

Incident Management and Procedures Policy

Stronger Together Foundation is committed to ensuring that incidents which occur in relation to the provision of services are managed consistently and effectively, and that workers can identify, manage, report and resolve incidents.

The organisation collects and reviews data on incidents in order to inform improvement activities.

Stronger Together Foundation regularly reviews its incident management system and processes to ensure that they are:

- **Appropriate to the size of the organisation and the classes of supports it provides**
- **Well documented**
- **Readily accessible to all workers employed or engaged by the organisation**
- **Reflective and adaptive, with an intent to prevent incidents**

Responsibilities and delegations

This policy applies to	All Staff
Specific responsibilities	
Policy approval	Senior Management

Policy context – this policy relates to:

Standards	NDIS Practice Alter – High-risk Restrictive Practices
Legislation	National Disability Insurance Scheme Act 2013 National Disability Insurance Scheme (Incident Management and Reportable Incidents) Rules 2018 <i>Disability Services Act 2006 (DSA)</i> NSW Disability Services Act 1993 Work Health And Safety Act 2011
Contractual obligations	
Organisation policies	Open Disclosure Policy Critical Incidents Policy Work Health and Safety Policy Risk Management Policy
Forms, record keeping, other documents	Incident Management Register Incident Report Template Incident Investigation Register of Complex Family Support

Definitions

Incidents are acts, omissions, events or circumstances that occur or could occur during or in relation to the provision of supports, or the alteration or withdrawal of supports, that cause harm, either physically or emotionally, to a worker, client, or other stakeholder. Incidents also include acts, omissions, events or circumstances that have caused or could cause damage to property, the environment, material or cause public alarm.

Reportable Incidents: refer to incidents, or alleged incidents, of severity that must be reported to an external agency. This includes but is not limited to:

- The death of a client
- Serious injury
- Abuse or neglect
- Sexual misconduct
- Unauthorised restrictive practices

Workers are staff, contractors and volunteers employed or engaged by Stronger Together Foundation.

Procedures

Induction and staff training

All workers must be familiar with the organisation's incident management system, understand the organisation's definition of a Reportable Incident, and understand the procedures they must follow for reporting all incidents to the organisation and an external body (if required).

Stronger Together Foundation promotes a culture of open reporting and ensures that all workers understand that they are supported to report any incident or alleged incident, and that there will be no negative consequences for doing so.

Incident identification

If a worker observes an incident, or a client or member of the public notifies a worker about an incident that does or could cause permanent or temporary detriment to a client, worker or other stakeholder, then the worker must report the incident to Leadership Team / their nominated supervisor and complete an Incident Report and/or a Child and Family Concern Form.

Incident Report

This form is completed for any incident, injury, near miss, hazard, behaviour of concern, or situation that impacts the safety or wellbeing of a child, family member, staff member, or visitor. This includes incidents that have resulted in physical harm (e.g. bruise, red mark, head injury, or harm that requires First Aid) or emotional harm (e.g. significant emotional response beyond typical dysregulation).

Child and Family Concern Form

This form is completed for any child protection and family wellbeing concern that is reported regarding a child, family member, staff member or visitor.

Workers and clients will be protected against any adverse actions as a result of reporting or alleging that an incident has occurred.

Immediate response

Where possible, an incident will first be addressed by the organisation's personnel responsible and qualified to effectively manage the incident as it takes place. First respondents understand that they must contact emergency services if the situation warrants.

Notification procedures

Staff must report incidents to various agencies and persons based on the following priority system:

- For serious incidents, workers must first contact emergency services
- Workers must report all incidents internally to their supervisor / Leadership Team and complete an [Incident Report](#) and/or a [Child & Family Concern Form](#).
- Appropriate staff member is responsible for notifying families, guardians and advocates of the client.
- If an incident is a Reportable Incident, the Senior Manager will notify the relevant external body within the expected timeframe of the external body.

Supporting clients

Throughout the incident management process, from initial response through to review, clients will be supported by the organisation through means of:

- Reassurance if the client reported the incident;
- Trauma and counselling services where required;
- Changes to regular supports if necessary;
- Clear, ongoing communication regarding the progress and outcomes of the investigation.

Clients will be involved in the management and resolution of the incident where appropriate.

Assessment and investigation

Leadership Team is responsible for creating an initial assessment of any incident, to determine the severity of an incident and to establish the need for, and scope of, an investigation. If an incident is a Reportable Incident, an internal investigation will take place. All investigations will be undertaken and conducted in accordance with principles of natural justice and procedural fairness.

Incidents involving criminal allegations will be reported to law enforcement, who will receive full support of the organisation in their investigations.

Whenever an investigation into an incident is conducted, it should establish:

- The cause of an incident
- The effect of an incident
- Any organisational processes that contributed to or did not function in preventing an incident
- Changes the organisation can make in order to prevent further incidents from occurring

Information related to incident investigations, including records of phone conversations, emails, documents and, where possible, records of face to face interviews will be recorded and kept in strict confidence.

Register of Complex Family Supports

Following assessment and investigation of incidents, the Leadership Team may place child/family on the Register of Complex Family Supports. This register is to ensure children and families with

complex supports are adequately supported. Children/families will be placed on this register if there is an identified concern within the following categories:

- Child protection
- Child or family wellbeing
- If the child is under the care of the minister.

Leadership Team to support staff to maintain records of formal & informal supports, collaboration opportunities, risks identification and management.

Incident resolution

Based on Leadership Team's assessment, the organisation may undertake remedial action proportionate to the severity of the incident, including but not limited to:

- Providing an apology
- Disciplinary action
- Financial compensation

The organisation will inform and involve clients, family and advocates in the process of incident management and resolution.

Incident register and review

The organisation keeps an accurate register of all incidents that occur in relation to the provision of services. Each entry in the register contains:

- A description of the incident
- A determination of whether or not the incident is a Reportable Incident
- Where possible, time, date and location
- Names of all the people involved, including witnesses
- Details of the incident assessment
- Actions taken in regard to the incident

The organisation will review this information annually to understand trends, address systemic issues and inform improvement activities.

Records will be kept for a minimum of seven years.

Assessment, investigation and Action plans for ongoing Behaviours of Concern during Group Programs

- The leadership team reviews the register of incidents monthly.
- If a child has 5 or more incidents which relate to behaviour of concern, then a meeting with the family to discuss how to support the child will take place. Outcomes may include:
 - Internal referral for additional support relating to the behaviour of concern.
 - External referral for additional support relating to the behaviour of concern.
 - Monitoring, with a follow up meeting date set.
- All action plans will be reviewed formally with the family within 5 weeks.

Provider Alert: High-risk Restrictive Practices

<https://www.ndiscommission.gov.au/sites/default/files/2023-02/Practice%20alert%20-%20High%20risk%20restrictive%20practices%20-%20accessible.pdf>

All new staff and volunteers will receive a copy of the NDIS Provide Alert: High-risk Restrictive Practices and be guided through the application of these policies and procedures throughout the staff induction process.

Continuous development and training, and refresher training, around restrictive practices should occur every 2 years (alongside child protection training). Staff training should include positive behaviour support framework, supporting children with behaviours of concern, restrictive practice legislation, high-risk restrictive practices, etc.

Policy Review and Version Tracking			
Review	Date Approved	Approved By	Next Review
1	October 2018	Senior Manager	October 2020
2	October 2020	Senior Manager	October 2022
3	September 2023	Senior Manager	September 2025
4	June 2026	Senior Manager	June 2028

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