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Incident Management Process

Purpose

The purpose of the Incident Management Process is to:

- Ensure a consistent and coordinated approach to incident management including the identification, notification, investigation, and analysis of incidents resulting in appropriate action
- Allow the lessons learned to be shared across the organisation
- Ensure that the organisation has processes that comply with legislative and contractual requirements in relation to incident management
- Establish a standard approach to incident management including the establishment of performance indicators to monitor compliance

Scope

The Incident Management Procedure:

- Applies to all incidents that occur while delivering tenancy management and property management services
- Provides guidance on the types of incidents that might occur and the key elements of the different approaches required
- Describes roles and responsibilities in the incident management process
- Articulates legal and contractual requirements in relation to notification
- Defines the timeframes within which incidents, and the results of the investigation of these incidents are to be reported.

Definitions

Apology

A key aspect of open disclosure is saying sorry or offering an apology to the tenant and their family/carer following an incident. An apology is an expression of sympathy or regret, or of a general sense of benevolence or compassion, in connection with any matter, whether or not the apology admits or implies an admission of fault in connection with the matter.

Complaint

An expression of dissatisfaction made to or about Cornerstone, our services, or our staff including how the handling of a complaint was managed where a response or resolution is explicitly or implicitly expected or legally required.

A complaint may, for example be about policies, procedures, employee conduct provision of information, quality of communication or treatment, or quality, access to or promptness of service. Complaints do not include requests for services or information or explanation of policies or procedures or industrial matters.

Complaints may be made in person, by telephone, email, letter, survey and in some cases through the media.

Critical Incidents

A critical incident is defined as an event (or alleged event) that occurs as a result of, or during the delivery of services, and has caused or is likely to cause significant negative impact to the health, safety or wellbeing of a client or service recipient. Critical client incidents will usually require a crisis response, incident management, coordination and consideration of a range of risks and sensitivities.

Critical incidents may include:

- The unexpected death, serious injury or alleged assault, including physical, sexual abuse, sexual assault and indecent assault of a client, that happens as a result of, or during the delivery of services
- Allegations of serious unlawful or criminal activity or conduct involving an employee, a subcontractor or volunteer that has caused, or has the potential to cause, serious harm to clients
- An incident where a client assaults or causes serious harm to others (including employees, volunteers or contractors), as a result of, or during the delivery of services
- A serious fire, natural disaster, accident or other incidents which are likely to result in:
- Significant damage to property
- Closure of premises
- Prevention of service provision
- A significant threat to the health and safety of clients.

Hazard

A source or situation with a potential for harm in terms of human injury or ill health, damage to property, damage to the environment or a combination of these.

Incident

Any unplanned event resulting in, or with the potential for, injury, damage or other loss. This includes a near miss.

Incident Category

Grouping of incidents, for example, staff, visitor, contractor, property, security, hazard incidents and complaints.

Incident Investigation

The management process by which underlying causes of undesirable events are uncovered.

Incident Management

A systematic process for identifying, notifying, prioritising, investigating and managing the outcomes of an incident and steps taken to prevent similar occurrences.

Incident Type

The core issues of the incident such as a tenant injury or equipment failure. There can be more than one type of incident associated with each registered incident.

Near Miss

Any event that could have had adverse consequences but did not.

Notifier

Any staff member who completes an incident report form relating to an incident or near miss. Tenants, families/carers and disability support staff can notify via the complaints process.

Notification

The process of documenting data about an incident or near miss.

Reportable Incident

A reportable incident is defined by the NDIS Quality and Safeguards Commission as a death, serious injury, abuse or neglect, serious physical assault, sexual misconduct and the unauthorised use of restrictive practices.

Process

When an incident occurs a series of actions must follow. The importance of identifying these as separate steps is to ensure that all appropriate action is taken.

Step 1 – Identification

Incidents may be identified through several methods. These can include direct observation, team discussion, staff meeting discussion, property inspection, tenant visit, phone call or email from support providers and neighbours, complaints, and audits. Incidents may be identified at the time they occur or at any time after the event.

Step 2 – Immediate Action

Following identification of an incident, it may be necessary to take immediate actions to mitigate the harmful consequences of the incident. These actions may include:

- Providing immediate support and assistance to individuals involved in the event (tenants, staff, contractors or visitors) to prevent the harm from becoming worse
- If the person affected by the incident is a person with a disability, assessment must be made in relation to how best to provide the support and assistance required
- Consideration must be given to facilitate contact with specified persons, such as family members, carers or advocates, including independent advocates
- The requirement for support, assistance and protection for the specified persons must also be considered and offered
- If the person with a disability does not have specified persons to contact, provide them the details of the following independent advocacy services in South Australia who could provide assistance and support:
    - Independent Advocacy SA
      1800 999 884 | indepedentadvocacysa.org.au
    - Advocacy for disability access and inclusion
      1800 856 884 | advocacyfordisability.org.au
    - Disability Rights Advocacy Service
      08 8351 1900 | dras.com.au
    - Brain Injury SA | 08 8217 7600
      braininjurysa.com.au
- If the person with a disability advises they would like independency advocacy support and requires assistance to do so, Cornerstone will facilitate contact with one of the organisations listed
- Making the situation/scene safe to prevent immediate recurrence of the event
- Gathering basic information while the details are still fresh in the minds of those who have observed the incident or are the first to have been informed of the incident
- Notifying police or ambulance if required.

Step 3 – Notification

- Staff are required to report all incidents and near misses by using the Incident Report Form
- All tenant incidents must be documented in the tenant's digital file
- The staff member who observes the incident or who is informed of the incident, completes the Incident Report Form and notifies the General Manager
- The General Manager reviews the incident and informs the Chief Executive Officer immediately if the incident is a critical client incident or reportable incident
- The General Manager and/or Chief Executive Officer will ensure that the incident is notified in accordance with relevant policy and legislation.
- As soon as possible after the event, the General Manager should share with the family and support persons what is known about the event and what actions have been taken. If appropriate an expression of apology or regret can be extended.

State-based Reporting	Any possible critical incident should reported by phone to the South Australian Housing Authority (SAHA) Business Relations Specialist.
Critical Client Incidents	**A Critical Client Incident Report (using the SAHA template) must be completed as soon as practicable (or within close of business on the next business day) and emailed to:** • **SAHA Business Relation Specialist** • IndustryPartnershipsCHP@sa.gov.au (following the phone call to the Business Relation Specialist)
Under the NDIS Commission	All reportable incidents, except for those concerning the use of restrictive practice, must be reported to the NDIS Commission using the reportable incidents portal within 24 hours of the registered NDIS provider becoming aware of the incident.
Reportable Incidents	Those concerning the use of restrictive practice, other than in accordance with an authorisation, must be notified within 5 days.

Step 4 – Investigation and Analysis

- All incidents require investigation
- All incidents will be allocated to the General Manager who is responsible for completing the investigation
- The investigation will include capturing information from a range of perspectives to ensure that the complete nature of the incident, including causative and contributory factors have been identified and documented
- All incidents will be reviewed by the Executive Team
- The purpose of analysis is to understand how and why the incident occurred, to identify ways of improving the system of service delivery and how to prevent a reoccurrence.

Step 5 – Action

- Action is the implementation of recommendations arising from the review and analysis process
- A suitable timeframe for the implementation of recommendations must be documented in the action plan.

Step 6 - Feedback

- Feedback is an important component of a successful incident management program and should be provided where appropriate to tenants and their families/significant others, Disability Support Providers, and staff
- The success of incident management is dependent on feedback to all staff on the results/outcomes of investigations in a timely manner
- Feedback must be provided to staff involved in the incident and should occur as soon as possible
- Feedback should be given to all staff where there are systemic issues identified and changes that the organisation needs to make.

See the following page for a diagram of the incident management process.

Incident Management Process Diagram

- Incident Identified
- Incident Reported

- Immediate action to mitigate harmful consequence or risk

- Completion of Incident Report Form, or Critical Incident Report Form
- Notify relevant manager

- Investigation by CEO or delegate

- Notification in accordance with legal and contractual requirements

- Review and analysis by Executive team

- Action any recommendations from Executive team

- Feedback and open disclosure

Responsibilities

All staff are responsible for ensuring that they report incidents in accordance with this procedure

Managers are responsible for ensuring that all staff are familiar with the content of this procedure and for ensuring that incidents are reported and investigated appropriately

Managers are responsible for ensuring that the recommendations of the investigation are implemented

The Chief Executive Officer is responsible for ensuring that all incidents are reported, investigated and managed in accordance with this procedure

The Chief Executive Officer is responsible for ensuring that identified systemic issues are addressed and that the organisation adopts a process of continuous improvement

The Chief Executive Officer is responsible for ensuring that critical client incidents and reportable incidents are reported in accordance with State Government policy and Commonwealth legislation

The Chief Executive Officer is responsible for ensuring that the Board is provided with a regular report in relation to incident management.

Related Documents

- NDIS (Incident Management and Reportable Incidents) Rules 2018
- NDIS Code of Conduct
- NDIS Practice Standards
- Master Community Housing Agreement

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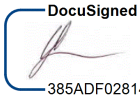
Signed	DocuSigned by:  385ADF028145424...
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