

INCIDENT MANAGEMENT POLICY AND PROCEDURE



Purpose and Scope

Cahoots is committed to providing a safe environment for all participants, staff, volunteers, and visitors. Cahoots is committed to establishing a formal process to report and investigate all workplace accidents/incidents and near miss occurrences. This includes all participants, staff, volunteers and visitors. The process includes identifying contributing factors of the accident/incident or near miss and making the necessary recommendations to prevent a recurrence.

The purpose of this policy and procedure is to provide guidelines as far as reasonably practicable to establish the process for reporting, investigating and applying appropriate control measures when an accident, incident or near miss occurs in a timely manner.

This policy and procedure replaces the Incident and Hazard Management Reporting and Recording Procedure.

This policy and procedure applies to all participants, staff and volunteers.

The Operations Manager is responsible for the implementation of this policy.

Definitions

Incidents means:

- 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;
- are acts by a person with disability that occur in connection with providing NDIS supports or services to the person with disability and which have caused serious harm, or a risk of serious harm, to another person;
- are reportable incidents that have or are alleged to have occurred in connection with providing NDIS supports or services to a person with disability.

Reportable Incidents means an incident involving a Cahoots participant where one or more of the following occurs:

- Death;
- Serious injury;
- Abuse or neglect;
- Unlawful sexual or physical contact with, or assault of a person with a disability;
- Sexual misconduct committed against, or in the presence of, a person with a disability, including grooming of the person for sexual activity;
- Use of an unauthorised restrictive practice or, the use of an authorised restrictive practice if it is not used in accordance with the participants Behaviour Support Plan.

Participant means a person accessing a Cahoots service, including all potential, current and previous participants of Cahoots.

Worker means a person who carries out work in any capacity for Cahoots, including work as an employee, a contractor or sub-contractor or an intern, trainee or volunteer.

POLICY STATEMENT

The Cahoots incident management system aims to maximise the safety and wellbeing of its participants and workers, while respecting participants needs, values, and preferences. The system aims to be easily understood and accessible for all participants and workers to ensure accountability when dealing with such incidents.

Continuous improvement

The system also identifies any issues which emerge from incident analysis, providing opportunities for continuous improvement and effective risk management. Cahoots will comply with all requirements of the NDIS Commission, and Commonwealth and state legislation in regard to the reporting of critical and reportable incidents or dangerous workplace incidents.

Staff training

Workers will be made of aware of the incident management policy and procedure during onboarding, in staff meetings and through online training for service delivery staff.

PROCEDURES

How incidents are identified, recorded and reported

Incidents may be identified in a number of ways, including where a worker or another person observes the incident, a person with disability makes a disclosure about the incident, or another party informs that the incident occurred.

Whilst some incidents may be easy to identify (witnessing an injury, disclosure being made to a worker, observing a behaviour of concern), others may be harder to identify. Appendix A sets out the potential indicators and signs associated with particular types of incidents. These are only examples and not an exhaustive list.

When an incident occurs, the first step is to ensure the safety and wellbeing of all people involved in the incident.

A worker should ensure the impacted person is safe from harm:-

1. Contact Police if there is a risk of immediate harm which requires their assistance.
2. Contact an Ambulance, other relevant service or apply first aid, if required.
3. Advise affected person(s) about potential advocates and supports they can access.
4. Contact the participant's emergency contact, if required.
5. Contact the on-call phone to notify Cahoots management.
 - Complete the Cahoots Incident Report Form online

Note: if a participant or worker does not wish to participate in a victim interview or provide a witness statement, this decision is to be respected.

The Cahoots Incident Report Form is a digital form accessible via QR code which collects information from the following incident types:

- Client/Behavioural
- Disclosure
 - Injury
- Near-Miss
- Restrictive Practice
- Vehicle
- Medical Emergency (Seizure, Asthma, Anaphylaxis)

Which people incidents must be reported to

Once a Cahoots Incident Report Form has been completed and submitted, the relevant Coordinator, Quality & Safeguarding Lead & WHS Officer receives the report via email. The WHS Officer also sends the report to management if required as per Schedule 1 below. The incident is also automatically logged in the Cahoots Incident Register.

The notified worker(s) assess the incident type, risk level and whether further investigation is required internally or whether an external party is required to undertake an investigation. The post-incident assessment criteria is detailed in Schedule 2 below.

If the incident is deemed to be a reportable incident, the Cahoots Quality and Safeguarding Lead will notify the NDIS Commission via the NDIS Commission portal.

All reportable incidents, except for the unauthorised use of a restrictive practice, must be notified to the NDIS Commission within 24 hours of you becoming aware of the incident.

Any unauthorised use of restrictive practices must be notified within 5 days.

Schedule 1: Incident notification		Schedule 2: Post-incident assessment
Insignificant	Service Coordinator	Why the incident occurred
Minor		Whether the incident could have been prevented
Moderate	Service Coordinator	How well the incident was managed and resolved
	Operations Manager	What, if any, regulatory action needs to be undertaken to prevent further similar incidents from occurring, or to minimise their impact
Major	Service Coordinator	
	Operations Manager	
	CEO	
Catastrophic	Service Coordinator	Whether other persons or bodies need to be notified of the incident
	Operations Manager	
	CEO	
	Board Chair	

The Quality and Safeguarding Lead reviews the causes, handling and outcomes of incidents in the Cahoots Incident Register regularly, will look for patterns and report at the Manager's monthly team meeting. Any incidents classified major or above are then tabled at the next meeting of the Board. The Parent and Carer Reference Group will be provided a summary of this report, if relevant.

How is the impacted person involved in the management and resolution of the incident

Following an incident, the impacted participant(s) and/or their legal decision maker will be:-

- Advised again of their right to an advocate or supports.
- Kept informed and asked to provide feedback of the post-incident assessment, any investigations and corrective actions.

Depending on the severity of the incident, this update will be communicated by a Family Relationship Officer or Cahoots Management.

Investigations

An investigation may be an appropriate response. The following may be reasons to undertake an investigation:-

- The cause of the incident is unknown, or could have been one of a number of factors or a combination of factors.
- The nature and the impact of the incident was significant, and requires investigation to support the safety and wellbeing of people with disability.

- The incident may involve an allegation against a worker and an investigation is required to determine what actions are required to manage the potential risk associated with the subject of allegation.

Where an investigation is required, the CEO will appoint a Lead Investigator. The Lead Investigator will have no conflict of interests, will maintain independence, and have had no involvement in the incident.

An external body might be engaged as the Lead Investigator if a conflict of interest arises or Cahoots does not have the required expertise.

The Lead Investigator will:

- Be impartial and objective.
- Gather relevant evidence to ensure an in-depth understanding of the incident.
- Establish the cause of the incident.
- Determine its impact.
- Identify operational issues that have contributed to its occurrence and detail an action plan to rectify operational issues.

Corrective actions

Corrective actions may be required following an incident to continuously improve the support Cahoots provides to participants.

A corrective action should be undertaken:

- Where an incident could have been prevented (or the severity lessened) by action (or inaction) by yourself, participant, worker or other person.
- Where there is an ongoing risk to people with disability.
- Where action by yourself may prevent or minimise the risk of a reoccurrence.
- Where a pattern of incidents is identified in the Incident Register.

When corrective actions are required, workers identified in Schedule 1 will consider the details raised in the post-incident assessment (Schedule 2) as well as:

- The views of people with disability impacted by the incident.
- What has been learnt and could be improved.

Corrective actions aimed at reducing the likelihood of similar incidents occurring may include:

- Training and education of workers
- Modification of the environment
- Development or amendment of a policy or procedure
- Changes in the way in which support or services are provided
- Other practice improvements
- Disciplinary action for the worker involved in the incident including ongoing performance reviews, imposing a probationary period, or termination of employment

Restorative actions aimed at repairing a relationship with a person with disability may include:

- Providing ongoing support to the person with disability impacted by the incident.
- Giving an apology to the person with disability involved in the incident.

Corrective actions will be added to the Continuous Improvement Register.

The Quality and Safeguarding Lead is responsible for regular review of the Continuous Improvement Register and ensuring actions are complete.

Record Management

All records, correspondence and information relating to incidents will be stored securely in Cahoots information management system for a minimum of 7 years.

Records are not to be printed and removed from Cahoots location.

Access to records will be limited to appropriate workers who have a business purpose for doing so.

Correspondence relating to the assessment or potential investigation of an incident should also be documented and retained as detailed in NDIS Incident Management Systems Detailed Guidance for Registered NDIS Providers June 2019.

Communication

This policy will be communicated in an appropriate way to:

- Participants and their support networks through Cahoots e-newsletter, website, intake process, easy to read flyers and accessible on request.
- Staff and volunteers through inductions, professional development and staff meetings.

Policy Review

This policy will be reviewed every two years in consultation with participants and their support networks together with staff and volunteers.

This policy is not intended to be a static document and Cahoots commits to its ongoing development as part of continuous quality improvement, and as policy and legislation changes dictate.

References and Related Documents

- NDIS Incident Management Systems Detailed Guidance for Registered NDIS Providers June 2019
- Cahoots Safeguarding Children and Adults at Risk Policy
- Cahoots Information Management Policy
- Cahoots Emergency and Disaster Management Policy
- Cahoots Emergency and Disaster Management Plan
- Cahoots Advocacy List

Versions

No.	Approval Date	Description of Amendment
1.0	16/06/2011	Policy created
2.0	17/01/2013	Reviewed
3.0	30/9/2015	Reviewed
4.9	3/10/2017	Reviewed
5.0	13/01/2021	Updated
6.0	30/04/2021	Reviewed and updated including NDIS commission
7.0	21/05/2021	Reviewed and updated – Appendices added
8.0	02/06/2023	Updated, NDIS Quality Standards, replaces Incident and Hazard Management Reporting and Recording Procedure
9.0	02/05/2025	Reviewed
10.0	03/02/2026	Reviewed and updated with changes due to PKG transition

Owner	Approver	Next Review
Operations Manager	CEO	February 2028

APPENDIX A: INDICATOR OF INCIDENTS (NDIS Guidelines)

Incident types	Behavioural indicators and physical signs
Physical abuse, unlawful physical contact or physical assault	Inconsistent, vague, unexpected or unlikely explanation for the injury.
	Unexplained injuries – broken bones, fractures, sprains, bruises, burns, scalds, bite marks, scratches or welts.
	Other bruising and marks that may suggest the shape of the object that caused it.
	Avoiding or being fearful of a particular person or worker.
	Being overly compliant with workers.
	Frequent and overall drowsiness (associated with head injuries).
	Out of character aggression.
Sexual contact, sexual assault or sexual misconduct	Dropping hints that appear to be about abuse.
	Bruises, pain, bleeding – including redness and swelling around breasts and genitals.
	Torn, stained, or bloody underwear or bedding.
	Repeating a word or sign, such as 'bad', 'dirty'.
	Presence of a sexually transmitted disease.
	Pregnancy.
	Sudden changes in behaviour or character, e.g.: depression, anxiety attacks (crying, sweating, trembling, withdrawal, agitations, anger, violence, absconding, sexually expressive behaviour, seeking comfort and security).
	Sleep disturbances, refusing to go to bed, and/or going to bed fully clothed.
Psychological, emotional or verbal abuse	Refusing to shower.
	Depression, withdrawal, crying or emotional behaviour
	Being secretive, and trying to hide information and personal belongings.
	Speech disorders.
	Weight gain or loss.
	Feelings of worthlessness about life and themselves; extremely low self-esteem, self-abuse, or self-destructive behaviour.
	Extreme attention-seeking behaviour and other behavioural disorders (e.g.: disruptiveness, aggressiveness, bullying).
Domestic violence	Being overly compliant.
	Depression, withdrawal, crying or violence.
	Feelings of worthlessness about life and themselves; extremely low self-esteem, self-abuse, or self-destructive behaviour.
	Extreme attention-seeking behaviour and other behavioural disorders (e.g.: disruptiveness, aggressiveness, bullying).
Being overly compliant.	

Incident types	Behavioural indicators and physical signs
Neglect	Inappropriate or inadequate shelter or accommodation, including unclean and unsanitary living conditions.
	Weight loss.
	Requesting, begging, scavenging, or stealing food.
	Being very hungry or thirsty.
	Inadequate supply of fresh food.
	Constant fatigue, listlessness or falling asleep.
	Dropping hints that appear to be about neglect.
	Extreme longing for company.
	Poor hygiene or poor grooming – overgrown fingernails and toenails, unclean hair, unshaven, unbathed, wearing dirty or damaged clothing.
	Inappropriate or inadequate clothing for the weather.
	Unattended physical problems, dental, and/or medical needs.
	Social isolation.
	Loss of social and communication skills.
	Removal of means of communication.
Displaying inappropriate or excessive self-comforting behaviours.	
Financial abuse	Sudden decrease in bank balances.
	No financial records or incomplete records of payments and purchases.
	Person controlling the finances does not have legal authority.
	Sudden changes in banking practices.
	Sudden changes in wills or other financial documents.
	Unexplained disappearance of money or valuables.
	Person does not have enough money to meet their budget.
	Person is denied outings and activities due to lack of funds.
	Borrowing, begging, stealing money or food.

