

Client Incident Management Policy

ONCALL

ONCALL/SACARE¹'s vision is to be nationally recognised as the leading integrated community service provider, empowering people to live their best lives. ONCALL is steadfastly focused on quality service that puts the client at the centre, is enabled through technology transformation, and delivered by people who are committed.

Quality and compliance are embedded into our daily actions and behaviours. ONCALL's policies and procedures provide the foundation and framework for our work and actions to ensure we provide best practice service quality and compliance. All staff are required to know and apply ONCALL policies and procedures that apply to their work.

Policy Purpose

This policy supports the principles in the United Nations Convention on the Rights of Persons with Disabilities and the United Nations Convention on the Rights of the Child. Its purpose is to:

- support the safety and wellbeing of clients in preventing and responding to incidents
- ensure incidents affecting clients are effectively and consistently identified, reported, responded to, managed, and monitored
- ensure adherence to legislative and regulatory requirements
- facilitate continuous improvement in services as a result of incidents that occur.

This policy covers the entire incident management cycle from risk identification and minimisation; incident identification; response; reporting; review, investigation, and monitoring; and analysis and learning.

Policy Scope

Inclusions

This policy applies to all ONCALL staff, Board members, students, and volunteers.

Exclusions

Incidents involving staff only are not covered by this policy. These are covered by Work Health and Safety Policy.

ONCALL staff providing labour hire services to partner organisations must follow the partner provider's policy and operational procedures².

Responsibilities

ONCALL is responsible for providing incident management training and ensuring training is completed by all staff.

It is everyone's responsibility to ensure the safety and wellbeing of clients by:

- being aware of their roles and obligations with incident reporting policy and procedures
- completing all required incident management training provided by ONCALL
- being vigilant in reporting incidents when they occur
- seeking advice from your line manager if unsure in any circumstance

¹ ONCALL is inclusive of the following entities - ONCALL Group Australia; Ablecare Pty Ltd trading as ONCALL; SACARE Pty Ltd. Throughout this document, ONCALL/SACARE will be referred to as ONCALL.

² Labour Hire Service Procedures, Engaging Labour Hire Agency Residential Care Staff in Out of Home Care Services, Department of Health and Human Services, June 2015

This will ensure that appropriate support can be provided to those affected by an incident and that the circumstances are examined to reduce the likelihood of future incidents.

Policy Statement

Incident management principles

ONCALL adheres to the following principles of incident management in our work with people with disabilities, families, and young people. These are modelled on the NDIS Quality and Safeguards Commission *Principles of good incident management and resolution* (Appendix 1) and consistent with best practice incident management in child and family services.

ONCALL's incident management is:

- Centered on the people we support
- Outcome focused
- Clear, simple, and consistent
- Accountable
- Focused on continual improvement
- Proportionate in response

Incident management cycle

Risk identification and prevention

Prevention is the best way to keep people with disabilities, children, and families safe from incidents that may cause harm. ONCALL applies a risk assessment and mitigation, risk enablement, and prevention approach in support planning with clients through its Intake Risk Assessment and throughout the client's involvement with ONCALL.

Incident identification and response

ONCALL will act immediately to identify and respond to an incident involving a client, prioritising the health, safety and wellbeing of the client and any staff and other people involved. If in doubt about whether an event is considered an incident, staff should report it as an incident.

ONCALL will include the client, and/or a support person acting in the client's interests in responding to the incident. Managers will notify the client's support person/family of the incident and the steps taken by ONCALL to respond to the incident and mitigate risks. ONCALL will seek the support person's/family's feedback throughout this process.

ONCALL will provide both an immediate response and ongoing support as required to the client and others impacted as a result of the incident.

Record and report

ONCALL fosters an organisational culture that values and learns from experience including the reporting and review of client incidents, as a means of preventing or reducing future incidents.

All staff are required to follow the recording, reporting and actions specified in ONCALL's Incident Reporting Procedures, Guidance and Workflow documents. These documents ensure ONCALL adheres to external incident reporting requirements as specified in legislation, regulation and funding agreements. These include, but are not limited to, the requirements of:

- NDIS Quality and Safeguards Commission – *Incident Management Systems*
- Department of Families, Fairness and Housing (Vic) - *Client incident management system*
- Transport Accident Commission – *Serious Incident Reporting Guidelines*
- Department of Children, Youth Justice, and Multicultural Affairs (Qld)- *Incident management for residential care services*

Investigate, review and monitor

ONCALL will undertake a review, and/or internal or external investigation as determined by the appropriate incident reporting requirements for the client and circumstance. ONCALL applies the principles of person-

centered practice and procedural fairness (as defined in the National Disability Insurance Scheme (Procedural Fairness) Guidelines 2018)) in the conduct of all investigations. ONCALL will inform affected individuals of the progress and outcome/s of the investigation.

ONCALL has governance and operational committees to ensure incidences are comprehensively and transparently reviewed and, if required, investigated; to ensure a response plan is developed when required; to monitor those actions are implemented; and that information is used to inform the continuous improvement of services.

ONCALL will undertake a case review and/or root cause analysis to determine the cause of an event to prevent its recurrence. This is a fact-finding process to establish and document relevant facts, reach appropriate conclusions based on available evidence and determine a suitable response. The review consequently informs service delivery to these clients (e.g., medication review, behaviour support plan review.)

Analyse and learn

The ONCALL Governance and Operational Committees will:

- Monitor, oversee and review feedback from the external reporting bodies on incidents reported by ONCALL
- Review incident themes and trends
- Identify and oversee corrective actions including improvements to policy, procedure and processes and training needs and opportunities
- Seek client and staff feedback on how well an incident response was managed
- Review the operation of the incident management system to ensure it is delivering effective outcomes and to look for improvements in the process.

ONCALL National Safeguards Manager provides monthly reports to ONCALL Audit, Compliance and Risk Management Committee.

Communicate and consult

ONCALL provides clients with information about incident management in the client information packs and/or service agreements.

ONCALL recognises our clients are the centre of the incident management process. We will:

- ensure clients are actively involved in determining their support needs should an incident occur
- keep them and their families/support people involved and advised of progress throughout the incident management and any review or investigation that occurs
- provide access to their personal information if requested and consistent with ONCALL Privacy Policy.

ONCALL will communicate and consult with any staff involved in an incident investigation as relevant to the circumstances of the incident.

Record management and storage

ONCALL utilises incident management systems to record all elements of the lifecycle of incidents.

The ONCALL incident management system adheres to the Australian Privacy Principles and to applicable Commonwealth and state legislation for the management of personal, including health, information as specified in ONCALL's *Privacy Policy*.

Privacy, confidentiality, and protections

ONCALL adheres to the Australian Privacy Principles throughout the incident management cycle. (Ref: ONCALL Privacy Policy). Incident information is treated as confidential information, has role-based access permissions, and is provided to people on a need-to-know basis only. Privacy Principles apply in the provision of incident reports to external bodies. (Ref: ONCALL's Privacy Policy)

ONCALL fosters a culture of disclosure and learning. ONCALL will provide protections so that anyone who makes a report may do so confidentially and without fear of intimidation, victimisation, disadvantage or reprisal. In matters of the disclosure of misconduct ONCALL provides for Whistleblower protections (Ref: ONCALL Whistleblower Policy).

Breaches of this Policy

The breach of this policy by a team member, director or officer of the company may lead to disciplinary action being taken in accordance with the company's disciplinary procedure. Serious breaches may be regarded as gross misconduct.

All team members, directors and officers of the company will be expected to cooperate fully in any investigation into suspected breaches of this policy or any related processes or procedures. If an issue is identified with a supplier, we will work with them to prepare a corrective action plan and resolve all violations within an agreed upon time period. We reserve the right to terminate our relationship with individuals and organisations in our supply chain if they breach this policy.

Definitions

INCIDENT	An act, omission, event or circumstance that occurs in connection with provision of supports or services to a child, young person, or person with a disability that have, or could have, caused harm to a person.
INCIDENT MANAGEMENT SYSTEM	A set of processes and procedures used to manage incidents Incident management software: <ul style="list-style-type: none">• Periscope (Queensland and Victoria)• CONNX (South Australia)
GOVERNANCE AND OPERATIONAL COMMITTEES	Audit, Compliance and Risk Management Committee Quality and Governance Committee Practice Improvement and Safeguards Committee

Document Control

Approval and Review

DOCUMENT OWNER			
APPROVAL DATE	Draft	REVIEW DATE	Draft

Access and Feedback

This policy will be made available to all staff on the ONCALL intranet and ONCALL database (Periscope), and to directors in the ONCALL Board orientation.

Users should provide comments and feedback on the accuracy, currency, and useability of the policy document to AskQuality@oncall.com.au.