

Waylight Pty Ltd

Waylight Plan Management

Document Title	Risk Management & WHS Policy
Document Number	WL-POL-09
Version	1.0
Date	2026-04-02
Review Date	2027-04-02
Approved By	Joshua, Director
Classification	Internal

1. Purpose

This policy establishes Waylight's risk management system and work health and safety framework. The system is proportionate to Waylight's scale as a sole-operator plan management business operating primarily from a home office with digital service delivery.

2. Scope

This policy applies to all workers, contractors, and volunteers engaged by Waylight Pty Ltd in the delivery of plan management services.

3. Applicable Standards

- NDIS Practice Standards. Risk Management: 'Risks to participants, workers and the provider are identified and managed.' A documented risk management system must be in place, relevant and proportionate to the size and scale of the provider.
- The risk management system must cover: incident management, complaints management and resolution, financial management, governance and operational management, human resource management, information management, work health and safety, and emergency and disaster management.
- NDIS Practice Standards: 'Appropriate insurance is in place, including professional indemnity, public liability and accident insurance.'

4. Policy Statement

- Waylight maintains a documented risk management system that identifies, analyses, prioritises, and treats risks to participants, workers, and the business.
- The system is proportionate to a sole-operator plan management business.
- Waylight maintains appropriate insurance: Professional Indemnity (PI), Public Liability (PL), and Personal Accident / Workers' Compensation.

- Waylight maintains emergency and disaster preparedness proportionate to a home-office, digital-delivery operation.

5. Procedure

5.1 Risk Identification and Assessment

- Step 1: The Director maintains a Risk Register identifying risks across all areas required by the Practice Standards: incident management, complaints, financial management, governance, HR, information management, WHS, and emergency/disaster.
- Step 2: Each risk is assessed for likelihood (rare, unlikely, possible, likely, almost certain) and consequence (insignificant, minor, moderate, major, catastrophic).
- Step 3: Risks are prioritised using a risk matrix (likelihood x consequence) and treatment actions are assigned.
- Step 4: The Risk Register is reviewed quarterly and updated whenever a new risk is identified or an existing risk changes.

5.2 Key Risk Areas for Plan Management

- Financial risks: incorrect claims, fraud, fund mismanagement, PAPL non-compliance, mitigated by WL-POL-01 and WL-POL-02.
- Data and privacy risks: participant data breach, unauthorised access, mitigated by WL-POL-13 and Supabase security controls.
- Compliance risks: legislative changes not captured, registration conditions breached, mitigated by WL-POL-06 legislative monitoring.
- Continuity risks: Director unavailable, system failure, mitigated by WL-POL-12.
- WHS risks: ergonomic issues (home office), psychological stress (sole operator workload), mitigated by ergonomic setup and workload monitoring.

5.3 Insurance Requirements

- Waylight maintains current certificates of currency for: Professional Indemnity (PI) insurance, Public Liability (PL) insurance, and Personal Accident / Workers' Compensation insurance.
- Certificates are reviewed annually at renewal to ensure coverage remains appropriate.
- Copies of current certificates are available for the auditor.

5.4 Emergency and Disaster Management

- Waylight's emergency and disaster plan addresses: data loss (mitigated by Supabase automated backups and local backup procedures), system outage (manual processing procedures documented), natural disaster affecting home office (remote access capability, Contractor-Accountant delegation), Director incapacitation (see WL-POL-12 Continuity of Supports).

- The Director tests backup restoration annually to confirm data recovery capability.

5.5 Infection Prevention and Control

Waylight's plan management services are delivered primarily through digital channels (phone, email, portal). Face-to-face participant meetings are infrequent. Infection prevention measures for in-person meetings include: meeting in well-ventilated spaces, hand hygiene, and staying home when symptomatic.

6. Responsibilities

Role	Responsibility
Director (Joshua)	Maintains the Risk Register. Conducts quarterly risk reviews. Ensures insurance is current. Maintains emergency and disaster plan. Manages WHS for home office.
Contractor-Accountant	Identifies financial risks during reconciliation. Reports risks to the Director.
Plan Management Worker (future)	Reports risks and hazards to the Director. Follows WHS procedures.
Participants	Report any safety concerns to Waylight.

7. Related Documents

- WL-POL-01 Financial Management Policy (financial risk controls)
- WL-POL-07 Incident Management Policy
- WL-POL-08 Complaints Management Policy
- WL-POL-12 Continuity of Supports Policy
- WL-POL-13 Information Management Policy (data risks)
- Risk Register (internal)
- NDIS Practice Standards (Verification Module)

8. Audit Readiness Notes

- Q: 'Tell me about your risk management system.', A: I maintain a Risk Register covering all eight areas required by the Practice Standards. Each risk is assessed for likelihood and consequence, prioritised, and has treatment actions. I review it quarterly. The biggest risks for a plan management business are financial, incorrect claims, fraud, fund mismanagement, and those are covered by specific policies with detailed controls.
- Q: 'What insurance do you have?'. A: Professional Indemnity, Public Liability, and Personal Accident insurance. I have current certificates of currency for all three.
- Q: 'What happens if there is a disaster or your systems go down?'. A: Supabase has automated backups. I have documented manual processing procedures for system outages.

If I am incapacitated, the Contractor-Accountant is authorised to handle urgent matters under the delegation arrangement.

9. Review

This policy is reviewed annually or earlier if triggered by an incident, complaint, legislative change, or new risk identification. Next scheduled review: 2027-04-02.

Version History

Version	Date	Author	Changes
1.0	2026-04-02	Joshua	Initial version