



Incident Management Policy and Procedures

"I have a right to have any incidents managed in a way that ensures my safety and to be reported appropriately" – client voice

Introduction

Play Grow Flourish Incident Management process ensures that each client is safeguarded and that incidents are acknowledged, responded to, and well managed. All incidents are dealt with promptly and in ways that are culturally appropriate. In line with this policy, incidents will be treated as a priority, keeping the client informed and involving them in the resolution process. This policy complies with the *NDIS (Incident Management and Reportable Incidents) Rules 2018* and *NDIS (quality indicators) guidelines 2018*.

Purpose

This policy is intended to provide guidance in relation to the management of incidents in accordance with internal requirements and NDIS reporting requirements.

Scope

Play Grow Flourish's Client Incident Management System includes, but is not limited to, incidents that consist of acts, omissions, events, or circumstances that occur in connection with providing services to people with disability and have or could have caused harm to the person with disability. The incident management system also includes incidents that consist of acts by a person with disability and have cause serious harm, or risk of serious harm to another person.

This policy applies to all Play Grow Flourish's stakeholders, including clients, families, carers, advocates, staff, students, contractors, other service providers, government agencies and members of the community. All Play Grow Flourish's staff are trained in and comply with the requirements of this Policy.

Policy

Play Grow Flourish is committed to managing incidents in an accountable, transparent, timely and meaningful way and in the most direct way possible.

Any individual, stakeholder or agency wishing to report an incident in relation to Play Grow Flourish service provision will be provided with information regarding the organisations Incident Management policy and procedure. All instances will be heard respectfully and with a willingness to assist the person making the report.



Upon recruitment, all staff must undergo an induction process that includes training and information in relation to Play Grow Flourish incidents processes. Additional on-the-job and formal training will be provided where required.

Play Grow Flourish is committed to the following incident management principles:

- Ensuring clients are aware of how Play Grow Flourish manages incidents when entering the service.
- Ensuring the immediate safety of clients and Play Grow Flourish staff.
- Identify and report incidents as soon as practicable after the event.
- Assist people to report an incident in whatever way is meaningful for them and in a language or communication method that is appropriate.
- Protect confidentiality and privacy of people affected by incidents.
- Investigate incidents and report fairly, objectively, and professionally.
- Remain open and accountable in dealing with any incident; and
- Integrate incident analysis information into Play Grow Flourish's continuous improvement process.

Play Grow Flourish's Incident Management System provides for collection of statistical and other information relating to incidents to enable Play Grow Flourish to analyse trends, systemic issues and to report these findings to the NDIS Quality and Safeguards Commission if required.

Play Grow Flourish understand that failure to comply with the incident management requirements of the NDIS legislation and rules may lead to the NDIS Commissioner taking compliance and enforcement action against the organisation.

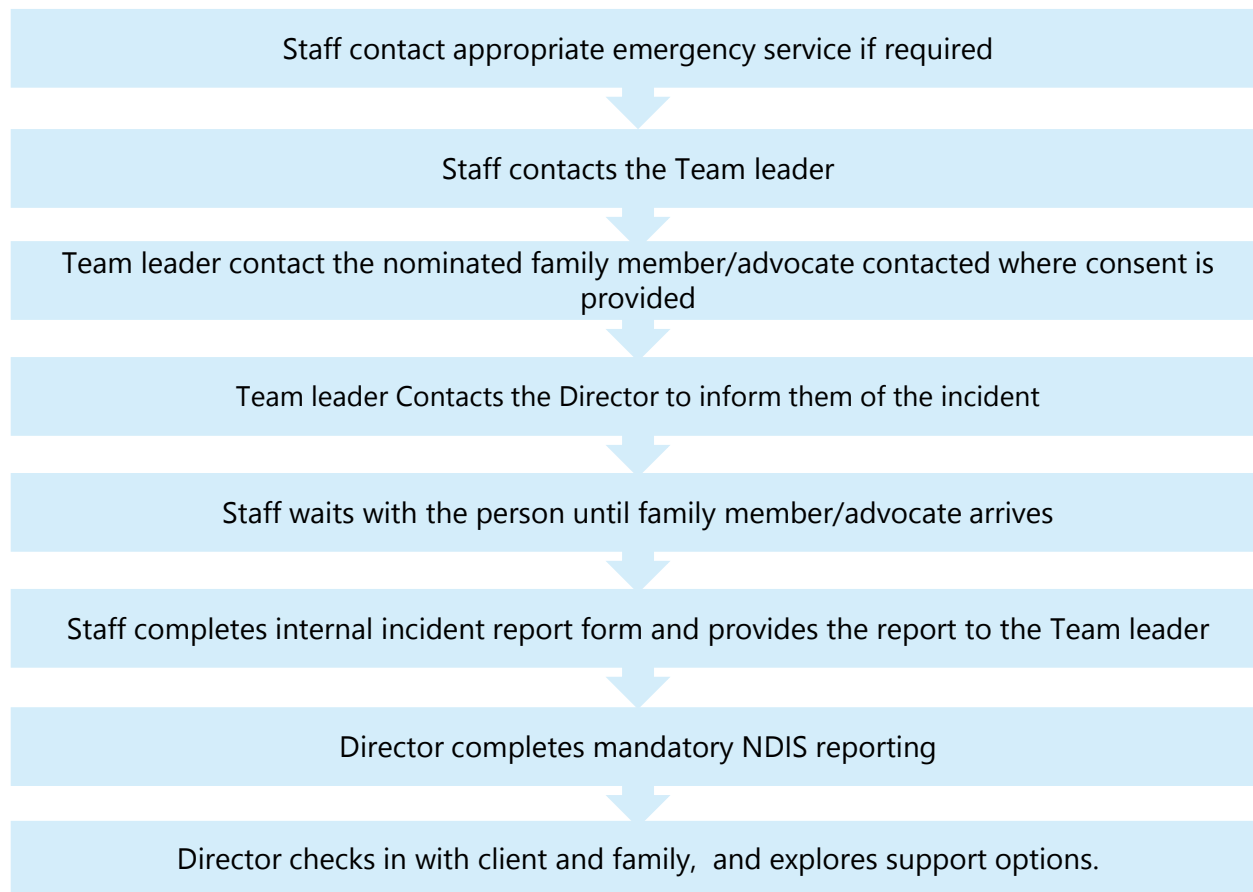
Procedure

Incident management processes are provided to the client in the Welcome Pack in an appropriate language, terms, or mode of communication. Any stakeholder wanting to report an incident report can do so.

Play Grow Flourish will afford all reporters the highest standard of confidentiality. Incident matters will only be discussed with those on a need-to-know basis and will not be a matter of discussion between any other individuals. All documentation will be retained in a secure place and in compliance with all privacy policies and legislation.



Play Grow Flourish incident triage process:



Investigation Process:

Once the initial triage has been applied, Play Grow Flourish's Management will conduct an investigation to identify the root causes and apply the appropriate remedial action. While all members of Management may conduct investigations, serious incidents (egg involving injury, abuse, or potential media/legal impact) will be managed or directly overseen by the Director to ensure compliance and appropriate escalation. In the case of serious or reportable incidents, the Director or most senior available member of Management will lead or oversee the investigation to ensure compliance with regulatory requirements. All incident information is entered onto the Incident Register. Correspondence regarding the outcome of the incident resolution is provided to the client.

Investigation of incidents will not be conducted by a person about whom was involved in the incident.

All staff will manage incidents with:

- Courtesy and encouragement
- Sensitivity to the needs of the client



- In a supportive manner
- Efficiency and effectiveness
- Timeliness
- Empathy by sharing other people's feelings and perspectives of issues involved.
- Communicate mindfully, and
- Provide details regarding external support agencies that may assist them with complaints/incidents resolution if required

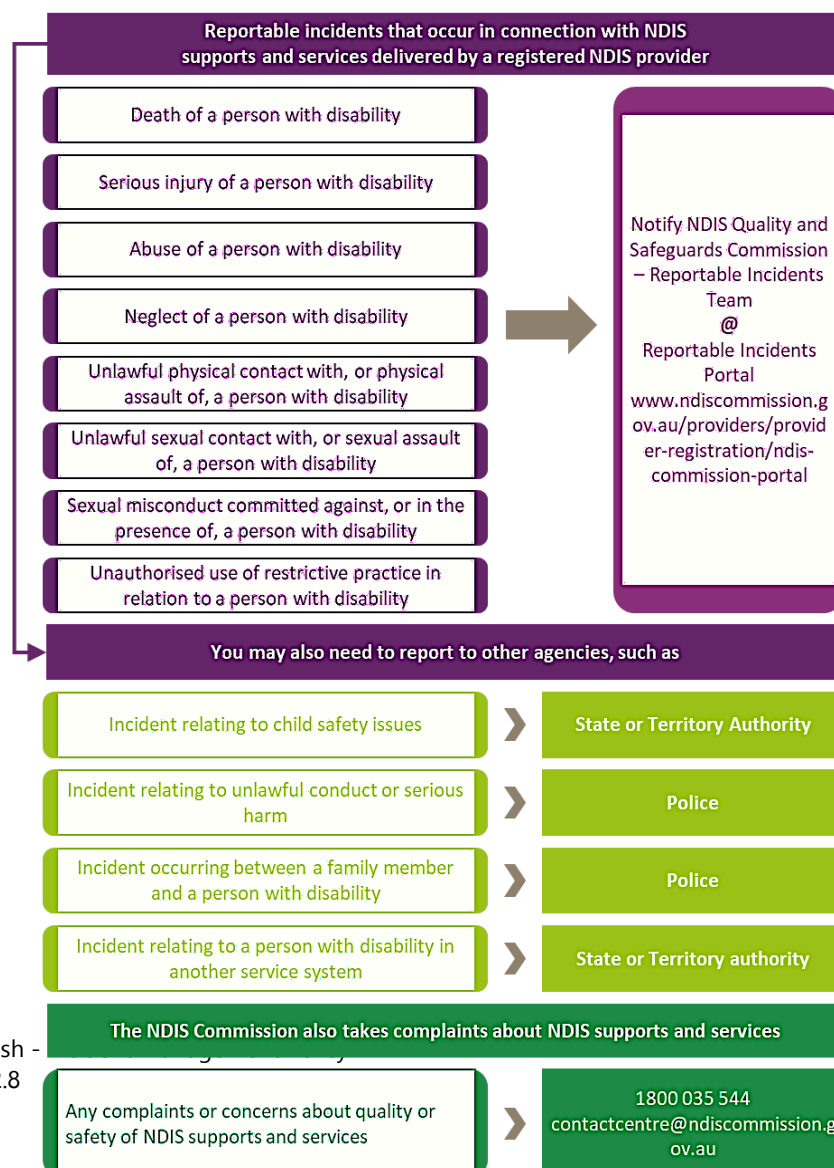
Findings and Outcomes

Individuals or parties with a report of an incident may make contact directly with the NDIS Quality and Safeguard Commission, should the issue remain unresolved, dealt with unsatisfactory or at any time in the management process.

NDIS Quality and Safeguard Commission

- 1800 035 544 – Interpreters can be arranged.
- www.ndiscommission.gov.au/about/complaints-feedback/complaintNDIS

Reportable Incident- see also Appendix A





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Figure 1: Reportable incidents with 24-hour reporting requirements



Reportable incidents

Reportable incidents will be notified to the NDIS Commission within 24 hours of the event, with a more detailed report about the incident and actions taken in response to it provided within five (5) business days.

Any instance of unauthorised use of restrictive practice will be notified by the Director to the NDIS Commission within five (5) business days of a provider's key personnel being made aware of it. If there is harm to a client, it will be reported within 24 hours.

Any updated or new information that comes to hand after the event, will be provided in writing to the Commissioner.

If required, a final report will be provided within 60 business days of initial report. The NDIS Commission will advise Play Grow Flourish whether a final report is required.

Where a reportable incident occurs in connection with the provision of services by the provider and does not include those outlined in Appendix A, Play Grow Flourish will ensure that all internal reporting documentation is completed.

In all cases, Play Grow Flourish will assess:

- The impact on the NDIS client
- Whether the incident could have been prevented
- How the incident was managed
- What, if any, changes are required to prevent further similar events occurring.

Incident Monitoring and Review

As part of Play Grow Flourish's commitment to Quality Management and continuous improvement, Play Grow Flourish maintains all incident information using the Incidents Register. Adopting a process as such assists to review service performance and progress through ensuring that the list is analysed for repeat issues enabling opportunities for identification of service improvement.

The register includes the following:

- Identification
- Details including root causes.
- Who was involved in the incident?
- Preventative action that has/will be undertaken.
- Incident handling improvement strategies; and
- Incident handling Improvement implementation.

The register will be reviewed and updated at a minimum of once per month as part of Play Grow Flourish Director Review process (led by the director or delegated member of the team or unless required sooner due to high incident occurrences.

The statistical data will be provided to the NDIS Commissioner if it is deemed to be required. Records for incidents will be kept for seven (7) years in line with the *NDIS (Incident Management and Reportable Incidents) Rules 2018*



Incidents Relating to Violence, Abuse, Neglect, Exploitation and Discrimination

Play Grow Flourish takes reports of violence, abuse, neglect, exploitation, and discrimination very seriously. It is mandatory for any report of abuse or neglect reported to Play Grow Flourish by staff, clients, families, carers and other stakeholders or members of the public to be reported by Play Grow Flourish to the Police and to any relevant external agency. Any reports of these natures are to be immediately forwarded to the Director. See *Violence, Abuse, Neglect, Exploitation and Discrimination Policy*.

Responsibilities

For the purpose of this policy, the Management Team includes the Director, Executive Team Leader and Human Resources Manager.

Management is responsible for:

- Approving and monitoring the implementation of this policy and recording any changes within the Policy Version Control Register
- Reviewing the incident register to identify trends and continuous improvement actions.
- Responding to requests from the NDIS Commission in relation to Incidents
- Ensuring all staff have been provided with training in relation to this policy as required.
- Investigating Incidents
- Liaising with the client and support network post-incident
- Providing de-briefing opportunities to staff involved in the incident.
 - Reporting any reportable incidents to the NDIS Commission
 - Supporting staff to complete an incident report where required.
 - Recording Incidents on the Incident Register
 - Identifying staff incident training needs within their teams and actioning
 - Monitoring Compliance with Play Grow Flourish's internal reporting timelines.
 - Ensuring corrective actions and followed through.
 - Ensuring records and documentation are securely stored in line with privacy legislation.

Shift Managers are responsible for:

- Following Play Grow Flourish Incident Management Procedures
- Completing an incident report within 24 hours of the incident occurring and providing to the Director.
- Supporting staff to complete an incident report if they are unsure or require clarification.
- Providing on the ground support and reassurance to staff and clients during or after an incident.
- Communicating urgent incident risks immediately to Management.



- Participating in investigations or reviews if delegated by Management (as long as there's no conflict of interest).
- Monitoring compliance of their teams with incident management expectations.

Staff are responsible for:

- Following Play Grow Flourish Incident Management Procedures.
- Completing an incident report within 24 hours of the incident occurring and providing to the Shift Manager.
- Participating in a debrief with two members of the Management after an incident occurring.
- Providing incident reports to Shift Managers via text that it has been completed on Brevity.
- Respecting confidentiality of incidents and not discussing details outside authorised channels.
- Engaging in reflective practice and using incident feedback to improve service delivery.
- Ensuring they are aware and understand this policy and seek clarification where unsure.



Related Policies and Documents

- Client Welcome Pack
- Freedom from Violence, Abuse, Neglect, Exploitation and Discrimination Policy
- Advocacy Policy
- Complaints and Feedback Policy
- Privacy and Confidentiality Policy
- Incident report form
- Incident Register
- Training Register including induction records.

Review

Play Grow Flourish will review each policy through internal audit processes, client feedback or as contextual drivers determine the need for a review.

Release Date:	Version No:	Approved By:	Amendments:
January 2024	1.0	Director	Nil
Review Date:	Version No:	Approved By:	Amendments:
May 2025	2.0	Human Resources Manager	Updated responsibilities. See Master Register for details.



Appendix A – NDIS Mandatory Reporting Guide

NDIS Reporting Timeframes 24 Hour Reporting - These incidents include alleged incidents and incidents that have occurred:

<p>The death of a person with disability</p>	<p>The place of death does not affect whether the death is a reportable incident so long as there is the required connection between the death and the service provision. Once the connection is established, deaths are reportable if the person dies:</p> <ul style="list-style-type: none"> • In their own private home • In supported accommodation • In the community during community access • In hospital or other health care facility. <p>Registered NDIS providers do not need to establish the cause of death before reporting the death to the NDIS Commission.</p>
<p>Serious injury of a person with disability</p>	<p>The serious injury of a person with disability must be notified to the NDIS Commission if it occurs or is alleged to have occurred in connection with the provision of NDIS supports and services. In determining whether an injury is 'serious,' consideration should be given to the level of harm caused. A serious injury includes, but is not limited to:</p> <ul style="list-style-type: none"> • Fractures • Burns • Deep cuts • Extensive bruising, including large individual bruises, or a number of small bruises over the impacted person. • Head or brain injuries which might be indicated by concussion or loss of consciousness. • Any other injury requiring hospitalisation. If a person with disability is hospitalised in relation to a severe injury the incident should be classified as reportable. There will be instances in which a person with disability is hospitalised for reasons unrelated to severe injury, these instances are not reportable incidents.
<p>Abuse or neglect of a person with disability</p>	<p>Physical abuse – non-accidental physical acts towards a person with disability that are intended to cause hurt or harm. Acts that result in that person experiencing significant pain, shock, or other unpleasant sensation. In some circumstances, acts of physical abuse will also amount to unlawful physical contact or assault, and may cause a serious injury to the person with disability</p> <p>Psychological or emotional abuse – verbal or non-verbal acts that cause significant emotional or psychological anguish, pain or distress including verbal taunts, threats of maltreatment, harassment, humiliation or intimidation, or a failure to interact with a person with disability or acknowledge the person with disability's presence</p> <p>Financial abuse – improper or illegal use of money (including NDIS funds where they are managed by the individual person with disability), property, resources, or assets of a person with disability, including improperly withholding finances from that person, and coercing or misleading the person with disability as to how the funds or property will be used</p>



	<p>Systemic abuse – a failure to recognise, provide, or attempt to provide adequate or appropriate services, including services that are appropriate to the person's age, gender, culture, disability support needs or preferences, which has a significant physical, emotional, or psychological impact on the person with disability.</p>
<p>Sexual misconduct committed against, or in the presence of, a person with disability, including grooming of the person for sexual activity</p>	<p>The term sexual misconduct is designed to address conduct of a sexual nature that can but does not necessarily amount to a criminal offence. It also includes those sexual offences which are unlawful, but do not include any physical contact between the person and the subject of the allegation. These offences are not examples of unlawful sexual contact or assault as there is no contact present, however they constitute unlawful sexual conduct. Sexual misconduct incidents include the following:</p> <ul style="list-style-type: none"> • Unlawful sexual conduct • Sexually explicit comments and overtly sexual behaviour • Crossing professional boundaries in a way that has sexual implications or connotations • Grooming of the person for sexual activity.
<p>The use of a restrictive practice in relation to a person with disability, other than where the use is in accordance with an authorisation (however described) of a State or Territory in relation to the person.</p>	<p>There are five occasions when this means that the use of a restrictive practice is reportable to the NDIS Commission:</p> <ul style="list-style-type: none"> • When the use of the restrictive practice for a person with disability does not have authorisation (however described) by the relevant state or territory body • When the restrictive practice is used for a person with disability in a state or territory which does not have an authorisation process for that practice AND the practice is not used according to a behaviour support plan • When the restrictive practice is used for a person with disability according to an authorisation (however described) by the relevant state or territory body BUT the practice is not used according to a behaviour support plan or interim behaviour support plan because the person does not have such a plan • When the restrictive practice is being used according to an authorisation (however described) by the relevant state or territory body, but the restrictive practice used was not included in the person with disability's behaviour support plan • When a restrictive practice is being used according to an authorisation (however described) by the relevant state of territory body, but the restrictive practice is being applied in a way which is inconsistent or contrary to the requirements or directions in the person's behaviour support plan.



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