

SD8

Restrictive Practices

Thrive Care Group Subsidiaries



This policy is part of Thrive Care Group's (Thrive) comprehensive policy suite, designed to guide and govern operations across all subsidiaries. It establishes a unified framework that ensures consistent standards, accountability, and alignment with Thrive core values and strategic objectives. The policy applies to all employees, contractors, and stakeholders within Thrive and its subsidiaries, supporting seamless governance and compliance throughout the organisation.

SD8 Restrictive Practices

Policy Statement

1. Thrive is committed to ensuring the safety and wellbeing of individuals receiving services. The use of Restrictive Practices must be minimised and only used as a last resort in accordance with the NDIS (Restrictive Practices and Behaviour Support) Rules 2018 and, where applicable, the Aged Care Quality Standards and associated restrictive practice requirements.
2. Thrive prohibits the use of Restrictive Practices except where necessary to prevent harm to the individual or others. All incidents involving Restrictive Practices will be reported, reviewed, and managed in accordance with this policy.
3. Thrive supports the use of Positive Behaviour Support Plans (BSPs) as best practice when working with clients with Behaviours of Concern.
4. Thrive is committed to reducing and eliminating the use of Restrictive Practices and ensuring that when they are used, the least restrictive option is implemented.
5. Thrive ensures that all restrictive practices are authorized, document, monitored and reports in accordance with Commonwealth and State legislation.

Procedures

1. Authorisation of Restrictive Practices
 - a. Thrive does not act as a specialist Behaviour Support Provider and does not manage the authorisation process.
 - b. Thrive ensures that BSPs developed by qualified practitioners are authorised through a Restrictive Practice Authorisation Panel (RPA Panel).
 - c. A nominated Thrive team member will participate in the panel to support implementation.
 - d. Thrive initiates authorisation processes as require by jurisdiction and maintains evidence of authorisation.
2. Identification and Assessment
 - a. Where behaviours of concern are identified, Thrive refers the client (with consent) to a registered Behaviour Support Practitioner.

- b. Thrive will collaborate with the client, practitioner, and support network to:
 - i. Undertake a functional behaviour assessment
 - ii. Develop a Positive Behaviour Support Plan
- c. Thrive supports the practitioner to gather information and identify unmet needs, triggers and risks.

3. Positive Behaviour Support Plans

- a. Plans must be developed by an experienced practitioner in consultation with the client, guardian, and Thrive.
- b. Plans must be authorised through an RPA Panel.
- c. Plans must include informed consent from the client or guardian.
- d. Thrive will ensure:
 - i. Engagement of the client and support network in all stages of assessment, planning, implementation, and review
 - ii. Development of proportionate behaviour support strategies
 - iii. Clear timeframes for application and review
 - iv. Person centred strategies are prioritised
 - v. Plans aim to reduce and eliminate regulated restrictive practices
 - vi. Only trained team members support clients where restrictive practices may be applied

4. Implementation of Behaviour Support Plans

- a. Thrive drafts and approves an authorisation memo before implementation.
- b. Thrive uses only authorised regulated restrictive practices.
- c. All instances are documented in client notes.
- d. Monthly reports are submitted to the NDIS Commission.
- e. Clients are informed that consent can be withdrawn at any time.
- f. Thrive provides person centred training, coaching and mentoring to team members implementing behaviour support plans.
- g. Thrive supports specialist behaviour support providers to train team members in the use and monitoring of behaviour support strategies.
- h. Thrive ensures team members understand the rationale underpinning the plan and the risks associated with restrictive practices.

5. Interim Behaviour Support Plans

- a. Thrive supports the development of interim behaviour support plans where immediate risk is identified.
- b. Thrive collaborates with mainstream service providers (e.g. police, emergency services, mental health services) in contributing to interim plans.
- c. Thrive ensures interim plans include strategies to reduce risk and transition to comprehensive plans.
- d. Thrive facilitates training for team members implementing interim plans.

6. Monitoring and Review

- a. Thrive monitors the effectiveness of behaviour support plans through data collection, feedback and supervision.
- b. Plans are reviewed at least annually, or more frequently if the client's needs or behaviour change.
- c. Thrive contributes to reviews and supports modifications to strategies based on observed progress.
- d. Thrive uses data to inform improvements and reduce restrictive practices.
- e. Thrive notifies the NDIS Commission of changes to plans and works with the Commission where engagement with providers is not possible or plans are not implemented correctly.

7. Incident Management

- a. Thrive supports immediate referral to a medical practitioner following an incident involving restrictive practices.
- b. Thrive collaborates with emergency services and health professionals in responding to unauthorised use.
- c. Thrive reports all unauthorised restrictive practices to the NDIS Commission in accordance with the NDIS Incident Management and Reportable Incidents Rules 2018 and, where applicable, the Aged Care Quality Standards and associated restrictive practice requirements.
- d. Thrive conducts debriefing with clients, support networks and team members.
- e. Debriefing outcomes are documented and used to inform improvements.

8. Complaints and Feedback

- a. Thrive informs clients and their support networks that they can provide feedback or make a complaint about restrictive practices at any time.
- b. Thrive refers to OM5 – Feedback & Complaints Policy for the process to follow.
- c. Thrive uses feedback to improve services and reduce the use of restrictive practices.

9. Risk Management and Emergency Planning

- a. Thrive integrates restrictive practices risk management into the organisation's broader risk management system.
- b. Thrive conducts regular risk assessments and reviews risk controls in partnership with clients, support networks and team members.
- c. Thrive ensures continuity of supports during emergencies and disasters.

10. Training and Competency

- a. Thrive ensures all team members involved in restrictive practices complete mandatory annual training in:
 - i. Positive behaviour support
 - ii. Restrictive practices
 - iii. Incident management
 - iv. Person centred support
 - v. Duty of Care – Dignity of Risk
- b. Thrive assesses and documents team member competency annually and provides refresher training as required.
- c. Thrive maintains and reviews all training records.

Related Business Procedures

1. SD1 – Delivery of Support & Services Policy
2. SD2 – Behaviour Support Planning & Implementation Policy
3. OM5 – Feedback & Complaints Policy
4. OM6 – Incident Management Policy

5. OM8 – Information Management Policy

Responsible Persons

1. The Chief Executive Officer must:
 - a. Manage and monitor compliance with this policy.
 - b. Notify the Board of Restrictive Practices as these occur
 - c. Ensure appropriate authorities are notified, as relevant
 - d. Support the organisation to effectively reduce and eliminate the use of Restrictive Practices for clients
2. Management must:
 - a. Manage and monitor compliance with this policy.
 - b. Ensure team members receive appropriate training, supervision and debriefing.
 - c. Provide effective supervision to monitor the use of Restrictive Practice.
 - d. Facilitate development and execution of BSPs.
3. All Thrive team members must:
 - a. Comply with this policy.
 - b. Report the use of any authorised or unauthorised restrictive practice
 - c. Provide appropriate support to clients a when a restrictive practice has been used.
 - d. Engage in training and provide feedback for improvement.

Definitions

1. **Behaviours of Concern:** 'Behaviours of such intensity, frequency or duration that the physical safety of the person or others is likely to be placed in serious jeopardy, or behaviour which is likely to seriously limit the use of, or result in, the person being denied access to ordinary community facilities' (NDIS Quality and Safeguarding Framework, 2016, p. 98).

2. **Behaviour Support:** The NDIS Quality and Safeguarding Framework (2016) defines the requirements for the delivery behaviour support. This includes Positive Behaviour Support as an evidence -based method of intervention.
3. **Behaviour Support Plan (BSP):** A comprehensive or interim plan developed to address behaviours of concern through tailored, evidence-informed strategies.
4. **Client:** any individual who receives support or care from Thrive or access the services provided by Thrive.
5. **Positive Behaviour Support (PBS):** A proactive approach that focuses on developing adaptive skills and improving quality of life while reducing challenging behaviours.
6. **Prohibited Practice:** Any practice that interferes with a client's human rights, is unlawful or unethical, and is incompatible with the principles of the Disability Inclusion Act 2014.
7. **Regulated Restrictive Practice:** A practice that restricts the rights or freedom of movement of a person with disability, including seclusion, chemical restraint, mechanical restraint, physical restraint and environmental restraint
8. **Reportable Incident:** An incident involving the use of restrictive practices that must be reported to the NDIS Commission.
9. **Restrictive Practices:** Any intervention that restricts the rights or freedom of movement of a person with a disability, used only as a last resort and in accordance with authorisation protocols.
10. **Team Member:** All Thrive employees, volunteers and subcontractors.
11. **Thrive:** Thrive Care Group Pty Ltd ABN 68 637 232 752, together with each of its subsidiaries.

References

1. Aged Care Act 2024 (Cth) and its associated regulations
2. National Disability Insurance Scheme (NDIS) Practice Standards and their associated regulations
3. NDIS (Restrictive Practices and Behaviour Support) Rules 2018
4. NSW Restrictive Practices Authorisation Policy
5. NDIS Quality and Safeguarding Framework 2016
6. NDIS Behaviour Support Competency Framework 2018

7. Disability Inclusion Act 2014

Version Control

Version 1	31 August 2025	New policy creation
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