor/supplier	BizCover/ DUAL Australia	Product/resource	Professional Indemnity and public & product liability insurance	
Contact person	Michael Gottlieb	Phone	1300 295 262	Email broker@bizcoverforbrokers.com.au
Alternate contact person	n/a	Phone	n/a	Email n/a
Resource vendor/supplier	Holdfast Insurance Brokers Pty Ltd/ AIG Australia Limited (AIG)	Product/resource	Disaster Management insurance	
Contact person	KELLY KEAST	Phone	(08) 8273 0900	Email info@holdfast.com.au
Alternate contact person	n/a	Phone	n/a	Email n/a

Business operation:	NDIS continues to fund Behaviour Support and Support Coordination			Order of return number	5
Who is responsible for implementing this plan?	MD	Phone	0457310614	Email	nick@alloraoptions.com.au
Alternate person responsible	BSM, SCM, CSM, BA	Phone	BSM: 0491 907 971 SCM: 0416 572 927 CSM: 0484 577 044 BA: n/a	Email	BSM: shannen@alloraoptions.com.au SCM: sam@alloraoptions.com.au CSM: scott@alloraoptions.com.au BA: grace@alloraoptions.com.au

Business impact issues	<i>See business impact analysis</i>			
Action plan (Detailed steps to return business operation prior to interruption).	<ol style="list-style-type: none"> 1. Contact and enact Disaster management insurance - Business interruption insurance. 2. Key Management Personnel to identify any opportunities for government compensation (or similar) that the organisation may be eligible to claim. 3. Key management personnel to identify opportunities to continue to gain income to keep the organisation going as well as to provide continuity of supports to Allora’s clients. E.g. grants funding or alternative funding lines to utilise under the NDIS to deliver services in line with our current strategic direction and skillset. 4. Key management personnel to re-evaluate the strategic direction of the company and identify new gaps in the market and service opportunities and develop a new business plan. 5. Continue to monitor the media and NDIS Commission official communications for any updates regarding what NDIS providers should do. 6. As a last resort utilize cash reserves to pay staff and to ensure other essential business expenses can be paid. 			
Resource needs (List needs and contact information for resource needs—staffing, equipment, contracting out services)	<ul style="list-style-type: none"> • Legal Advice and <u>professional indemnity insurance/ public & product liability insurance</u> • <u>Disaster management insurance</u> – business interruption • Risk, actions, continuous improvement and WHS/Incident/hazards reporting system (<u>CentroAssist</u>). • Managing director and executive management team as specified in persons responsible and alternate persons responsible. • Cash Reserves • Accountant 			
Resource vendor/supplier	Wright Street Lawyers		Product/resource	Legal Advice
Contact person	Spiro Pilouras	Phone	0420 565 012	Email spiros@wrightstreetlawyers.com.au
Alternate contact person	n/a	Phone	n/a	Email n/a
Resource vendor/supplier	BizCover/ DUAL Australia		Product/resource	Professional Indemnity and public & product liability insurance
Contact person	Michael Gottlieb	Phone	1300 295 262	Email broker@bizcoverforbrokers.com.au
Alternate contact person	n/a	Phone	n/a	Email n/a

Resource vendor/supplier	Holdfast Insurance Brokers Pty Ltd/ AIG Australia Limited (AIG)		Product/resource	Disaster Management insurance	
Contact person	KELLY KEAST	Phone	(08) 8273 0900	Email	info@holdfast.com.au
Alternate contact person	n/a	Phone	n/a	Email	n/a
Resource vendor/supplier	Commercial and Legal		Product/resource	Accounting	
Contact person	Shaun Argent	Phone	0411 372 457	Email	s.argent@commercialandlegal.com.au
Alternate contact person	Angelina Comley	Phone	0409 697 259	Email	a.comley@commercialandlegal.com.au

Business operation:	Access to appropriate technology/access to essential resources to allow employees to deliver services.			Order of return number	6
Who is responsible for implementing this plan?	MD	Phone	0457310614	Email	nick@alloraoptions.com.au
Alternate person responsible	BSM, SCM, CSM, BA	Phone	BSM: 0491 907 971 SCM: 0416 572 927 CSM: 0484 577 044 BA: n/a	Email	BSM: shannen@alloraoptions.com.au SCM: sam@alloraoptions.com.au CSM: scott@alloraoptions.com.au BA: grace@alloraoptions.com.au
Business impact issues	<u>See business impact analysis</u>				
Action plan (Detailed steps to return business operation prior to interruption).	<ol style="list-style-type: none"> 1. If there has been damage to employee's equipment as a result of a disaster event whilst in the office, the items will be covered by "Disaster management insurance" (up to \$15,750) <ol style="list-style-type: none"> 1.1. Individual employees will submit a tech-request including all items required to work. 1.2. Utilize extra stores of electronic and non-electronic equipment such as laptops, monitor, keyboards, mouses, mobile phones, connector docks and cables, desks, chairs, ergonomics equipment and projector. 1.3. If there are no extra stores of these items, they will be purchased as required utilising compensation provided by the "disaster management insurance". 2. In the event that the building is damaged and as a result poses a WHS hazard or is unable then Disaster management insurance will cover damage costs to repair the building to a safe and usable state for employees. 				

	<p>2.1. staff will conduct their work from a suitable alternative location including working from home if the staff members home is suitable.</p> <p>2.2. if it is not suitable an alternative location will be identified and provided to the employee along with protocols on maintaining client privacy and confidentiality.</p> <p>3. Employee vehicle damaged on work property or within work time e.g. driving to clients house?</p> <p>3.1. The individual employee will enact a claim on their personal car insurance as appropriate.</p> <p>3.2. Employees are responsible for taking their personal vehicle for repairs and may use a loan car to conduct business activities in an interim period.</p> <p>3.3. Employees will need to provide the employer with registration, insurance details if these things have changed.</p> <p>3.4. Further, the employees will need to provide evidence that the damages to the vehicle were repaired by a qualified repairer, via an invoice statement.</p>			
Resource needs (List needs and contact information for resource needs—staffing, equipment, contracting out services)	<ul style="list-style-type: none"> • <u>Disaster management insurance</u> • Laptops, monitor, keyboards, mice, mobile phones, connector docks and cables, desks, chairs, ergonomics equipment and projector. • Vehicle/transportation • Workspace/location 			
Resource vendor/supplier	Officeworks	Product/resource	Laptops, monitor, keyboards, mice, mobile phones, connector docks and cables, desks, chairs, ergonomics equipment and projector.	
Resource vendor/supplier	Holdfast Insurance Brokers Pty Ltd/ AIG Australia Limited (AIG)	Product/resource	Disaster Management insurance	
Contact person	KELLY KEAST	Phone	(08) 8273 0900	Email info@holdfast.com.au
Alternate contact person	n/a	Phone	n/a	Email n/a

Business operation:	HR Management - Workplace health, safety and well-being management – employee retention, managing director and executive/senior management retention		Order of return number	7
Who is responsible for implementing this plan?	BSM	Phone	0491 907 971	Email shannen@alloraoptions.com.au
Alternate person responsible	CPC and BSO	Phone	CPC: 0487 026 568 BSO: 0456 241 442	Email CPC: katherine@alloraoptions.com.au BSO: alicia@alloraoptions.com.au

Business impact issues

See business impact analysis

Action plan

(Detailed steps to return business operation prior to interruption).

1. Ensure the safety and security of all Allora Options employees through enacting of emergency procedures relevant to the disaster and responding to the situation accordingly.
2. Enact the “delegation of authority” if required to backfill a position. Ensure adequate remuneration including a “higher duties agreement” is place for the individual who has been identified to perform the role.
3. Contact all Allora Options employees via phone call to determine whether, how and to what extent they have been affected by the disaster.
 - 3.1. Determine whether individual employees are safe and able to continue their work.
 - 3.2. If not direct them to the relevant disaster relief service to assist them.
4. Ensure the safety of the work location (whether it be the Allora Options office, working from home environment or alternative location) before allowing any employees to utilise this for work purposes.
 - 4.1. Report the incident/disaster in the Allora Options WHS/hazards and incidents reporting system.
 - 4.2. Identify and set control actions for any potential hazards caused by the incident/disaster.
 - 4.3. Ensure all control actions are met and the location is compliant with Allora Options WHS policy before allowing any Allora Options employee to commence work at the Allora Options office or identified alternative location.
5. Ensure to offer a confidential debriefing session with for employees with a member of the business support team in which employees may bring up any concerns they have.
 - 5.1. The business support team member will listen to the employee and will as much as is reasonably practicable will assist them to rectify any issues.
 - 5.2. Ensure to conduct follow-up with each employee, regardless of whether they expressed concerns or not, regarding whether they need anything further or to ensure they know you have followed up on any issues or requests.
6. Direct employees to access the EAP if they are experiencing any distress or trauma resulting from any disaster.
7. Enact Public and products liability insurance (client or any other person on the property at the time of the incident)
8. Enact professional indemnity insurance or management liability insurance.
 - 8.1. In the event that an employee or manager of Allora Options is found liable for something during the course of the disaster event.
9. Disaster management insurance enacted – Business interruption

	10. ReturnToWorkSA insurance enacted by any injured employees as a result of a disaster event. 10.1. Allora Options will then <u>notify SafeWork SA</u> of the incident if it was life threatening or considered a serious injury.			
Resource needs (List needs and contact information for resource needs—staffing, equipment, contracting out services)	<ul style="list-style-type: none"> • Legal Advice and <u>professional indemnity insurance/ public & product liability insurance</u> • <u>ReturnToWorkSA insurance</u> • <u>Disaster management insurance</u> – business interruption • All staff at Allora Options • Functioning work phones and/or telehealth provider platform. • Risk, actions, continuous improvement and WHS/Incident/hazards reporting system (<u>CentroAssist</u>). • Managing director and executive management team as specified in persons responsible and alternate persons responsible. • Alternative working location including working from home. • <u>Management Liability Insurance</u> • <u>Employee Assistance Program</u> • Business support team employees 			
Resource vendor/supplier	BizCover/ DUAL Australia	Product/resource	Professional Indemnity and public & product liability insurance	
Contact person	Michael Gottlieb	Phone	1300 295 262	Email broker@bizcoverforbrokers.com.au
Alternate contact person	n/a	Phone	n/a	Email n/a
Resource vendor/supplier	Holdfast Insurance Brokers Pty Ltd/ AIG Australia Limited (AIG)	Product/resource	Disaster Management insurance	
Contact person	KELLY KEAST	Phone	(08) 8273 0900	Email info@holdfast.com.au
Alternate contact person	n/a	Phone	n/a	Email n/a
Resource vendor/supplier	BERKLEY INSURANCE AUSTRALIA	Product/resource	MANAGEMENT LIABILITY	
Contact person	KELLY KEAST	Phone	(08) 8273 0900	Email info@holdfast.com.au
Alternate contact person	n/a	Phone	n/a	Email n/a

Business operation:	Client base retention and referrals			Order of return number	8
Who is responsible for implementing this plan?	BSM	Phone	0491 907 971	Email	shannen@alloraoptions.com.au
Alternate person responsible	CPC and BSO	Phone	CPC: 0487 026 568 BSO: 0456 241 442	Email	CPC: katherine@alloraoptions.com.au BSO: alicia@alloraoptions.com.au
Business impact issues	<u>See business impact analysis</u>				
Action plan (Detailed steps to return business operation prior to interruption).	<ol style="list-style-type: none"> 1. Seek legal advice dependant on the issue that has arisen regarding the best course of action to protect the organisation. 2. In the event of reputational damage: <ol style="list-style-type: none"> 2.1. Ensure the director is briefed by the business support team to put out a statement to reassure our clients of our continuing commitment to provide them with a quality service. 2.2. Asking them for their feedback, concerns or queries that they may have to ensure that we can address their concerns. 2.3. In the event of a data breach reassure clients and stakeholders of our continuing commitment to their privacy 2.31. how we are going to manage the breach and what this means for them and what are they to expect to happen due to this breach. This will also assist in the prevention of complaints to the NDIS Quality and Safeguards commission if Allora Options is able to rectify the complaint through an internal complaints system. 2.4. Ensure that all concerns are followed up in a timely, empathetic and effective manner that leads to demonstrated change within the organisation. 2.5. Ensure that this information is communicated to each person providing a complaint, feedback or concern. 3. In the event of a loss of clients begin social media marketing campaign indicating that Allora Options has immediate capacity for Level 1-3 Support Coordination and Positive Behaviour Support Services. 4. Advise employees against speaking to media outlets, instead to come to Allora management or business support team with their concerns and they will be resolved internally. 5. If the Allora Options name's reputation is damaged irreparably then consider re-branding the organisation under a different trading name. 6. Professional indemnity insurance enacted – reputational protection and public relations 7. Public and products liability insurance 				

Resource needs (List needs and contact information for resource needs—staffing, equipment, contracting out services)	<ul style="list-style-type: none"> • Legal Advice and <u>professional indemnity insurance/ public & product liability insurance</u> • <u>Disaster management insurance</u> – business interruption • Complaints management and reporting system (<u>CentroAssist</u>). • Managing director and executive management team as specified in persons responsible and alternate persons responsible. • <u>Management Liability Insurance</u> • Business support team employees 			
Resource vendor/supplier	Wright Street Lawyers		Product/resource	Legal Advice
Contact person	Spiro Pilouras	Phone	0420 565 012	Email spiros@wrightstreetlawyers.com.au
Alternate contact person	n/a	Phone	n/a	Email n/a
Resource vendor/supplier	BizCover/ DUAL Australia		Product/resource	Professional Indemnity and public & product liability insurance
Contact person	Michael Gottlieb	Phone	1300 295 262	Email broker@bizcoverforbrokers.com.au
Alternate contact person	n/a	Phone	n/a	Email n/a
Resource vendor/supplier	Holdfast Insurance Brokers Pty Ltd/ AIG Australia Limited (AIG)		Product/resource	Disaster Management insurance
Contact person	KELLY KEAST	Phone	(08) 8273 0900	Email info@holdfast.com.au
Alternate contact person	n/a	Phone	n/a	Email n/a
Resource vendor/supplier	BERKLEY INSURANCE AUSTRALIA		Product/resource	MANAGEMENT LIABILITY
Contact person	KELLY KEAST	Phone	(08) 8273 0900	Email info@holdfast.com.au
Alternate contact person	n/a	Phone	n/a	Email n/a

Business operation:	Face-to-face services can be provided			Order of return number	9
Who is responsible for implementing this plan?	SCM, CSM, PBS Practitioners and Support Coordinators	Phone	CSM: 0484 577 044 SCM: 0484 577 044	Email	CSM: scott@alloraoptions.com.au SCM: sam@alloraoptions.com.au
Alternate person responsible	n/a	Phone	n/a	Email	n/a
Business impact issues	<u>See business impact analysis</u>				
Action plan (Detailed steps to return business operation prior to interruption).	<ol style="list-style-type: none"> 1. Employee's will work (from home, office or approved alternative location) and provide alternative methods of face-to-face services e.g. telehealth or video calls and continue with non-face-to-face works. 2. SCM and CSM will ensure their employees in respective departments conduct a thorough risk/WHS assessment to ensure that client visits can re-commence with all clients. This will consist of phoning the client/representative or contact and ensuring the safety of their property e.g. no risks of harm to the employees caused by any natural disasters. <ol style="list-style-type: none"> 2a. If the client's property is not safe to attend employees will not attend until safe to do so and will continue providing non-face-to-face services or alternative face-to-face services e.g. telehealth or video calls 3. Employee's will be responsible for ensuring that they have a roadworthy, registered and insured vehicle to use to travel to clients houses if theirs has been damaged via claiming on their personal insurance. <ol style="list-style-type: none"> 3a. Once Allora Options has all necessary documents on file proving vehicle roadworthiness, registration, insurance and an acceptable risk assessment on file for each client affected by the 'disaster', Allora Options employees may/are required to recommence face-to-face services. 				
Resource needs (List needs and contact information for resource needs—staffing, equipment, contracting out services)	<ul style="list-style-type: none"> • Home visit/WHS risk assessment tool • All Allora Options employees conducting face-to-face visits will need a roadworthy (evidenced by a 12-monthly service invoice), registered and insured vehicle. • Alternative to face-to-face services if required e.g. telehealth platform or mobile phone if appropriate • Risk, actions, continuous improvement and WHS/Incident/hazards reporting system (<u>CentroAssist</u>). • Managing director and executive management team as specified in persons responsible and alternate persons responsible. 				
Resource vendor/supplier	n/a	Product/resource	n/a		

Contact person	n/a	Phone	n/a	Email	n/a
Alternate contact person	n/a	Phone	n/a	Email	n/a

Appendix

Links:

[Safe Work Act 2012](#)

[Public and Product liability policy wording](#)

[Professional indemnity policy wording](#)

[Disaster management insurance policy wording](#)

[Return to Work Act 2014](#)

[Cyber Liability and Protection](#)

[Management Liability Insurance](#)

[Mandatory Return to work insurance](#)

['An employer's guide to resolving workplace issues, updated 2023'](#)

[Privacy Act 1988](#)

[Business Continuity Policy](#)

[Privacy and confidentiality policy](#)

[whistle-blower policy](#)

[SafeWork SA Workplace Incident Notifications](#)

[Business impact qualitative descriptors](#)

Insurances:

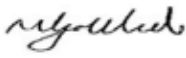
Public and product Liability and professional indemnity insurance document
(Relevant details only)

Certificate of Currency

Professional Indemnity & Public Liability Combined

This Certificate:

- is issued as a matter of information only and confers no rights upon the holder;
- does not amend, extend or alter the coverage afforded by the policy listed;
- is only a summary of the cover provided. For full particulars, reference must be made to the current policy wording;
- is current only at the date of issue.

Name of Insured	Vita Felix Group Pty Ltd
Occupation	Allied Health <ul style="list-style-type: none">• Applied Behaviour Therapy/ Applied Behaviour Analysis (ABA)• Aged and/or Disability Care Worker• Counsellor• Diversional Therapy• Learning disabilities consultant
Policy Number	BMM/65818/000/22/N
Policy Period	4.00pm Local Standard Time on 21 November 2022 to 4.00pm Local Standard Time on 21 November 2023
Limit of Indemnity	Professional Indemnity : AUD\$10,000,000 Public Liability : AUD\$20,000,000 any one occurrence and Product Liability \$20,000,000 in the aggregate.
Excess	Professional Indemnity : AUD\$1,000 each and every claim. Public & Products Liability : AUD\$500 each and every claim.
Reinstatements	Professional Indemnity: 1 Public & Product Liability: None
Interested Party	None Noted
Underwriter	DUAL Australia Pty Ltd on behalf of certain underwriters at Lloyd's in accordance with the authorisation granted under Unique Market Reference Number: B1736DU2200001
Signature	
Name of Signatory	Michael Gottlieb (BizCover for Brokers)
Capacity/Title	Director
Date	30 Nov 2022

Please note

This Certificate is issued subject to the policy's terms and conditions and by reference to the insured's declaration. The information set out in this Certificate is accurate as at the date of signature and there is no obligation imposed on the signatory to advise of any alterations.

Disaster management insurance certificate
(Relevant details only)

BUSINESS PROPERTY

Sum Insured

Building(s) Replacement Value	\$ Not Insured
Contents Replacement Value	\$ 15,750
Stock including customers goods	\$ As per policy wording
Accidental Damage	\$ As per policy wording
Additional Benefits	
Removal of Debris	\$ As per policy wording
Rewriting of Records	\$ As per policy wording

Optional Extension

Flood	Not Insured
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Excesses

Business Property	\$ 250
Accidental Damage	\$ 250
Earthquake, Subterranean fire or Volcanic Eruption	1% of the total sum insured for Fire section at this Situation or \$20,000 whichever is the lesser.

Imposed Conditions

Condition # 1

Name	422: Policy Wording
Code	PC11

Wording

AIG My Business Pack - Steadfast Client Trading Platform policy wording 09.00844.2 applies to this Policy.

BUSINESS INTERRUPTION

Sum Insured

Cover Selected	Gross Profit
Indemnity Period (months)	12
Gross Profit	\$ 1
Claims Preparation Costs	\$ 10,000
Additional Increase in Cost of Working	\$ 50,000
Outstanding accounts receivable	\$ 7,500
Loss of Rent Receivable	\$ Not Insured

THEFT**Sum Insured**

Contents (incl stock and customer goods)	\$ 15,000
Tobacco / Cigarettes	\$ Not Insured

Excess

Theft	\$ 250
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Imposed Conditions**Condition # 1**

Name 275: Steadfast - Office

Code SOFH

Wording

The following amendment is made to Policy Section 4 - Theft of the Policy:

Parts (a), (b), (c), (d) and (e) under Section 4.2 "What You are covered for" are deleted and replaced with the following:

(a) theft or attempted theft where there is no sign of forcible and violent entry to or exit from the Situation but excluding theft or attempted theft from any open-sided structure such as, but not limited to verandas or yards or other open spaces even if they are partially or fully enclosed; or

(b) theft or attempted theft as a result of actual or threatened assault or violence including armed hold up.

In all other respects, the Policy terms, conditions and exclusions remain unaltered.

GLASS**Sum Insured****Replacement Value**

Temporary repairs and other associated costs	\$ 10,000
Signs	\$ 10,000

Excess

Glass	\$ 250
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Cyber Liability and Privacy Protection
Platinum (relevant details only)

Schedule of Insurance

Page 3 of 8

Class of Policy: CYBER	Policy No: AU00061718-000
The Insured: VITA FELIX GROUP PTY LTD	Invoice No: 560611
	Our Ref: VITA FELIX

This policy has been placed through

DUAL AUSTRALIA PTY LTD
 G P O BOX 7101 SYDNEY NSW 2001

DUAL AUSTRALIA PTY LTD is an underwriting agency who has placed the policy with

CERTAIN UNDERWRITERS AT LLOYDS
 ABN 49 080 862 291
 LLOYDS

Cyber Liability and Privacy Protection - Platinum

POLICY NUMBER: AU00061718-000

POLICYHOLDER: VITA FELIX GROUP PTY LTD T/as Allora Options

INSURANCE PERIOD:	From 4:00pm on 25/07/2023 To 4:00pm on 25/07/2024 Australian local time in the State or Territory where this policy was purchased
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BUSINESS DESCRIPTION: Psychologist

DEDUCTIBLE: \$1,500 inclusive of defence costs by the insured for each claim

SYSTEM OUTAGE PERIOD: 12 Months

WAITING PERIOD: 8 Hours

INDEMNITY LIMIT:
 \$1,000,000 any one claim and in the aggregate during the insurance period

INSURING CLAUSES:

CLAUSE	SUB-LIMIT	DEDUCTIBLE
2.1 Response Costs	Indemnity Limit	\$1,500
2.2 Liability	Indemnity Limit	\$1,500
2.3 Business Interruption – Loss and Mitigation Costs	Indemnity Limit	\$1,500

AUTOMATIC EXTENSIONS:

CLAUSE	SUB-LIMIT	DEDUCTIBLE
3.1 Advancement of Defence Costs	Indemnity Limit	\$1,500
3.2 Business Interruption - Human or System Error	Indemnity Limit	\$1,500
3.3 Business Interruption - Reputational Damage	Indemnity Limit	\$1,500
3.4 Botnetting and Phreaking Expenses	Indemnity Limit	\$1,500
3.5 Continuous Cover	Indemnity Limit	\$1,500
3.6 Court Attendance Costs	\$500 per day	Nil
3.7 Cyber Extortion	Indemnity Limit	\$1,500
3.8 Discovery Period	Indemnity Limit	\$1,500
3.9 Emergency Costs	Indemnity Limit	\$1,500
3.10 Enforceable Undertaking Expenses	Indemnity Limit	\$1,500

Schedule of Insurance

Class of Policy: CYBER	Policy No: AU00061718-000
The Insured: VITA FELIX GROUP PTY LTD	Invoice No: 560611
	Our Ref: VITA FELIX

3.11 Identity Protection Costs	Indemnity Limit	\$1,500
3.12 Legal Representation Costs	Indemnity Limit	\$1,500
3.13 Newly Created or Acquired Subsidiary	Indemnity Limit	\$1,500
3.14 Notification Costs	Indemnity Limit	\$1,500
3.15 Payment Card Breach Event	Indemnity Limit	\$1,500
3.16 Post-event Consulting Costs	Indemnity Limit	\$1,500
3.17 Public Relations Costs	Indemnity Limit	\$1,500
3.18 Restoration Costs	Indemnity Limit	\$1,500
3.19 Hardware Repair or Replacement	\$250,000	\$1,500

OPTIONAL EXTENSIONS:

CLAUSE	SUB-LIMIT	DEDUCTIBLE
4.1 Contingent Business Interruption	Not Included	Not Included
4.2 Social Engineering and Cyber Fraud	\$250,000	\$1,500

JURISDICTION: Worldwide

RETROACTIVE DATE: 25/07/2023 excluding any known claims or circumstance

DATE OF PROPOSAL: 23/06/2023

WORDING: DUAL Australia Cyber Liability and Privacy Protection Insurance 11.20

Management insurance coverage certificate
(Relevant details only)

Management Liability Insurance

INSURED: Vita Felix Group Pty Ltd

PERIOD OF INSURANCE: From: 4pm 13/07/2023 To: 4pm 13/07/2024

INDEMNITY LIMIT \$1,000,000 In the aggregate

POLICY WORDING: BIA Management Liability Insurance 09.2021

INTERNET SITE(S): www.alloraoptions.com.au

RETROACTIVE DATE: 13/07/2023

JURISDICTION: Worldwide excluding USA and Canada unless specifically stated otherwise

INSURER: Berkley Insurance Australia, APRA Authorised Insurance Company ABN: 53126559706

DEDUCTIBLES FOR INSURING CLAUSES

1.1 Directors' & Officers' Liability \$0 Each and Every Claim Each and Every Claim

1.2 Company Reimbursement \$2,500 Each and Every Claim Each and Every Claim

1.3 Company Liability \$2,500 Each and Every Claim Each and Every Claim

SUB-LIMITS FOR EXTENSIONS

SUB-LIMITS

**DEDUCTIBLES
(each & every claim)**

2.2 (a) Directors & Officers and Company Reimbursement Pollution Costs (in the aggregate)	\$1,000,000	D&O: Nil, CR: \$2,500
2.2 (b) Company Liability Pollution Costs (in the aggregate)	\$250,000	\$5,000
2.3 Statutory Liability (in the aggregate)	\$1,000,000	D&O: Nil, CR: \$2,500, CL: \$5,000
2.4 (a) Directors & Officers and Company Reimbursement Workplace Health and Safety Costs (in the aggregate)	Full Limit of Indemnity	D&O: Nil, CR: \$2,500
2.4 (b) Company Liability Workplace Health and Safety Costs (in the aggregate)	\$1,000,000	\$5,000
2.6 General Inquiry Costs (in the aggregate)	Full Limit of Indemnity	D&O: Nil, CR: \$1,000
2.11 Additional Dedicated Limit for Directors (in the aggregate)	\$1,000,000	Nil
2.12 Extradition Bail Bond Costs (in the aggregate)	\$250,000	\$1,000
2.13 Deprivation of Assets Expenses (in the aggregate)	\$100,000	Nil
2.14 Prosecution Costs (in the aggregate)	\$100,000	Nil
2.15 Reputation Protection Expenses (in the aggregate)	\$250,000	Nil
2.16 Crisis Costs (in the aggregate)	\$250,000	Nil
2.17 Employment Practices Liability Entity Coverage (in the aggregate)	Full Limit of Indemnity	\$10,000
2.18 Third Party Discrimination or Sexual Harassment Entity Coverage (in the aggregate)	\$1,000,000	\$10,000
2.19 Attendance Compensation (in the aggregate)	\$100,000	Nil

2.20 Tax Audit Costs (including ATO Risk Reviews) (in the aggregate)	\$50,000	\$2,500
2.21 Employee Theft and Customer or Contractor Crime (in the aggregate)	\$250,000	\$10,000
2.22 Theft and Crime Investigation and Data Reproduction Costs (in the aggregate)	\$50,000	Nil
2.23 Identity Fraud Expenses (in the aggregate)	\$50,000	\$1,000
2.24 Internet Liability (in the aggregate)	\$250,000	\$1,000

POLICY EXTENSIONS:

(in addition to extensions listed above)

- 2.1 Advancement of Costs and Emergency Defence Costs
- 2.5 Continuous Cover
- 2.7 Claims Specialist Advice
- 2.8 Outside Directorships
- 2.9 Extended Reporting Period
- 2.10 Retired Directors and Officers
- 2.25 Run off cover following Takeover or Merger of the Company
- 2.26 Run off cover for Subsidiaries
- 2.27 Intellectual Property
- 2.28 New Subsidiary

Risk Matrix

Used for the Risk Management Plan

Risk matrix

A risk matrix is used during risk assessment to define the level of risk by considering the category of likelihood against the category of consequences. A risk matrix aids to increase visibility of risks and assist management decision making.

		Consequence				
		Insignificant	Minor	Moderate	Major	Extreme
Likelihood	Almost certain More than 90% likelihood of occurring	Medium	Medium	High	High	High
	Likely Between 50% and 90% likelihood of occurring	Low	Medium	High	High	High
	Possible Between 20% and 50% likelihood of occurring	Low	Medium	Medium	High	High
	Unlikely Between 10% and 20% likelihood of occurring	Low	Low	Medium	Medium	High
	Rare Less than 10% likelihood of occurring	Low	Low	Low	Medium	High